

Code of Conduct

Empowering trust,
responsibility
and innovation

Table of content

01	Foreword
02	Scope
02	Mission and guiding principles
03	Integrity within our organisation
05	Integrity in business transactions
07	Integrity and social responsibility
08	Communication, training and advice
08	Reporting concerns
08	Validity, review and disciplinary actions
08	Acknowledgement

Foreword

Dear Colleagues,

In today's rapidly evolving digital landscape, the responsibility of those who create, manage, and offer technological solutions is greater than ever. From the way we manage our resources and handle data to how we interact with colleagues and business partners, our actions shape the future of dataspace and collaboration. This Code of Conduct serves as a guiding framework, ensuring that integrity, transparency and end-to-end responsibility remain at the heart of everything we do.

At Cofinity-X, we not only seek to develop technology and achieve long-term goals, but also to foster a supportive, inclusive and productive environment. As we work together to innovate and develop best-in-class products and services, it is essential that we do so with respect and accountability. We thrive by sharing ideas, learning from each other, and respecting the diversity of experiences and perspectives that everyone brings to the table.

This Code of Conduct is not just a set of rules; it is a reflection of our collective commitment to ethical conduct and continuous improvement. We want to be a role model in an ever evolving and rapidly expanding Catena-X ecosystem. Together we can revolutionize collaboration, shaping a future where technology works for the greater good.

Thomas Rösch

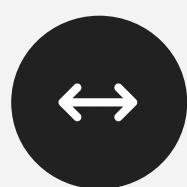
Thomas Rösch, CEO





Scope

The Code of Conduct applies to the entire entity, including situations that may occur outside the workplace or working hours. We also expect our business partners to adhere to these principles. Employment contracts and specific policies, as well as business partners' contracts, may contain additional obligations that remain unaffected.



Mission and guiding principles

We are on a mission to bring global industries together and empower sovereign data exchange. We operate the largest collaborative and open data ecosystem of partners and enable value generation and sustainability along the automotive value chain while complying with the Catena-X standards. We are aware of our responsibility, and we are committed to achieving our goals while adhering to the highest ethical and legal standards.

This Code of Conduct describes the basic rules of behavior that should guide our decision making within Cofinity-X. We strive to make decisions based on ethical considerations, always choosing the right course of action even when it may not be the easiest or most convenient. Both in our relationships between colleagues and in our relationships with business partners and the rest of the world, we will fulfill our goals in a responsible, transparent and sustainable manner. But we'll still have the courage to make mistakes, because every mistake is a chance to learn and get better. The following Guiding Principles reflect the spirit of our company and serve as a backbone for defining our corporate culture.

Everyone at Cofinity-X is responsible for knowing, understanding and implementing these guiding principles in their daily work. We ask you to refer to this Code of Conduct whenever you are faced with difficult decisions. And we are all encouraged to be vigilant, to consult when in doubt, and to speak up whenever we see misconduct or we think we can improve ourselves. Let's get started on a great journey together!



Quality

We deliver consistent, best-in-class products and services while pushing the boundaries of excellence



Customer focus

We put our customers first and actively understand and solve their needs



Ownership and empowerment

We take proactive end-to-end responsibility and support each other



Transparency

We share relevant information within the company and are honest about our weaknesses



Diversity

We work in an inclusive environment by embracing multiple perspectives



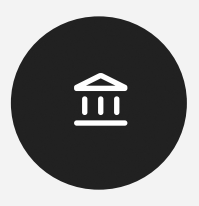
Continuous improvement

We embrace feedback, constantly measure and improve ourselves



Focus and endurance

We deliver our long-term goals, stay calm and trust in our ability to succeed



Integrity within our organisation

An organization that operates based on integrity is an organization that builds trust. And a trustworthy company builds long-term relationships with its employees, its business partners and its shareholders, which directly impacts its culture, performance and overall success. Cofinity-X will always strive not only to comply with laws, regulations and internal company rules, but to create a work environment and achievements that we can all be proud of. Without losing our dynamic identity, we are committed to upholding the highest ethical standards and implementing internal best practices that allow us to set an example in the industry. For us, this means in particular:

Equitable workplace

Cofinity-X is proud to be a diverse company, and we are dedicated to fostering an inclusive and equitable workplace where everyone can thrive. We stand for a working environment that offers access to the same opportunities, resources, and support to all employees, regardless of their background, identity or personal characteristics.

We do not accept intolerance or harassment in the workplace. Everyone has the right to be treated fairly, with dignity and respect. No one may be discriminated against on the grounds of race, ethnicity, gender, sexual orientation, age, ability, socioeconomic status, religion, culture, national origin or thought. And we will protect those who are negatively affected by discriminatory actions within the company.

Employees at all levels are encouraged to contribute their ideas and perspectives, ensuring that decision-making processes consider a wide range of viewpoints. Flexible work arrangements and special consideration to specific circumstances are also a priority to ensure everyone can perform their jobs effectively.

Accurate and reliable record keeping

We understand the importance of maintaining accurate and trustworthy records to safeguard the integrity and reputation of the company.

Therefore, we uphold the highest standards of record-keeping across our organization. Accuracy, integrity and transparency are essential principles in our record-keeping processes, and we make sure that all records, whether physical or electronic, are maintained in accordance with legal, regulatory and operational requirements.

All records reflect true and correct information, without error or alteration, and are retained for the time periods specified in internal policies and legal requirements. We are all accountable for this, and will do our part in handling, documenting and reporting financial disclosures. The company will always maintain transparency in all record-keeping processes, allowing audits and reviews at any time.

Careful and proper handling of resources

We treat internal resources, whether financial, physical, digital or intellectual, with the utmost respect and responsibility. The proper handling of resources is fundamental to ensuring the integrity, sustainability and growth of our organization. We must ensure these resources are protected from damage, theft and misuse.

Resources are only used for their intended business purposes and in a manner that maximizes efficiency and minimizes waste. Personal use of company resources is prohibited unless explicitly authorized cases.

We take appropriate security precautions to ensure the protection of all our IT resources, including hardware, software, network infrastructure and digital data. We always ensure that devices are physically protected from theft, damage or unauthorized access, and keep our software and systems up to date by regularly installing security patches and updates as instructed by the company. We ensure proper classification, handling and destruction of data. Unauthorized access to or disclosure of confidential information, and deliberate or accidental data alteration, corruption or destruction, are prohibited.

Information security

At our company, we follow all internal information security policies, standards, and procedures as part of our daily work. Protecting our systems and data is everyone's responsibility, so we make sure to understand the security requirements for our roles and act according to them.

We use our IT resources ethically and responsibly, and avoid activities that could enable internal and external misuse. Attempting to gain unauthorized access to any systems, networks or data is strictly prohibited. If we're ever unsure about a security matter, we ask questions or seek guidance. We stay alert for risks and report any suspected incidents promptly. That's how we keep our company, colleagues, and customers secure.

Data protection

When entrusted with personal, sensitive and/or confidential information, it's our duty to protect and handle such data with care, in compliance with applicable laws and internal policies.

Especially when collecting, storing, processing or transferring personal data, we exercise the utmost care. We ensure that personal data is handled in a way that respects privacy rights, complies with legal frameworks, and protects individuals' personal information from harm. We do our best to safeguard personal data from misuse, loss, unauthorized access, disclosure or destruction, and any breaches are reported timely to allow for a proper response.

Dealing with trade secrets

We handle our business affairs in a responsible manner and only share critical business information in a need to know basis. We protect our confidential information, especially our intellectual property and trade secrets, including formulas, designs, processes, customer lists, software, business strategies, or any other information that has commercial value and is not generally known or easily accessible.

Dealing with trade secrets in an open-source environment requires particular attention, as open-source projects encourage public collaboration and transparency, which may seem at odds with the protection of proprietary information.

When contributing in an open-source environment, are protected by following our internal policies. We make sure that we do not contribute proprietary code without the proper authorizations. Contributions should be limited to the code or functionality that is publicly intended for collaboration, avoiding conflicts with the company's development efforts.

Conflicts of interest

All decisions, both at the organizational and individual level, should be made based on objectivity and the best interests of the company. No individual shall use their position, access to information or decision-making authority for personal gain, or allow personal interests to influence decisions in a way that could compromise the integrity of Cofinity-X. We recognize that situations may arise where personal interests could potentially conflict with professional duties or the best interests of the company.

Conflicts of interest can lead to decisions no longer being made unbiased, even if only in appearance. If we cannot avoid situations where our personal, familial, financial or other interests could interfere with, or appear to interfere with, our professional responsibilities and duties, we immediately disclose said conflicts of interest and work together to find a solution to resolve them.



Integrity in business transactions

Our commitment to integrity shapes our reputation and strengthens our relationships with our business partners. We believe that ethical behavior is the foundation of our long-term success, and will strive to achieve high levels of mutual trust and respect with customers, suppliers, partners, shareholders and any other relevant stakeholder. We will treat all individuals and organizations with fairness and objectivity, ensuring that our business decisions are made impartially and without bias. We pledge to be truthful and transparent in all our communications and dealings, and take full responsibility for our actions and decisions. For us, this means in particular:

Anticorruption

Corruption in any form is contrary to our values at Cofinity-X. We do not tolerate bribery, kickbacks or any form of unethical conduct, whether it involves public officials, private entities or individuals. We firmly believe in the values of integrity, fairness and trust, and are committed to preventing corruption in all its forms. We uphold that all transactions and decisions must be based on merit, transparency and accountability. It is absolutely prohibited for any employee, contractor, agent or business partner to offer, accept or solicit bribes or improper payments to influence business decisions or gain an unfair advantage. We have established clear principles of conduct in our internal policies and procedures regarding procurement, supplier selection and the granting and acceptance of entertainment, gifts and other benefits. We categorically reject corrupt or illicit behavior and expect all our employees to be aware and abide by these principles in all their interactions.

Anti-money laundering and terrorist financing

We recognize the serious threat that money laundering and the financing of terrorism pose to the integrity of the financial system and the wider global community. As such, we are dedicated to maintaining the highest ethical standards to ensure our business is not used to facilitate these criminal activities. At Cofinity-X, we take a strong and unwavering stance on anti-money laundering and counter-terrorist financing. We do not accept cash payments, keep accurate records of all transactions, implement adequate controls to ensure that we do not do business with blacklisted persons or entities and comply with all legal requirements for the prevention of illicit activities. Any suspicious transactions will be reported to the relevant authorities and we will cooperate with whatever investigation that may be carried out.

Antitrust and competition law

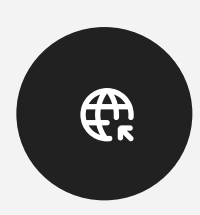
As part of our commitment to ethical business practices, we strive to promote and uphold the principles of fair competition at all levels of our organization. We believe that competition fosters innovation, benefits consumers and contributes to a prosperous economy. Our company ensures that all employees, especially those involved in sales, procurement and pricing decisions, fully understand and comply with antitrust laws. We recognize that these laws are crucial to ensuring that companies operate on a level playing field. We do not tolerate any behavior that violates antitrust laws or any agreements with shareholders, competitors and suppliers that compromise fair competition. This includes price fixing, market sharing or any type of collusion with competitors that could harm market dynamics. By fostering a culture that values transparency, ethical conduct, and competition, we aim to contribute to the broader goal of protecting and enhancing the integrity of the marketplace.

Foreign trade law

We understand the complexities of global trade and are committed to ensuring that our business practices comply with the legal frameworks that govern international transactions. Our commitment includes strict compliance with export and import control laws, sanctions regulations, trade embargoes and other restrictions imposed by local, national and international authorities. We recognize the importance of complying with these laws to maintain the integrity of our business operations, ensure fair trade, and avoid any violations that could damage our reputation or the global economy in general. This commitment ensures that our business not only complies with the law, but also contributes to the responsible and transparent flow of goods and services around the world.

Respect for intellectual property

We encourage the creation of innovative ideas, inventions and works that contribute to the success of our organization and are committed to maintaining the highest ethical standards in the creation, use and protection of intellectual property. We will register, protect and properly manage our intellectual property to maximize its value and ensure compliance with applicable laws. We are committed to respecting the intellectual property rights of others, including patents, trademarks, copyrights and trade secrets. We will not knowingly infringe the intellectual property rights of others and will avoid using unlicensed or counterfeit products or services. We will only use the intellectual property of third parties when it is guaranteed that we have the corresponding rights of use, for example, in the form of licenses. When using or contributing to open source projects, we ensure compliance with the relevant licensing requirements.



Integrity and social responsibility

Integrity and social responsibility are more than principles: they are commitments that shape the way we innovate, build and engage with the world. In a rapidly evolving technological landscape, we recognize that our decisions have important social, environmental and ethical implications. That is why we hold ourselves to the highest standards of honesty, transparency and accountability in all aspects of our business. By integrating integrity and social responsibility into our culture, we aim to create technology that not only advances society, but also respects and uplifts it. For us, this means in particular:

Health and safety at work

At Cofinity-X we are fully committed to ensuring the health, safety and welfare of our employees, contractors and visitors—whether working on-site, remotely, or in hybrid settings. We recognize that maintaining an inclusive, safe and healthy workplace is not only essential to the success of our business, but also to the overall well-being of those who interact with our organization. This includes following established safety procedures, reporting hazards or incidents promptly, and fostering a culture where concerns can be raised without fear of retaliation.

While our work may not always involve physical labor, we recognize the importance of ergonomic safety, mental health, digital wellness, and secure working conditions in every aspect of our operations. We strictly adhere to all applicable health and safety regulations and promote proactive practices to prevent injury, reduce stress, and support overall wellness. Our goal is to ensure that every individual feels safe, valued, and supported—both in the workplace and in the digital spaces where we collaborate. Together, we strive to create a workplace where everyone feels protected, supported, and empowered to thrive.

Human rights

We are firmly committed to respecting and upholding the fundamental human rights of everyone affected by our business, from our employees and contractors to our customers, partners and the communities in which we operate. As a technology company, we recognize our unique responsibility to ensure that innovation does not come at the expense of privacy, freedom, dignity or equality.

We respect internationally recognized human rights. These include the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the five pillars of the International Labor Organization's (ILO) core labor standards.

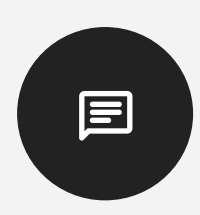
Among other things, we ensure unrestricted respect for the rights to freedom of association and collective bargaining, compliance with occupational health and safety standards and regulations, and the prohibition of child labor, forced labor and slavery in all its forms, as well as the prohibition of unequal treatment in employment. This applies both to our operations and our entire supply chain. Protecting human rights is not just a policy: it is an essential part of who we are and how we innovate responsibly.

Environmental protection and sustainability

We recognize our responsibility to protect the environment and actively contribute to a more sustainable future. We are committed to minimizing our environmental footprint through responsible business practices, innovation and continuous improvement in all areas of our operations.

We strive to reduce energy consumption, greenhouse gas emissions and waste, and work with partners who share our commitment to sustainability and environmental compliance.

Sustainability is integrated into our decision-making processes and is part of what we aim to achieve with our products as well. We encourage employees to contribute by embracing digital efficiency, reducing unnecessary travel and supporting green initiatives in the workplace and beyond. Through transparency, collaboration and innovation, we aim to create technology solutions that not only drive human progress, but also preserve the planet for future generations.

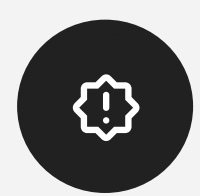


Communication, training and advice

The Code of Conduct will be handed out to every employee joining the company, and must be easily accessible both on the intranet and website of Cofinity-X.

To ensure that all employees have a clear understanding of the provisions of the Code of Conduct and that they can apply ethical principles in their decision-making and actions, a mandatory training for all employees must be implemented, including practical examples. The training should be updated and repeated at regular intervals to ensure that employees are always up to date on integrity matters.

In case of doubts or when faced with difficult decisions, employees must contact the Cofinity-X Compliance Manager at any time directly in person, by telephone or by e-mail at compliance@cofinity-x.com, in order to obtain advice. Only the Compliance Manager has access to these e-mails and will handle matters with the outmost confidentiality.



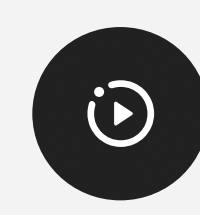
Reporting concerns

We believe that a strong ethical culture is built on open communication. Upon suspicion of illegal or unethical behaviour, or breaches of the Code of Conduct and/or any other internal policies or regulations, employees must report the facts to their superiors and/or the Compliance Manager immediately, in accordance with internal policies.

In particular, both employees and third parties external to the company have access to an anonymous whistleblowing hotline, which can be accessed through the following link:

<https://cofinity-x.integrityline.app>

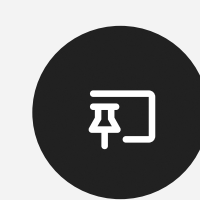
All reports will be investigated in a confidential, fair and timely manner, according to the principles described in the Whistleblowing Policy, and retaliatory actions against those who dare to speak up will not be tolerated.



Validity, review and disciplinary actions

The Code of Conduct comes into force upon approval by the managing directors and remains valid until revoked. It is reviewed at least once a year, or more frequently if necessary.

Without a formally approved exception, non-compliance with the Code of Conduct can be subject to disciplinary actions in accordance with applicable laws and established Cofinity-X GmbH processes. The company will report relevant situations to the respective authorities, which may lead to reputational damage, professional bans, fines and criminal penalties.



Acknowledgement

The Code of Conduct must be included in the employment contracts of our employees as an integral part of it. For those employees who do not have it integrated into their employment contract, a process of distribution and written acceptance of the Code of Conduct must be carried out to ensure that it has been received and is known by all Cofinity-X employees.



Cofinity-X GmbH
www.cofinity-x.com
Breslauer Platz 4
50668 Cologne

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