



## CORPORATE COMPLIANCE

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**Comprehensive, well managed and transparent corporate compliance is an essential. With the help of a healthy culture and our compliance management, Interroll can ensure that both management and employees behave in accordance with the rules. Along with laws and regulations, the Interroll Code of Conduct is the benchmark for ethically required behavior.**

Interroll's aim is to establish and manage its corporate compliance to fulfill legal, regulatory, and contractual obligations as well as our voluntary commitments to society. We must comply with all respective laws

and regulations in order to ensure that our business activities on all levels and by all entities are conducted in a socially, ecologically and economically responsible manner. Interroll's reputation and the confidence placed in it by our business partners, shareholders and the public substantially depend on all employees behaving responsibly. All levels of management must demonstrate a high degree of ethical competence and leadership throughout the Interroll Group. This reflects our corporate culture, which is oriented toward shared values and adheres to compliance guidelines.

Sant'Antonino, March 16, 2023

A handwritten signature in black ink, appearing to read 'P. Zumbühl'.

**Paul Zumbühl**  
*Chairman of the Board of Directors*

A handwritten signature in black ink, appearing to read 'Ingo Steinkrüger'.

**Ingo Steinkrüger**  
*Chief Executive Officer*

**Scope**

With this policy we establish our commitment to Corporate Compliance with establishing a management system to ensure that all legal, regulatory or voluntary obligations are fulfilled.

**Objectives,  
Targets,  
KPIs**

Our Objectives and Targets are defined on a global level for the Interroll Group from the baseline 2022 and have to be accomplished, if legal or contractual obligations do not oblige to another date and unless not stated otherwise, by 2030.

For each Interroll entity, specific and more precise strategy plans will be developed to accomplish the objectives based on their individual baseline.

Objectives	Targets	KPIs
<b>We have strong business ethics defined and implemented in the organization.</b>	All employees instructed in and signed Code of Conduct by 2023	% of personnel instructed in and signed Code of Conduct
<b>We are in full compliance with laws and regulations, internal policies and directives on group and entity level.</b>	No violations of laws and regulations, internal policies and directives on group and entity level	Number of violations
<b>We have a zero tolerance policy regarding bribery, corruption, and fraud.</b>	No incidents of bribery, corruption, and fraud	Number of known/report-ed incidents
<b>We maintain an efficient and effective system for whistleblowing.</b>	All alleged cases reported in EQS integrity line	% Ratio of cases reported in EQS Integrity Line
<b>We manage Data Protection well on group and entity level.</b>	All entities with Data Protection management system in place	% Share of entities with Data Protection in place
<b>We ensure that policies/directives are known, trained and signed by employees.</b>	All policies / directives are known, trained, and signed by employees.	% of signed policies/directives



### Our activities for Corporate Compliance support the SDGs:



### As signatory of the UN Global Compact with this policy we respect following principles:

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| <b>Principle 1:</b>  | Businesses should support and respect the protection of internationally proclaimed human rights; and                     |
| <b>Principle 2:</b>  | make sure that they are not complicit in human rights abuses.  |
| <b>Principle 3:</b>  | Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; |
| <b>Principle 4:</b>  | the elimination of all forms of forced and compulsory labor;   |
| <b>Principle 5:</b>  | the effective abolition of child labor; and  |
| <b>Principle 6:</b>  | the elimination of discrimination in respect of employment and occupation  |
| <b>Principle 7:</b>  | Businesses should support a precautionary approach to environmental challenges;  |
| <b>Principle 8:</b>  | undertake initiatives to promote greater environmental responsibility; and   |
| <b>Principle 9:</b>  | encourage the development and diffusion of environmentally friendly technologies.  |
| <b>Principle 10:</b> | Businesses should work against corruption in all its forms, including extortion and bribery.                             |



**Governance**

Within the organizational structure of Interroll the Corporate Compliance is assigned to the Chief Financial Officer who has the overall responsibility for its strategic implementation and performance.

The operational implementation is delegated to the Director Corporate Sustainability & Compliance and the local Managing Director of the legal entity.

The local Managing Director is required to nominate a local Compliance Officer with approval of the Director Corporate Sustainability & Compliance. As matter of principal and if not otherwise stipulated the Head of Finance/Controlling of the legal entity acts as local Compliance Officer.

**Compliance**

Compliance to this policy and local legal obligations regarding Corporate Compliance are regularly monitored by the Group Management, the Interroll Corporate Sustainability & Compliance Organization and randomly checked during Compliance Audits.

**Reporting**

The status and measures taken to accomplish the Objectives and Targets for Corporate Compliance as well as the consolidated performance of the KPIs is annually reported and published in the Interroll Sustainability Report and Corporate Governance Report.

