

19.12.2023

Anti-Bribery and Corruption Statement.

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1. Introduction

peopleForecast GmbH (“HRForecast”) is committed to conducting business ethically in every country where we operate, as well as complying with all applicable laws. This includes compliance with anti-bribery and anti-corruption (“ABC”) laws.

The purpose of this document is to set out HRForecast’s stance in relation to bribery and corruption. This statement applies to all team-members, agents, sales reps, associated third parties and contractors of HRForecast within all regions, areas, and functions. We expect our third parties and suppliers to adhere to this statement.

2. Definitions

Bribery - the offer of a commercial, contractual, regulatory, business or personal advantage intended to induce or reward the recipient for performing their job improperly.

Corruption - the abuse of an entrusted power for private gain.

Facilitation payment - any facilitating payment or expediting payment to a foreign official, political party, or party official, the purpose of which is to expedite or to secure the performance of a routine governmental action.

Kickback – any payment of any portion of a contract made to employees of another contracting party or the utilization of other techniques, such as subcontracts, purchase orders or consulting agreements, to channel payment to public officials, political parties,

party officials or political candidates, to employees of another contracting party, or their relatives or business associates.

3. HRForecast's policy on bribery and corruption

HRForecast has a zero-tolerance policy towards bribery and corruption.

HRForecast staff and others working on our behalf must not offer, promise or give a bribe to anyone, and must not request, agree to accept, or take a bribe from anyone.

HRForecast has in place measures to maintain its high ethical standards and protect its reputation against any allegations of bribery and corruption. It is the HRForecast's policy to compete fairly. We want to win business because of the quality and competitiveness of our products and services. We will not attempt to win on any other basis. We seek to positively influence others wherever practical by setting an example and openly refusing to undertake or support bribery as a way of doing business anywhere in the world.

Bribery is a crime in most countries where HR Forecast operates, and penalties can be severe, including prison sentences and large financial penalties. There are several anti-bribery and corruption laws globally, which HRForecast and those providing services on its behalf may need to comply with. Existing laws do not only make paying or taking a bribe illegal, i.e. the person who pays or takes a bribe has committed a crime, but often also hold companies liable for failing to prevent bribery by those working on its behalf, even indirectly, unless the company can prove it had adequate procedures in place to prevent bribery.

A bribe could involve:

- The direct or indirect promise, offer, authorisation, or provision of anything of value.
- The offer or receipt of any kickback, loan, fee, commission, reward, or other advantage.
- The giving of contributions or donations designed or stipulated to influence the recipient to act in the giver's favour.

The purpose of a bribe is often to obtain, retain or "facilitate" business, where the person receiving the bribe is, or may be, in a position to provide that kind of business advantage to the party offering the bribe. This may involve sales initiatives, such as tendering and contracting; or it may simply involve the handling of administrative tasks such as licences, customs, taxes or import/export matters. It does not matter whether the act of bribery is committed before or after the tendering of a contract or the completion of an administrative task.

The party offering or receiving a bribe might be:

- An employee, officer, or director.
- Any person acting on behalf of HRForecast (e.g., third party suppliers or agents).
- Individuals and organisations representing HRForecast that authorise someone else to conduct these acts.

Where do bribery and corruption risks typically arise?

This section deals with some specific situations that may present concern about the potential for bribery or corruption.

Use of agents and third parties

Because the actions of an agent, or third party acting on HRForecast's behalf, can expose HRForecast to liability under ABC laws, a level of due diligence appropriate to the market

may be undertaken prior to the appointment of an agent or third party, and at renewal of any agreement with an agent or third party. Particular care will be taken to understand any connection to a government official. It is the third party's responsibility to fully declare any such connection or any other relevant factors to HRForecast. HRForecast may require that agreements with agents and third parties include provisions regarding compliance with ABC laws.

Hospitality and entertainment

Bona fide hospitality and promotional or other business expenditure, which seeks to promote our brand, to better present products and services, or to establish cordial relations, is recognised as an established and important part of doing business.

Hospitality, entertainment, or other business expenses provided to business partners and customers for these purposes are permitted, if they are reasonable and proportionate, and are not intended to influence the outcome of any business transaction. If you have any queries, please discuss these with your HRForecast contact or email compliance@hrforecast.de

Hospitality, entertainment, or other similar expenses are not permitted if:

- It might influence the outcome of a business transaction, whatever the value of the expense, or a reasonable individual could interpret it that way.
- It is for the purpose of facilitating or expediting any decision to award new business, to renew existing business or to take any other action.
- It is given for personal benefit, friendship, personal acquaintances, or family purposes.

Giving and receiving gifts

In many countries where HRForecast does business there are generally accepted customs regarding the exchange of business gifts to strengthen business relationships.

HRForecast generally permits the giving and receiving of business gifts of 'Nominal Value' that are customary business courtesies and are reasonable in value and frequency; for HRForecast staff this may mean prior approval from the HRForecast's designated ABC manager.

The giving or receiving of gifts (or otherwise personal preferential treatment) by HRForecast staff or third parties acting on our behalf must never:

- Be used to obligate, or appear to obligate, the recipient.
- Be of cash, cash vouchers, certificates with a set negotiable value, or other cash equivalents.
- Be sought or requested from any person or organisation.

Facilitation payments

Facilitation payments are illegal in many countries and are prohibited by HRForecast policy. No HRForecast employee, agent or third party acting on HRForecast's behalf may willingly offer to make, or make, a facilitation payment.

Payments to facilitate tax evasion

HRForecast will not facilitate the evasion of tax by a customer, supplier or other third party, including government officials and contractors, by making payments to offshore bank accounts, or by other means, which have no commercial basis or could be construed by tax authorities to be made to facilitate tax evasion by the recipient.

4. Reporting

If you are aware of any HRForecast related non-compliance with this statement or applicable ABC Laws and Regulations you can report it to compliance@hrforecast.de.

HRForecast staff should follow our internal whistleblowing policy.

5. Management statement

The HRForecast management hereby validates this policy and all its contents.

Bremen, 19.12.2023



Florian Fleischmann

CEO

Munich, 19.12.2023



Christian Vetter

CEO