

Lanes & Planes Code of Conduct

Lanes & Planes GmbH
Friedenheimer Brücke 16 • 80639 Munich
Munich Local Court HRB 235318

www.lanes-planes.com

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Preamble

At Lanes & Planes, we are proud of our diversity, our individuality, and our respective personal and cultural backgrounds. As a shared guide, this Code of Conduct helps us make decisions in an increasingly rapidly changing world that align with the principles and values of our company.

We view diversity, openness, and mutual respect not merely as values, but as the foundation of our collaboration and shared success.

For our customers, business partners, and suppliers, this Code of Conduct outlines what we stand for as one of Germany's leading providers of digital business travel and receipt management, and what they can rely on when working with us.

This Code of Conduct is binding for all Lanes & Planes employees, regardless of their role or hierarchical level. Furthermore, all employees must comply with applicable laws, regulations, as well as internal rules and guidelines.

Managers at all levels bear a special responsibility for our corporate culture. They actively model the values of Lanes & Planes, as well as integrity and equal opportunity, support their employees in implementing these principles, create psy-

chological safety, promote open communication, and address misconduct early on.

Furthermore, this Code of Conduct also defines our expectations of our business partners.

We monitor the direct and indirect impacts of our business activities on the environment and society, and we strive to achieve an appropriate balance between economic, ecological, and social interests.

We act in accordance with generally accepted values and principles, behave in a legally compliant manner, and pay particular attention to internationally recognized human rights and labor standards as described in this Code of Conduct.

We stand behind the goals and contents of this Code of Conduct and, within the scope of our respective legal and practical capabilities, make every appropriate and reasonable effort to continuously fulfill this voluntary commitment.

A man with a beard and a dark cap is sitting in a train, looking out the window. Outside the window, several white wind turbines are visible against a hazy, mountainous landscape. The scene is captured in a cinematic style with soft lighting.

Responsibility to our society and our environment

Environmental and climate protection

The protection and preservation of our natural livelihoods affect and obligate us all. With this in mind, we conduct our business in an ecologically responsible manner and are committed to the goal of a climate-neutral future.

We fulfill our ecological responsibility by applying applicable legal requirements and recognized standards for environmental and climate protection. We work continuously to reduce any negative impacts of our business activities on the environment and the climate.

To this end, we at Lanes & Planes take the following measures, among others, which are based on legal and internationally recognized standards. We encourage our employees to actively contribute to these efforts:

- Measures to reduce or avoid waste.
- Conserving natural resources, for instance through measures to save water and other raw materials, as well as by promoting the circular economy.
- Use of climate- and environmentally friendly technologies, processes, and products.
- Measures to increase energy efficiency and the proportion of renewable energies in the energy consumption at our headquarters.
- Company suggestion scheme for employees to improve measures for environmental and climate protection.

Respect for human rights

We respect internationally recognized human rights. These include, in particular, the prohibition of child and forced labor, compliance with occupational health and safety obligations, respect for freedom of association, fair and humane working conditions, and the prohibition of inhuman or degrading treatment. In all business activities, we strive to neither cause nor contribute to human rights violations. We also expect the same commitment from our customers and business partners.



Mutual respect and prohibition of discrimination

We treat our employees with appreciation and approach our colleagues with respect. This is reflected in our daily behavior: we listen to one another, let others finish speaking, and provide constructive feedback. We strictly reject any form of unlawful punishment, abuse, harassment, disadvantage, intimidation, or discriminatory, boundary-crossing, degrading, or otherwise undignified behavior. This also applies to digital communication, such as in chats, emails, or video conferences. We align our actions with recognized international labor and social standards.

We value the diversity of our employees and foster a working environment that enables inclusion and equal opportunity. We reject any form of discrimination or unequal treatment based on national or ethnic origin, social background, health status, disability, sexual identity or orientation, age, gender, political opinion, religion, or worldview, and we take consistent action against it. We make decisions regarding hiring, development, compensation, and promotion in a transparent, fair, and non-discriminatory manner. We expect this behavior from our customers and business partners as well.

Our managers pay special attention to exemplifying and actively promoting an inclusive and fair working environment.



Workplace safety and health protection

We observe internationally recognized standards for occupational health and safety and promote a culture in which we take responsibility for ourselves and others. By preventing accidents, injuries, and work-related illnesses, we create a safe and health-promoting work environment. For us, health encompasses both physical and mental well-being. Therefore, we promote sustainable working practices and create an environment in which stress, excessive demands, and conflicts can be addressed openly and at an early stage.



Responsibility for ethical business conduct

Business integrity and fair competition

We pursue exclusively legal business objectives and practices and maintain business relationships only with reputable partners. We behave fairly and respectfully towards our customers and business partners and respect differing legal, economic, social, and cultural backgrounds.

We base our corporate actions on universally valid ethical values and principles, particularly integrity, respect for human dignity, and the merit principle. We advocate for free and fair competition, tolerate no anti-competitive agreements, and always act in accordance with applicable laws. We strictly reject competitive advantages gained through unfair business practices.

Prevention of money laundering and combating corruption

We do business exclusively with reputable partners whose business activities comply with applicable law. We comply with all legal requirements for the prevention of money laundering that apply to us. Money laundering occurs, in particular, when cash or other assets originating from criminal activities are introduced into the legal financial and economic cycle to conceal their true origin.

Our employees are obligated to report any indications or suspicions of money laundering immediately via the designated internal reporting channels. Employees in particularly affected or risk-relevant departments receive regular ad-hoc training in accordance with applicable legal requirements on the topics of money laundering prevention, anti-corruption, and the responsible handling of benefits.



We oppose all forms of corruption and any actions that could create the appearance of improper influence. We handle benefits to third parties, particularly gifts, invitations, donations, and sponsorship activities, responsibly, transparently, and in accordance with applicable legal and internal guidelines.



Dealing with conflicts of interest

We make our decisions free of conflicts of interest and exclusively for the benefit of Lanes & Planes. Every employee is prohibited from making business decisions based on personal interests or advantages. Private interests must not influence business decisions. We transparently disclose and promptly address potential conflicts of interest—for example, arising from secondary employment, personal relationships, or financial interests.

Data protection and information security

We share confidential information only with individuals who require it to perform their duties. We process personal data in accordance with the principles of the GDPR; our employees ensure in particular that processing is purpose-bound, confidential, and minimized. In addition to protecting personal data, we ensure a high level of

IT and information security. Our employees use IT systems, passwords, and access credentials responsibly and report suspicious security incidents (e.g., phishing, data loss) to IT Security immediately.

Protection of confidential information and intellectual property

We protect entrusted trade secrets and other confidential information of our customers and business partners against unauthorized acquisition, use, and disclosure, taking into account statutory provisions for the protection of trade secrets.

We respect the intellectual property (e.g., patents, trademarks, copyrights) of our customers, business partners, and other third parties, and when exchanging know-how and technologies, we ensure that sufficient precautions are taken to protect intellectual property rights.

Safeguarding customers' interests

We take appropriate measures to ensure the safety and quality of our products or services. We ensure that our products or services comply with the relevant statutory provisions.

Compliance with foreign trade regulations

We ensure that we do not violate sanctions or export control regulations.

Sanctions are official restrictions on economic relations with states, individuals, or companies in response to serious violations of (international) law. In the case of export control regulations, the restrictions apply to the nature and characteristics of traded goods.

Reporting breaches

At Lanes & Planes, we value mutual appreciation, respectful collaboration, business integrity, and legally compliant behavior. We do not tolerate violations of this Code of Conduct, laws, or internal regulations. If our employees become aware of a potential violation, they have the option to report it to their manager or to the internal reporting office via our electronic whistleblower system. Completely anonymous reporting is also possible via the electronic whistleblower system.

Our collaboration is based on mutual trust. Our employees need not fear any negative consequences if they submit a report or if they are unsure whether their suspicion actually constitutes a compliance violation.

Lanes & Planes is committed to the legal requirements for protecting whistleblowers from any reprisals and disadvantages that could result from reporting. This includes, in particular, discrimination, termination of employment, denial of a promotion, or a negative performance review. Even the threat or attempt of such disadvantage is prohibited. We investigate and penalize violations of the prohibition on reprisals and disadvantages, the obligation of confidentiality, and intentional obstruction in the submission of reports. Whistleblowers are only unprotected if they demonstrably and intentionally abuse the whistleblower system by providing false information.

Every incoming report is reviewed immediately and confidentially by the internal reporting office. The review is conducted impartially, objectively, and in accordance with the presumption of innocence and the right to be heard. We penalize violations appropriately, taking into account the severity of the offense. Potential consequences can range from a verbal warning to a formal warning, and up to termination. In the case of criminally relevant violations, Lanes & Planes reserves the right to file criminal charges.



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