

ISEC7

Code of Conduct

PREAMBLE

Our Code of Conduct is a guideline for all employees of the ISEC7 Group. Specifically, the Code of Conduct is addressed to the management, executives and all our employees, customers and suppliers. The Code of Conduct is binding and represents, on the one hand, the demand on ourselves to live up to the values and principles listed therein and, on the other hand, forms a basis for partnership and responsible cooperation with our business partners. The content of this Code of Conduct will be ongoing optimized, based on the existing management system.

OBLIGATION OF ALL EMPLOYEES

With this Code of Conduct, ISEC7 commits to act in a socially and environmentally conscious manner and to strike a balance with economic goals. ISEC7 strives to conduct business in a high quality and sustainable manner based on ethical principles and to promote fair competition. This includes, in particular, compliance with applicable laws and acceptance of anti-trust prohibitions or restrictions on competition.

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HUMAN RIGHTS

We are committed to respecting human rights, and in particular we are committed to Resolution 217 A (III) of the United Nations General Assembly. We reserve the right to refuse business relations with suppliers and customers if they obviously deliberately violate international human rights.

Equality & non-discrimination

Any form of discrimination is prohibited as a matter of principle. Payment, promotions and new hires are always made free of discrimination.

We refrain from any form of discrimination by employers or employees:

- for racial reasons
- because of ethnic origin
- because of religion or ideology
- because of the sex
- because of the sexual identity
- because of the marital status
- due to pregnancy
- due to a disability
- due to physical characteristics
- due to age

Protection against child or forced labor. ILO. Minimum wage.

We strictly reject child labor or forced labor without exception and expect the same from our business partners. Children of compulsory school age and generally persons younger than 15 years may not be employed even if the legal requirements of the respective country of our supplier would allow this. Forced labor, slave labor or work comparable in this way must not be used. The legal minimum wage requirements and the ILO requirements must be complied with.

ENVIRONMENT AND CLIMATE

Protecting the environment and climate protection are important to us. We pursue the objective of playing a model role within the IT industry in terms of sustainability, climate protection and reduction of environmental impact beyond the requirements of the Paris Climate Agreement. To this end, we proactively pursue ecological goals, even beyond legal obligations and regulations.

Our employees are required to treat all natural resources (e.g. energy, water, land) used in our company with care. We try to reduce waste and dispose of or recycle it responsibly. Our goal is to improve energy efficiency, reduce energy consumption and minimize

greenhouse gas emissions. Our employees are expected to act responsibly in the production and distribution of our products and/or services.

We strive for climate neutrality and therefore monitor, document and compensate for energy consumption and greenhouse gas emissions in categories 1 and 2. We are gradually striving to go beyond our own system boundaries and include upstream and downstream activities in our carbon footprint.

To protect our employees, we comply with all laws and regulations relating to health and safety in the workplace. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

At ISEC7, we follow a set of principles to achieve our environmental goals and improve the carbon footprint of upstream and downstream activities:

Climate First

If there are several options to choose from, we prefer climate-friendly processes.

Bike & Public Transportation First

It is possible for all employees to obtain a company bicycle. Train travel is possible for all employees and this is preferable to car and air travel. Air travel for which an alternative travel option exists must be justified.

Videoconferencing First

We avoid unnecessary travel when videochat or teleconference are alternatively possible and reasonable.

Organic First & Vegan Choice

When purchasing food, we prefer organic, regional and fair trade products. At company events for employees or business partners, a selection of vegetarian or vegan products should always be offered in the catering.

Fix First

We prefer the repair to the new purchase of objects, if it is possible alternatively.

WORKING STANDARDS

Team spirit, constructive cooperation

We want to do an excellent job - which is why we constantly question existing solutions and develop new and creative ideas in the interests of our customers. To this end, we promote

constructive teamwork. The requirements of our customers are decisive for our work and further development. A key success factor is based on the diversity of our employees - and that makes us proud.

For us, teamwork means involving other colleagues in group activities, acknowledging contributions of group members, offering support, being helpful, passing on relevant information in full and including passive colleagues in the discussion.

We are always open to new ideas and approaches. We deal with them in a factual manner, ask questions and discuss them openly.

For constructive criticism we follow usual feedback rules:

- as descriptive as possible, not judgmental
- concrete, not generally related to a person
- related to realistically changeable aspects
- objective and comprehensible
- open for dialogue
- not purely negative

Standards of cooperation

We expect our employees to act in accordance with the highest professional standards and our company's guidelines at all times. If employees violate existing guidelines, rules or regulations in the course of their work or through their behavior, they will be subject to disciplinary measures.

Open communication with employees

We do not cover up misconduct. If our employees report actual or suspected misconduct in good faith, we will not tolerate any attempts to intimidate or retaliate against them. We understand "in good faith" to mean that our employees are convinced that their account is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

We take reports from our employees seriously, treat them confidentially if requested by them, and conduct a fair and conscientious investigation in such cases, giving all parties involved the opportunity to present their views.

Dialog in business cooperation relationships

All business information of our partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Required documents are properly created, stored or, if necessary, destroyed after the end of the cooperation.

Sustainable customer orientation

Our reputation as a company our customers can trust is our most valuable asset, and it is up to all of us to ensure that we continually earn that trust. All communications and other interactions with our customers should be aimed at increasing their trust in us.

We behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a targeted implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.

Privacy

Our objective is to ensure that every individual has the right to decide for themselves who learns about them, when and for what purpose, and to secure personal data against manipulation, loss and unauthorized access.

We treat all personal data of our customers, business partners and employees responsibly and with the utmost care. When handling personal data, we check the legal admissibility of the collection and attach importance to the principles of proportionality and data economy.

Our employees are obliged to take all measures to secure the data, which are suitable to protect our IT system against internal as well as external data theft. This concerns in particular passwords misused in the company as well as unauthorized viewing or downloading of files, in particular of inappropriate material from the Internet.

Compliance with applicable law

We require our managers to familiarize themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in complying with the Code of Conduct.

The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions.

Violations of economic embargoes and trade, import and export control regulations must also be ruled out by our business partners, as must the financing of terrorism.

We expressly commit to compliance with the export control laws and sanctions lists of the United Nations, United States, European Union, United Kingdom, Australia and New Zealand.

Fair competition

We are committed to fair competition and comply with these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not enter into agreements on the division of markets and do not agree on a coordinated approach to public tenders. We do not participate in any anti-competitive boycott.

Dealing with company internals

We attach importance to the careful and responsible handling of the manufactured products, the working materials used and the intellectual property of the company.

Our intellectual property is one of our most valuable assets. Unauthorized use can result in its loss or serious depreciation.

Handling of technologies involving artificial intelligence

ISEC7 is committed to compliance with international ethical standards in the use, development and handling of technologies involving artificial intelligence. These are defined by the "Principles for the Ethical Use of Artificial Intelligence in the United Nations System" of 27 October 2022 and by the "International Guiding Principles of the Hiroshima Process for Advanced AI Systems" of the G7 states of 30 October 2023.

ISEC7 is aware of its responsibility in dealing with artificial intelligence. In particular, human dignity and protection against discrimination must be respected. Data protection regulations must also be complied with. Preventive measures to minimise risk, traceability and transparency as well as incident reporting and robust security controls support compliance with these principles.

CORRUPTION PREVENTION

We are committed to compliance with the UN Convention against Corruption.

Acceptance of gifts, donations

Gifts to our employees

Our employees do not demand or accept personal benefits from customers or suppliers that influence or could influence their own behavior with regard to their own work for the company.

If gifts are offered by third parties, they may only be accepted if they are generally customary practice and can be recognized as a courtesy or kindness. In the case of gifts whose value

exceeds the customary amount, the Compliance Officer or management must be informed. If this is not possible, these gifts must generally be rejected.

Gifts from our employees

Gifts on our part may also only be offered within the scope customary for the business relationship and to a materially appropriate extent. The person receiving the gift must not be able to associate it with any obligation that would influence his or her business decisions.

Donations

ISEC7 donates to various non-profit organizations and in principle not to political parties or to individuals. Donations to organizations whose goals contradict our corporate philosophy and this Code of Conduct or damage our reputation are also excluded as a matter of principle. The allocation of donations is always transparent.

Bribery and corruption

We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties. We ensure through control mechanisms that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Our employees are prohibited from accepting or giving favors of any kind (cash, travel, gifts, etc.) that are tied to an undue advantage (contract award, project award, etc.).

Our business partners are also required to avoid conflicts of interest that pose a risk of corruption.