

Code of Conduct

Code of Conduct for lawful and responsible behavior within the
Softing Group



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softing

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PREFACE

Dear employees of the Softing Group,

Softing's public image is defined by the way each and every one of us presents and conducts ourselves. We are all responsible for not only ensuring our global commercial success but also meeting our social responsibilities as a Group.

This Code of Conduct provides a framework of standards that applies to every employee regardless of their role. It is designed to help us address the ethical and legal challenges we face in our day-to-day work and defines how we work with our business partners, colleagues, shareholders and the public. It is binding for all employees of companies within the Softing Group.



We are always seeking to strike a balance between achieving commercial success and effectively competing with other providers, while at the same time ensuring that we do not violate law and order or transgress the bounds of common decency in the process. Although we strive for success in everything we do, no transaction ever justifies breaking the law. It is not always easy for individuals to weigh up every aspect of the steps they need to take as they seek to strike this balance. The Code of Conduct provides guidance in this area and sets boundaries for unacceptable conduct when acting on behalf of our company.

In doing so, we do not have to sacrifice our feelings and opinions for the sake of prevailing political correctness. However, while we all have the right to like or dislike things, people or the behavior of others, we should always treat everyone with respect, both internally and externally.

The primary objective of this Code of Conduct is to guide us rather than threaten us. Nevertheless, we must make it clear that any breaches of the Code of Conduct will be consistently followed up and penalized where necessary in the interests of the company and all of its employees. Every employee is obligated to keep themselves informed about existing internal and external regulations and ensure that they are acting in accordance with them. Line managers are always available to assist with any doubts about whether an event or activity complies with the Softing Group's regulations. In turn, each line manager must ensure that their organization meets the requirements of this Code of Conduct.

With this in mind, I ask you to read these rules and incorporate them into your day-to-day work.

Kind regards,

A handwritten signature in black ink, consisting of a stylized 'L.' followed by a series of connected loops and strokes.

1. ACTING LAWFULLY AND WITH INTEGRITY

The success of the companies in the Softing Group has many sources. These include the expertise and skills of our employees, and their sense of responsibility.

Our goal is to continually increase the value of the Softing Group and generate significant added value for the benefit of all employees and shareholders of Softing AG as well as other stakeholders, particularly our customers. The conditions for achieving this goal entail legal compliance, social responsibility, high productivity, optimized efficiency and customer focus. Softing wants to maintain and nurture its good image. Our business activities are governed by the legal systems of various countries and regions, the rules of living as part of society, and ethical standards which impose a number of obligations upon the Softing Group and its employees. It is not always easy to recognize and fulfill these obligations, but it is essential. Expertise and a sense of responsibility are the keys to success, and both spring from law-abiding, ethical conduct.

We comply with all applicable national and international laws, legal regulations and rules, appropriate regulatory requirements and relevant international agreements, norms, guidelines, standards, conventions, guiding principles and other applicable regulations, with the regulations that impose the strictest requirements always taking priority.

2. SCOPE AND BINDING NATURE

This Code of Conduct addresses some particularly important areas of responsibility, and it should motivate employees to seek advice when in doubt.

Such advice may be sought from an employee's superior or from Softing's specialist departments (e.g., the legal department or human resources). It is especially important to seek advice if a situation could harm others or the company itself, if high risks are involved or if the legal status of the situation is unclear.

Softing respects the law and demands the same from all of its employees and business partners.

Legal situations which are unfavorable to either an individual or the Softing Group must not be ignored. The Softing Group complies with all applicable laws. Unlawful behavior can be damaging in a number of ways: It can cause financial damage, but it can also harm our reputation and thus damage our market position. The value of every single company in the Softing Group is influenced by its reputation, among other things. Even the appearance of a legal violation can affect public opinion and negatively impact the behavior of our customers and shareholders.

3. WORKING AND SOCIAL PRINCIPLES

3.1 Diversity and inclusion

Employees must understand that their behavior reflects on Softing and affects the company's reputation both externally and internally. Softing therefore expects all of its employees to engage with their colleagues, business partners, customers and other third parties in a friendly, professional and fair manner. We work with colleagues and business partners from different ethnic backgrounds, cultures, religions and ages, irrespective of disability, skin color, sexual identity, ideology and gender. No one may be unfairly advantaged, disadvantaged, harassed or excluded on the basis of their gender, background, race, language, nationality, beliefs, religious or political views, age, sexual orientation, physical constitution or appearance.

These principles apply to both our collaboration with colleagues within the company and our conduct towards external partners. We make decisions affecting our employees, suppliers, customers and other business partners exclusively on the basis of factual considerations and never based on other inappropriate motives such as discrimination or coercion.

In a working environment characterized by respect and fairness, employees are strictly considered based on their skills and qualifications from the time of their application and throughout the entire period of their employment, ensuring and promoting equal treatment and opportunities. Any form of reprisals and/or discrimination in the workplace is to be avoided irrespective of the characteristics protected under a given legal system. In

the event of a long-lasting conflict, employees must consult with their superiors and the human resources department to find an acceptable solution.

All employee interactions must be based primarily on trust. Communication is the foundation for sound decision-making. As part of the decision-making process, all employees should contribute as much of their own expertise as possible as well as knowledge from elsewhere in the company. Successful projects demand teamwork as well as personal initiative.

3.2 Human rights

Universal human and fundamental rights are respected and protected. In particular, no use must be made or benefit derived from slavery, human trafficking, or any kind of forced, compulsory or child labor under any circumstances.

3.3 Handling company property

Employees may not use company property (e.g., equipment, goods, vehicles, office materials, documents, files, data storage devices) or company manpower for personal purposes without the explicit approval of the responsible department. No company property may be removed from the company premises without written permission from an employee's superior. Data, programs and documents also may not be copied and removed from or brought into the company without authorization. Laptops or company cars assigned to individual employees by Softing may be used outside the company premises.

3.4 Private activities: Integrity is essential.

If an employee intends to accept another job – even as a freelancer – or become an active entrepreneur, they must inform the human resources department. This particularly applies to roles in companies which Softing could have a business relationship with or compete with. All employees are free to acquire shares in another company.

3.5 Freedom of association

Softing welcomes the personal involvement of its employees in clubs, political parties and other social or political institutions as long as such activities do not hinder the employee's ability to fulfill the obligations of their employment contract.

The right of employees to freely associate and enter into collective bargaining negotiations must be respected in accordance with applicable regulations, and no employee may be discriminated against due to their role within or membership of such interest groups.

4. HEALTH AND SAFETY

The fundamental workers' rights of each individual employee are respected. In particular, we ensure compliance with minimum wage, working hours and annual leave regulations in accordance with applicable national legislation.

We take care to ensure a safe working environment free from health hazards, and consistently meet all applicable occupational health and safety requirements as a minimum standard. In addition, we have an appropriate and effective occupational health and safety management system in place with regular information and training for employees to prevent accidents and work-related illnesses as effectively as possible.

5. ENVIRONMENT, ENERGY AND CLIMATE PROTECTION

We consistently observe all national environmental regulations and international environmental standards applicable to our business activities as well as the products and services we offer. We continually minimize burdens on and risks to people and the environment to the furthest possible extent, consistently promote the use of effective mechanisms to reduce waste, optimize environmental protection and use resources sustainably, and work tirelessly to improve environmental protection, sustainability and our ecological footprint in our day-to-day business operations. We have implemented a suitable environmental management system in order to achieve these objectives.

6. HANDLING CONFLICT MINERALS

We apply relevant rules and standards relating to "conflict minerals" and prohibit the use of raw materials

in our own products that directly or indirectly finance armed groups who violate human rights.

7. SUPPLY CHAIN

Suppliers are chosen solely on the basis of price, quality, reliability, technological standards, product suitability, the existence of a long-lasting, conflict-free business relationship, certification according to the standards of the ISO or the Eco-Management and Audit Scheme, and the use of a quality management system. Personal relationships or interests must never play a part in contractual agreements. Softing employees must not be motivated by the promise of material or immaterial personal benefits when providing consultancy services or recommendations to others.

8. FAIR BUSINESS PRACTICES

8.1 Fair competition

Softing operates around the world and is therefore subject to a variety of legislation. For example, competition-related agreements between competitors must be evaluated on the basis of the laws of the country affected by the agreements as well as those of the country in which the agreements are made. Under certain circumstances, if Softing is competing with companies from another country in any market in the world, Softing itself may be subject to the laws of that country.

According to the rules of free and fair competition, only recognized and honest business practices must be followed in accordance with all applicable provisions of antitrust and competition law in particular.

8.2 Fighting corruption

No employee may directly or indirectly solicit, accept, offer or confer personal benefits in connection with their professional activities, particularly in the context of initiating, granting or fulfilling a contract, regardless of whether this is with a private individual, a company or a public institution.

No benefits of any kind may be offered to public officials – including those from foreign nations – or employees from another company. This rule applies to all types of benefits with the exception of customary token or promotional gifts that are purely symbolic and of little monetary value. This rule also applies if a particular contractual partner would have been chosen even without the prospect of such benefits. Here, too, the impression of inappropriate conduct must be strictly avoided. If employees are confronted with such an offer, they must immediately report this to their superior. Employees must always bear in mind that improper behavior on someone else's part does not justify improper behavior on their own part. When participating in a call for tenders, any agreements with other potential bidders are strictly forbidden. If Softing itself issues a call for tenders, Softing's employees are prohibited from revealing information about a bidder or their offer to another bidder.

Compliance with anti-corruption conventions and relevant anti-corruption laws must be ensured, and any form of corruption and circumvention must be avoided. Furthermore, no direct or indirect benefits or advantages may be offered, promised or granted if this could be considered to have an improper influence on business decisions, regardless of whether this breaches any applicable laws.

8.3 Conflicts of interest

Separating the private and corporate sphere: Conflicts of interest must be avoided.

All employees must separate their private interests from those of the company. Hiring decisions must also not be influenced by private interests or relationships. Potential conflicts of interest must be disclosed immediately, and if any irregularities arise, it is imperative that the respective supervisors inform the management right away.

Business decisions must be made solely on the basis of objective criteria and must be free from irrelevant considerations and/or personal interests, ensuring that personal and professional interests are strictly separated and avoiding conflicts of interest with private concerns or other economic or other activities, including those of relatives or otherwise related parties, at all times.

8.4 Preventing money laundering

Relevant statutory obligations relating to the prevention of money laundering must be observed and no actions and/or activities that could directly or indirectly support money laundering or terrorism financing must be tolerated.

9. HANDLING INFORMATION

9.1 Insider trading rules

Inside knowledge must not be used for personal gain. Employees with internal knowledge about the activities of a company in the Softing Group – such as the planned sale of parts of a company, the acquisition of external companies, the establishment of joint ventures or other issues relevant to the share price (known as inside information) – are prohibited from using this knowledge for personal gain either directly or through a third party. Employees may not pass on any such knowledge to people not involved directly in the respective project or to third parties. Information may only be shared with others involved directly in the project on a need-to-know basis and in compliance with all applicable rules of confidentiality.

9.2 Communicating in public

When expressing personal opinions in public – whether in social media or any other media that are accessible to a large number of people – employees must make it clear that they are not speaking on behalf of the company and are obligated to safeguard the interests of Softing.

9.3 Data protection and information security

All employees and business partners must be granted the right to informational self-determination. All employees are obligated to comply with all data protection provisions and regulations

Taking into account all applicable copyright and data protection regulations, intellectual property must be respected and all confidential and sensitive information and data must be protected against improper use and unauthorized disclosure, with personal data processed in strict compliance with applicable data protection requirements.

9.4 Information security

The aim of information security is to preserve the:

- confidentiality (only accessible by authorized users),
- integrity (protecting accuracy and completeness), and
- availability (accessible to authorized users for their use upon request)

of information.

In this context, for Softing this means ensuring the confidentiality of data made available as part of customer projects and observing statutory provisions such as data protection laws. It is also vitally important to ensure that our own development results are specifically protected against unauthorized access.

Among other things, customer trust in Softing is based on the fact that we incorporate quality and safety considerations into our internal processes in addition to providing high-quality products and services.

Due to the intensive use of IT systems, Softing's business activities depend to a large extent on the functionality and availability of these systems. As a result, our information security management systems must counteract the steady increase in potential external and internal attacks.

The resulting risks are managed and minimized by the Softing's Group standards in the form of an information security policy that must be observed accordingly by all Softing employees irrespective of seniority.

9.5 Conduct towards authorities: Cooperation while protecting our rights.

Softing is committed to maintaining an open, cooperative relationship with all authorities. It is important to remember, however, that the job of some authorities is to investigate violations of the applicable law. Such procedures always follow specific rules, and these rules include the right of the affected party to seek legal counsel.

Exercising this right or the "right to remain silent" is not an admission of guilt. In cases such, information or files

should only be provided after consulting the legal department. If necessary, a trusted lawyer should be involved.

In the event of hearings, questioning, or searches by the police or public prosecutors, the legal department is responsible for protecting the rights of the individuals affected. All employees who are responsible for compiling and sending information about the company to the stock exchange authorities and other authorities or who issue other public notices on behalf of the company must provide this information in full, openly, properly, on time and in a comprehensible form.

10. HANDLING OPERATIONAL AND INTELLECTUAL PROPERTY OF SOFTING AND THIRD PARTIES

Dedication to development: Softing protects its own intellectual property and respects the rights of others.

Our development work produces valuable assets. Decisions of great economic importance are based on these assets, so our developers are required to compile, document and communicate the results of their work in accordance with accepted scientific and technical standards. Inventions, patents and other know-how are exceptionally important to Softing's future. Patents and the associated right to prevent others from using an invention for a certain period of time are the "reward" for the effort and expense that go into our development work.

We must therefore be extremely diligent in legally protecting our inventions. Employees must not share new findings or corporate secrets in any form with third parties. Such information is to be kept secret at all times unless it is already common knowledge. Any agreements with third parties which entail granting a license or transferring knowledge must be reviewed by the responsible department before being signed. When developing products, employees must research the legal situation with respect to existing property rights. All employees must respect the effective property rights of third parties and refrain from their unauthorized use. Violating such a right can have negative consequences for us and our customers. These can range from claims for damag-

es – which may be many times higher in the case of a deliberate patent violation than the amount that would have been paid otherwise – to the confiscation of goods on the borders of the countries we export to.

Employees are prohibited from appropriating the findings of other employees or third parties. No employee may acquire or make use of the secrets of a third party without authorization. The legal department is available to advise employees on intellectual property rights.

11. EXPORT CONTROL, CUSTOMS AND TAXATION

All currently applicable import and export control regulations, trade restrictions and trading bans (embargoes) as well as customs and tax laws relating to the import, export and transfer of goods, technology, services and information as well as capital movements and payments must be observed.

All employees dealing with the import and export of goods, services, hardware, software or technology as described above are required to comply with all applicable economic sanctions, export controls and import legislations as well as all guidelines and processes relating to their business activities.

12. COMPLIANCE WITH THE CODE OF CONDUCT

12.1 Responsibility

Since a company always acts through its people, the interests of the company are identical to the interests of its employees when it comes to legal compliance.

All employees are therefore obligated to follow the applicable laws, and all supervisors must ensure that their employees fulfill this obligation. The following principles govern interactions with colleagues, customers, suppliers, other companies and the authorities. They should make it easier for employees to apply the rules of conduct in selected fields to their daily work. This program outlines some key points that are particularly important in practice. Every employee is required to take note of these.

Rules of conduct are based on legal requirements as well as ethical principles. Ethics are a social consensus regarding values essential to social behavior and fair, respectful interaction. Softing is committed to such values.

12.2 Reporting breaches of the Code of Conduct

12.2.1 Obligation to report breaches

Softing will provide its employees all of the information and legal advice that they need to prevent violations of the law. The company will also protect its employees against unjustified actions by the authorities.

Legal violations will not be tolerated, however. Softing enforces compliance with these rules. The penalty for violations may consist of a warning, a claim for damages or the termination of an employment relationship. When in doubt, employees can and must seek advice from the competent individuals and departments mentioned earlier. It is not enough merely to take note of this Code of Conduct.

Supervisors must organize their departments in such a way that reports of legal violations can always reach them. It must be possible to actively address grievances. However, supervisors must also take the initiative to regularly review their departments and engage in dialog with their employees. There is an obligation both to provide and obtain information. The purpose of this Code is to ensure that Softing's employees continuously comply with legal requirements. To put the Code into practice, it is also necessary to make knowledge of and compliance with the legal requirements part of the company's training and continuing professional development measures. Only regular exposure to the material will create the necessary awareness of it in the company.

The principles mentioned above must be actively incorporated into our corporate culture. The observation of these principles requires a sensitivity to the legal limits of one's own actions and a willingness to measure these actions against legal standards.

12.2.2 Direct reporting

Employees should submit such reports to their superior or the legal department. Reports can be submitted

anonymously as well. All supervisors are required to monitor the activities of their employees with respect to potential violations of this Code. Softing will ensure that no employee is disadvantaged in any way based solely on a violation report submitted in good faith. If the reporting employee has played a part in the violation of the Code, any subsequent proceedings against this employee by Softing will take into account whether the report itself or the employee's timely cooperation with the investigation of the violation was able to avert damage to Softing.

12.2.3 Your Voice

If you are unable to provide a direct report for any reason, you can also report breaches via Your Voice. All reports may be made by stating the reporting person's name or submitted anonymously.