

What guides us.  
The New Work code  
of conduct.



# What guides us.

## The New Work SE code of conduct.

### What drives us

Dear colleagues,

Work is an integral part of life, and the entire world of work is currently undergoing major upheaval amid digitalisation and demographic change.

We've made it our mission to identify the opportunities heralded by this change and to make them available to as many people and businesses as possible. Our vision – For a better working life – conveys what we expect from our products and embodies our understanding of responsibility. Here, we take responsibility to mean adapting to the effects of our daily actions, whenever we develop new products, and whenever we take business decisions. The success of our company relies heavily on the trust placed in us by our colleagues, users, customers, business partners, investors and public institutions. We do our utmost to foster and safeguard the trust built up over the course of many years.

We live and breathe New Work. Above all, this means placing our trust in our colleagues and giving them the space they need to do their job. In the same vein, we're aware that trust and freedom are not ends unto themselves. We take on responsibility by channelling all of our efforts into the company's success, our vision – For a better working life – and our passion for working together to achieve great things.

This Code of Conduct goes hand in hand with our Cultural Beliefs. It's essential to our compliance system and guides us in our daily work so we act with integrity and without putting the company at risk. This Code of Conduct must be observed at all times, and it applies throughout the entire New Work Group. As and where necessary, supplements may be added for subsidiaries outside of Germany. Let's use this Code of Conduct as an opportunity to bolster our company and create a working environment in which we all really, really want to work.

### **The Executive Board**



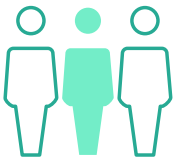
## 01 Integrity

Our culture is defined by integrity and responsibility for our own actions. We act in line with our Cultural Beliefs. We're good corporate citizens and are aware of our commitments to society and the environment.

We talk the walk, and we walk the talk. We're reliable partners and we keep our promises. We follow the letter of the law and always strive to do the right thing.

We uphold exacting professional standards in all of our business activities. We refrain from any unfair or inappropriate conduct towards our colleagues, users, customers or the general public.

This enables us to continue fostering our reputation, credibility, and the trust our stakeholders place in us, all the while ensuring we uphold our responsibility to society.



## 02 Respect

As an international company we stand for diversity, tolerance and equal opportunities to promote and ensure a safe place for us to all work together. Our conduct and actions are defined by mutual respect, fairness, transparency and honesty.

We never tolerate discrimination due to ethnicity, nationality, gender, family status, age, physical features or appearance, religion or world view, sexual preferences or any other such reason. We will pursue and take action against every single instance of discrimination or harassment.



## 03 Data and Privacy

First and foremost, we operate an online business network. Our users and customers entrust their personal data to us. We know we can only grow and prosper if we do justice to the level of trust we enjoy. This is why we're fully aware of the major responsibility we have when handling personal data supplied by our users, customers, employees, business partners and other third parties. We go to great lengths to protect such data, at the very least by applying legal and industry standards to ensure maximum confidentiality and security.

Many of our products' value propositions revolve around being able to see at least some of other users' details, which is a key aspect of social networking. Based on this premise, we enable our users and customers to choose their own privacy settings on our platforms.

We're also aware that our IT and communications systems are central to our business and to serving our users' and customers' needs. We have appropriate security measures in place to protect our IT systems, in turn safeguarding our data and products.



## 04 Conflict of interest

As employees we may find ourselves faced with decisions where our personal interests aren't necessarily in line with those of the company.

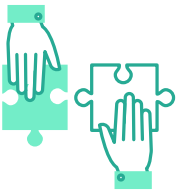
We're aware that personal interests and relations must not influence our decisions as employees since conflicts of interest can lead to biased decisions that aren't in the company's interests.

We take particular care when it comes to potential conflicts of interest by disclosing them to our superiors and then collectively coming up with a suitable way of dealing with them.



## 05 Company property

We always respect the company's property and do our best not to be wasteful with the company's resources. We look after the equipment and workstations provided to us and only use them as intended. Any unauthorised private or illegal use is of course prohibited.



## 06 Conduct with users, customers and business partners

When interacting with users, customers and business partners, we always strive to foster long-term relationships. We're a reliable business partner and we deliver on the contractual promises we make. We engage with our partners on an equal footing and in the spirit of fair business relationships. By the same token, we expect our business partners to uphold similar standards in their conduct.



## 07 Fair competition

Our aim is to entice and win over our customers and business partners thanks to the quality of our products. We don't use any unfair means to achieve our aims or hinder fair competition. We comply with applicable competition law and other such regulations, and we're aware that any breaches here can lead to heavy fines for the affected employee and the company, while also tarnishing our reputation.



## 08 Confidentiality

Our expertise, products and developments are all crucial to our success. This is why we prevent unauthorised access to our intellectual property and keep it safe from third parties. Conversely, we respect third-party intellectual property rights and ensure we only use them as permitted by law or as agreed with the holder.

Any breaches of this Code of Conduct, pertinent law, or internal rules and guidelines may have severe consequences. Misconduct and breaches will always be dealt with, irrespective of the employee's position within the hierarchy and no matter how important a business partner is. With business partners, this may lead to termination of our business relations with them. When it comes to employees, we will review the potential consequences under labour law and then take any appropriate action. We reserve the right to initiate criminal proceedings as and when warranted.

Our superiors, the Legal department and our Employee Committee are happy to answer any questions about this Code of Conduct.

The company has set up a whistleblowing platform operated by our General Counsel and Chief Compliance Officer where we can submit (anonymous) tips. When reporting inappropriate conduct, we can choose whether a male or female member of the Legal department should handle it.

This Code of Conduct may be updated or supplemented, and is subject to ongoing development along with any Group guidelines. To this end, we will first gather ideas and previous experience from every employee. We actively call for suggestions and feedback, and we want controversial issues to be raised and discussed openly without any fear of repercussions. This also applies to any breaches of this Code of Conduct.