

Code of Conduct for Responsible Lobbying

Adventa is actively, openly and transparently contributing to the discourse on social and political issues. Adventa engages in the public debate on a number of different topics, in multiple countries, and with a variety of stakeholders and organizations.

Adventa's lobbying activities are guided by transparency, fairness, integrity as well as fact-based information and based on the following principles which apply to our Employees, as well as to hiring consultants in this field

Lobbyists of the company as well as consultants shall:

1. Identify themselves by name and by the Adventa organization they are representing;
2. Represent themselves as working for Adventa to the effect of registration (where existing) to be transparent with third parties and/or staff of public authorities;
3. Openly declare the company's business interests;
4. Ensure that information provided reflects company's knowledge, is complete, and not misleading;
5. Be transparent when obtaining or trying to obtain information about the purpose of the request;
6. Do not induce staff of public authorities to contravene rules and standards of behaviour applicable to them.

Adventa fully respects and follows the national laws of each of the jurisdictions in which the company carries out lobbying activities.

If Adventa employs former staff of public authorities we respect their obligation to abide by the rules and confidentiality requirements which apply to them.

Adventa voluntarily will not hire active Members of Parliament or legislative decision makers for service.

When Adventa hires consultants to represent the company in lobbying activities an official contract always needs to be provided, which will include details regarding the purpose and/or goal of the lobbying activity.

Adventa's contracted lobbyists need to abide by the same rules as the in-house lobbyists, as outlined in the company's policy.

Adventa / its lobbyists – signs up in lobbying registers of public institutions, where existing, and discloses relevant aggregate costs of lobbying, including personnel costs and consulting costs.

Adventa supports the introduction of transparency rules (e.g. lobbying registers) in the political systems where the company represents its interests.

Adventa does not make any donations as a company to political parties, politicians or candidates for a political office.

All lobbying activities must justify the objectives in terms of returns and impact on the company.

The Ethics, Risk and Compliance shall review and audit lobbying exercises on a regular basis to ensure compliance.

Guideline for External Funding

As a sustainability objective, Research & Development, CSR and the pursuit of excellence in knowledge, information and technology, Adventa shall grant external fundings and sponsorships of activities that are aligned to the objectives. The following general principles govern external funding / sponsorships in whole or in part by Adventa.

Definition

Institutional research / training is defined as any research/training activity using institutional facilities or with support from funds administered by the Institution.

Private research/training is supported from funds administered by private parties and that does not require the use of Institutional facilities or equipment to fulfil an external contractual or consulting obligation.

Guidelines

Research / Training must be only for purposes that are consistent with Adventa's principal missions of the pursuit and application of knowledge for the furtherance of public interests. The research/training can either be classified projects or projects that otherwise prohibit or limit publication of knowledge acquired or open research/ training where public publication is authorised. Publication is considered to include, but is not limited to, journal publications, proceedings of meetings and conferences, student dissertations and theses, and book manuscripts.

Research/training funding must always be in a written contract with the research party, stating

1. the purpose of the research/training,
2. the topic and deliverables,
3. the size of the funding and duration
4. the confidentiality
5. the scope of funding and permissible claims.

In those research/training projects in which proprietary information is provided by Adventa prior to or during the course of the project, any limitations on the disposition of that information must be described in writing prior to the time the information is made available and any requirements of confidentiality or other limitations must be documented.

Adventa shall retain ownership of patent rights and software copyrights issued on the basis of any sponsored research, unless, in exceptional circumstances, deviations from this policy may be approved by the Managing Director of Adventa.

A Research member who serves as principal investigator on a sponsored project is responsible for justifying the appropriateness of direct costs budgeted and charged on that project in accordance with overall government regulations, conditions made as a part of an individual award, Adventa policies and guide lines.

A Research member shall be accountable to Adventa for the proper conduct of the project or program, including, for example, compliance with policies and procedures concerning the use of human subjects or animals in research activities, and environmental safety.

If there is doubt whether the external funding constitute a bribe, refer to the Anti-Bribery policy of Adventa or contact the Ethics, Risk and Compliance dept for advice.