
POLITICAL INVOLVEMENT POLICY

thinkproject

CMS

Management system: [CMS](#)

Product: ALL

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1 INTRODUCTION

As an international company operating in many regions of the world, Thinkproject Group is affected by local, national and international laws, regulations and public policies. It is our objective to maintain legally irreproachable relations with governmental bodies, as we act transparently, honestly and in compliance with the applicable law and the principles outlined in our Code of Conduct.

This policy describes the guiding principles for political engagement and all forms of political activity by Thinkproject Group and our employees. We want to ensure that our employees understand the importance of the guidelines set forth in this policy and act in accordance with these commitments.

2 COMMITMENT

Thinkproject Group is committed to act in compliance with all applicable regulations and moral standards regarding the political engagement of organisations. As a company that has defined integrity as one of its core values, we do not engage in any action resulting in undue influence or unfair competition. This includes our commitment not to make political contributions, donations or lobbying expenditures. To enforce this commitment, Thinkproject Group has an internal approval process to ensure that donations, sponsorships or gifts are not politically motivated. This approval process is conducted on a case-by-case basis, with approval required by the Thinkproject Group CEO or CFO.

Should Thinkproject Group change this policy to allow political donations and/or lobbying expenditures in the future, Thinkproject Group commits to disclose the payments made and follow all applicable laws and regulations.

3 PERSONAL POLITICAL ACTIVITY AND CONTRIBUTIONS

We encourage our employees to be active in civic and community activities, including participation in the democratic and political process. At the same time, we want our employees to be aware of the following guidelines:

- Political involvement should take place outside of employees' working hours
- Political contributions are not reimbursed by Thinkproject Group
- All forms of political activity or contribution must comply with applicable laws and the Thinkproject Group Code of Conduct. All employees must consult with the Legal Department or the Compliance Department when in doubt
- Political involvement of any kind on the company's behalf is prohibited: if employees are engaged in political activities, they must make sure not to create the impression that such activity is associated with or on behalf of Thinkproject Group

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4 INTERACTION WITH GOVERNMENTS AND OTHER AUTHORITIES

We recommend our employees to contact the Senior Management, Legal or Compliance Department, when receiving any kind of governmental inquiry before taking further action. For more details on our expectations and requirements when dealing with third parties, please refer to our Code of Conduct.

5 MEMBERSHIPS IN PROFESSIONAL AND TRADE ASSOCIATIONS

The company participates in trade associations for a variety of reasons, including networking, building industry skills, civic participation and monitoring of industry policies and trends. Company participation in trade associations, including membership on a trade association board, does not mean that the company agrees with every position a trade association takes on an issue. In fact, from time to time our corporate positions may differ from those of the trade association of which we are members.

The company makes payments to these associations, including membership fees and dues.

A list of these associations which the company paid annual dues of EUR 10.000 or more is available from the Accounting Department.

6 AREA OF APPLICABILITY

This policy applies to Thinkproject Group and its subsidiaries.

7 REFERENCE DOCUMENTS

- Code of Conduct

8 DOCUMENT CONTROL

Version	Date	Author	Approved by	Details of changes made
1.0	22.07.2022	Peter Mezger	Markus Scheuermann	Original version

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