

Reporting Criteria

You have the option of reporting violations or grievances relating to the following key areas/topics via the whistleblowing system of the secunet Group.

Corruption / Conflict of Interest:

Corruption is the deliberate misuse of entrusted power or of a particular position of trust for private benefit or advantage, not necessarily one's own.

Violations may include the following situations:

- Improper influencing of a business relationship or of a public official, for example by offering gifts or invitations
- Acceptance of bribes (kickbacks), or bribe payments made to a public official
- Accepting personal benefits (for oneself and/or third parties) in return for disregarding internal rules and processes, e.g. awarding contracts in breach of a proper tendering procedure
- Favouring friends and acquaintances when awarding contracts or selecting suppliers
- Engaging in activities that conflict with the employee's actual role, for example working for a business partner whose engagement lies within that employee's discretion

Breaches of Competition or Antitrust Law

Anti-competitive agreements and concerted practices between undertakings are prohibited. These may take the form of unlawful arrangements concerning prices, pricing, market, customer or territory allocation, contracts, production volumes, strategies and so on, but also the impermissible exchange of competitively sensitive information, as well as the abuse of a dominant market position.

Breaches of Data Protection Law

Violations of provisions for the protection of personal data.

Examples:

- Disclosure of customer or employee data
- Unauthorised sale of special categories of personal data (e.g. health data, information on criminal offences committed)
- Inadequate access protection for personal data

Breaches of Security Clearance Regulations and Information Security Incidents

Disregard of information security policies, for example through:

- Non-compliance with the regulations on handling classified information
- Endangering or disregarding building (physical) security
- Violations of the information security policies
- The intentional use of software that is not properly licensed within the corporate environment

- Use of IT systems for illegal, non-compliant or activities not approved by the company

Human Rights and Environmental Breache

These include breaches of:

- The prohibition of child labour
- Protection from slavery and forced labour
- Freedom from discrimination
- Protection from unlawful deprivation of land
- The prohibition of withholding an adequate wage
- The right to form trade unions or employee representation bodies
- Protection from torture, as well as occupational health and safety and the related health hazards
- The prohibition of causing harmful soil change or water pollution, including within one's own business area

Other legal violations

Reports of criminal offences or other serious violations that do not fall under any of the specific key areas include, for example:

- Theft, fraud and embezzlement (breach of trust), where there is a risk of significant financial or reputational damage to secunet
- Sabotage or destruction of work equipment
- Disclosure of trade and business secrets
- Forgery of documents
- Violations of tax law provisions
- Violations of customs law and of export control regulations
- Violations of the Anti-Money Laundering Act
- Violations of secunet-internal policies (e.g. breach of the procurement, signature or travel policies)