

# COMPLIANCE POLICIES

A compilation of our beliefs  
and commitments



Global code of conduct

Anti-money laundering and  
counter terrorist funding  
policy

Anti-bribery & anti-corruption  
policy

Anti-Fraud Policy

Compliance, reporting &  
resources

# 1. Introduction

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All policies within this document, including the Global Code of Conduct, apply to the Dennemeyer Group, comprising all entities of the IP Solutions branch, Dennemeyer S.A. and its affiliates, all entities of the Law firm branch, Dennemeyer & Associates S.A. and its affiliates, Dennemeyer IP Consulting and all entities of the Dennemeyer Technologies branch, Dennemeyer Overtime, Dennemeyer Software Solutions and its affiliates, (referred to as “Dennemeyer”) and establishes basic principles and ethical guidelines that Dennemeyer pursues in conducting its business.

These policies are applicable to every employee of Dennemeyer and we ask that our suppliers, vendors, and other business partners familiarize themselves with and encourage them to have policies in line with our guidelines.

The Global Code of Conduct cannot address every issue that may be encountered, so we must be familiar with its principles and use it to guide our judgment and inform our actions.



**We think like an entrepreneur!**

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## 2. Vision and mission

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### OUR VISION

Become the first choice Partner in IP globally.

### OUR MISSION

A global IP ecosystem – designed to maximize client value through quality, connectivity, and efficiency.

### OUR VALUES

- Trust and Respect: Our people are key!
- Integrity and High quality service: We think Global and act local!
- Entrepreneurship and Ownership: We think like an entrepreneur!

## 3. Ethical conduct

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We are committed to maintaining a working environment and conducting business with integrity. Our obligation to act ethically starts with open and honest communication with our colleagues, customers, and any other business partner or authority with whom we interact.

### Honesty and authenticity

We all have a responsibility to act with integrity and fairness, with honesty and respect.

Only make honest and factual claims about the availability, suitability, quality, and performance capabilities of our products and services and do not disparage or unfairly criticize competitors' products or services.

We strive to communicate with our potential and existing customers in a truthful and accurate way. When we claim something about our products and services, we must be able to substantiate it.

### Professional and knowledgeable conduct

Our reputation is established by providing customers with consistently great products and service quality. Each experience for our clients depends upon all employees understanding their roles and responsibilities and ensuring they always adhere to Dennemeyer's quality standards, business processes and regulatory requirements. Always be professional and knowledgeable when conducting business – whether with a current client, a potential client, or a supplier.

### Teamwork

The strongest contributions come from teams who trust each other. Being a team player and working together allows us to provide the best work product for our clients and cultivates an atmosphere of mutual respect and collaboration.

### **Anti-bribery and anti-corruption**

Dennemeyer takes a strong stance against bribery and corruption in its global business operation. We have a strict zero tolerance policy for bribery and corruption and we respect and adhere to the applicable anti-bribery laws. Regular training sessions and reviews of our corresponding policies give our employees a better understanding of this important topic.

Dennemeyer's suppliers are carefully selected and obliged to follow adequate standards in adherence to applicable anti-bribery laws in all services provided to Dennemeyer.

### **Anti-money laundering**

To protect Dennemeyer's reputation and avoid criminal liability, it is important not to become associated – however innocently – with the criminal activities of others. In particular, ensuring Dennemeyer does not receive proceeds of criminal activities is paramount, as this can amount to the criminal offense of money laundering. Employees must look out for warning signs of money laundering and immediately notify the AML Officer or seek advice from the Compliance department in case of suspicious activity.

### **Conflicts of interest**

Conflicts of interest can arise when your personal relationship or financial interests overlap with the best interests of Dennemeyer. Navigate potential conflicts of interest carefully; these situations can impact the decisions we make, erode trust within teams, and can have a significant negative impact on Dennemeyer's reputation and effectiveness. The best rule for any situation that appears to present a conflict of interest is to "abstain and disclose."

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Dennemeyer, you may be faced with a conflict of interest. Avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

Conflicts of Interest may also arise when providing our services to customers. Especially in our IP Law firm services professional rules of conduct have to be observed.

Please be familiar with the rules and guidelines Dennemeyer maintains to avoid any professional conflict of interest in providing our services.



**Denнемeyer is committed to complying with all applicable laws and regulations**

## 4. Business integrity

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### Antitrust and competition

Denнемeyer is committed to complying with all applicable antitrust, competition and fair trade laws and regulations of each country and region where we conduct business. Antitrust and competition laws promote fair competition and protect consumers from unfair business practices. These laws frequently address areas such as illegal agreements between competitors aimed at preventing or restricting free competition, price fixing, and unfair trade practices.

Denнемeyer employees must 1) avoid any formal or informal agreements with competitors that limit competition, 2) respect competitive bidding processes and not rig or fix the outcomes, and 3) use appropriate sources that are truthful when gathering competitive intelligence.

### International trade

Denнемeyer must also comply with all applicable international trade laws and regulations. These laws and regulations apply to the import and export of goods and technical data between countries, transactions or dealings with sanctioned countries and restricted parties, and anti-boycott/boycott requests.

Due to the fact that Denнемeyer provides services throughout the world, our services may be subject to political or legal changes that lead to limitations or, in rare cases, also to the impossibility of our performance. We strive to provide continuous services to our customers and in case of any applicable restriction to inform them timely and efficiently.

## 5. Protection of information, data and other assets



Effective information security is a team effort

### Information security

Information is one of Dennemeyer's most valuable business assets. Protecting information and ideas, whether our own or those of others, is crucial to our business success and builds our reputation as a trustworthy partner.

Employees must always consider the nature and classification of the information they receive, understand the handling requirements for information, and take personal responsibility for the proper use, circulation, retention, protection and disposal of all information.

### Responsible use of company assets

Only use Dennemeyer property for their intended business purposes, unless other use is permitted by special approval. Take precautions to protect all company assets in your care from loss, theft, damage, waste, or misuse.

### Data privacy

Dennemeyer respects the privacy of all individuals and the confidentiality of any personal data Dennemeyer holds about them. When collecting, using, or storing personal data, Dennemeyer ensures that this is allowed by the applicable laws.

We collect, process, and use personal data only to the extent that such is necessary for defined, clear, and lawful purposes. We make sure that data is used in a way that is transparent for those concerned and that we observe their right to information and correction as well as their right to possible objection and the blocking or deletion are protected.

## 6. Workplace environment

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Sharing ideas and innovative attempts to improve or develop our services and team efficiency is highly appreciated within Dennemeyer.

Departments should support each other and share information if no confidentiality or restriction applies. Employees are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination.

**Dennemeyer is committed to fostering a supportive workplace for employees to maximize their potential.**

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### **Occupational safety**

Dennemeyer is committed to an injury-free and illness-free workplace that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety.

### **Anti-discrimination / equality**

Dennemeyer provides equal opportunities for employment. We base employment decisions on merit, considering qualifications, skills and achievements. We do not tolerate discrimination based on characteristics such as age, gender, race, ethnic background, sexual orientation, gender identity or expression, disability, genetics, national origin or religious beliefs. Dennemeyer will not tolerate actions, comments, or conduct that, creates, encourages, or permits an offensive or intimidating work environment.

### **Harassment**

Dennemeyer does not tolerate harassment. Harassment is unwelcome and offensive conduct that may interfere with a person's ability to perform his or her work. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or even a compliment can lead or contribute to harassment.

# Anti-money laundering (AML) and counter-terrorist funding (CFT) policy

The anti-money laundering and counter terrorism funding (AML/CFT) policy establishes a risk based approach to prevent money laundering and to counter terrorism funding.

A risk-based approach enables the measurement of risks for the potential laundering of proceeds of crime based in the field of activity, identification of the criteria, and the activation of the appropriate means and methods for mitigating and controlling such risks.

The policy aims to be compliant with the USA Patriot Act and similar EU legislations.

This policy is based on management of compliance risks arising from customers and vendors and it also oversees:

- Ongoing compliance with the requirements introduced by the national and international laws, regulations, and sanctions;
- Implementation of the risk-based “Know Your Customer” and “Customer Activity Monitoring” principles;
- Determination and reporting of the suspicious transactions; and
- Preservation of reputation and brand value of Dennemeyer towards national and international authorities.



# 1. Definitions AML / CFT

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## 1.1 Money laundering

Money laundering is defined as the process where the identity of the proceeds of crime are so disguised that it gives the appearance of legitimate income. Criminals specifically target financial services firms through which they attempt to launder criminal proceeds without the firm's knowledge or suspicions.

## 1.2 Suspicious activity

Suspicious activities must be monitored and reported when Dennemeyer employees have knowledge and/or suspicion that the activity involves money laundering or terrorist financing. It is impossible for Dennemeyer to define all activity that would qualify as suspicious. However, the following factors quantify the types of suspicious activities that Dennemeyer monitors:

- Activities with high-risk jurisdictions
- Request for cash payments of invoices from clients or vendors
- Request from a vendor to process payments to a different account holder than the company which issued the invoice
- Request from a client to process payments to a different account holder than the company which has the contract with Dennemeyer
- Request for payments without invoices (e.g. pre-payments)

## 1.3 Suspicious transactions

Suspicious transaction refers to any information or matter raising doubt that assets subject to a transaction, performed or attempted to be performed with or through the agency of Dennemeyer, have been obtained illegally, are to be used for unlawful purposes or are to be used by any terrorist organizations or associated party.

These guidelines can be implemented through risk management activities (see below).

## 2. Risk management activities

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The primary purpose of the risk management policy is to ensure identification, assessment and scoring of risks, action planning, and mitigation of the potential risks Dennemeyer may be exposed to, in relation to the laundering of proceeds of crime and the financing of terrorism. To that end, Dennemeyer has developed "Know Your Customer" and "Know Your Vendor" risk assessment principles.

### 2.1 Know Your Customer (KYC) and Know Your Vendor (KYV)

Dennemeyer performs necessary controls and takes additional measures with respect to:

- Recording of all details and address details of customers, acceptable to the legal authorities, before performing a transaction and during the course of a continuous business relationship;
- Identifying beneficial ownership of customers;
- Screening of the customers and vendors against national/international sanctions lists

Dennemeyer does not establish any business relations or perform the transaction requested if the proof of identification is not made or sufficient information about the purpose of the business relations is not obtained.

Business relations will be terminated when the identification and verification of the customer is not performed, as it is required to be conducted in all cases of suspicion related to sufficiency and accuracy/authenticity of the previously obtained identity details of the customer, and if there are any positive matches against sanctions lists.

We conduct two types of KYC / KYV processes depending on the risk level assessed for customers and vendors.

Our Standard process is performed at a minimum for all customers and vendors and Enhanced Due Diligence measures are applied for customers and vendors where a higher risk level has been found. For more information regarding the detailed KYC/KYV checks Dennemeyer performs, please refer to the internal relevant processes and/or contact the Compliance Department.

## 3. Reporting procedures

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Dennemeyer will actively search for suspicious activity. All suspicious activities should be immediately reported to the AML Officer at [AML@dennemeyer.com](mailto:AML@dennemeyer.com) or the internal CTF committee.

## 4. Termination of the business relationship

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Dennemeyer will terminate the business relationship with any third party not cleared through our KYC/KYV processes.

# Anti-bribery & anti-corruption policy

## Application

This anti-bribery and anti-corruption policy reflects the standards which Dennemeyer expects any person or entity that performs services on behalf of Dennemeyer to adhere to.

Such persons or entities acting on Dennemeyer's behalf could include business associates, partners, agents, intermediaries, representatives, suppliers, contractors, third-party service providers and consultants (collectively "Third Parties").

## Commitment to anti-bribery and anti-corruption

The purpose of this Policy is to reiterate Dennemeyer's commitment to conducting its business with honesty and integrity and in full compliance with applicable anti-bribery or anti-corruption laws. In the event that local laws are more restrictive than this policy, the more stringent local requirement will apply.

## Dennemeyer strictly prohibits all bribery or corruption in any form whatsoever

Bribery and corruption are strictly prohibited. A "bribe" is anything of value that is offered, promised, given or received by any party to influence a decision or to gain or reward an improper or unfair advantage for the benefit of Dennemeyer or any other party.

"Corruption" is the abuse of power or position for private gain. Bribery and corruption can take many forms, including the offering, provision or acceptance of:

- Cash payments;
- Loans or non-arms length transactions;
- "Consulting" relationships;
- Political or charitable contributions; or
- Kick-backs, gifts, travel, hospitality, or the reimbursement of expenses.





### **Facilitation payments**

Do not make “facilitation payments”. Facilitation payments are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other Third Parties to perform routine functions they are otherwise obligated to perform. This does not include legally required administrative fees or legally permitted fees to fast-track services.

We accept that refusal to make illicit payments may lead to commercial delays, for example, in the processing of government papers, and that there may be a commercial cost to Dennemeyer attributable to this policy.

### **Dealing with public officials**

Interactions with public officials require enhanced scrutiny and sensitivity. A “public official” is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, regulator, or a public international organization.

Please seek authorization from Compliance prior to entertaining, contracting with, or offering or making payments to public officials. In addition, because interactions with public officials carry special risks under applicable anti-bribery and anti-corruption laws, contracts and payments to public officials should be reviewed carefully to determine what additional safeguards, if any, may be necessary to protect Dennemeyer.

As Dennemeyer and our agents also act as intermediaries with the Government, be extra cognizant of third parties and all sources of indirect risk. Any employee found to have knowledge, or found to have been directly, indirectly, or complicit in engaging in prohibited conduct shall be subject to disciplinary actions.

### **Political donations and lobbying**

Do not offer contributions to political parties or candidates that might influence, or be perceived as influencing, a business decision.

Dennemeyer has a policy of strict political neutrality; it does not make donations to any political parties, organizations, or individuals engaged in politics. The company will co-operate with governments and other official bodies in the development of policy and legislation that may affect its legitimate business interests, or where it has expertise.

Employees are entitled to their own political views and activities, but they may not use Dennemeyer premises or equipment to promote those views or associate their views with those of Dennemeyer.

### **Charitable donations**

As part of its corporate citizenship activities, Dennemeyer may support local charities or provide sponsorship, for example, to sporting or cultural events. Any such sponsorship must be transparent and properly documented. Dennemeyer will only provide donations to organizations that serve a legitimate public purpose, and which are themselves subject to high standards of transparency and accountability.

Charitable donations may only be decided by top management and local directors. Compliance must be informed about all necessary details in advance to conduct due diligence on the recipient.



## Record-keeping

In addition to prohibiting bribery and corruption, anti-bribery and anti-corruption legislation requires proper record-keeping and the establishment and maintenance of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices.

Record all transactions in a complete, accurate, and detailed manner so that the purpose and amount of the transaction is clear.

Third Parties are not permitted to pay, offer, accept, or request bribes on our behalf. This means due diligence shall be undertaken on Third Parties to establish their anti-bribery credentials, where warranted by the assessed level of risk. This could include informing these persons (and associated companies) of this Policy and making commercially reasonable inquiries into their reputation and past conduct.

## Gifts and entertainment

Subject to the restrictions set out in the prior section relating to public officials, gifts and entertainment (e.g., meals or tickets to sporting events or theatre) given to or received from persons who have a business relationship with Dennemeyer are generally acceptable, but must meet the following requirements:

1. The gift is modest in value
2. Is appropriate to the business relationship
3. Complies with local laws and regulations
4. Is infrequent
5. Is not given or received to gain an improper advantage, and
6. Does not create an appearance of impropriety

Cash payments or cash equivalents must not be given or received.

Gifts and entertainment (including meals) that are repetitive, no matter how small, may be perceived to be an attempt to create an obligation to the giver and should be avoided. Gifts or entertainment given close in time to when a decision impacting Dennemeyer's business is being made may be perceived as a bribe in return for a favorable decision and should also be avoided.

# Anti-Fraud Policy

## Anti-fraud

Dennemeyer maintains a zero-tolerance policy toward fraud in all its forms. We are committed to ensuring that risks of fraud are identified, managed and reduced through effective controls. We adhere to all applicable anti-fraud laws across all regions where we operate, ensuring compliance with both local and international standards. This commitment applies to all employees and business partners as well as any other individuals or entities acting on behalf of Dennemeyer.

## What is fraud?

Fraud is defined as any intentional act of dishonesty made for personal or corporate gain or to cause loss to another party. It includes, but is not limited to:

- Engaging in fraudulent business activities
- False representation (e.g., forgery or alteration of documents, inflating charges to clients)
- Omission of required information
- Manipulation of financial reporting
- Dishonest acquisition of services
- Deception relating to time recording or expenses
- Misuse or theft of assets or resources
- Collusion to conceal or facilitate fraudulent acts (e.g., allowing personal interests to affect professional decisions)

## Roles and responsibilities

- Employees must remain vigilant against the risk of fraud and are responsible for reporting any suspicion of fraudulent activity without delay.

- Managers are expected to promote awareness and foster a culture of integrity and transparency.
- Compliance and other relevant units are responsible for investigating suspected fraud and recommending corrective measures.

## Reporting suspected fraud

All suspicions of fraud must be reported immediately to a supervisor or the Compliance Department via the existing channels, such as the Whistleblowing Channel. Reports can be made anonymously and will be treated confidentially.

## Investigation and response

All allegations of fraud will be promptly and thoroughly investigated. If fraud is proven, Dennemeyer will take appropriate disciplinary action and may refer the matter to external authorities for legal action. Recovery of losses will be pursued where possible.

## Assurance and continuous improvement

Dennemeyer regularly reviews its control environment to strengthen its defenses against fraud. Internal audits, control assessments and employee training form part of our continuous improvement efforts in fraud risk management.

# Compliance

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Compliance with all Dennemeyer's principles is an essential element in our success. The Compliance Department, in conjunction with other departments, is responsible for ensuring these principles are applied throughout Dennemeyer.

As with any concerns that could potentially impact Dennemeyer, nothing is too small to report. By quickly reporting potential violations, you are helping Dennemeyer maintain its reputation and address potential problems before they could have a negative impact – financial, reputational or legal – on the company.

Dennemeyer is committed to maintaining a culture in which our employees can feel safe raising good faith concerns about potential violations. Dennemeyer will not tolerate any retaliation against an employee who raises an honest compliance concern. Our Compliance Department will treat any such concern seriously and keep the identity of the employee raising the concern confidential unless otherwise required by law.

The Compliance team can help explain and interpret this Code and provide guidance about how to conduct business on behalf of Dennemeyer in compliance with the law.

**In case of questions, advice, or doubt, please reach out to the [Compliance Department](#).**



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# Whistleblower channel & additional resources

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## Whistleblower channel

Denнемeyer offers a dedicated platform for anonymous and confidential reports related to misconduct, policy violations or other serious confidential matters.

The [Denнемeyer Whistleblowing Channel](#) empowers individuals to report misconduct anonymously and securely, without fear of retaliation.

Through the Whistleblowing Channel, you can submit information about reprehensible matters or report actions that are unethical, illegal (including conduct in violation of EU laws and regulations) or in violation of internal policies. All inquiries are treated confidentially and securely and will trigger an internal investigation of the reported matter.

## Supervisors and Managers

Are available to answer questions and are familiar with the Company guidelines that apply to the business activities in your organization.

## Human Resources

Can explain and answer questions about employment, benefits, and workplace issues.

## Treasury

Is available to answer questions about the Code or Company policies related to financial, company controls and accounting matters.

See Denнемeyer Q.wiki and Academy for information on training and published policies.



Become the first choice partner in IP globally.