

Code of Conduct

- **SUNLIFE GmbH Code of Conduct**
- **Taking responsibility together**

1. Compliance with laws and company policies

We comply with all applicable laws, official stipulations and internal policies.

Every employee is responsible for being familiar with and complying with the regulations applicable to their individual area of responsibility.

2. Integrity and responsible actions

We make our corporate decisions objectively, transparently and solely in the interests of SUNLIFE GmbH.

Personal interests may not influence corporate decisions. Honesty, reliability and mutual respect guide our day-to-day actions.

3. Conflicts of interest

Private or financial interests may not come into conflict with the interests of SUNLIFE GmbH.

The following are potential conflicts of interest:

- Family or personal relationships to customers or suppliers,
- Secondary activities,
- Financial interests in business partners,
- Personal benefits derived from business relationships.

Any current or potential conflicts of interests must be immediately reported to the relevant manager or member of the executive board.

4. Gifts, invitations and corruption prevention

SUNLIFE GmbH strongly objects to any form of corruption and bribery.

Gifts or invitations may only be accepted or permitted if they

- are of a reasonable value,
- are socially acceptable,
- do not and are not intended to influence any business decision,
- do not give the impression of quid pro quo.

Cash gifts or financial benefits may neither be offered nor accepted.

Particularly strict standards apply to dealings with the authorities and public bodies. Unauthorised payments are prohibited without exception.

5. Fair competition

We are committed to fair and open competition.

Price fixing or other anti-competitive agreements with competitors are prohibited.

Confidential information relating to competitors is neither obtained nor disclosed.

6. Dealing with customers and business partners

We treat our customers, suppliers and business partners fairly, respectfully and reliably.

Contractual agreements are honoured. Decisions regarding suppliers or business partners are made solely based on objective, qualitative and economic criteria.

7. Confidentiality and data protection

Protecting confidential corporate information and personal data is a top priority.

All employees are committed to,

- treating trade and company secrets confidentially,
- using personal data exclusively in accordance with the applicable data protection regulations,
- using information for official purposes only.

This obligation continues even after the employment relationship has ended.

8. Dealing with company property

Company property must be used carefully, responsibly and economically.

This includes in particular:

- IT systems,
- Mobile phones,
- Vehicles,
- Working equipment,
- Documents and data.

Misuse, damage or unauthorised use must be avoided.

9. Respectful working relationship

We treat one another with openness, respect and appreciation.

Discrimination, harassment, bullying or any other form of inappropriate behaviour will not be tolerated.

We promote a corporate culture defined by mutual respect, equal opportunities and teamwork.

10. Sustainability and responsibility

SUNLIFE GmbH acts in an economically responsible manner and handles resources carefully.

We promote sustainable actions in our day-to-day work and take into consideration economic and social aspects, insofar as this is possible within the scope of our business activity.

11. Reporting breaches

Breaches of the law, internal policies or this Code of Conduct can cause significant harm to the company.

All employees are encouraged to report potential breaches to their manager or directly to the executive board.

Reports will be treated confidentially and examined carefully. Nobody shall be disadvantaged due to a report, provided that it is made in good faith.

Final provisions

This Code of Conduct is an integral part of our corporate principles and applies to all employees as well as the executive board of SUNLIFE GmbH.

It serves as a guideline for our daily actions and supports our aim of building long-lasting, trusting relationships with our customers, business partners and within our company.