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*Be courteous, treat everyone with dignity and respect, do your best at all times and always be dependable.*

- Family Pond



**POND**  
SECURITY

# CODE OF CONDUCT

Code of conduct  
Pond Security Service GmbH



## CONTACT INFORMATION

**Pond Security Service GmbH**

**Rueckinger Str. 12**

**63526 Erlensee**

**+ 49 (0) 6183 - 806 0**

**info@pond-security.com**

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## Gemeinsam.

Together.

Ensemble.

Insieme.

Вместе.

Împreună.

Juntos.

함께.

יחד.

اعم و ايوس.

Maζί.

Bir arada.

1

**QUALITY**

2

**INTEGRITY**

3

**INNOVATION**

4

**TRUST**

# INTRODUCTION

**This code describes the ethical standards by which Pond Security Service GmbH operates in its pursuit of excellence in security services. It reflects our core values of honesty, integrity, quality and innovation, and is designed to promote high standards in day-to-day service operations. It applies to all employees of the company.**



**Engin Atmaca**  
CEO



**Adis Muslimovic**  
CEO

We expect all employees, customers and business partners to be treated fairly and their legal rights and personal privacy to be respected. There must be no different treatment based on gender, ethnicity, disability, origin, religion, age or sexual identity that is not based on factual and objective grounds. As a company, we do not tolerate sexual harassment in the workplace, nor any related discrimination. Nor do we tolerate bullying. Signs of this include, in particular, defamation of an employee or his or her family, spreading rumors, threats, humiliation, insults, harassment, dishonorable or undignified treatment by superiors or colleagues, and deliberate withholding of information necessary for work. Those affected have a right to be heard by their superiors and to be taken seriously.

Any form of modern slavery or human trafficking in our operations or our supply chains will not be tolerated by our company. We are committed to diversity and tolerance in the workplace and demonstrate appreciation for all employees regardless of age, ethnicity and nationality, gender and gender identity, physical and mental ability, religion and belief, sexual orientation and social background.

# HUMAN RIGHTS



## ANTI-DISCRIMINATION AND HUMAN RIGHTS

Pond Security recognizes internationally applicable human rights and respects their content. We are against any form of violence and discrimination and do not tolerate any misconduct in this regard. We are committed to ensure anti-discrimination and respect for human rights is observed within our HR system and by all stakeholders.

Each of our applicants and employees is given equal opportunity regardless of gender, physical or mental limitations, origin, religious affiliation, sexual orientation, political views, union membership or age. In this context, we have already implemented measures such as awareness training, briefings and company reintegration.

## CHARTA OF DIVERSITY

Pond Security signed the Diversity Charta and is thus visibly committed to an appreciative and prejudice-free working environment. The Charta of Diversity is an initiative to promote diversity in companies and institutions. By signing the Charta of Diversity, we are sending a clear signal for diversity and tolerance in the world of work and signaling our appreciation of all employees regardless of age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation and social origin.



charta der vielfalt

UNTERZEICHNET

Our commitment to diversity enables us to adapt to social and economic changes such as globalization, demographic change and a shrinking workforce. By signing the Charta of Diversity, we are clearly positioning ourselves vis-à-vis our employees, our customers and our business partners.

## HUMAN TRAFFICKING AND FORCED LABOR

This company or its employees are prohibited from engaging in any form of human trafficking and Forced Labor. Human Trafficking and Forced Labor is defined as:

- Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- The recruitment, concealment, transportation, supply and transfer of persons for labor and services through the use of force, fraud, coercion for the purpose of servitude, peonage, financial dependency, slavery, forced labor and child labor.

Any activity that could be construed as meeting the above definition is strictly prohibited and such actions will have employment related consequences. Employees are encouraged to contact either the internal company complaint station (phone: 06183 / 806-169; email: [beschwerdestelle@pond-security.com](mailto:beschwerdestelle@pond-security.com); web: [complain.pond-security.com](http://complain.pond-security.com)), or the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org).

## HONORING NATIONAL LAWS

All employees and stakeholders must always comply with the laws, rules and regulations of the country in which they operate. This Code of Conduct provides the basis and must be followed in all of Pond's business activities, even if it is stricter than local legislation.

Local Pond facilities may adopt and implement policies that are more stringent or detailed than those set forth in the Code of Conduct. If local regulations are adopted, they apply in addition to the Code of Conduct.



# STAFF

## GOAL

The goal of Pond Security Service GmbH is to create and promote a productive and respectful environment at all times in which employees can work and advance. Our aim is to promote personal development to the greatest extent possible and to make optimum use of the talents and abilities of our employees.

Management welcomes the open and active exchange of ideas. Employees are promoted and/or compensated on the basis of their performance. Any discrimination or harassment based on origin, gender, age, religion, sexual orientation or ethnicity will not be tolerated.

## SALARY STRUCTURE

Pond Security Service GmbH offers its employees a transparent and adequate salary structure. Not least because of the difficult situation on the labor market, which is characterized by a shortage of skilled workers and the resulting fierce competition for high-performing employees, there is a need to offer interesting incentives to potential employees. Practically, in the specific context of the security services industry, this means that Pond Security often pays above-standard wages and, where possible, distributes other monetary benefits such as vacation and Christmas bonuses and performance-based bonuses to motivate its workforce to be fully engaged and committed and to encourage long-term employment.

As a member of the German Security Association (BDSW), Pond Security also actively contributes to ensuring that wages in particular adequately reflect the high demands placed on security personnel.

## CAREER MANAGEMENT

Instruction, education and advanced training courses pursue the goal of making the required knowledge accessible to employees and adapting information, once acquired, to the state of the industry.

We consider it very important to support our employees in their personal and professional development. We aim to address this important aspect through feedback discussions, career plans, specific training offers and measures to reduce staff turnover.

## CHANGE MANAGEMENT

The security industry in particular is subject to constant change in many areas, be it legal, technical, organizational or personnel. Only together can we adapt to this change and master the new challenges. This requires good communication at all levels, but also the willingness of everyone to change and improve.



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*Do conduct yourself in a dignified manner, being polite and courteous to everyone, regardless of origin, religion, appearance or gender.*

- Family Pond

## PERSONAL

Private relationships or connections should not and must not be mixed with official business and must not influence official decisions.

## EMPLOYEE BENEFITS

To ensure an attractive working environment, in addition to adequate pay, development opportunities and work-life balance, other measures such as employee discounts, employee gifts, fitness offers, health check-ups, award programs and team-building activities have been introduced.

Our aim is to achieve continuous improvement in this area and to retain our employees through attractive working conditions.

## HEALTH AND SAFETY / WORKING CONDITIONS

Pond Security Service GmbH believes that all employees\* have a right to safe and healthy working conditions and complies with all health and safety regulations in the areas in which it operates.

In addition the company supports measures to promote health and well-being. Pond Security is committed to avoiding any violation of basic human rights.

## SOCIAL DIALOGUE

Pond Security Service GmbH is committed to ensuring social dialogue and maintaining good communication with employee representatives and trade unions. We respect the right of all employees to form and join unions of their choice and to engage in collective bargaining. For this reason, Pond Security has a Staff Council that employees can contact with all concerns.

## PROTECTION OF COMPANY PROPERTY

Every employee of Pond Security Service GmbH is obligated to handle company property responsibly and to protect it from loss, damage or misuse. Company facilities or objects may not be used for private purposes without the consent of management.

## PUBLIC OFFICE

Participation in a public or non-profit institution, in associations or in public functions at municipal or supra-regional level as well as the exercise of honorary offices are generally welcomed by the company, provided that involvement or honorary office does not jeopardize the fulfillment of contractual duties and is compatible with the position in the company. In case of doubt, acceptance of such engagements should be coordinated with the management.

The conduct and outward appearance of employees must always be in accordance with the job description, the function and the reputation of the company.



# CORPORATE POLICY

## MANAGERS

Managers should be particularly aware that they act as role models within the company. They should pay particular attention to compliance with the Code of Conduct and pass on its contents. In our company, we are also committed to a working environment that strengthens and promotes women in management positions. We recognize the essential role that diversity plays in leadership and are actively committed to breaking down barriers that prevent women from taking on leadership roles. All employees are expected to treat women in leadership positions with the same respect and support that they give to male colleagues. Discrimination, harassment or any form of discrimination against women will not be tolerated.

## CULTURE OF IMPROVEMENT

Where people work, errors happen. Mistakes should always be reported so that they can be analyzed and the causes determined; this is the only way to develop corrective counter measures to reduce the risk of reoccurrence. Therefore, mistakes must not be covered up, concealed or glossed over. Critique on a constructive basis is not only desired, but should also be consciously demanded; no one should suffer disadvantages by pointing out/reporting mistakes or voicing constructive criticism.

## CUSTOMERS

Pond Security Service GmbH treats customers fairly, sincerely and responsibly. We work to understand the needs and requirements of our customers and strive to provide quality and efficient services at all times.

## VENDORS

Pond Security Service GmbH treats suppliers fairly, honestly and responsibly and has the objective to build relationships based on mutual trust.

## ERADICATE WHITE-COLLAR CRIME AND CORRUPTION

Pond Security Service GmbH is aware of the serious damage caused by white-collar crime, which threatens both the general public as well as its own company. Therefore, we actively oppose all forms of corruption and related crimes.

Corruption is strictly rejected by our company and is not tolerated in any conceivable way. Through appropriate organizational measures and personnel regulations, corruption and other white-collar criminal acts are addressed sustainably and, above all, preventively. In addition, Pond Security Service GmbH works to uncover corruption and related criminal acts to prosecute them without regard to the person.

Employees who are exposed to an attempted bribery must report this immediately to their supervisor and the Compliance Officer. Employees who are exposed to an attempted bribery must report this immediately to their supervisor and the Compliance Officer.

**1** Corruption damages the company and the reputation of its employees

**2** Corruption leads to significant business and economic damage

**3** Corruption is not a trivial offense, but a punishable offense

**4** Corruption can start with small favors

## AVOIDANCE OF CONFLICTS OF INTEREST, GIFTS AND GRATUITIES

### BASIC PRINCIPLES

Private and business interests must be strictly separated. Business connections or contacts may neither be used for one's own benefit or that of others, nor may they lead to a disadvantage for the company. In case of doubt, employees must disclose to their supervisors any risk or potential conflicts of interest. They must seek advice and assistance from the supervisor or the Compliance Officer. Every employee can also turn to the works council.

## CONFLICTS OF INTEREST DUE TO SECOND JOBS

Employees of Pond Security Service GmbH are obligated to report any additional employment to the management. The management may prohibit or revoke the approval of secondary employment if there are indications the secondary employment will impair fulfillment of duties under the employment contract and/or violate legal or labor law obligations. In order to exclude conflicts of interest, working for a competitor or another business partner is generally not permitted.

## CONFLICTS OF INTEREST DUE TO SHAREHOLDINGS

Participations in other companies in the direct business environment are only permitted with the explicit written approval of the management of Pond Security Service GmbH.

## DONATIONS AND SPONSORING

The Executive Management decides on the allocation of donations to charitable institutions. Business partners or companies associated with this company as well as political parties do not receive donations. Sponsorship is only permissible if it cannot influence the business actions and decisions of the recipient. recipient's business actions and decisions - there must not even be the appearance of such influence.

In particular, sponsorship may not be misused as an incentive for influencing sales and order decisions. The only consideration to which the sponsorship recipient may commit is the presentation of Pond Security Service GmbH in public. Agreements on other consideration are prohibited.

## CONDUCT TOWARDS AUTHORITIES AND PUBLIC OFFICIALS

Holders of political offices and representatives of authorities or public institutions (office holders) are obliged to act in the public interest. They may therefore neither directly nor indirectly accept gifts, benefits or other material or immaterial advantages. Even joint meals or repeated small gifts in the sense of „courtesies“ are punishable in the case of public officials and must therefore be refrained from without exception.

Only appropriate and occasional gifts that correspond with recognized social rules of courtesy and do not compromise respect for the office or political function are permissible (e.g. a bouquet of flowers or a bottle of wine on a birthday, on a service anniversary, on the occasion of leaving office).

## **GIFTS AND OTHER GRATUITIES**

Manufacturers and suppliers shall be selected solely on the basis of fair competition and evaluation of account the criteria of price, quality and suitability of their performance. Benefits to oneself or to third parties in the form of money, material assets, monetary benefits or other tangible or intangible advantages may neither be demanded nor accepted. Benefits also include, for example, invitations to events and trips, admission tickets, the free or reduced-price provision of items for use (e.g. clothing, vehicles, vacation homes) and discounts, provided that these offers are not directed at all employees or large sections of the workforce, e.g. at one location.

The „sponsoring“ of events for employees or within the workforce, e.g. Christmas or birthday parties, by business partners or outside third parties is not permitted. Gifts made or accepted for reasons of courtesy or custom must be socially appropriate. As a guideline, gifts and benefits with a value of up to 35.00 euros per business partner per year are considered socially appropriate. Notwithstanding this, attention must be paid to ensuring that it does not place the recipient in a conflict situation.

It must be ruled out that this could influence corporate decisions. In the case of higher values and in cases of doubt, the written consent of the supervisor(s) must be obtained and the Compliance Officer informed.

For reasons of self-protection, the greatest possible transparency must be ensured. Confidential gifts as well as multiple gifts within a short period of time suggest that they are inadmissible. Benefits received contrary to these guidelines must be returned to the donor or, if this is not possible or inappropriate due to the occasion or situation, handed over to the Compliance Officer. He shall decide in an appropriate manner on their whereabouts or use; as a rule, he shall donate them to a charitable purpose. This regulation also applies if there are doubts about the value of the gift.

## **BUSINESS LUNCHEAS AND INVITATIONS**

Business meals which, in terms of their occasion, nature, frequency and extent, constitute customary business practice, i.e. which serve legitimate business purposes, are permissible if an invitation is issued voluntarily and within a reasonable framework of normal cooperation. However, any impression of improper influence on business decisions must be avoided.

All employees are expected to show the necessary sensitivity in this respect. Invitations by business partners or service providers to other events (e.g. sporting or cultural events, in-house trade fairs, product information events, seminars, training courses, etc.) are only permissible if they are appropriate in terms of their nature and scope and, from an objective point of view, are customary in the business. They require the written approval of the supervisor in each individual case. Business trips or private travel associated with business trips may not be made at the expense of business partners or third parties. Such travel expenses are to be settled without exception in accordance with the applicable travel expense regulations.



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*Take pride in yourself, in who you are and what you do. Take pride in your organization, in who we are as a team and what we can achieve together. Take pride in your appearance; show everyone what you are made of.*

- Family Pond

# INFORMATION AND DATA PROTECTION



## INFORMATION SECURITY

Pond Security Service GmbH is committed to behaving in a responsible manner with respect to all information in its possession. Appropriate measures will be taken to protect proprietary or licensed information or other confidential or otherwise proprietary information of customers and other third parties.

Employees must maintain absolute confidentiality about all company and business secrets, both during the term of their employment and after termination. Any indications of suspected criminal acts or similarly serious irregularities must not be disclosed to the outside world, but must be reported to the responsible internal authorities, such as superiors or the Compliance Officer.

Whistleblowers do not have to fear any consequences if the disclosure of the trade secret is made in good faith „to uncover an illegal act or professional or other misconduct“ and this is suitable to protect the general public interest.

## DATA PROTECTION

The protection of confidential, secret and personal data of employees, customers and suppliers is a central concern. Pond Security Service GmbH collects, processes or uses data only insofar as this is necessary for defined, clear and legitimate purposes.

Compliance with applicable laws and regulations is a standard practice. All employees are obligated to know and comply with legal regulations on data protection as well as legal and company regulations on information security. At Pond Security Service GmbH, IT systems are regularly used and data processed in the course of everyday business.

Appropriate security measures, such as passwords and licensed software, are therefore indispensable to ensure the protection of intellectual property and personal data. In order to avoid serious damage to the company, all employees are instructed and encouraged to observe the IT security measures at all times. IT systems provided by the company may only be used for business activities and not for personal purposes.





# ENVIRONMENT AND SUSTAINABLE PROCUREMENT

The following guidelines refer to the most significant aspects that have an impact on the environment due to our corporate activities and contain our most important ideas and goals in order to meet the requirements of responsible environmental management.

## ENERGY MANAGEMENT & GREENHOUSE GAS EMISSIONS

Our business activities have an impact on the environment and climate. Our activities generate greenhouse gases, which are caused, for example, by the energy requirements of our business buildings, our vehicle fleet, the mobility of our employees or business trips.

Therefore, Pond Security Service GmbH is committed to,

- Continuously reduce the energy consumption of our office site and the resulting greenhouse gas emissions, such as through the use of electric vehicles, conversion of lighting to LED and the installation of a solar power system.
- Support the mindful use and consumption of resources and fuels, as well as
- Promote environmentally conscious behavior among our employees and other key stakeholders through information and training

## WASTE MANAGEMENT

Our office and administrative activities result in the generation of waste. In addition, the Pond Academy provides training and instruction on the transport of hazardous materials, so we also have a high level of responsibility in this area.

Therefore, Pond Security Service GmbH is committed

- to continuously reduce the amount of waste generated at our site,
- to guarantee the conscious use of office materials,
- instructing our employees on the subject of waste management, and
- to provide responsible and up-to-date information on the transport of hazardous goods

## SUSTAINABLE PROCUREMENT

Our purchasing activities are limited to the areas of occupational safety clothing, fuel and gasoline, and office supplies. We continuously strive to reduce negative environmental impacts of our supply chain as well as to deal responsibly with social aspects.



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*Do the right thing – even when no one is watching.  
This is a very important value because it creates  
the groundwork for trust.*

- Family Pond

# COMPLIANCE

## COMPLIANCE AND CONSEQUENCES FOR VIOLATIONS

Each individual employee is responsible for complying with the provisions of this Code of Conduct in his or her daily work.

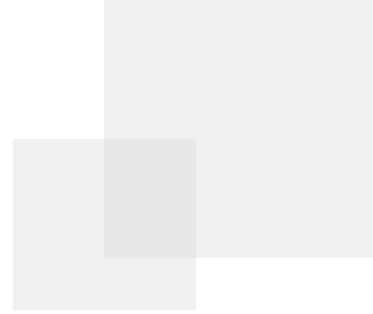
Managers have a special obligation to lead by example in complying with the principles and to set an example of integrity and loyalty through their own conduct. In particular, they must ensure that this Code of Conduct is implemented and brought to life in day-to-day business. Any indications of deviations are to be taken seriously. The appropriate contact persons are available to our partners for this purpose.

Anyone who violates this Code of Conduct must expect sanctions under labor law, up to and including termination/dismissal, irrespective of the person. If the company suffers damage as a result of violations, it will assert claims for damages or recourse against the person(s) responsible to the extent permitted by law. In the event of suspected criminal acts, the company will principally file criminal charges.

## CONTACT PERSON FOR QUESTIONS

In the event of questions regarding the Code of Conduct or uncertainties regarding proper behavior, discussion should be sought with the direct supervisor(s), the next higher-level supervisor(s). In addition, any employee can also contact our compliance officers ([beschwerdestelle@pond-security.com](mailto:beschwerdestelle@pond-security.com)) at no cost to him or her.

All team members are encouraged to promptly report violations of the policies set forth in this document by emailing [qs@pond-security.com](mailto:qs@pond-security.com). Pond Security is committed to providing whistleblowers of violations with appropriate protection from retaliation. If a violation is confirmed, it may be addressed through sanctions and may result in termination of employment.



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