

smart data worx Code of Conduct

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1 Foreword

Dear colleagues,

This Code of Conduct brings together our most important basic rules and principles in one document. These principles are binding for all of us, both now and in the future.

It provides guidance and applies equally to each and every one of us. It sets out the standards we expect of ourselves and, at the same time, represents our commitment to responsible conduct towards business partners, the public, and one another within the company.

Our values play a particularly important role in this: personal responsibility, openness and transparency, as well as lawful and ethically sound conduct at all times. Together, we are responsible for the reputation of our company.

Misconduct by individuals can cause significant harm to all of us. We therefore ask you to read this Code of Conduct carefully and to use it, together with us, as a guideline for our day-to-day conduct.

Thank you!

Lars Friebe
Managing Director

Ralf Pichl
Managing Director

2 Preamble

This Code of Conduct summarises the key principles and rules that guide our actions. It reflects the standards we set for ourselves and the commitments we make to our business partners and other stakeholders.

Each of us is responsible for our own decisions and conduct. At the same time, we support and help one another in taking the “right” path together. To achieve this, one thing is particularly important to us: open and honest communication.

We know that, both as individuals and as a company, we can always learn from mistakes. Mistakes help us develop and improve. For this reason, we want to foster a culture in which we actively ask for and give feedback, and in which potential mistakes can be discussed constructively and corrected.

Our cooperation and actions are shaped by respect, trust and independence. We are committed to working together in an appreciative and transparent manner. We are a learning organisation in which employees inspire, motivate and help one another develop.

Our managers act as role models. They are also responsible for promoting and exemplifying a company culture in which everyone's conduct is ethically responsible and unaffected by personal interests or relationships. As managers, they are always open to questions, suggestions and criticism from our team.

When assessing and weighing up conduct and decisions, the following questions can help guide us:

- Is my conduct in the interest of my company, or is it driven by personal interests?
- Could my conduct damage the reputation of my company?
- Would I feel uncomfortable explaining my conduct to someone I trust?
- Can I take responsibility for my actions with a clear conscience?

3 Conduct in the Business Environment

3.1 Compliance with Laws and Regulations

Compliance with laws and regulations is a fundamental principle of responsible business conduct for us. We comply with all applicable laws at all times, even where doing so may result in short-term economic disadvantages or difficulties for the company or for individuals.

At smart data worx GmbH, business decisions are made exclusively in the interests of the company. Conflicts of interest involving personal matters or other economic or other activities — including those of relatives, close associates or related

organisations — should be avoided from the outset. If such conflicts nevertheless arise, they must be resolved in accordance with the law and this Code of Conduct. Transparent disclosure of the conflict is a prerequisite for doing so.

3.2 Fair Competition

Our goal is to support companies and public-sector organisations in gaining control over their own data and to accompany them on their journey towards a data-driven culture. We help them develop a deeper understanding of the opportunities and risks associated with their data and support them in handling it in a first-class manner. Consulting on equal terms is part of our corporate philosophy.

Corruption and antitrust violations threaten this objective and are not tolerated. We have a zero-tolerance policy. Bribes and cartel agreements are not acceptable means of obtaining business. We would rather forgo a business opportunity or internal targets than violate the law. Violations will not be tolerated and will result in sanctions against the individuals concerned. All employees must be aware of the serious risks that corruption or antitrust violations can pose to smart data worx, as well as to them personally. All colleagues are therefore expected to actively contribute within their own area of responsibility.

3.3 Prevention of Money Laundering

smart data worx complies with its legal obligations to prevent money laundering and does not participate in money laundering activities. All employees are expected to have unusual financial transactions reviewed by the management of smart data worx where there is any doubt, particularly transactions involving cash that could give rise to suspicion of money laundering.

4 Conduct towards Colleagues and Employees

4.1 Equal Treatment and Non-Discrimination

A culture of equal opportunity, mutual trust and mutual respect is of great importance to us. We promote equal opportunities and prevent discrimination in the hiring of colleagues, as well as in promotions and the granting of training and professional development opportunities. We treat all colleagues equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or belief.

4.2 Human and Labour Rights

We respect internationally recognised human rights and support their observance. We strictly reject all forms of forced labour and child labour. The right to

appropriate remuneration is recognised for all colleagues. Pay and other benefits comply at least with the applicable national and local legal standards, or with the standards of the relevant national industries, sectors and regions. The basis of mutual trust and cooperative working relationships is open and constructive dialogue shaped by mutual respect.

4.3 Occupational Health and Safety

The safety and health of all colleagues are key corporate objectives on an equal footing with the quality of our solutions and our economic success. Occupational safety and health protection are an integral part of all operational processes and are taken into account from the outset in technical, economic and social considerations. Each employee promotes safety and health protection in their working environment and complies with occupational health and safety regulations. These regulations are made available to all employees when they join the company and subsequently each year as part of regular instruction. Every manager is required to support their employees in fulfilling this responsibility.

The same safety standards apply to employees of subcontractors working on behalf of smart data worx as to our own employees. This is taken into account both in their selection and in our cooperation with them.

5 Conduct within Society

5.1 Sustainable Environmental and Climate Protection

Sustainable environmental and climate protection, as well as resource efficiency, are important corporate objectives for us. We ensure that the environmental and climate impacts arising from our solutions are kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers. Every employee is responsible for using natural resources carefully and for contributing to the protection of the environment and climate through their individual conduct.

5.2 Donations

We see ourselves as an active member of society and are involved in various ways. Donations and other forms of social engagement are made solely in the interests of the company. We do not make financial contributions — in particular donations or sponsorship — to political parties in Germany or abroad, to organisations affiliated with or similar to political parties, to individual elected officials, or to candidates for political office.

5.3 Public Appearances and Communication

We respect the right to freedom of expression as well as the protection of personal rights and privacy. All colleagues should be aware that they may also be perceived as part of and representatives of smart data worx in their private lives. They are therefore expected to protect the company's image and reputation through their conduct and public appearances, particularly in dealings with the media.

6 Handling of Information

6.1 Reporting

smart data worx is built on strong values: reliability and honesty, credibility and integrity. We therefore attach great importance to open and truthful reporting and communication regarding the company's business activities towards investors, employees, customers, business partners, the general public and government institutions. All colleagues ensure that both internal and external reports, records and other company documents comply with applicable legal rules and standards. They must therefore always be complete, accurate, timely and properly recorded in the relevant systems.

6.2 Confidential Company Information / Insider Information

We take the necessary steps to appropriately protect confidential information and business documents from access or inspection by colleagues who are not involved, as well as by other third parties.

6.3 Data Protection and Information Security

The protection of personal data, particularly that of employees, customers and suppliers, is of particular importance to smart data worx. Personal data may not be collected or processed without a legal basis or the consent of the individual concerned.

7 Protection of Company Property

We use the company's property and resources properly and carefully, and protect them against loss, theft and misuse. The intellectual property of our company represents a competitive advantage for smart data worx and is therefore an asset worthy of protection. We defend it against any unauthorised access by third parties. We use the company's tangible and intangible property exclusively for company purposes and not for personal purposes, unless expressly permitted. This also applies to business travel. All colleagues, together with their managers, are

responsible for ensuring that the nature and scope of business travel are always proportionate to the purpose of the trip and that travel is planned and carried out economically, taking time and cost considerations into account.

8 Implementation and Contact Persons

The management of smart data worx is responsible for implementing this Code of Conduct and ensuring that no colleague suffers any disadvantage as a result of complying with the guidelines or agreements. Our managers have a particular role-model function and are measured to a special degree by this Code of Conduct in their actions. They are the first point of contact for questions about understanding the rules and ensure that all employees know and understand the Code of Conduct.

As part of their leadership responsibilities, they prevent unacceptable conduct and take appropriate measures to prevent violations of the rules within their area of responsibility. Trusting and effective cooperation between employees and managers is reflected in honest and open communication and mutual support. For further questions regarding the Code of Conduct, all employees and third parties, including customers and suppliers, may also contact the central email address:

codeofconduct@smartdataworx.com

All information will be treated in strict confidence.

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