

Preamble

Allround Service consistently works in accordance with all legal rules and regulations.

Our policies and guidelines include:

- Compliance management system
- Code of Conduct
- Anti-Corruption Policy
- Data/IT security standards (separate document)
- Environmental management system (separate document)

Compliance management system (CMS)

We adhere to the German Corporate Governance Code (no. 4.1.3)

"The Management Board ensures that all provisions of law and the company's internal policies are complied with, and endeavours to achieve their compliance by the group entities (Compliance). It shall also institute appropriate measures reflecting the company's risk situation (Compliance Management System) and disclose the main features of those measures. Employees shall be given the opportunity to report, in a protected manner, suspected breaches of the law within the company; third parties should also be given this opportunity."

In addition to data protection provisions, we are also subject, in particular, to occupational safety and environmental protection regulations, and we are constantly aware of our responsibilities in accordance with the aforementioned Code.

Regular CMS training events and a focus on CMS-related issues creates awareness among staff during the weekly scheduled meetings. The continuous monitoring of processes and audits of the regulatory compliance minimises the risk for the various areas of the enterprise.

Code of Conduct (CoC)

The materials set out in quotation marks encompass a series of documents that can be viewed/retrieved/presented.

Social interaction:

The principles of the Convention on Human Rights must be observed (e.g. no discrimination based on gender/skin colour/religion/sexual orientation or origins). Courteous interaction based on respect, fair treatment and payment for service rendered. In summary: long-standing collaboration, mutual esteem.

IT security/access permissions

The reception desk of Allround Service is continuously staffed during office hours to prevent any unauthorised access by outside persons. The computers of Allround Service can only be accessed using a personal username and password (which is changed regularly); this log-in information may not be made accessible to outside parties. The IT administrator will shut down access immediately if there is any suspicion of unauthorised access or infringements. Customer and freelancer access points, such as to the FTP server or CAT tools, will be closed following the completion of the job (or specific work steps). In summary: Maximum risk mitigation.

Handling trade secrets, sensitive data, insider knowledge

All translators and interpreters are subject to a general duty of confidentiality – in the same way as doctors and lawyers. Duties of non-disclosure are defined (for customers, employees, freelancers, suppliers) through our “NDA (Non-Disclosure Agreement)”, commissioned data processing agreements, and various data protection notices. Acquired insider knowledge may not be passed on and/or used for personal benefit. Price-fixing agreements may not be made with any outside parties. The GDPR must be observed. In summary: duty of confidentiality demanded from all parties, compliance with legal provisions.

Invitations and gifts

The “AS Anti-Corruption Policy” and the “employment contracts” state that no payments or gifts/benefits may be offered to or accepted from business partners/outside parties. In summary: Prevention of corruption

Environment

Resource-efficient working (e.g. paperless office, where possible), avoidance of travel. In summary: Sensitisation

Training events (recaps)

(Compact) trainings are organised in connection with all the specified and additional aspects (e.g. fire safety, occupational health and safety). In summary: Sensitisation

Indications of infringements / Consequences

Please forward indications/reports of rule violations to the management or its representatives. Consequences for infringements range from a meeting to termination (without notice) of the employment contract/business arrangement. In summary: clear rules

Anti-Corruption Policy

Combating corruption is particularly important to Allround Service (hereinafter referred to as "AS"). For that reason, all permanent employees are made clearly aware of the applicable anti-corruption laws in order that corruption is prevented. AS explicitly demands that its management personnel and all other employees working within the enterprise do not undertake, commission or permit any actions whatsoever that could constitute infringements of applicable anti-corruption laws or regulations, in particular that they do not make or order any unlawful payments to customers, state employees, or public officials, or to the business partners, family members or close friends of these persons.

In addition, AS confirms that it will not offer or grant any gifts or benefits of any kind to its business partners' employees, representatives or external contractors and likewise, that it will not accept or demand any such gifts or benefits, financial or otherwise from the employees, representatives or the external contractors of its counterparty, where the recipient has no legal entitlement to receive such gifts or benefits.

If the business partner or AS extends payments or gifts not permitted under this policy, or if the business partner or AS has sufficient reason for presuming that such payments or gifts will be or have been extended, then the business partner or AS may terminate all possible existing agreements with immediate effect.

issued 10/2019

updated: 06/2021