Code of Conduct
for the
enventa group GmbH

Version: 3.0
As oft: 20.10.2026

Contents

1. Introduction 2
2. Principles of the Code of Conduct and our behaviour 3
2.1. Law-abiding conduct 3
2.2. Respect for human rights 3
2.3. Sustainability and the environment 3
3. Working environment 4
3.1. Equal opportunities, diversity and inclusion 4
3.2. How we interact with each other 4
3.3. Occupational health and safety 5
3.4. Conflicts of interest and personal relationships in the workplace 5
3.5. Fair working conditions 5
4. Assets of the company and third parties 6
4.1. Assets of the company, intellectual property 6
4.2. Cybersecurity 6
4.3. Data protection 7
4.4. Safeguarding our principles 7
5. Conduct in business relationships 7
5.1. Relationships with customers, business partners and suppliers 7
5.2. Benefits and gifts 8
5.3. Combating money laundering and the exclusion of anti-company influences, trade controls and economic sanctions 9
5.4. Political donations, donations for charitable purposes, sponsoring 9
5.5. Fair and free competition 10
5.6. Insider trading 10
5.7. Technical developments and progress 10
6. Responsible behaviour 11
6.1. Decision-making and approvals 11
6.2. Reporting and records, controls and audits 11
6.3. Internal and public communication 11
7. Notes and reports of concerns 12

1. Introduction

Managing Directors and executive managers bear a special responsibility in terms of setting an example of integrity in their conduct, and ensuring compliance with all applicable laws and regulations in their business activities. In its Code of Conduct, the enventa Group has defined its own corporate understanding of responsible and ethical business behaviour. The Code of Conduct is supplemented by internal guidelines and regulations, as well as contractual labour agreements.

The enventa Group and its subsidiaries are committed to ecologically and socially responsible corporate governance, which we also expect from our customers, suppliers and business partners in equal measure. We expect our employees to adhere to our principles of ecological, social and ethical behaviour within the framework of our own corporate culture. We strive to make our business activities and our products and services sustainable, and encourage our business partners to support this endeavour.

Our Code of Conduct is rooted in national laws and regulations, as well as international standards. Any violation of the Code of Conduct not only harms our Group and, therefore, each and every one of us, but can also lead to considerable damage for our Group, our business partners and other stakeholders. We, therefore, aim at every turn to avoid misconduct from the outset, and expect the same from our customers, suppliers and business partners. Ultimately, violations can lead to the termination of business relationships – including all associated supply contracts with the business partner concerned and, depending on the severity of the violation in question, may result in penalties under labour, civil and criminal law.

Everyday business life repeatedly leads to situations in which it is not immediately recognisable as to which action or decision is the right one. We are aware of this. For this reason, we have compiled the most important rules of conduct for our Group of companies in this Code of Conduct and created guidelines that serve as a source of orientation. This should assist everyone in making the right decision in difficult situations, and to combine legally compliant behaviour with our fundamental values.

Although each and every one of us is responsible for our own actions and behaviour, we view ourselves as a team that is there for each other in the spirit of an open exchange, lending each other support wherever needed. An open and honest dialogue spanning all specialist and management levels of the Group helps us to achieve this goal together.

The following questions can serve as a useful source of impetus when assessing behaviour:

- Am I acting out of a personal interest or in the interests of my company?
- Could my behaviour damage my company’s reputation?
- Will I be indebted to my counterpart in this situation?
- Would I be uncomfortable disclosing my behaviour to a person of confidence?
- Can I take responsibility for my actions with a clear conscience?

This Code of Conduct was adopted by the Executive Management team of enventa Group GmbH, and is seen as an essential component of our understanding of values and the basis for our actions. The Code of Conduct is deemed binding for all employees of all subsidiaries – be they under direct or indirect control – as well as their employees, managers and members of the executive bodies.

We also expect our business partners to behave in accordance with these principles and to respect and observe our principles of behaviour in any business relationship we share. We will make our Code of Conduct available to our business partners and monitor the level of compliance with our principles. Should our business partners violate our principles, we shall discuss the matter with our business partner and establish measures to resolve the situation. Any repeated or serious violation may lead, among other things, to the suspension of the business relationship, the elimination of the violation or – as an ultimate consequence – the termination of the business relationship.

2. Principles of the Code of Conduct and our behaviour

2.1. Law-abiding conduct

The enventa Group complies with all applicable laws and regulations of the countries in which it operates. We respect our guidelines and policies, and act in accordance with ethical standards, as we expect others to do. We have adopted a zero-tolerance policy towards all forms of corporate offences and illegal misconduct.

2.2. Respect for human rights

The dignity of every human being is an inviolable fact.

Every individual is entitled to the rights and freedoms proclaimed in the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms. We respect and protect human rights and demand their observance at all times. We are committed to promoting tolerance towards those with different opinions while respecting the principles of democracy and the rule of law.

We are committed to a zero-tolerance policy for all violations of human rights – including child, forced and compulsory labour and modern slavery. This shall apply both to forms of co-operation within our Group of companies, and to our conduct vis-a-vis our business partners.

2.3. Sustainability and the environment

The efficient and careful use of natural resources and the environment is a matter of course for us. We pay close attention to applying the principles of economy, recyclability and sustainability in everything we do. We are careful with energy and water consumption, emissions and waste.

When selecting our suppliers, we pay attention to the sustainable use of natural resources, as well as the use of ecologically efficient technologies.

We expect the same principles from our customers, suppliers and business partners.

3. Working environment

3.1. Equal opportunities, diversity and inclusion

The enventa Group is a Group of companies comprising different cultures, backgrounds and a variety of lifestyles. Ethnic origin, skin colour, religion, ideology, gender, age, sexual orientation, gender identity, marital status, disabilities or similar traits play no role in our recruitment, selection and promotion of employees. We encourage and value the diversity of our employees, and promote a controversial exchange at every opportunity. Our employees all have the same opportunities to develop within the Group. We do not tolerate discrimination of any kind, and are actively committed to the principle of inclusion.

We support the development of professional skills through appropriate training and further education within the scope of the operational options available to us.

The compatibility of family and career is particularly important to us, which is why we support our employees with various programmes.

3.2. How we interact with each other

We stand for a working environment characterised by respect – and without discrimination or harassment.

A working relationship based on openness and trust, as well as one characterised by politeness, mutual respect and consideration for one another, serves as the basis of our collaborative efforts. We approach our work with a team spirit, fairness and sense of mutual appreciation – this also applies to our dealings with our customers, suppliers and other contacts.

Flat hierarchies and open interaction with one another are important to us. We reject the abuse of power in any form.

We fundamentally reject any sexual, discriminatory and other form of harassment, be these manifested in comments or other types of behaviour. This, of course, also applies to bullying or any other form of intimidation in the workplace. We shoulder responsibility and address specific misbehaviour directly and support each other.

Anyone who has experienced any form of discrimination or harassment can contact the internal reporting system (Whistleblower System) in addition to the contact point in the HR or Legal

Competence Centre. We take all reports seriously; we categorise the situation at hand and discuss the next steps.

3.3. Occupational health and safety

We ensure that the necessary measures are taken at all workplaces to prevent accidents at work and work-related illnesses. The enventa Group also offers various health-promoting measures. Every employee and every company in the enventa Group is required to establish and ensure a safe and healthy working environment, and to report any irregularities to the Human Resources Competence Centre or their line manager. In addition to acting as role models in their areas of responsibility, executive managers also pay close attention to the health and safety of their employees.

3.4. Conflicts of interest and personal relationships in the workplace

We clearly separate corporate interests from personal interests.

We will only engage in secondary employment if it does not jeopardise the interests of the company. We refrain from investing in affiliated companies, companies in which an investment is planned or with which we have an ongoing business relationship if this could have an impact on our activities at the enventa Group.

Due to close personal relationships between employees and/or managers, the professional interaction between the individuals and with their work can be influenced by private interests. This applies, in particular, to employees with professional/disciplinary responsibility. These conflicts of interest within a direct dependency relationship in the respective area of responsibility must be disclosed and resolved from the outset. Disclosure can be made to the Competence Centre Human Resources or Legal.

3.5. Fair working conditions

We reject all forms of forced and child labour. We employ young people exclusively within the framework of the prevailing legal provisions. This principle also applies to our collaborative efforts with our business partners.

We reject the practice of wage dumping. Wages and salaries, as well as the associated social benefits in the enventa Group, correspond as a minimum to the statutory minimum standard of the respective country or are higher.

We also expect our customers, suppliers and contacts to behave in accordance with the law, and to observe and comply with legal and social standards. This shall apply, in particular, to human rights, child and youth protection, equal opportunities and treatment of employees, wages/salaries and social benefits, the right to organise and health and safety in the workplace.

4. Assets of the company and third parties

4.1. Assets of the company, intellectual property

We are aware of the value of our in-house expertise, and we protect it accordingly. We always handle resources, company property and intellectual property with the requisite care and responsibility. We do not use these for illegal or unauthorised private purposes, and we protect these from misuse.

We respect and recognise the intellectual property of customers, business partners, suppliers and competitors.

Trade secrets and technical expertise render a significant contribution to our success. We treat all information and documents that are not suitable or intended for disclosure to third parties as strictly confidential, and protect them against unauthorised access. This also means that we do not discuss this outside the work environment or in public.

In the case of employees working on the move, we ensure that communication by e-mail or telephone is always handled confidentially. When employees leave, we ensure that all equipment is returned, all access blocked and all internal company documents returned.

This information includes, for example, development projects, planned product launches, strategic considerations, planning and financial data, personnel information, expertise and all other business secrets and sensitive data. We only share confidential information internally if this is deemed necessary in the context of a task. We only disclose information to third parties if this is in the interests of the company, and there is a corresponding confidentiality obligation. If we suspect that confidential information has come to the attention of persons lacking the necessary authorisation, we immediately inform our superiors or use the internal reporting system (Whistleblower System).

4.2. Cybersecurity

For the enventa Group, reliable cyber security is a crucial component for the trust of our customers, employees and other business partners, and, therefore, represents a cornerstone for the continued existence of the Group. The misuse of data by hackers, for example, the loss of data due to malware or the impairment of data processing are high risks in the Group's IT environment. We are aware that the data processed in (and by) the enventa Group represents valuable information, and we take precautions in accordance with the latest technological standards to ensure appropriate security.

And, last but not least, it is also the responsibility of each and every one of us to take appropriate security precautions, in order to protect against data loss, unauthorised access, destruction or automated disclosure, theft or other instances of misuse. In addition to the intended use of our IT systems, we achieve this – especially when working on the move – by using secure passwords and methods for further authentication, among other things. We use the company's hardware and software to achieve the underlying objectives and refrain from any unauthorised instance of personal or illegal

use. In communication, we pay keen attention to the authenticity of e-mails and other communication channels, and check the content before taking action.

The direct line manager or the Group Security Officer are on hand as contacts for reporting suspected cases of misuse. The internal reporting system (Whistleblower System) can also be used for this purpose.

4.3. Data protection

As an IT software solution and service provider, it is essential that we process a large amount of data in order to fulfil our tasks and obligations vis-a-vis our customers, service providers, contractual partners, authorities and other third parties. The respective rights to the personal data of our customers, suppliers, employees and business partners are legally protected by data protection laws. We handle this data responsibly. The processing and collection of personal data is managed on a legal basis, the consent of the data subject or a governing contractual provision. Suitable technical measures are used to protect personal data against loss, unauthorised access and erroneous disclosure. Data subject rights are safeguarded by us in the process.

Personal data pertains to data that relates to an identified or identifiable person. This includes all information that refers to a natural person and everything that can contribute to the identification of this person. For example: a person’s name, e-mail address, account details, customer number, address, date of birth, telephone number, location, IP address, cookie ID, vehicle registration number, tax identification number or national insurance number.

Enventa has appointed an external data protection officer. The contact details of our external data protection officer are available on our company website under data protection. We will inform our data protection officer immediately if we become aware of or suspect any data protection breaches.

4.4. Safeguarding our principles

We train our employees at regular intervals to ensure that the principles for protecting our corporate values remain present in our everyday work.

5. Conduct in business relationships

5.1. Relationships with customers, business partners and suppliers

A good business relationship is important to us, but not at any price. We maintain a zero-tolerance policy towards all forms of corruption and the exertion of influence.

We make decisions in the business environment on the basis of objective and comprehensible reasons, thereby separating personal and professional interests. We make appropriate and fair

agreements and render our services in accordance with applicable laws and regulations and the company's internal guidelines. We avoid all decisions that give the appearance of undue influence, e.g. through inducements or other benefits. Conflicts of interest that render an unbiased, objective decision impossible are disclosed in good time, and the next steps are agreed with the relevant line manager, HR Competence Centre or Legal.

Our suppliers are selected carefully and in full compliance with the legal requirements for fair competition. Private relationships with a supplier must not lead to the occurrence of preferential treatment. Employees who are in a position to exert direct or indirect influence on the order must inform their direct line manager about the private relationship before selecting or deciding in favour of a supplier.

To the extent that offers or orders have not already been approved and checked by Executive Management itself, we ascertain compliance with our principles on a random basis.

We maintain fair, correct and transparent dealings with our customers, suppliers and business partners.

5.2. Benefits and gifts

We do not accept benefits or gifts (e.g. tickets, invitations, trips, discounts, individual price reductions, etc.) if these could influence our decision. We also do not offer this type of benefit to our customers, suppliers and business partners.

Gifts deemed to be of a reasonable amount that are within the scope of the statutory and tax regulations (reference value in the European Union EUR 35.00) are excluded from this provision. These may include small promotional gifts, invitations to a customary business lunch or gifts for special occasions – provided they are not money or money-like gifts.

We do not accept gifts of a higher value. If the rejection of a gift could be misinterpreted in the business relationship (e.g. due to cultural customs), we will contact Executive Management before accepting/rejecting the gift and agree on how to proceed.

Invitations to company events are sent to our customers in coordination with Marketing. Travelling and accommodation costs for third parties are not covered by the enventa Group.

Invitations to business meals and entertainment events can also entail tax consequences for the individual being invited. In the interests of the company, these invitations are documented and disclosed to the line manager and the relevant Accounting department.

In particular, when in contact with public officials and government agencies, even stricter requirements apply than in normal business transactions. Under no circumstances may gifts be accepted, monetary donations, benefits or invitations be offered, in order not to jeopardise their independence. We are aware of this point, and take great care to comply with these principles, particularly in our relationships with public officials, authorities, civil servants, public corporations, state-owned companies,

international organisations, members of parliament and elected officials and members of political parties.

We are also committed to ensuring that our close relatives and partners also comply with these regulations, and that there is no impression of indirect influence.

In any instance of doubt, we consult with our direct superior beforehand.

5.3. Combating money laundering and the exclusion of anti-company influences, trade controls and economic sanctions

We comply with the relevant laws aimed at combatting money laundering and terrorist financing, as well as all applicable economic sanctions. We do not tolerate bribery or corruption of any kind. We do not pay any bribes.

We verify the identity of customers, suppliers and business partners with whom we wish to enter into a business relationship. No individual in the enventa Group may do business with companies and organisations or persons associated with money laundering, funds from criminal activities, terrorism or drug trafficking.

We allocate payments to the corresponding services without delay and ensure transparent payment flows.

We immediately report any suspicions to our superiors, Legal or via the internal reporting system (Whistleblower System).

Where necessary, we report the facts checked to the relevant authorities.

5.4. Political donations, donations for charitable purposes, sponsoring

The enventa Group is committed to its social and community engagement. This also includes support for charitable organisations in the form of donations. Donations are always made on a voluntary basis, and without expectation of anything in return.

We use sponsorship exclusively for advertising purposes to promote the Group’s brand and image, in a manner that is always in harmony with the service being provided in return. The sponsoring partners must provide demonstrable services for the enventa Group.

Donations and sponsorship measures shall only be permitted within the framework of the applicable legal system and in accordance with the current internal guidelines of the enventa Group, and shall only be granted after a transparent approval process.

As a matter of principle, we do not support political parties or party-affiliated organisations with donations, grants or other forms of sponsorship.

5.5. Fair and free competition

Fair and free competition is a cornerstone of a healthy market economy. We support (and promote) functioning competition and comply with the applicable competition and antitrust laws. We do not enter into any agreements or other arrangements with competitors, suppliers or other companies that have the purpose or effect of preventing free competition. In particular, this also includes no price fixing agreements, no market sharing, no coordination of market behaviour and strategies and no calls for unfair boycotts. We do not discriminate in the purchase or sale of goods and services, and we select our suppliers and service providers carefully.

If our employees feel any sense of uncertainty or if they have any questions, the Managing Directors and experts from Legal will help them find a solution.

5.6. Insider trading

We do not utilise insider information for our own benefit and comply with the legal requirements (in Europe, in particular, the Market Abuse Regulation [MMVO]).

A spirit of co-operation rooted in trust with our customers and suppliers forms the basis of our success. Everyone in the enventa Group treats insider information as strictly confidential, and ensures that it cannot be accessed by unauthorised third parties. The securities or financial instruments of these companies may not be bought or sold if insider information is available. This information will not be passed on to friends, acquaintances or third parties – even in confidential conversations.

The term “confidential information” denotes information which, if it were made public, would be capable of significantly influencing the share price of listed companies or financial instruments linked to the share price of such companies (so-called “insider information”).

5.7. Technical developments and progress

As a software company Group, we naturally have a keen interest in new, innovative technological developments. We are interested in testing the potential of these technologies and their suitability for use in our Group of companies. We believe that these technical developments and the implementation of new technologies should only be realised in compliance with ethical standards and with respect for nature.

By “new technologies”, we mean, for example, applications, state-of-the-art programming languages, artificial intelligence and machine learning.

We take a responsible approach to the use and development of these new technologies. In doing so, we comply with the latest security standards, the protection of privacy, data protection and the statutory participation rights of employees.

6. Responsible behaviour

6.1. Decision-making and approvals

All employees make their decisions and approvals exclusively on the basis of the corporate guidelines, procedures and approval processes established by the enventa Group.

We only enter into contracts, transactions and commitments within the decision-making powers delegated to us by the enventa Group.

6.2. Reporting and records, controls and audits

Compliance with the legal framework for proper accounting and financial reporting is nothing short of a matter of course for us. We ensure that the business documents and data we produce comply with legal requirements and are up-to-date, timely, appropriate, complete, correct and comprehensible.

We comply with (and observe) the applicable tax laws and regulations.

We perform control measures and audits for our business activities when necessary. We co-operate with required inspections and audits to the best of our knowledge and belief.

6.3. Internal and public communication

We always represent our own values and stand by the statements we issue. We endeavour to establish (and promote) our brand through communication in different media and with different interest groups.

We comply with company policies and procedures, applicable laws and regulations when communicating – including posting on social media. We refrain from making false statements, allowing discrimination, harassment, the disclosure of confidential information, the violation of privacy and deception or damage to customers, suppliers, co-operation partners or competitors.

We are aware that the personal disclosure of information – including through the use of social media – can have a negative impact on the reputation of the enventa Group. We do not pass on any confidential information, and do not disseminate any offensive or insulting content. We communicate our personal views and statements in accordance with company policy and applicable laws and regulations in such a way that these are not to be construed as official statements or views of the company. We also take personal responsibility for our own statements and opinions.

7. Notes and reports of concerns

The enventa Group has introduced an internal reporting system, thereby allowing every employee and every business partner to report suspected or potential misconduct – even completely anonymously – without being penalised, in order to ensure that the Code of Conduct is put into practice effectively and that the enventa Group can continue to develop in a spirit of trust.

We act with integrity and comply with legal and internal regulations. This Code of Conduct contains (and summarises) the most important rules of conduct. Detailed regulations relating to individual topics are set out in the local guidelines. Furthermore, the direct line managers, the Competence Centre Human Resources, Legal and the Executive Management teams are available to provide advice in an atmosphere of trust.

The first point of contact for questions and doubts should always be your direct line manager.

In addition thereto, the Competence Centre Human Resources and Legal are also available as trusted points of contact.

It is also possible to submit a report – including in anonymous form – via our internal reporting system (Whistleblower System). The reporting system is available to employees and external persons as a reporting option on our website. The internal reporting system is supervised by an ombudsman, in order to ensure the confidentiality and anonymity of whistleblowers.

Dealing with violations – Sanctions

We rely on recognising indications of misconduct or a significant breach of the law or internal regulations at an early stage, in order to be able to implement effective countermeasures. No one who expresses their concerns in good faith and to the best of their knowledge and belief will suffer any disadvantages for their behaviour.

Every report and registered suspicion of unfair behaviour shall be processed by the ombudsman via the internal reporting system and by Legal – with the involvement of other supporting divisions.

If the case's subsequent investigation reveals evidence of misconduct, appropriate measures are examined and initiated on a case-by-case basis. Any failure to comply with the rules can result in considerable economic damage, fines and reputational damage for the enventa Group. However, serious violations can also lead to personal consequences under criminal, labour and civil law for both employees and managers.

However, the points of contact must not be misused to deliberately provide false or defamatory information. Such reports can result not only in civil, but also criminal consequences for the person submitting the report in question.

The Code of Conduct and current information on the enventa Group can be found at www.enventa-group.com.

Code of Conduct of enventa Group GmbH and its subsidiaries

enventa Group GmbH
Im Mittelfeld 1
76135 Karlsruhe
compliance@enventa-group.com

As of: October 2026