



AQUISCAP & Cie.

GLOBAL BUSINESS CONDUCT AND ETHICS CODE

Embracing Our core DNA Values in Every Moment

www.aquiscap.com



**Integrity
Committed
Commitment
Alignment
Entrepreneurship
Performance
Cooperation**

A Note from Antonio Cristofaro



Since AQUISCAP & Cie. GmbH was founded 2023, we have grown from a small team of dedicated professionals to a robust network of colleagues and partners around the globe. This remarkable growth and our accomplishments stem from our unwavering commitment to fostering a culture that attracts, empowers, and inspires top talent at every level of our organization.

Our strategic and operational decisions are anchored by five Core Values: integrity, collaboration, excellence, integration, and entrepreneurship. These values form the bedrock of our Global Code of Business Conduct and Ethics ("Code"). The Code encapsulates the principles that guide our behavior in delivering services to clients, collaborating with each other, and engaging with our vendors and partners.

While the Code serves multiple purposes, its essence is encapsulated in one central theme: doing the right thing consistently. In our industry, it is crucial to speak up. We encourage everyone to seek clarification if something in the Code is unclear. If you suspect any violations of our Code, Core Values, company policies, or the law, please speak up. Trust is the cornerstone of all effective relationships, and direct, honest, and compassionate communication is the best way to build and maintain that trust. Dedicate yourself to using your voice and upholding the standards set out in our Code. By doing so, you will truly be **Living Our Core Values Every Moment.**

Sincerely,

Antonio Cristofaro
Managing Director

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Understanding Our Code

Purpose and Overview

At AQUISCAP & Cie. GmbH, we are committed to living our core values every day by delivering exceptional service, holding ourselves and each other accountable, and fostering a corporate culture we can all be proud of. Our Code of Conduct outlines the principles and standards that guide our behavior and decision-making processes, ensuring that we promote integrity, transparency, and accountability in all our business activities.

Our commitment to these principles is unwavering. We believe that it is not enough to succeed commercially; we must also succeed in ways that are honest, ethical, and fair. This means treating all employees with equity, civility, and respect. In return, we expect our employees to adhere to the highest standards of conduct and ethics while delivering services to clients, collaborating with each other, and working with outside vendors and partners.

Integrity in Every Action

Acting with integrity in every action and interaction is paramount. This means making decisions that accurately reflect what we stand for as a company. While the right course of action may often be clear, we recognize that work can be complex and the laws and rules that apply to us can be intricate. It is crucial to understand where to go for help when faced with ethical dilemmas.

The AQUISCAP & Cie. GmbH Code of Conduct is an essential resource in navigating these challenges. It is designed with you in mind, providing guidance to:

- **Promote Integrity and Ethical Conduct:** Uphold the highest standards of integrity in all business activities.
- **Address Ethical Situations:** Offer clarity on common ethical dilemmas you may encounter in your work.
- **Maintain Professionalism:** Avoid even the appearance of impropriety in connection with our business activities.
- **Uphold Commercial Honor:** Observe the highest standards of commercial honor and equitable principles in trade.

Adherence to this Code is paramount, and no business objective justifies violating it, our core values, AQUISCAP & Cie. policies, or applicable laws. Ensuring compliance with these standards is non-negotiable and foundational to our corporate culture.

Compliance with Laws and Regulations

At AQUISCAP & Cie. GmbH, we are unwavering in our commitment to comply with all applicable laws, rules, and regulations in every jurisdiction where we operate. We understand that navigating the complexities of these requirements can be challenging, and it is crucial to uphold our standards consistently across all regions.

While we strive to provide comprehensive guidance, it is impossible to foresee every potential question or scenario you might encounter. In situations where you are uncertain about the appropriate course of action, we encourage you to seek assistance from a member of Firm Management—Senior Officers, Managing Directors, Functional Heads, or those supervising transactions. Additionally, our Compliance, Legal, or Human Resources Departments are always available to provide support and clarification.

Given our global operations, it is essential to recognize and respect the diverse laws and customs that may apply. While we honor the norms of our clients, business partners, and colleagues worldwide, all AQUISCAP & Cie. employees must adhere to the standards and principles outlined in this Code. Should any provision of our Code conflict with local laws or requirements, please seek guidance from the Compliance or Legal Departments to resolve the issue appropriately.

Adherence to the Code

All employees of AQUISCAP & Cie. GmbH and its subsidiaries are required to read, understand, and comply with our Code. This obligation extends to consultants, contractors, agents, suppliers, vendors, and temporary employees ("business partners") who act as extensions of our firm. These business partners are expected to uphold the spirit of AQUISCAP & Cie.'s Code and adhere to any applicable contractual provisions.

If you supervise business partners, it is your responsibility to communicate our standards and ensure they are understood and followed. Failure of a business partner to meet our ethics and compliance expectations, or their related contractual obligations, may lead to the termination of their contract.

Accountability and Discipline

Violating our Code, core values, AQUISCAP & Cie. policies, or the law—or encouraging others to do so—poses significant risks to our firm, including legal liability and damage to our reputation. If you observe or suspect any violations, you are obligated to report them through any of the resources listed in this Code.

Breaches of our Code may result in disciplinary actions, up to and including termination of employment. Moreover, violations of laws or regulations can lead to legal proceedings and penalties, including potential criminal prosecution in certain circumstances.

No Rights Created

This Code represents a statement of fundamental principles, policies, and procedures that govern the conduct of all AQUISCAP & Cie. employees and subsidiaries. It is intended to guide our business practices and does not create any rights for employees, customers, clients, visitors, suppliers, competitors, shareholders, or any other person or entity.

Continuous Improvement and Feedback

At AQUISCAP & Cie. GmbH, we highly value your feedback. If you have any suggestions on how we can enhance our Code of Conduct, strengthen our Core Values, refine our policies, or improve our resources to better address specific issues you have encountered, we encourage you to bring them forward to the Compliance Department.

Promoting an ethical and responsible workplace is a collective responsibility. By sharing your insights and recommendations, you contribute to the continuous improvement of our organization and help uphold the highest standards of integrity and excellence.

Together, we can ensure that AQUISCAP & Cie. GmbH remains a leader in ethical business practices and a company we can all be proud to be a part of.

Our Responsibilities

Employee Responsibilities

Each employee is expected to:

- Act professionally, honestly, and ethically in all business dealings.
- Familiarize themselves with the Code and relevant policies.
- Complete all required training and stay informed about current standards and expectations.
- Report any concerns about potential violations promptly.
- Cooperate fully with investigations or audits and never alter or destroy records related to such inquiries.

Management Responsibilities

Management has additional responsibilities to:

- Lead by example, demonstrating high ethical standards.
- Foster a respectful and communicative work environment.
- Address ethical dilemmas proactively and support employees in doing so.
- Ensure that business partners adhere to our ethical standards.

Guideline Reminder

No business objective justifies violating our Code of Conduct, core values, AQUISCAP & Cie. policies, or applicable laws. Adherence to these standards is paramount and non-negotiable.

For detailed information on management's specific responsibilities within your jurisdiction, please refer to the section "Where to Go: Additional Resources."

Making Good Decisions

Making the right decision is not always easy. To assist in navigating complex situations, consider the following questions:

- **Is it legal?**
- **Is it consistent with our Code, values, and policies?**
- **Would I feel comfortable if my decision were made public?**
- **Would I feel comfortable if senior management knew about it?**

What Should I Do If I Receive a Report of an Issue?

Q: As a manager, I'm unsure about my responsibilities when someone comes to me with an issue. What if the issue involves a senior manager?

A: Regardless of who the allegation involves, it is imperative that you report it. AQUISCAP & Cie. GmbH provides multiple channels for reporting concerns to ensure confidentiality and protection. If you feel uncomfortable reporting the issue to a specific person, you have several alternatives:

- **Compliance Hotline:** A confidential and secure option for reporting concerns.
- **Compliance Department:** Directly contact the Compliance team.
- **Legal Department:** Reach out for legal guidance and support.
- **Human Resources Department:** They can provide additional support and ensure the issue is handled appropriately.

It is your duty to ensure that all allegations are reported and addressed, fostering a culture of transparency and accountability.

What If the Misconduct Is Not in My Area of Supervision?

Q: I observed misconduct in an area that I do not supervise. Am I still obligated to report it?

A: Absolutely. Every employee at AQUISCAP & Cie. GmbH has a responsibility to report misconduct, regardless of their supervisory scope. As a leader, your obligation is even more significant. Here are the steps you should take:

- **Consult the Managing Director or Relevant Leader:** Discuss the issue with the leader overseeing the area where the misconduct occurred.
- **Use Reporting Channels:** If direct consultation is not feasible or effective, utilize the Compliance Hotline, or contact the Compliance, Legal, or Human Resources Departments.

Your proactive approach in reporting and addressing misconduct is crucial in maintaining the integrity and ethical standards of our organization. By taking these steps, you help ensure that all concerns are handled appropriately and in accordance with our Code of Conduct.

Asking Questions and Reporting Concerns

Employees are encouraged to report any suspected violations of the Code, our values, or the law. Various reporting channels are available, including direct communication with management, the Compliance Team, the Legal Team, Human Resources, or the Compliance Hotline. All reports will be taken seriously and addressed impartially and thoroughly.

Our Non-Retaliation Policy

AQUISCAP & Cie. GmbH prohibits retaliation against anyone who reports a concern in good faith or participates in an investigation of suspected wrongdoing. Retaliation will result in disciplinary action, up to and including termination.

Waivers and Amendments

In rare cases, waivers of the Code may be necessary. Such waivers must be requested in writing and approved by the Senior Counsel and Director, Global Compliance. Any amendments to the Code will be promptly disclosed as required by law.

Our Core Values

Overview

Integrity

- **Ethical Standards:** Upholding the highest levels of honesty and moral principles in all business dealings.
- **Transparency:** Ensuring all actions and decisions are open and clear to stakeholders.
- **Accountability:** Taking responsibility for actions and their consequences, both positive and negative.
- **Maintaining Data Privacy:** We respect the privacy of personal and corporate information. Employees must follow data privacy laws and company policies when handling sensitive information.

Committed

- **Dedication:** Showing unwavering commitment to achieving goals and objectives.
- **Loyalty:** Demonstrating steadfast allegiance to the company's mission and values.
- **Perseverance:** Persisting through challenges and obstacles to deliver results.

Commitment

- **Devotion:** Fully dedicating oneself to the success of the company and its clients.
- **Allegiance:** Maintaining a strong sense of loyalty to the company's vision and mission.
- **Pledge:** Making firm commitments to uphold company values and deliver excellence.

Alignment

- **Strategic Harmony:** Ensuring that all actions and decisions are in line with the company's strategic goals.
- **Unified Vision:** Working together towards a common objective with a shared understanding.
- **Consistency:** Maintaining uniformity in actions, policies, and communication across all levels of the organization.

Entrepreneurship

- **Innovative Spirit:** Encouraging creativity and the development of new ideas to drive the business forward.
- **Business Acumen:** Demonstrating sharp business sense and making informed decisions.
- **Venture Creation:** Taking initiative to explore and develop new business opportunities.

Performance

- **Superior Quality:** Striving for excellence in all deliverables and services.
- **Efficiency:** Maximizing productivity and minimizing waste to achieve the best results.
- **Results-Driven:** Focusing on achieving measurable outcomes and success indicators.

Cooperation

- **Teamwork:** Collaborating effectively with colleagues, clients, and partners to achieve common goals.
- **Alliance:** Building strong, mutually beneficial relationships with external stakeholders.
- **Collective Effort:** Encouraging collective problem-solving and sharing of best practices to enhance overall performance.

Enforcing Anti-Corruption and Anti-Bribery Requirements

We prohibit all forms of bribery and corruption. Employees and third parties representing us must comply with anti-corruption laws and our internal policies.

Antitrust and Fair Competition

We support free and fair competition and prohibit practices that limit competition or gain unfair advantages.

Anti-Money Laundering (AML)

We are committed to preventing money laundering and complying with AML laws. Employees must report any suspicious activities related to financial transactions.

Cooperating with Investigations and Audits

Employees must fully cooperate with internal and external investigations and audits, providing accurate and complete information.

Creating an Environment of Respect and Safety in the Workplace

Creating a Diverse, Equitable, and Inclusive Environment

We promote a diverse, inclusive, and respectful workplace, providing equal opportunities for all employees.

Harassment-Free Workplace

We do not tolerate any form of harassment, bullying, or abusive conduct. Employees must report any incidents of harassment or intimidation.

Health and Safety

We prioritize the health and safety of our employees, maintaining safe working conditions and promptly addressing any risks or hazards.

Alcohol and Drugs

We strictly prohibit the use of alcohol and drugs in the workplace to ensure a safe and productive environment for all employees.

Workplace Violence

We maintain a zero-tolerance policy towards any form of violence or aggressive behavior in the workplace, ensuring a safe and respectful environment for everyone.

Performance: Adhering to the Highest Standards

Service Quality and Stewardship

We are committed to delivering high-quality services and meeting our clients' expectations. Employees must adhere to the highest standards and avoid shortcuts that could compromise quality.

Conflicts of Interest

Employees must avoid situations where personal interests conflict with the company's interests. Any potential conflicts must be disclosed and managed appropriately.

Obligation to Disclose

Employees must inform the Compliance Department of any legal or regulatory issues they are involved in that could affect the company.

Integration: Collectively Protecting Our Information and Assets

Our Firm's Assets

Employees are responsible for protecting company assets, including physical, electronic, and intellectual property.

Confidential Information and Intellectual Property

Confidential information and intellectual property must be protected and only used for legitimate business purposes.

Accurate Recordkeeping

Business records must be accurate and complete, reflecting the true nature of transactions and activities.

Responsible Communications

All communications must be honest, professional, and compliant with regulatory requirements. Only authorized individuals may speak on behalf of the company.

Entrepreneurship: Demonstrating Leadership Everywhere

Human Rights

We respect human rights and support efforts to eliminate abuses such as child labor, slavery, and human trafficking.

Charitable Activities

Employees are encouraged to support charitable causes, ensuring their activities are lawful and do not interfere with their responsibilities.

Political Activities and Lobbying

Employees may participate in political activities on a personal level but must not use company resources or represent the company in such activities without proper authorization.

Corporate Citizenship

We engage responsibly in charitable activities and support initiatives that positively impact our communities.

Sourcing Responsibl

We evaluate and select business partners based on their ability to meet our ethical standards and comply with the law.

In Conclusion

A Personal Commitment

At AQUISCAP & Cie. GmbH, we are dedicated to cultivating a workplace environment grounded in the principles of integrity, respect, and excellence. This commitment is embedded in our corporate ethos and is reflected in every action and decision we make. By diligently adhering to our Code of Conduct, we ensure that our behaviors consistently align with our core values. This adherence not only reinforces our internal culture but also significantly contributes to the sustained success and esteemed reputation of our company. For comprehensive information regarding our policies and procedures, we encourage you to visit our website or reach out to the Compliance Department for further assistance.