



## Code of Conduct





## Foreword

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### To our Great People

**Since our founding in 1997, HEG has enjoyed a strong reputation for honesty and integrity. We all make decisions that affect one another, our customers and suppliers. Therefore any action affect always the entire company. How we choose to act is very important; it can expose us to considerable risk or it can enhance the trust of those who we work with and rely on us.**

Our business is built on our exceptional reputation. Today, HEG is the largest privately owned hosting company in Europe, furthermore it is the largest domain registrar in the UK and one of the leading managed hosting providers in Germany. We are the leading hosting provider for business customers seeking high quality service combined with excellent price and performance. Our success is closely related to our reputation, meaning it is up to us all to act in ways that protect and enhance that reputation.

Our Code of Conduct sets the expectation to our commitment to integrity and high ethical standards in all that we do at HEG. The Code of Conduct sets out the basic rules and procedures that we should all follow whilst working at HEG and explains how our values should guide us in our decision-making. All insights shared will help us to continue to move in the right direction and will offer us support when we are faced with challenges.

As we embrace new challenges and increase our presence in rapidly changing markets, one thing that shall never change is our commitment to our values and our ethical standards. Our core values and standards form the foundation of our culture, wherever we may be.

This pledge will continue to differentiate us from our competitors, unite our brands and continue to fulfil the increasing demands on us all. In such a competitive environment, we will sometimes encounter situations that test our judgment and integrity. Our Code of Conduct will help you to make the right decisions. But if you should you ever find yourself in a difficult position or find yourself questioning whether a situation is consistent with our values, the Code is there to help you reach those who are ready to offer assistance.

I encourage all employees to read and understand our values, because I expect from all of you that you uphold them. If you have any questions or concerns, please contact your line manager or a member of the COMPLIANCE COMMITTEE, or of course direct your concerns to me personally.

Our people are our greatest strength. With your help, I am confident that HEG will continue to command the trust that our customers, suppliers, shareholders and employees have in us.

Thank you for your continued support.

**Patrick Pulvermüller**  
Group CEO

## Our Vision, Mission and Values

The intrinsic values we believe in, the framework by which we make decisions, hire, evaluate and promote people is central to our business culture.

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### Our Vision

It is nothing less than to web enable businesses like no other. We want to be the first choice for companies looking to make the most of the web.

### Our Mission

We listen to our customers, solve their problems and deliver the best possible support.

### Our Values

- ✓ **Helpful**  
If we can, we do.
- ✓ **Open**  
We are honest and transparent with each other and our customers.
- ✓ **We talk**  
We prefer talking to typing.
- ✓ **We can**  
We embrace new ideas and act on them.
- ✓ **Excellence**  
Good isn't enough. The best is better for both, our customers and our company.

# Our Code of Conduct

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**At HEG, our vision is to web enable businesses like no other. We want to be the first choice for companies looking to make the most of the web.**

**We are also committed to conducting business fairly and honestly. This means each individual must always uphold decent ethical standards in the way that they work. We must all contribute towards delivering on our vision.**

## What is the Code of Conduct?

In general, a Code of Conduct sets out the way in which each individual can contribute towards the success of a company. Within HEG, it will guide us to comply with our values and our culture to ensure that we are honest and transparent with our customers, colleagues and third parties at all times.

Our code clearly demonstrates the behaviour that is required from employees and all organisations and individuals that we partner with. It states how we comply with relevant legislation and by applying such standards, we can work as a team to achieve an ethical approach in all aspects of our work.

## What is Compliance?

Compliance is an international business term that means acting in accordance with the relevant domestic and international laws, standards and principles. This also includes all company policies of HEG.

## Consequences of Non-Compliance

Our values are extremely important to our business. A sensible application of our Code of Conduct will help

us to achieve the highest standard in our working environment. This will further support us in making better decisions on a daily basis.

It is essential that all external and internal parties comply with the Code of Conduct. Noncompliance with the required behaviours will be investigated and employees may be subject to appropriate disciplinary measures. Any third parties, agents or representatives that, as required, do not comply with our Code may be subject to appropriate sanctions in accordance with the applicable laws or contractual provisions.

Each one of us must ensure that we behave in an ethical manner, understand and comply with our Code and raise any concerns regarding any potential violations.

## Our customers

We listen to our customers, solve their problems, and deliver the best possible support.

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**We value our customers, and as such our mission is to deliver the best possible support. We do this by listening to our customers; solving their problems through honest and transparent communication and by ensuring that our customers are our central focus. We continually strive to improve our relationships with new and existing customers and aim for excellence in our approach.**

### What Our Customers Can Expect From Us?

In any dealings with HEG, our customers can expect our approach to reflect the following values:

#### Helpful

If we can, we do. Our culture encourages us to help colleagues and customers whenever we can.

#### Open

In all aspects of our work, we are honest and transparent with each other and our customers. We always ensure that we deal with customers, colleagues and suppliers openly.

#### We talk

We prefer talking to typing. We encourage a culture where people prefer to pick up the phone and speak directly. We believe that when too many emails are sent, the risk of misinterpretation by either the sender or receiver is too high. Talking allows us to convey a more nuanced meaning.

#### We can

We embrace new ideas and act on them. We are receptive to fresh ideas and are constantly looking for suggestions on how to improve, no matter where they come from. We take all our customers' views on board and strive to incorporate them into our business aims.

#### Excellence

Good is simply not good enough. At HEG, we are proud of our place at the forefront of the hosting industry. The best is better for both our customers and us.

We are never satisfied with the way things are, or how they are done, just because 'that's the way it has always been done'. We never doubt our ability and never underestimate our capacities for affecting change. We do not stray from our goals.

## Our Products and Services

To web enable businesses like no other.

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**This customer commitment is reflected in the development of our highly reliable products. Our vision is to web enable businesses like no other and we strive to be the first choice for those looking to make the most of the web.**

### Products

We listen to our customers to gain a better understanding of their needs and develop products, which solve their problems. We provide different channels for our customers to contact us and we focus on solving their problems. We constantly seek improvements to our products, wherever necessary, - all in order to address our customers' issues.

### Practice

One of our values is to continually improve everything that we do. To deliver upon this vision, we must never be satisfied with how we do things, and must always look closely at how we can do things better. Evolving our business in order to stay ahead is key to this.

### Planning

We focus on the future and strive to anticipate the changes that it brings. The Internet economy moves at a high pace – so we must always think about the ever-changing needs of our customers and the products that will satisfy these needs.

## Employment Principles

Diversity, non-discrimination and equal opportunities

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**At HEG, our employees are at the core of what we do and as such we strive to find and motivate the very best people. To be the best we need to build the strongest team for the long term. That means getting the best people into our business and inspiring them to stay. We recognise our people as our most important asset and we ensure that we follow a fair and consistent recruitment process. The ethos of teamwork is of paramount importance to us.**

The way in which we conduct our employment and recruitment is in accordance with the following core values:

### Non-discrimination

We will never discriminate based on race, colour, religion, gender, sexual orientation, disability or any other factor governed by law. We act fairly when hiring any individual or contracting with suppliers and challenge any discriminatory behaviour in the workplace. Any decisions related to employment matters are based purely on merit.

### Diversity

We believe diversity is a great aspect of our business and our hiring practice implements this value. We aim to ensure that there is equal opportunity for all regardless of gender or any other characteristics. We recognise and celebrate the importance of diversity in our workplace so we are as diverse as the customers we serve.

### Equal opportunities

We are committed to Equal Opportunities in employment and we all share responsibility for treating each other with mutual respect. We strive to provide an inclusive work environment in which different ideas, perspectives and beliefs are respected and encouraged.

We must ensure that these standards are maintained throughout HEG, by anyone at any time.

We want to ensure that every employee feels comfortable within the workplace and we must all show respect for others. If an individual has any concerns in relation to the way they have been treated, we would encourage raising this with the relevant personnel. In the first instance, it would be best to speak to a line manager or consult your local HR Department.

# Individual conduct

Honesty, integrity and fairness

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**Each individual within HEG will act with honesty, integrity and fairness in all dealings. We do not tolerate any forms of bribery or improper offers or payments to or from employees. In addition, all individuals shall comply with applicable domestic and international laws, including those in relation to anti-corruption.**

## We do not tolerate harassment or bullying

As part of our commitment to having a respectful and inclusive work environment at HEG, we do not allow harassment or bullying. We consider harassment to include language or conduct, which may be derogatory, intimidating or offensive to others. At HEG, we treat each other, vendors and visitors to our premises with respect.

## We do not tolerate substance abuse

Taking substances poses a threat to all individuals in a workplace. For the protection of all, it is imperative that the workplace be free from substance abuse, including the use or possession of illegal or illicit drugs or the excessive consumption of alcohol. We do not tolerate the use, possession, distribution, promotion or sale of any substances whilst on our premises.

**However, we would encourage anyone with such a problem to speak to a line manager, the HR Department or a COMPLIANCE COMMITTEE member.** The use of these services will not jeopardise employment, provided that the individual maintains an acceptable level of performance and conduct.

## We will never offer or accept any form of bribe

Accepting gifts from a business contact, such as a customer, a supplier or a colleague will have the effect of clouding judgement when making decisions or may give the impression that one is buying favourable treatment. As we are all aware, we operate in countries that have bribery and other anticorruption laws. Those laws are designed to prevent companies

and individuals from gaining an unfair advantage and from undermining the rule of law.

We must never accept bribes, and must not participate in, or facilitate corrupt activities of any kind. This prohibition on offering or paying bribes also applies to third parties acting on HEG's behalf, such as contractors or consultants. We must never engage a third party who we believe may attempt to offer a bribe to conduct company business.

Giving and receiving gifts, meals, entertainment and travel may create a real or perceived conflict of interest or a situation where those expenses could be viewed as a bribe under applicable laws and international standards. Obtain the required approvals before providing or accepting anything if these are above our standard limits. These limits are stated in our internal company policies.

However, if you are unsure about what steps to take, we would encourage speaking to a line manager, the HR Department or a COMPLIANCE COMMITTEE member.

## We seek to avoid conflicts of interest

Conflicts of interest can arise and we seek to ensure that these do not have an impact on business operations. Employees are expected to use their judgment and always operate in the best interest of HEG. A conflict may arise when an employee's personal interest's conflict with that of HEG. This can include benefit to a family member or a relationship with a colleague. Employees should attempt to avoid conflicts and notify the COMPLIANCE COMMITTEE if they think they are or may be in breach.

We are relatively strict towards this issue as we know it not only places the individuals concerned in a compromising situation, but also their colleagues, managers and team-members. In addition, a conflict could also arise where an individual has a personal interest in one of HEG's suppliers or partners. In all cases, the individual concerned should act in the best interests of the business and report all conflicts to the HR Department.

## Individual conduct *continued*

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We are accountable and reliable to ensure the appropriate use of information, whilst exercising diligence, always in a humble way.

Our financial and other business records shape the business decisions we make.

We are responsible for ensuring that our books and records are full, fair, accurate, timely, and understandable reflections of our operations and business activities. Any records required by our jobs, such as invoices, expense reports or time cards must be accurate and complete.

If questions arise, we should ask a superior manager or HR manager for assistance. We do not support or condone preparing false records under any circumstances.

We employ chartered accountants and various external auditors to ensure that the way we conduct business and keep records is consistent with relevant accounting standards. We must cooperate with them and ensure that anyone acting under our direction acts in the same way too.

# Corporate Social and Environmental Responsibility

We are committed to sustainable business practices and environmental protection

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**HEG is committed to sustainable business practices and environmental protection. Sustainability is a core value of our corporate culture; we continue to evolve since our founding in 1997. We live up to the responsibility that we have to our customers, employees, the government and the wider social community. We aim to align our corporate, social and environmental responsibilities with our business strategies and operations.**

In order to fulfil this, we make careful use of finite resources; engage in activities such as recycling within the workplace, improve our carbon efficiency and energy efficiency steadily. We support renewable energy usage and use postal services that are climate-neutral.

We consider the environment and society when making decisions regarding our business and comply with all relevant laws and regulations. We are committed to improve our energy efficiency and effectiveness. In particular our power usage effectiveness (PUE) will be better than market average.

A number of environmental laws, standards, requirements and policies apply to our international business operations, practices and services. We appreciate the importance of our role in society and ensure that our values are reflected in our relationships with government and local communities. We are committed to keep and improve our excellent customers' & employees' satisfaction rates: The foundation of trust in our brand position.

We have a daily responsibility to understand and follow these requirements, including: Conserving energy, water, noble earths and other natural resources, managing materials and wastes properly,

and complying with environmental permits and health and safety requirements.

We expect our suppliers and partners to comply also with all applicable environmental, health and safety laws and standards in their operations.

HEG intends to be a European leader in encouraging education from an early age and enhancing our activity and presence in the communities in which we do business.

We do this by challenging others and ourselves to continuously improve, inspire, and strengthen our communities, touching lives of these people with our services every day.

HEG supports work-life-balance improvements for employees in various ways. We empower our employees' well being with health-care-programs during work and after.

HEG is also committed to increasing staff diversity across our collective Group. We also have targets to increase the current proportion of women in management; our aspiration is to be better than market average.

HEG has a long-standing, highly respected reputation as a responsible corporate citizen. For us, corporate responsibility means achieving business success in ways that demonstrate respect for people and the environment. We uphold the values and high standards of ethics expressed in our policies.

HEG has established an external communication policy, which should be adhered to in order to ensure that we have regulated an appropriate external communications.

## Compliance with the law

We ensure compliance with all applicable laws and regulations

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**We recognise that our industry is global and our activities are governed by our knowledge of the international and local laws as well as the applicable standards and principles.**

### Competition Laws

We are committed to free enterprise and fair competition and as such we should conduct business solely on the basis of merit and open competition. We will hire suppliers, agents or other intermediaries only by careful and fair assessment and avoid any conduct, which violates applicable laws.

We are all required to protect confidential information regarding HEG and should never seek, accept or discuss confidential information with competitors. We will also never encourage customers, suppliers or former employees of competitors to provide information that is confidential.

### Data Protection Laws

In accordance with data protection regulations, we will protect personal data from unauthorised access. We will be transparent and honest in all communications and comply with having relevant data available to customers upon their compliance with our procedures.

We should all take the necessary action to ensure that our customers' data is protected at all times. This includes: locking our computer screens when we are away from our desks, clearing our desks at the end of the day, storing classified information correctly, shredding or disposing of data when it is no longer needed and avoid leaving documents in printers. In addition, we also carry out secure wipes of data from our servers in accordance with the 'DOD data wiping standard'.

### Health and Safety Regulations

Our staff is our most valuable asset. We consider the safety and well-being of our teams to be extremely important. For us, complying with occupational health & safety (OHS) regulations represents a minimum. When necessary and appropriate, we establish and comply with our own standards, which may go beyond legal requirements.

We must all behave in a safe and responsible manner at all times and take personal responsibility for the protection of health & safety aspects while at work. We should always consider how our decisions and actions will affect health & safety of others and should never compromise this.

### Human Rights

We base relationships with employees on respect for human rights and the rights of workers. At HEG, we will not tolerate child labour or forced labour.

We also ensure that both, HEG and/or our suppliers, comply with acceptable workforce welfare standards. We strive to ensure that our employees are paid the acceptable living wages and that our suppliers also maintain these standards. We do not use finished goods produced by child or forced labour.

We will further avoid engaging in business with suppliers who do not comply with applicable local and international laws.

# Raising Concerns

What do I do if I have a concern about the Code of Conduct?

**We all have an obligation to uphold the ethical standards of HEG. All of us are able to raise concerns when we feel it is necessary to, in particular when we feel that an action represents a violation of our Code. We always say what we do and we do what it's right.**

This process will provide HEG with an opportunity to deal with concerns before they become a violation or risk.

There are several options for raising concerns in relation to our Code:

- In the first instance, a line manager should be consulted regarding any concerns.
- At HEG, we operate an open-door policy and the management team can be approached subsequent to raising concerns with a line manager.
- Any concerns regarding our Code can be raised to the HR Department.
- Concerns may also be raised to the Compliance Committee by email at [compliance@heg.com](mailto:compliance@heg.com).

When reporting a concern, individuals may choose to remain anonymous and their confidentiality will be respected at all times, if such is legally possible. HEG will then investigate into the matter and reach a reasonable solution.

However, any consciously false or misleading allegations may result in a breach of our Code.

HEG prohibits retaliation against any individual making a complaint in good faith. No action will be taken against individuals who have a genuine concern, even if proven not to result in a compliance breach.

## How can I learn more about our Code?

All employees should take their time to learn and understand our Code, our policies and all the laws and regulations applicable to our job responsibilities. In order to achieve this, HEG's management shall endeavour to provide all employees with training sessions to ensure we all understand the policies, laws and regulations applicable in our daily lives.

If any employee wants to learn more about our Code, they can approach the HR Department or the COMPLIANCE COMMITTEE.

## I am Unsure About a Breach of the Code

If you are ever unsure about whether any action constitutes a breach of our Code, you should ask the following questions:

- Is it legal?
- Is it unethical or improper?  
Am I being fair and honest?
- How would my actions look to others?
- Can I justify my decision?

However, if you are ever unsure, you should seek help from company resources such as a line manager, HR Department at [HR@HEG.COM](mailto:HR@HEG.COM) or the COMPLIANCE COMMITTEE at [COMPLIANCE@HEG.COM](mailto:COMPLIANCE@HEG.COM).

In any case, you can speak to members of the COMPLIANCE COMMITTEE by using the groupwide telephone list. Alternatively you are also free to contact the external Whistle Blowing Helpdesk via [compliance-heg@lindenaulegal.de](mailto:compliance-heg@lindenaulegal.de), when you intend to raise a concern.





CODE OF CONDUCT  
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