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## **HYPE CODE OF CONDUCT**

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*Last update: 07-03-2018*

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## 1. SCOPE

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Ethical conduct is of great importance to us in our day-to-day dealings with each other and with business partners. Our success as a company is determined not only by the quality and price of our services, but also by our integrity and our good reputation. Integrity is rooted in the company's philosophy and is taken very seriously by all of our staff.

This Code of Conduct is based on our common corporate values as set forth in the HYPE's Corporate Principles:

**INTEGRITY**  
**ACCOUNTABILITY**  
**FAIRNESS**  
**DIVERSITY**  
**CUSTOMER INTIMACY**

The aim of this Code of Conduct is to provide the basis for creating and maintaining the relationship of mutual trust which is essential to business success. HYPE's management therefore insists on full compliance with this Code of Conduct.

## 2. CORPORATE SOCIAL RESPONSIBILITY

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We are expected to act at all times with social and environmental responsibility, according to the highest professional standards. We therefore commit to the Declaration on Fundamental Principles and Rights at Work of the United Nations International Labour Organization and its eight Conventions that require,

- abolition of labour by children before the end of compulsory school
  - Minimum Age Convention, 1973, Convention no. 138
  - Worst Forms of Child Labour Convention, 1999, Convention no. 182
- no discrimination at work
  - Equal Remuneration Convention, 1951, Convention no. 100
  - Discrimination (Employment and Occupation) Convention, 1958, Convention no. 111
- abolition of forced labour



- Forced Labour Convention, 1930, Convention no. 29
- Abolition of Forced Labour Convention, 1957, Convention no. 105
- freedom to join a union, bargain collectively and take action
  - Freedom of Association and Protection of the Right to Organise Convention, 1948, Convention no. 87
  - Right to Organise and Collective Bargaining Convention, 1951, Convention no. 98.

### 3. COMPLIANCE WITH LAWS

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HYPE expects its employees to comply with all relevant legislation, to obtain the necessary permits and operate its facilities in strict accordance with the law. We are therefore expected to know the law as it applies to our sphere of responsibility; management is expected to provide appropriate training and guidance. In situations where the law or this Code of Conduct do not provide clear guidance, employees shall exercise good judgment and common sense.

Any failure to comply with this Code of Conduct or applicable laws and regulations will be fully investigated and appropriate action taken. This may include retraining or other corrective action and disciplinary action, including termination of employment, depending on the circumstances.

### 4. TRADE CONTROLS

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We support international efforts to prevent trade in technology that can be misused for warfare or warlike activities or other internationally prohibited activities. In our export activities, we are under a binding commitment to uphold all national and international regulations relating to trade controls.

### 5. ENVIRONMENT, HEALTH AND SAFETY PROTECTION

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We are committed to operations and practices which prevent harm to people and damage to the environment or property. We therefore provide a safe working environment and take appropriate steps to maintain high standards necessary to minimize the impact of our activities on the environment.

### 6. NON-DISCRIMINATION

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We are committed to non-discriminatory working practices. Independent of our position, we are all duty bound to treat our colleagues with fairness, courtesy and respect.

We do not tolerate any discrimination, harassment or bullying based on ethnicity, national origin, color, religion, sexual orientation, creed, age, sex, disability or any similar characteristic.

## 7. NO CONFLICT OF INTEREST

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HYPE's best interests are the paramount consideration in all business transactions. Therefore, we may not benefit, directly or indirectly, from improper use of a relationship with individuals or entities outside the Group.

We should do everything in our power to avoid situations which may give rise to conflict between our responsibilities towards HYPE and our personal interests. If, in spite of the best efforts of those concerned, a conflict of interest does arise, communication with our management is essential.

## 8. ANTI-BRIBERY AND ANTI-CORRUPTION

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We take a zero-tolerance approach to bribery and corruption wherever we operate by implementing and enforcing effective systems to counter bribery. Our Anti-Bribery Policy sets out our responsibilities and the responsibilities of those working for us. It provides information and guidance how to recognize and deal with bribery and corruption issues.

## 9. FAIR COMPETITION

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We are committed to the principles of fair competition and we respect the national and international laws restricting the operation of cartels and other monopolistic practices.

We prefer to transact business with organizations which demonstrate a comparable level of responsibility. Suppliers are carefully selected and integrated into the comprehensive qualification and continuous improvement process. Suppliers are expected to follow our Supplier Code of Conduct.

## 10. CONFIDENTIALITY

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Confidentiality should be maintained with regard to sensitive information, Intellectual Property Rights and commercial secrets. We shall not disclose such information to third parties, including friends and family, or use it in any way other than for legitimate business purposes. We shall take all reasonable precautions to safeguard and protect sensitive information and to prevent misuse of any kind.



## 11. ACCURACY OF RECORDS

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We will keep books, records, and accounts that accurately and fairly reflect all transactions, dispositions of assets, and other events. All our records must accurately and clearly represent the relevant facts and the true nature of transactions. No payment on behalf of HYPE may be approved or made with the intention or awareness that any part of the payment is to be used for any purpose other than that described by the documentation supporting the payment.

## 12. DATA PRIVACY

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We value the personal data entrusted to us and we are committed to processing personal data in a legitimate, fair, transparent and secure way. Our IT Security Guidelines and our Data Protection Commitment apply.

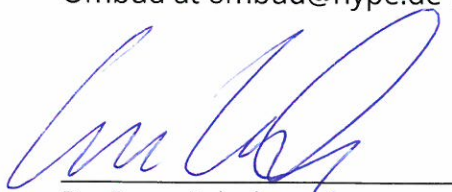
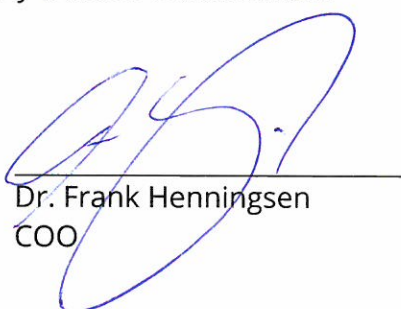
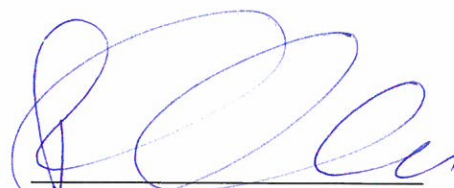
## 13. IMPLEMENTATION

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We all shall receive this Code of Conduct. Management shall ensure that it is included in employee onboarding programs and monitor compliance. Audits of compliance with this Code of Conduct will occur periodically.

Anyone who raises a concern regarding another employee or other person about a possible compliance breach in good faith will be supported by Management, and will not be subject to any retaliation. Any act or threat of retaliation will in itself be considered a serious violation of this Code of Conduct.

We may at some time come across a situation that appears to violate this Code of Conduct. We have a duty to report any suspected violation promptly. In general, we shall first seek to address our concerns with our manager. If the employee believes this is not appropriate, we shall contact HYPE's Ombud at [ombud@hype.de](mailto:ombud@hype.de) for any trustful conversation.

  
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