



We record & analyze communications

Compliance Policy

Scope of this document: ASC Technologies AG, Seibelstrasse 2-4, 63768 Hoesbach, Germany,
as well as such affiliated companies pursuant to § 15 of the German Companies Act (AktG)
that are covered by the current scope of the relating ISO certification.

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	Responsibility: M. Müller (COO)	Release date:	23.09.2025
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Valid without signature! Not controlled when printed!

Vision

Compliance and integrity are non-negotiable values for ASC Technologies AG ("ASC", "We"). As a worldwide leading provider of omnichannel recording, quality management and AI based analytics, ASC provides state-of-the-art solutions for digital communications governance and we are committed to conducting our business in full accordance with legal, regulatory, and ethical standards. This Compliance Policy expresses the clear expectations of the Executive Board:

Compliance is everyone's responsibility – at all levels, in every function, every day.

The term Compliance originates from the English phrase "to be compliant with", which means to act in accordance with laws, rules, and obligations. At ASC, compliance is more than mere adherence to external requirements – it is a binding internal commitment to lawful, ethical, and responsible corporate conduct.

We understand compliance as a central pillar of corporate governance and sustainable business success. It encompasses the entirety of our efforts to prevent violations of legal, regulatory, contractual, or self-imposed obligations, to protect the company from risks, and to uphold the trust placed in us by our customers, partners, employees, and shareholders.

Our vision is to maintain a robust and forward-looking compliance culture that is firmly embedded in all business areas of the global ASC Group ("ASC Group"), hence this policy applies to all employees, officers, and entities within the ASC Group. We pursue the strategic objective of acting with integrity and accountability at all times – in compliance with the law, with internal policies, and with our own ethical standards.

Mission

Our mission is to establish and maintain a structured, risk-based and practical compliance framework that ensures:

- The identification and mitigation of compliance risks,
- The effective prevention and detection of violations,
- The promotion of awareness, responsibility, and integrity throughout the organization.

The Contracts & Compliance department ("C&C"), in its role as central coordinating body for ASC's compliance management system, ensures that compliance is not understood as a one-off activity but as a continuous, organization-wide effort.

Principles

Our compliance system is based on the following core principles:

- **Lawfulness** – We observe all applicable laws, regulatory requirements, and industry standards in every jurisdiction in which we operate.
- **Integrity** – We act ethically and transparently, and we take responsibility for our actions.
- **Clarity** – We provide clear, understandable rules and guidance to enable compliance in day-to-day operations.
- **Preventive strength** – We foster a culture in which misconduct is avoided in advance, not merely sanctioned afterward.
- **Independence and neutrality** – The Compliance function operates autonomously and reports directly to the Executive Board.
- **Zero tolerance** – We do not tolerate deliberate violations of law, internal policy, or ethical principles.

ASC's compliance obligations explicitly include the protection of personal data. As part of our Data Protection Management System (DMS), we ensure compliance with the **EU General Data Protection Regulation (GDPR / Regulation (EU) 2016/679)** and the **German Federal Data Protection Act (BDSG)**. This includes technical and organizational measures (TOMs), documentation requirements, employee awareness, and internal processes for managing data subject rights and incident handling.

Continuous improvement

Compliance must evolve with our company and the world around us. We are committed to the continuous enhancement of our compliance management system. This includes:

- Systematic evaluation of new regulatory developments,
- Regular reviews, audits, and compliance performance indicators,
- Lessons learned from past incidents or risk assessments,
- Regular updates of documentation, registers, and controls.

Through this, we ensure that our compliance framework remains effective, resilient, and aligned with ASC's strategic and operational needs.

ASC's Multi-Management System (MMS) is externally audited and certified. The company holds the following certifications:

- ISO 9001 – Quality Management and ISO 14001 – Environmental Management
- ISO/IEC 27001 – Information Security Management
- SOC 2 Type II – Service Organization Controls

These certifications are a testament to our structured approach, high standards, and ongoing commitment to risk management, data protection, and process reliability.

Accountability & regular review

The Executive Board of ASC bears overall responsibility for compliance. It is supported by C&C, which coordinates the development, implementation, and monitoring of compliance measures across the entire ASC Group – including subsidiaries and international branches.

Compliance responsibilities are clearly assigned at all organizational levels, and all employees are personally accountable for adhering to applicable requirements in their area of responsibility.

The principles of this policy are operationalized through ASC's MMS and are directly linked to other key governance documents, especially the ASC Code of Ethics, which defines expected behavior and ethical standards for all employees and stakeholders.

Communication

Compliance is not only a matter of structure – it is a matter of culture. ASC therefore fosters a compliance culture that emphasizes openness, accessibility, and transparency.

To ensure effective communication, ASC provides the following:

- **Mandatory onboarding and periodic refresher training** for all employees on relevant compliance topics.
- **Accessible policies and procedural documents**, published via the ONE ASC Portal and Legal Portal.
- **Clearly assigned responsibilities** in all departments for compliance-relevant topics.
- **Regular internal and external communication** on compliance expectations, current developments, and observed risks.

A key element of our compliance communication is the whistleblower mechanism, which enables employees, partners, and third parties to report suspected violations of laws, regulations, or internal policies. Reports may be submitted confidentially or anonymously.

Primary point of contact for whistleblowing:

Matthias Deckelmann (Whistleblower Protection Officer)
Seibelstraße 2–4, 63768 Hösbach, Room 126
Telephone (voice mailbox): +49 151 2356 8549
Email (written reports): whistleblower-asc@t-online.de

Point of contact for all other compliance matters, including questions regarding internal policies, reporting channels, or risk assessments:

Kilian Haßkerl
Head of Contracts & Compliance
Email: compliance@asc.de

All reports and inquiries are handled confidentially and professionally. Retaliation against whistleblowers or anyone cooperating in an investigation is strictly prohibited.