

A close-up photograph of two men shaking hands. The man on the left is smiling broadly, wearing glasses and a light blue shirt. The man on the right is partially visible, also wearing a light blue shirt. The background is blurred, showing a warm, circular light source. The text 'eds group' is in white, and 'Anti-Corruption program' is in blue.

eds group  
**Anti-Corruption**  
program

# 1 Core principles

This document is binding for all companies within the EDS Group GmbH. It contains rules, procedures and principles that are an integral part of our common strategy and corporate culture.

The aim is to ensure a consistent approach, transparency and compliance with the laws, standards and values we share as a group.

Each company in the Group is obliged to comply with the provisions of this document and to ensure that they are implemented in its operations. In the event of any questions or uncertainties regarding the content of the document, the responsible personnel are required to contact the relevant Group department for support or clarification.

Adherence to this document is a key element in ensuring the integrity and successful collaboration within our Group.

The EDS Group strive to create an environment where all forms of corrupt behaviour are rejected, ethical principles are upheld, and the protection of the Companies' assets is emphasized. The EDS Group's anti-corruption program is the foundation of this effort. The system of internal controls, mechanisms, and processes established within the anti-corruption program of EDS Group aims to create effective defence against corrupt behaviour through the following principles:

- **corrupt behaviour** in all forms is **prohibited**, and the EDS Group do not tolerate it,
- the EDS Group ensure compliance with obligations arising from anti-corruption legislation and other regulations affecting the Companies' activities,
- the EDS Group ensure **compliance with internal regulations** and codes of conduct,
- the EDS Group manage and assess corruption risks and plan subsequent steps based on the **results of corruption risk** assessments,
- continuous evaluation of the **achievement of goals in the fight against corruption** takes place within the EDS Group, as well as testing the effectiveness of established control measures, mechanisms, and processes,
- the EDS Group promote and actively create a **corporate culture based on integrity and personal responsibility** for all individuals collaborating with the Companies and provide support to all relevant parties,
- representatives of the EDS Group **actively communicate** and advocate the EDS Group's anti-corruption program internally and externally.



For the purposes of this anti-corruption program, corruption is defined as behaviour that abuses position or function for personal gain in a manner contrary to law and ethical rules. EDS Group has decided to adopt an anti-corruption program aimed at:

- a) minimizing corruption risks in the business activities of EDS Group,
- b) proactively addressing corruption risks within the company while providing products and services to the company.

## The anti-corruption program of EDS Group consists of:

- 1) code of ethics for employees of EDS Group
- 2) ethical email where anyone can report incidents of corrupt or unethical behavior related to EDS Group,
- 3) a set of processes and measures for assessing corruption risks according to the activities of the company, groups of employees, or differences in markets where EDS Group operate.

The anti-corruption program of EDS Group is available not only to employees but is accessible and usable by the public, including suppliers, dealers, customers, media, and public officials and in all markets where EDS Group operates.

## The anti-corruption program is overseen by the company's statutory body

### Members of the statutory body

- set goals for the anti-corruption program and oversee its proper setup and functioning
- actively promote anti-corruption attitudes towards employees of the Companies and third parties
- conduct regular reviews of the Groups' anti-corruption management system and take measures to improve and develop it.

## Code of ethics of EDS Group and members of the statutory body

One of the fundamental tools of the anti-corruption program of the EDS Group is the code of ethics for employees of the company, who are obliged to adhere to it. However, some of its provisions also concern partners of EDS Group, such as the company's commercial representatives.

### The code of ethics includes:

- prohibition of corrupt behaviour,
- prohibition of actions in conflict of interest,
- reporting incidents of corrupt or unethical behaviour,
- special duties in the field of trade when implementing the anti-corruption program,
- principles for sponsoring or donating to political parties and movements,
- commitment to promoting the anti-corruption program beyond EDS Group

## 2 Objectives

- adherence to and promotion of a zero-tolerance approach to corrupt behaviour by all employees and third parties,
- minimize the motivation of all employees and representatives of the Companies of the EDS Group for corrupt behaviour,
- increase awareness of the consequences of uncovered corrupt behaviour (investigations, disciplinary, civil, and administrative penalties for perpetrators of corrupt behaviour and their accomplices),
- provide information and instructions on how the EDS Group perceive and address issues of corrupt behaviour to all employees and third parties.

**The achievement of the objectives of the Group's anti-corruption policy is ensured by management documents and procedures in the following areas:**

### Prevention

- Creation and strengthening of an anti-corruption environment
- Identification and assessment of corruption risks
- Verification and management of employees and third parties

### Detection

- Investigation of corrupt behavior
- Financial and non-financial controls

### Response

- Adoption of corrective measures
- Monitoring, testing, and evaluation of the anti-corruption program

## 3 Rules

### Sponsorship Rules

**Independence of Sponsorship:** The sponsorship by the EDS Group must not be tied to the pursuit of any business opportunities, whether in the public or private sector. Similarly, sponsorship must not lead to conflicts of interest, such as sponsoring projects of employees of the EDS Group and their family members. Sponsorship activities by the EDS Group are usually disclosed through press releases and information on their websites.

### Support for Political Parties and Movements

**Transparent Support:** Support for political parties and movements by the the EDS Group must be transparent and must never be tied to any business opportunities in the public sector. Group's companies strictly adhere to all legal obligations regarding potential support for political parties.

### Gifts and Hospitality

**Restrictions on Gifts:** Providing partners with excessively luxurious accommodations, unethical and expensive entertainment services, or gifts of clearly disproportionate value is prohibited. Such actions are considered potential corruption concerning partners of the EDS Group. Similarly, managers and employees of both companies are prohibited from accepting such obviously disproportionate services or luxury gifts. In case such behavior is observed from a partner, EDS Group employees are obligated to report this to their superiors.

### Facilitation Payments

**Prohibition of Payments:** EDS Group is strictly prohibited from providing facilitation payments. Business commissions for partners in the private sector, such as those based on dealership agreements, licensing agreements, or agency agreements, do not fall within the definition of facilitation payments.

# 3

## Violations

Violations of anti-corruption conduct rules are taken very seriously, and appropriate consequences are drawn from each such violation. If there is reasonable suspicion of a violation of anti-corruption conduct rules, depending on the severity, relevant authorities in criminal proceedings, regulatory authorities, or other public authorities will be informed. Furthermore, civil proceedings may be initiated to seek compensation for caused damages.

**For senior executives, leading employees, and other employees of the EDS Group,** violations of anti-corruption conduct rules may result in internal investigations and disciplinary consequences, including dismissal or revocation. Violations of anti-corruption conduct rules may also result in civil liability (especially for damages caused) or public liability (for criminal offenses or misdemeanours). Possible sanctions for individuals include warnings, bans on activities, fines, or imprisonment.

**For third parties,** violations of anti-corruption conduct rules may result in immediate termination of contractual cooperation. Violations of anti-corruption conduct rules may also result in civil liability (especially for damages caused) or public liability (for criminal offenses or misdemeanours) of specific individuals or legal entities. Possible sanctions for individuals include warnings, bans on activities, fines, or imprisonment, while possible sanctions for legal entities include bans on activities, fines, bans on fulfilling public contracts or participating in public tenders, bans on accepting grants and subsidies, or publication of judgments/decisions regarding offenses.

If you suspect corrupt behaviour, you can contact us through our confidential mailbox: <https://www.edsgroup.de/en/contact.html>.





eds group

Euro-Druckservice GmbH  
Medienstraße 5b  
94036 Passau  
Germany

+49 (0) 851 851 600-0  
[office@edsgroup.de](mailto:office@edsgroup.de)