



**CODE OF  
CONDUCT**

**MYTY**



## Inhalt

<b>1. Scope</b>	<b>3</b>
<b>2. Our Identity &amp; Principles</b>	<b>3</b>
2.1. Our Ambition	3
2.2. The MYTY Principles	3
<b>3. Business Integrity</b>	<b>4</b>
3.1. Anti-Corruption & Benefits	4
3.2. Avoidance of Conflicts of Interest	4
3.3. Sanctions & Trade Compliance	5
3.4. Money Laundering Prevention	5
3.5. Fair Competition	6
<b>4. People, Work Environment &amp; Human Rights</b>	<b>6</b>
4.1. Diversity, Equality and Inclusion	6
4.2. Anti-Harassment & Social Behavior	6
4.3. Human Rights	7
<b>5. Responsible Business Partners</b>	<b>7</b>
<b>6. Information, Data &amp; Property</b>	<b>8</b>
6.1. Data Protection	8
6.2. IT Security & Devices	8
6.3. Artificial Intelligence (AI)	9
6.4. Protection of Company Property & Intellectual Property	9
6.5. Public Communication & Social Media	10
<b>7. Environment &amp; Sustainability</b>	<b>10</b>
7.1. MYTY net+	11
<b>8. Reporting Violations</b>	<b>11</b>
<b>9. Validity &amp; Consequences</b>	<b>12</b>



## 1. Scope

This Code of Conduct is binding for all employees, managers, and governing bodies of the MYTY Group and its subsidiaries. Furthermore, we expect our suppliers, service providers, and business partners to acknowledge these principles or demonstrably act according to equivalent ethical standards. Compliance with these standards is an essential prerequisite for cooperation with the MYTY Group.

## 2. Our Identity & Principles

### 2.1. Our Ambition

We set new standards. Our success is based not only on what we do, but how we do it. This Code of Conduct forms the ethical foundation of our actions. It is binding for all employees of the MYTY Group.

### 2.2. The MYTY Principles

Our cooperation is based on five core principles:

1. **We go beyond standards:** We continuously challenge ourselves and strive for constant improvement.
2. **We are solution-oriented:** We solve problems sustainably and take responsibility beyond the project.
3. **We value good relationships:** We earn the trust of our customers every day.
4. **We do everything for the best idea:** We reject silo thinking; the best solution counts, regardless of hierarchies.



5. **We think and work in a network:** Every member is an access point to the entire expert network of the group.

## 3. Business Integrity

### 3.1. Anti-Corruption & Benefits

Wir dulden keine Form von Bestechung, Korruption, Erpressung oder Veruntreuung.

We do not tolerate any form of bribery, corruption, extortion, or embezzlement. Our **Anti-Corruption Policy** governs the handling of benefits bindingly. The key contents include:

- **Gifts:** Permissible up to a value limit of 50 EUR, provided there is a special occasion (e.g., anniversary) and no influence is intended. Cash gifts are strictly prohibited.
- **Invitations:** Permissible up to **250 EUR** per person for business occasions.
- **Public Officials:** Gifts or invitations to persons in public office are strictly prohibited.
- **Approval:** If the value limits are exceeded, prior approval must be obtained from the management or the executive board.
- **Reference:** Details can be found in the current Anti-Corruption Policy on the Shared Drive.

### 3.2. Avoidance of Conflicts of Interest

We strictly separate private interests from business matters. A conflict of interest



exists if private interests could conflict with the business success of the MYTY Group.

- **Secondary activities:** Engaging in secondary employment, especially with competitors or business partners, requires prior written consent.
- **Shareholdings:** Financial holdings in competitors or business partners that go beyond minor capital investments must be disclosed.
- **Contracting:** We only award contracts to related parties (family, friends) after disclosure and approval by the management of the MYTY Group (see also the requirements of the Anti-Corruption Policy).

### 3.3. Sanctions & Trade Compliance

We strictly adhere to all applicable national and international trade and sanctions laws.

- **Review:** Before establishing new business relationships, they are critically reviewed. If it is not a known entity or involves business with private individuals, additional background checks must be carried out, if necessary, to avoid violating sanctions, terrorism, or embargo regulations.
- **Prohibition:** Business with sanctioned persons, organizations, or countries that violate applicable law is prohibited.

### 3.4. Money Laundering Prevention

The MYTY Group takes measures to prevent it from being misused for money laundering or terrorist financing.

- When establishing new business relationships with unknown companies, institutions, or private individuals, these must be critically assessed and, if



necessary, subjected to a background check.

- Cash payments of significant amounts are generally avoided and critically questioned.

### 3.5. Fair Competition

We are committed to fair competition. Agreements with competitors on prices, conditions, or market sharing are prohibited.

## 4. People, Work Environment & Human Rights

### 4.1. Diversity, Equality and Inclusion

We live diversity. Discrimination based on gender, sexual orientation, origin, religion, age, or disability will not be tolerated.

- **Equality:** We treat all genders equally. Salary structures do not differentiate between genders.
- **Inclusion:** We are committed to inclusive language and the elimination of stereotypes (oriented towards the Gisler Protocol).
- **Employment:** Decisions on hiring and promotions are based solely on qualification, mindset, and skillset.

### 4.2. Anti-Harassment & Social Behavior

We maintain respectful, professional, and harassment-free interaction.

- **Zero Tolerance:** Bullying, sexual harassment, threats, or insulting behavior are not tolerated.



- **Behavior:** We communicate openly, honestly, and are receptive to criticism. We do not participate in gossip or damaging actions against colleagues.
- **Manners:** We are punctual, reliable, and let others finish speaking.

### 4.3. Human Rights

The MYTY Group is committed to respecting human rights according to the Charter of the United Nations.

- **Prohibition of child and forced labor:** We strictly reject child labor and ensure humane working conditions.
- **Fair working conditions:** We ensure fair pay and compliance with statutory working hours, including among our partners.

## 5. Responsible Business Partners

We expect the same integrity from our business partners (suppliers, service providers, intermediaries) that we impose on ourselves.

- **Integrity Check (Due Diligence):** We conduct an audit ("Third-Party Integrity Check") for new, unknown, and potentially high-risk business partners. This includes checking for corruption risks, opaque ownership structures, and sanctions lists.
- **Ethics in the supply chain:** We only work with companies that share our ethical principles (especially regarding human rights and anti-corruption).
- **Intermediaries:** Hiring intermediaries can involve a risk of corruption and is therefore subject to strict approval and documentation requirements. This is particularly relevant if these are related persons.



- **Short Check:**
  - a. Company research: Check legal notice (company website) and commercial register excerpt ([handelsregister.de](https://www.handelsregister.de)).
  - b. Sanctions list screening: Use free online tools, e.g. [finanz-sanktionsliste.de](https://www.finanz-sanktionsliste.de).
  - c. Internet check: Search for suspicious press, corruption reports, etc..
- **In-depth check (if risk signals are present):**
  - a. Request further documents (proof of ownership, organizational chart).
  - b. Double-check and consult with Compliance.
  - c. External service providers (optional, e.g. for particularly high risks).

## 6. Information, Data & Property

### 6.1. Data Protection

The protection of personal data of employees, customers, and partners has the highest priority.

- **Policy Summary:** The Data Protection Policy regulates the legally compliant handling of personal data according to the GDPR and is binding for all parts of the company. It ensures compliance with principles such as purpose limitation, data minimization, and transparency. Furthermore, the rights of data subjects and necessary technical-organizational measures to ensure data security are defined.
- **Reference:** Details can be found in the current Data Protection Policy on the Shared Drive.



## 6.2. IT Security & Devices

The use of our IT systems is subject to strict security standards.

- **Policy Summary:** The IT Policy prioritizes information security and limits the private use of company IT to a minimal minimum.
- The use of private end devices (BYOD) in the company network and "Shadow IT" are generally prohibited.
- Binding standards for mobile working, password security, and the physical protection of hardware ("Clean Desk") are defined.
- **Reference:** Details can be found in the current IT Policy on the Shared Drive.

## 6.3. Artificial Intelligence (AI)

We use AI innovatively but responsibly.

- **Policy Summary:** The use of AI tools for business purposes is desired but is subject to strict requirements for the protection of confidential information and personal data, which must not be entered unless it is ensured that they are not used for training. AI-generated results must always be reviewed by a human ("Human-in-the-loop"), and the use of ethically questionable or discriminatory AI systems is absolutely forbidden.
- **Reference:** Details can be found in the current AI Policy on the Shared Drive.
- **AI Hub:** With the MYTY AI Hub ([ai.myty.com](https://ai.myty.com)), an internal group-wide platform is available that provides AI applications in compliance with policies.



## 6.4. Protection of Company Property & Intellectual Property

We handle the property of the MYTY Group with care.

- **Physical property:** Office equipment, IT hardware, and financial resources may only be used for business purposes. We protect them from loss, theft, and misuse.
- **Intellectual property:** Our ideas, concepts, software codes, and brands are our most valuable asset. We protect these rights from unauthorized disclosure to third parties. We also respect the valid intellectual property rights of third parties (e.g., software licenses, copyrights for image material).

## 6.5. Public Communication & Social Media

We are careful about how we express ourselves publicly.

- Private expressions of opinion in social networks must not create the appearance of being official positions of the MYTY Group.
- We do not disclose confidential information or internal matters on social platforms.
- Official press inquiries are answered exclusively by the designated departments.

## 7. Environment & Sustainability

We are aware of the ecological challenges and take responsibility.

- **Sustainable Development Goals (SDGs):** We are committed to the United Nations Sustainable Development Goals.



- **Climate protection:** We strive to reduce our climate-damaging activities to a minimum and actively work towards the group's climate neutrality.
- **Resource conservation:** We implement energy-saving measures and cover our energy needs from sustainable sources whenever possible.
- **Priority for Rail:** For business travel, especially within the country and on short routes to neighboring regions, rail should preferably be chosen as the means of transport.
- **Proportionality:** Air travel is to be limited to the absolutely necessary minimum and should only be considered if alternative forms of travel are objectively unreasonable.
- **Digital Alternatives:** Before planning any trip, it must be critically checked whether the business objective can be achieved equally through digital tools.

## 7.1. MYTY net+

We go a step further in climate protection. With our initiative MYTY net+, we don't just compensate; we overcompensate.

- **The Principle:** Ultimately, with the help of certified climate protection projects, we remove more greenhouse gases from the atmosphere than we put in.
- **The +25% Rule:** We fully compensate for our unavoidable emissions and add another 25% on top.
- **Measures:** Investment in UN-certified renewable energy projects.
- **Measurability & Transparency:** Each agency has a "Climate Officer" who



records the CO2 footprint with our partner Planted. We invest transparently and traceably.

## 8. Reporting Violations

We encourage all employees and partners to report misconduct or violations of this Code of Conduct.

- **Policy Summary:** The Whistleblower Policy establishes a confidential reporting system ("Hintbox") for misconduct within the group. It guarantees protection against discrimination for whistleblowers acting in good faith and maintains their anonymity upon request. Incoming reports are objectively reviewed.
- **Reporting Channel:** You can reach our digital portal at: [myty.hintbox.eu](https://myty.hintbox.eu).
- **Protection from Retaliation:** Whistleblowers acting in good faith are protected from any sanctions or discrimination.
- **Reference:** Details can be found in the current Whistleblower Policy on the Shared Drive.

## 9. Validity & Consequences

This Code of Conduct is an essential part of our corporate culture and the employment relationship.

- Violations of this code or applicable law will not be tolerated and can lead to consequences under labor law (up to termination) as well as civil and criminal consequences.



- In case of doubt or uncertainty, please contact your supervisor, People & Culture, or the Compliance team at any time.