



CODE of CONDUCT of ACREDIA Versicherung AG

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Table of Contents

Introduction	2
Our guiding values	3
The single rules of the ACREDIA Code of Conduct:	4
Compliance with laws and other external and internal regulations	4
Dealing honestly with customers and business partners and with complaints	4
Fair competition	4
Prohibition of the misuse of insider information	4
Sanctions, prevention of money laundering and terrorist financing	4
Corruption, donations, sponsoring	5
Conflicts of interest	5
Handling company information, confidentiality, data protection	5
Sustainability	5
Respect, integrity, fairness, appreciative behaviour	6
Health and safety in the workplace	6
Corporate Communications	6
Protection of company property	6
Reporting misconduct	6

1 Introduction

For all employees of ACREDIA Versicherung AG ("ACREDIA"), the Code of Conduct forms the central and binding basis on which we orientate our actions.

This code regulates our dealings with each other within ACREDIA, but also our responsibility towards customers and business partners. We thus set clear standards for modern and ethically exemplary behaviour.

The Code of Conduct can only be brought to life if all ACREDIA employees internalise it and integrate it into their daily actions.

2 Our guiding values

Our corporate culture is based on four core values:



ENTHUSIASTIC

With commitment and enthusiasm, you will successfully develop personally and professionally.

OPEN

We work in teams in which you can always be open and be sure of everyone's appreciation.

CONFIDENCE

From a secure position, you can develop the courage to create significant innovations with added value for our customers.

COOPERATE

We can always rely on the support and loyalty of the team, especially in challenging situations.

3 The single rules of the ACREDIA Code of Conduct:

3.1 Compliance with laws and other external and internal regulations

We ensure that we are aware of and comply with all legal requirements that are relevant to our activities. We are committed to complying with legal rules and regulations. We also observe binding internal guidelines.

We neither allow ourselves to become involved in illegal activities in our working environment nor do we tolerate illegal activities that could lead to the involvement of ACREDIA in unlawful behaviour. Furthermore, we refrain from any action that is clearly aimed at circumventing such regulations and requirements.

3.2 Dealing honestly with customers and business partners and with complaints

We behave correctly, honestly, openly and professionally towards customers and business partners. We do not use deceptive or misleading practices. We endeavour to give our customers the best possible advice and provide them with all relevant information to enable them to make a well-informed and appropriate decision in their best interests.

We ensure that complaints from customers or business partners are handled in a fair and timely manner and in accordance with all applicable external and internal regulations.

3.3 Fair competition

We are committed to free competition in a functioning market economy. We behave fairly towards our customers, business partners and competitors on the market. We strictly comply with the provisions of competition and antitrust law. We do not tolerate any form of behaviour that is aimed at restricting free and fair competition.

3.4 Prohibition of the misuse of insider information

We ensure that market abuse and the misuse of insider information are prevented. The exploitation of insider information is punishable by law and also has disciplinary consequences. No employees of ACREDIA may gain an advantage for themselves or a third party by utilising or passing on insider information or confidential, price-sensitive information. We adhere strictly to the relevant legal provisions and internal guidelines.

3.5 Sanctions, prevention of money laundering and terrorist financing

We comply with national and international sanctions regulations, refrain from any business activities that are subject to such sanctions and do not enter into any business relationships with sanctioned persons or organisations.

We take all necessary measures to prevent money laundering and terrorist financing within our sphere of influence and always act in accordance with the "know your customer" principle.

3.6 Corruption, donations, sponsoring

We reject any form of corruption or bribery, whether in the receiving or giving role.

We see small gifts and invitations between business partners as an expression of mutual appreciation. Gifts and invitations must be honest and correct, and their value must be appropriate. One of our most important tasks is to protect the company's reputation. To this end, we act in accordance with the provisions of our anti-corruption guidelines.

Donations are voluntary, charitable benefits that are given without consideration. Sponsorship is the contractually agreed provision of money, goods or services in return for advertising. We comply with the relevant internal guidelines for donations and sponsorship.

3.7 Conflicts of interest

We ensure that our private interests do not conflict with our obligations to ACREDIA. A conflict of interest may arise from personal circumstances and/or relationships and may affect the ability to act in the best interests of ACREDIA.

If our personal or business interests conflict with those of ACREDIA, we disclose this immediately to our line manager or the Compliance Officer. We are guided in our professional activities solely by company interests.

3.8 Handling company information, confidentiality, data protection

We are aware of the highly sensitive nature of all data entrusted to us and protect it by handling it with care. We maintain confidentiality about confidential information of any kind as well as trade and business secrets that we learn about in the course of our professional activities. We comply with national and European data protection regulations.

3.9 Sustainability

We are aware of our ecological, social and economic responsibility as a financial services provider and are committed to responsible corporate governance. We are convinced that we can only be successful in the long term if ACREDIA fulfils its social responsibility as well as its economic requirements.

We proactively address sustainability at the environmental, social and governance (ESG) level. In addition to dealing conscientiously with the interests of our stakeholders, our focus is on social commitment, sustainable investments and the careful use of resources. It is particularly important to us to make the greatest possible contribution to protecting natural resources and preserving our environment and livelihoods. For this reason, we are part of the CEOs for Future network and follow the principles of the UN Global Compact.

It is very important to us that we are familiar with the various aspects of ESG and that we can be well-founded dialogue partners for our customers.

3.10 Respect, integrity, fairness, appreciative behaviour

We respect the opinions of others and their personal dignity, privacy and personal rights. We do not tolerate discrimination or harassment on the basis of nationality, culture, religion, ideology or trade union activity, skin colour, gender, sexual orientation, age or special physical needs. We recognise that every person is unique and valuable and must be respected for their individual abilities. We do not tolerate sexual harassment or bullying.

We practise these principles both internally and towards external partners.

3.11 Health and safety in the workplace

We are committed to maintaining a healthy and safe working environment and fair working conditions. Behaviour that endangers the health or safety of others will not be tolerated.

3.12 Corporate Communications

Oral and written external announcements by ACREDIA are made exclusively by the Board of Management or by authorised employees. If we appear in public without prior authorisation or participate in public discussions in a way that could be perceived as acting on behalf of ACREDIA, we make it clear that we are acting as a private individual.

3.13 Protection of company property

The property and resources of ACREDIA may only be used for company purposes, unless internal regulations provide otherwise. We undertake to handle company property, such as operating resources, operating equipment, but also intangible assets (such as intellectual property including software licences) with care and to protect them from misuse, loss or theft.

4 Reporting misconduct

Violations of the provisions of this Code of Conduct, of other internal guidelines and rules or of legal regulations can be reported. Such a report can be made

- to the line manager or the Board of Management,
- to the Compliance Officer or their deputy,
- via the digital reporting channel, which can be accessed via the ACREDIA website (also anonymously) or
- via the mailbox in the ACREDIA Lounge (also anonymously).

Contact person: Compliance Officer

