

ACP

# The ACP Code of Conduct

IT for  
innovators.

Dear ACP team,

As part of the IT industry, we are all very familiar with the – mainly English – terms and abbreviations that are used in our sector, such as MDM, VDI, EUC or DaaS. They all describe IT services that we deal with on a daily basis.

These technical terms, which are often meaningless to people outside the IT industry, are indicative of trends and current topics. Similarly, in business management, the current buzzwords include ESG, governance and compliance. These concepts are all about ensuring that a company acts fairly, sustainably and in a socially valuable way. Many employers make commitments around these themes. They might even draw up and publish rules and introduce comprehensive controlling and reporting processes, complete with the corresponding sanctions.

We at ACP have always acted in accordance with our values and encouraged self-reliance. Our successes over many years and our experiences show that our approach has been the right one. At the same time, we are aware that there is a growing demand for written rules of conduct, from both lawmakers and our partners and customers. In response, we are therefore now pleased to present our ACP Code of Conduct, intended as guidance for our employees, partners and customers.

The ACP Code of Conduct is based on our set of values, complemented by our commitment to environmental, social and governance practices. It should help make us more aware of the issues of corruption, competition and cartel law, data protection and IT security. And it shows how each of us can avert risks for ourselves and for our company.

I firmly believe that our ACP Code of Conduct will help us preserve our self-determined and values-based culture. At the same time, it provides the people around us with guidance, letting them know what we stand for and which principles guide our actions.

**Rainer Kalkbrener**

Rainer Kalkbrener  
Management ACP Group Austria



I firmly believe that our ACP Code of Conduct will help us preserve our self-determined and values-based culture.



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# ACP Group Austria

# Code of Conduct

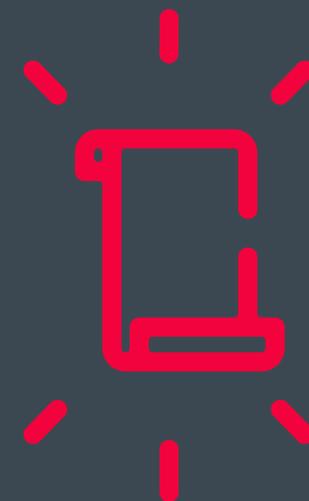
## General information and validity

Our employees undertake to comply with all of the applicable legal provisions and corporate conduct requirements and guidelines in all of their business activities. This Code of Conduct provides guidance on what to do in specific situations, supporting our employees in their daily work. It sets a minimum standard for the whole ACP Group, with local management being given the opportunity to introduce additional rules and regulations. We have also included information about some of our additional guidelines.

This Code of Conduct applies to the entire board of directors, all managing directors, executives, employees as well as all those acting on behalf of the ACP Group.

We also expect our business partners to act lawfully and with integrity, which is why we publish our Code of Conduct on our website and include references to it in our General Terms and Conditions.

Our Code of Conduct enters into force on 1 April 2023 and will apply until revoked.



# Our values

Our Code of Conduct is based on our values, which reflect our corporate culture shared by all our employees in the various ACP companies, comprising the following in particular:

## Open to new ideas – Seizing opportunities

The IT industry is constantly re-defining itself. Its potential for innovation fascinates and inspires us. We are open to new approaches because they enable us to lead the way in our market. We hold change dear because we know how important it is to ensure our success in the long term. For us, change is not an end in itself but an essential process to make good things even better. Our openness to new ideas gives us new perspectives for our personal growth on our life-long learning path.

## Entrepreneurial spirit

Our corporate history at ACP is characterised by entrepreneurial thoughts and deeds. Our collaborative company structure and open corporate culture underpin our actions: we treat all ACP resources as if they were our own. And even though we are all part of a whole, we still value individuality highly. We expect all our employees to give their utmost and to always look for feasible solutions. Our customers' issues are so important to us that we are always ready to go the extra mile for them in order to find a solution.

## Teamwork makes us strong

For us, teamwork means listening to each other, and working together across departments and functions to reach our common goals and to share the joy of our successes. Our reliability is evident from the way we treat and approach each other, our tasks and our customers. We are responsible and consistent, and we keep our promises. We speak out about what we observe, and value constructive feedback. We consider open and proactive feedback to be a sign of appreciation as we can continually learn from it.

## Appreciation and respect

Appreciation means that we respect every person and their personality, we recognise their achievements and we approach everyone with a positive attitude. We place our trust in others and value credibility and authenticity in all that we do. We adhere to the local laws as well as any other applicable legal requirements, and our colleagues and customers can always expect us to act in a loyal, reliable and responsible manner. Fairness and a communication style that is open and always appreciative are the basis of our shared success.

## Acting sustainably – for all our future

We aim for long-term sustainability in all our actions, acting responsibly towards the economy, environment and society at all times. We work together on securing our company's lasting success. To this end, we make investments as and when they are required, investing above all in the continuing professional development of our executives and employees. We work together as partners. We highly value our close partnership with our customers and strategic suppliers.



# Environmental, social and governance

ACP is committed to responsible and sustainable business management, complying with the following principles in particular:

## Environmental

We at ACP aim to protect our environment. We therefore comply with any applicable laws, treating them as a minimum standard. We use resources economically and in an environmentally responsible way, and we are committed to a circular economy. We aim to avoid carbon and other emissions that pose a threat to the environment in our behaviour and decisions. By using the available technological means of communication, we are reducing environmentally damaging travel. We are also investing in e-mobility and striving to reduce the energy consumption of our buildings and infrastructure across our group of companies as a whole.

## Social

We at ACP place social aspects at the heart of our working environment, and are committed to providing fair working conditions. We create a working environment with which our employees can identify and in which they can unlock their potential. We invest in the continuing professional development of our employees through a range of training programmes. We regularly sit down with our employees and exchange information and views, allowing us to align their goals and wishes with our own company goals. We treat each other respectfully. We do not tolerate discrimination, racist remarks or harassment at the workplace. We treat all our employees equally, irrespective of their age, gender, background, disability, philosophy of life and sexual orientation. ACP respects human rights and will therefore not partake, directly or indirectly, in transactions or projects that are connected with: the use of forced labour, including child labour or the breach of any other applicable provisions by the International Labour Organisation (ILO), the violation of human rights or political unrest.

## Governance

We at ACP are committed to fair corporate governance. We comply with statutory requirements and guidelines and strongly oppose any form of corruption or anti-competitive behaviour. We abide by any arrangements made and adhere to the provisions of labour, social and tax law. In this way we protect ourselves from penalties, actions for damages and any other consequences for our employees and company. This Code of Conduct is an important part of fair corporate governance. It encourages our employees to behave in a just and fair manner at all times. ACP appreciates open and factual feedback in order to restrict or prevent unwanted developments.

# Individual conduct requirements



Anti-corruption efforts

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# 1 ● Anti-corruption efforts

ACP opposes corruption and unlawful practices in any form. The way in which we live “Appreciation and respect” means that we comply with all applicable laws, and our colleagues and customers can always expect us to act in a loyal, reliable and responsible manner. Fairness and a communication style that is open and appreciative are the basis of our mutual success. We always treat our business partners with the politeness expected according to local and national standards and practices.

Our Anti-Corruption Policy provides information on the statutory cases of corruption and defines how to deal with our business partners. We must all act accordingly in order to protect us from court penalties.

ACP does not tolerate bribes or other inappropriate advantages. This applies irrespective of whether they are offered or accepted by ACP, whether they aim at a proper (e.g. accelerated) or unlawful provision of a service, or whether there is even a direct connection to a specific business transaction or whether they are intended to set the mood for future transactions in general.

If in doubt, please always check whether an intended gift (an advantage within the scope of local and national standards) is acceptable according to our business partners’ internal guidelines.



# Charitable donations and sponsorship

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A man with dark hair and a beard, wearing a white polo shirt with a small logo on the chest, is looking at a tablet device. He is standing in a server room, with a large rack of server equipment and numerous blue and white cables visible behind him. The room is brightly lit, and the server racks are filled with equipment.

## 2. Charitable donations and sponsorship

Donations and sponsorship are management decisions, and must comply with any applicable legislation. We regularly support projects that correspond to our values by donating money or our time, all of it within the scope of our social and sociopolitical responsibility. We are proud of our employees and their commitment to charitable causes.

We clearly distance ourselves from any social and communal activities that appear inappropriate or create unfair competitive advantages. This similarly applies to donations and sponsorship that may be linked to a political party.

Donations and sponsorship can quickly turn into cases of corruption. ACP strictly adheres to all laws and legal obligations.



Conflicts of interest

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# 3. Conflicts of interest

Private interests should not stand in the way of ACP's goals. Employees are urged to avoid situations in which personal or financial interests are in conflict with our company goals. When dealing with potential conflicts of interest, employees are advised to make them transparent and abide by the following principles in particular: Any paid sideline activities must be reported to the management and approved by it. Sidelines must not lead to activities at ACP being restricted in any way. However, ACP employees are encouraged to take part in occasional activities as authors, experts, lecturers and the like, none of which is classed as an inadmissible sideline. Holding stakes in competitors or business partners of the ACP Group creates a conflict of interest and is therefore inadmissible. Holding shares in listed companies is permitted, regardless of those companies' market position.

Buying, selling and service transactions that might represent a conflict of interest are only admissible if they would be concluded in the same manner with an independent third party. Where transactions with a possible conflict of interest exceed a value of EUR 10,000, they need to hold up to the arm's length principle and require additional approval from management.

The hiring of new employees must always be carried out properly with an established process to follow. An applicant's suitability is determined on the basis of objective criteria, with positive references being one assessment criterion. ACP allows employees to attract new staff from among their family and friends subject to the condition that any close relationships with employees must be disclosed and made transparent during the recruitment process.



Business conduct

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# 4.1 Expectations from business partners

ACP attaches great importance to corporate responsibility and integrity in all of its business activities.

For this reason we expect our business partners not only to observe any applicable laws, industry requirements and contractual obligations but also to exhibit a high degree of social responsibility, fairness and sustainability.

We actively communicate our standards on our website and refer to it in our General Terms and Conditions. We evaluate our strategic business partners before entering into a business relationship with them. We pass on any of our suppliers' specific provisions that also affect our customers, ensuring that any codes of conduct and guidelines are observed throughout the entire supply chain.



A man in a blue suit and brown tie is shaking hands with a woman in a red top. They are both smiling and looking at each other. The background is a plain, light-colored wall.

## 4.2 Representation by our employees

Our employees represent our company externally, which is why we expect them to always behave professionally and in keeping with our high standards. Above all, we expect them to be respectful and professional on business trips and at events, as well as on social media.

## 4.3 Fair competition

We believe fair competition means convincing others of the quality of our innovative products and solutions. We do not use any unfair means that might prevent or restrict competition. This means we adhere to the provisions of competition and cartel law.

# 4.3.1

## Competition law

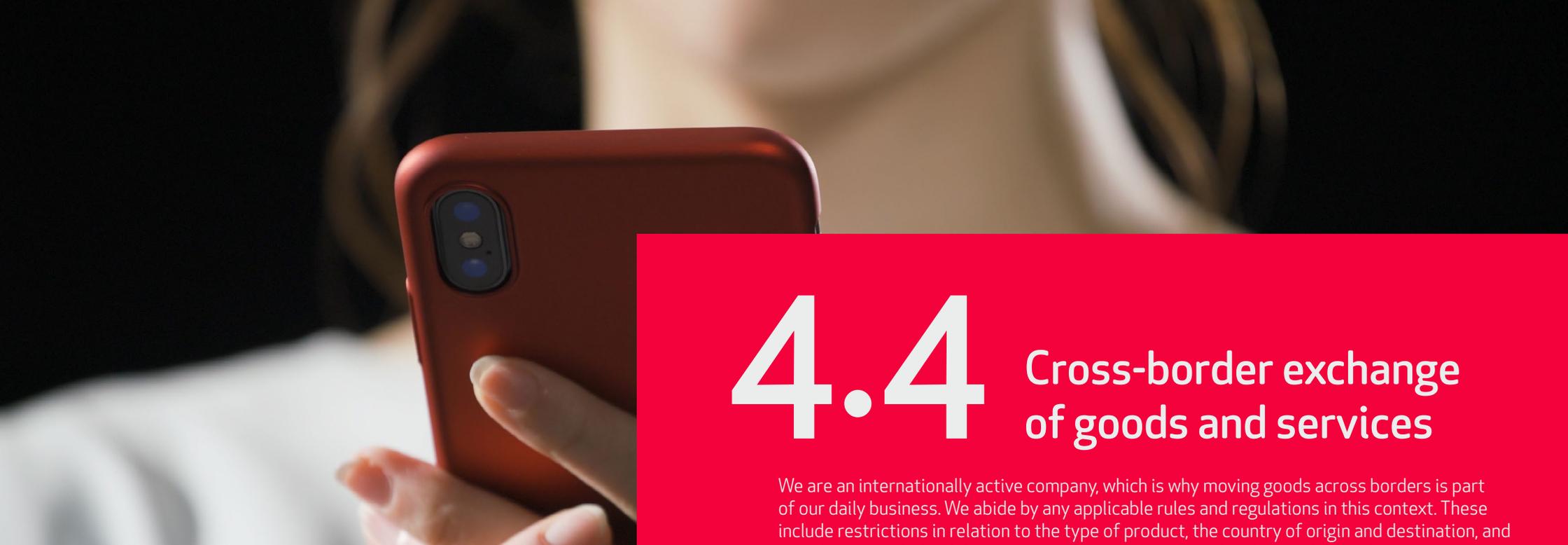
Competition law prohibits the deception of market participants by aggressive, misleading or otherwise unfair business practices in connection with the advertising of goods and services. We pay attention to our customers' needs, and advise and inform them accordingly.

# 4.3.2

## Cartel law

Cartel law prohibits any agreements (cartels) that are intended to prevent, restrict or distort competition or have such an effect. Accordingly, we do not fix prices or stipulate exclusive purchase obligations. We do not enforce any inappropriate purchase/sale prices and do not harm our customers by restricting sales or technical developments.





## 4.4 Cross-border exchange of goods and services

We are an internationally active company, which is why moving goods across borders is part of our daily business. We abide by any applicable rules and regulations in this context. These include restrictions in relation to the type of product, the country of origin and destination, and also the person behind the customer. Sanction lists must be observed. Specific tax provisions and regulations on the origin of goods might also be relevant. If in doubt, please always check with the supplier that they adhere to these regulations.

## 4.5 Anti-fraud measures

Fraudulent activities, specifically on the internet, are on the rise globally. Apart from simple forms of fraud by individuals, more complex fraudulent systems set up by criminal organisations are also on the increase.

To avoid any kind of fraud, and to protect our company and employees in particular, ACP subjects any unusual transactions to the four-eye principle. This means that any action to be taken will be checked by an authorised colleague, a “second set of eyes”, and their confirmation documented in brief.

An unusual transaction in this sense means any transaction that meets at least one of the following criteria:

- The transaction is not part of the respective ACP company's day-to-day operations.
- The transaction exceeds the transaction value set by the local management.
- ACP is waiving its rights to an excessive extent or assuming obligations that are disproportionate to the actual transaction.

A man with short brown hair, wearing glasses and a headset, is smiling while working at a computer. He is wearing a dark green V-neck sweater. The background shows a window with a view of greenery outside. The image is split into two parts: the top part shows the man, and the bottom part is a dark grey overlay with text.

# 4.6 Reporting

ACP depends on the accuracy and regularity of its accounting records to make appropriate decisions. All business transactions must be recorded completely, accurately and immediately in accordance with the defined workflows, auditing principles and generally recognised principles of accounting. We comply with all applicable standards, specifically in relation to record-keeping obligations pursuant to tax and company law. It is forbidden to make false reports within the ACP Group or to submit such reports to external organisations or persons.

Treatment/protection  
of property

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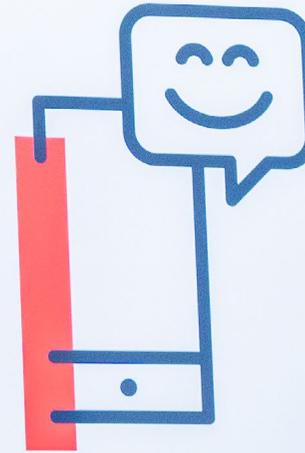


The ACP logo consists of the letters 'ACP' in white, bold, sans-serif font, set against a dark blue rectangular background. A thin red horizontal line is positioned below the blue rectangle.

ACP

MODERN WORKPLACE

Work smarter.



## 5 • Treatment/protection of property

All ACP employees treat ACP assets responsibly and with care, protecting it from loss, theft, misuse or third-party access.

Our assets should generally only be used for business purposes and in a way that conserves resources and is also economically reasonable; the same applies if allowed to be used for private purposes. Any damage should be reported to the local management and broken devices exchanged. We respect intellectual property rights and third-party rights. Unauthorised use is in breach of this Code of Conduct.



IT security

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# 6. IT-Sicherheit

To achieve our company goals, we need to have a high degree of information security in all our business processes. We therefore require all our business processes to comply with our IT Security Policy.

Compliance with our IT Security Policy not only protects ACP and our employees but also protects our customers and business partners and means that we can meet the statutory framework conditions. To ensure this level of protection, we derive organisational and technical measures from the Policy, which must be observed without fail by all. A high security and quality standard can only be achieved if all employees of the ACP Group are conscious of the utmost importance of security and quality.

Detailed guidance on how to proceed can be found in our IT Security Policy, which we have all read and consistently observe.



Confidentiality &  
data protection

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# 7 ● Confidentiality & data protection

ACP and its employees undertake to keep any business circumstances and their business partners secret, and ensure that confidential information is carefully stored. We assess legal admissibility before passing on any internal information to third parties. If we disclose confidential information under specific circumstances, we will enter into appropriate confidentiality agreements.

We process personal data only in accordance with the General Data Protection Regulation (GDPR), any applicable national legislation, our Privacy Statement, as well as internal requirements and processes. Where necessary, we are supported in our efforts by our internal Data Protection Coordinator and our external Data Protection Officer.

Prohibition of  
insider dealing

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## 8. Prohibition of insider dealing

Using non-public, price-related information in relation to securities transactions is prohibited by law. This applies to using for personal advantage as well as in order to benefit third parties. If employees become aware of inside information in the context of their professional activities, they will treat it as confidential and never use it for their personal advantage.

# Whistleblowing

We expressly encourage all our employees to live by ACP's values and set a good example for new colleagues.

For this reason, every employee should know that they can report any violation of our values or our Code of Conduct to their superior at any time. This concerns violations of the principles enshrined in our Code of Conduct, which can be found at [www.acp-gruppe.com/ueber-acp/compliance](http://www.acp-gruppe.com/ueber-acp/compliance), committed by either ACP itself or our contractual partners.

Reports can also be made anonymously to an external legal adviser at [whistleblowing.acp@gsv.at](mailto:whistleblowing.acp@gsv.at). ACP does not tolerate any form of retaliation or career disadvantages for those who reported a suspicion in good faith, and anyone who makes such a report will be given appropriate support.

In accordance with the Austrian Whistleblower Protection Act (HSchG), this implements a minimum standard for the protection of persons who report breaches of legal provisions within the meaning of [§ 3 HSchG](#).

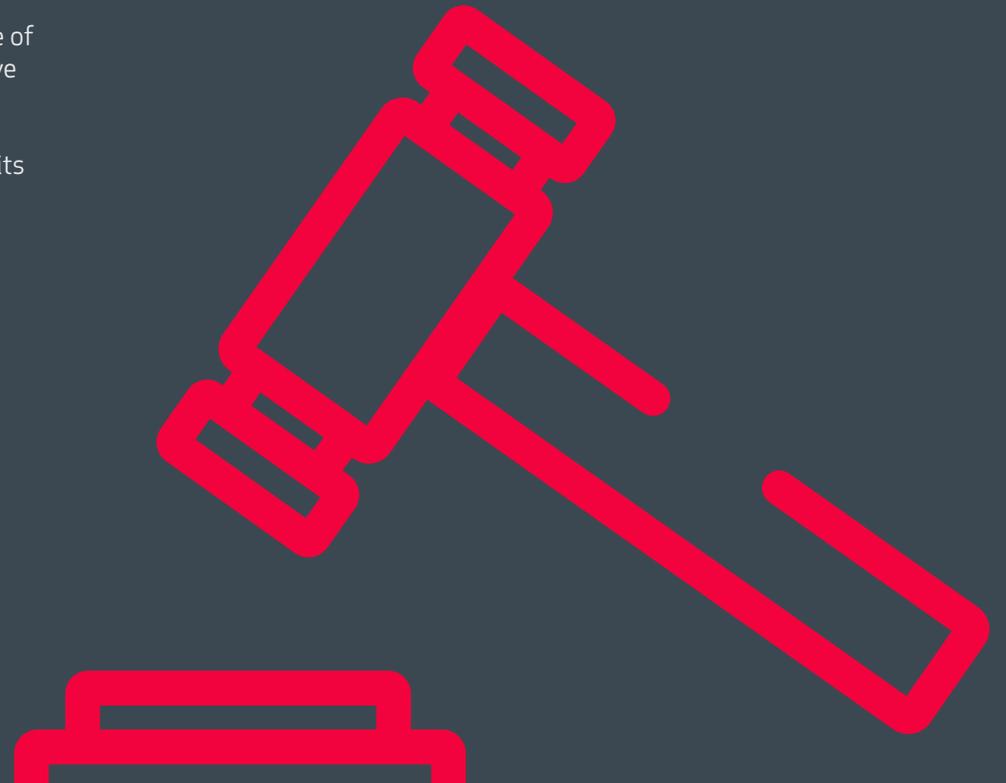
The Act not only provides protection for ACP's employees in Austria but also for any persons affected by the whistleblowing report. The aim is to avoid reputational damage or other negative consequences.



# Sanctions and consequences

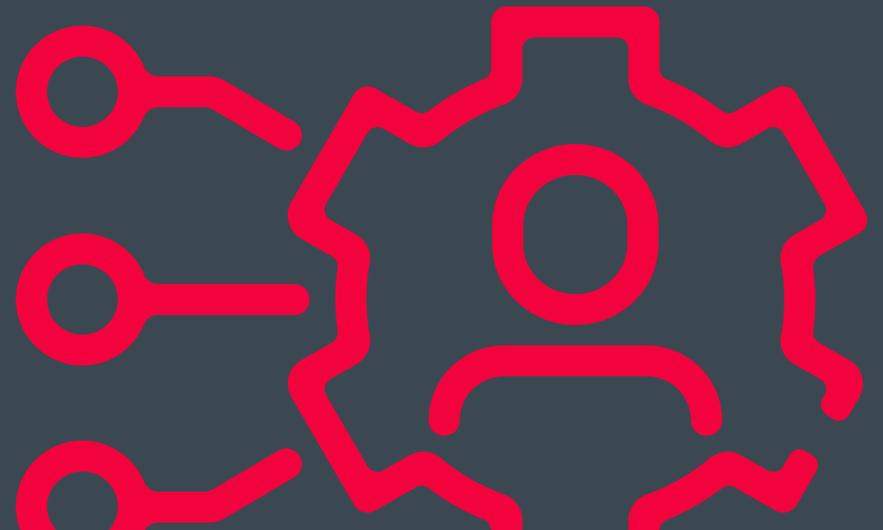
According to applicable legislation, breaches of laws and principles mentioned in this Code of Conduct may lead to fines, imprisonment and actions for damages. This could have negative consequences for both the ACP company in question and individual employees.

It is therefore important to familiarise yourself with this Code of Conduct and to abide by its principles. This will help prevent negative consequences for ACP and our employees.



# Responsibility and training seminars

The Management of the ACP Group AG is responsible for the implementation, review and improvement of this Code of Conduct, working together with regional managers with responsibility for regional affairs.



# Queries and information

If you have any queries about our Code of Conduct, please contact your local ACP management.

**You can also get in touch with us via:**

E-Mail: [compliance.AT@acp.at](mailto:compliance.AT@acp.at)

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