Code of Conduct (CoC)
and
Corporate Social Responsibility (CSR)
Manual

mandatory for all employees

of the DCCS IT Group

as well as for our business partners and stakeholders

V 4.0

Content Owner: IMS (Integrated Management System)

by: DCCS Management Board

Contents

1 Preamble

This document summarizes all mandatory principles of the DCCS on business ethics, environmental management and corporate social responsibility for employees and business partners. The purpose of this document is to summarize all the guidelines that guide us in our business activities and operational processes, and it thus also describes as a Code of Conduct binding behavior, convictions and standards that we set for ourselves and which we base our actions on. This Code of Conduct applies to all employees, managers and managing directors as well as to all locations within the DCCS IT Group. Our leaders, in particular, are role models of integrity, respect and responsible corporate governance.

Our CoC is an integral and fundamental part of our **integrated management system (IMS)(certified according to EN ISO 9001:2015, ISO 27001:2022, ISO 42001:2023, TISAX 6.0 and Cyber Trust silver Level).**

1.1 Due Diligence at DCCS

For us as a company, it is very important to have the due diligence idea integrated into our business activities and documented. This enables us to identify potentially negative but also positive effects preventively and to act accordingly. To anchor adequate behaviors and guidelines in our strategic decisions, short-, medium- and long-term planning and in our daily actions.

Taking into account the recommendations from the "**OECD Due Diligence Guidelines for Responsible Business Conduct"** and other requirements from various standards, our intended due diligence process consists of the following elements:

1. Anchoring in strategies and management systems – CSR commitment
2. Identification of actual and potential effects - materiality analysis
3. Eliminating, avoiding, and mitigating negative effects, tracking implementation and results - Risk management
4. Communication – Integrated reporting (management report, integrated reporting)
5. Complaints and reporting management
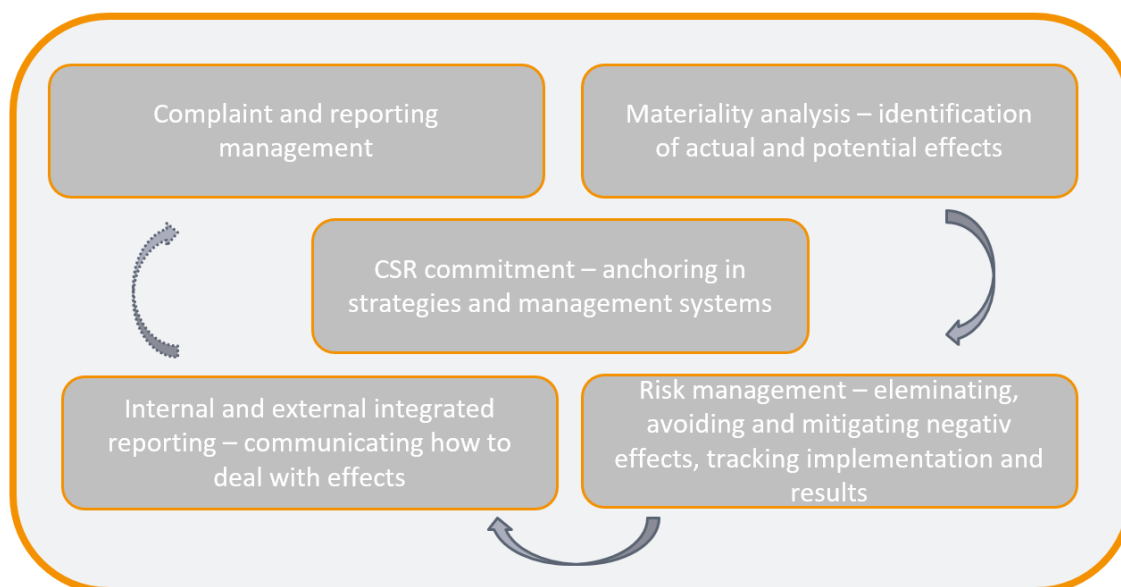
Figure 1: Building blocks of due diligence

1.1.1   Anchoring in strategies and management systems - CSR commitment

For us, responsible business conduct means anchoring this in our strategies and management systems and processes.

It goes without saying that we comply with all applicable laws, norms and standards. In addition, we regularly analyze the potential we have within the scope of our possibilities in order to contribute to a future worth living for all our stakeholders, and beyond.

Based on the quality management system that has already been implemented and has been certified according to ISO 9001 for many years, as well as the existing certifications according to ISO 27001 and TISAX, we are successively improving our integrated management system, which includes a due diligence process and risk management as an important component. The ISO 9001 certification ensures that our quality management processes are continuously improved, while the ISO 27001 certification guarantees the protection of our information security management systems. TISAX complements this with specific requirements for information security in the automotive industry.

In addition to these existing certifications, we also focus on responsible AI development and deployment. In line with this goal, it is our concern to consider the central CSR principles from the outset, also with regard to artificial intelligence. Accordingly, it was a logical consequence for us to supplement our successful integrated management system with ISO 42001. We focus on ethical behavior, such as requirements for fairness, transparency, and data protection, which ensure that AI systems do not discriminate and remain traceable. However, we also systematically evaluate the risks and effects of our AI applications on stakeholders such as customers, employees, and society.

We are continuously implementing all of these measures, both at the strategic level and in the already existing main and support processes and is thus reflected in the interaction of various processes from different analytical fields such as human rights, occupational health and safety or environmental protection. In this way, the due diligence is documented via the integrated management system for the individual processes in interaction with risk management.

1.1.2 Materiality analysis – identification of actual and potential effects

We at DCCS are aware that we live in a time in which the demands on our society can change rapidly and also complexity increases constantly. In order to be able to meet these challenges in the future and to be able to meet them with sustainable strategies, we have identified focus **areas** in our **ESG (Environmental, Social, Governance) analysis** in which we would like to set our priorities. The contents of this policy, as well as the mapping of our measures, initiatives, key figures, etc. In the integrated management system we describe how we integrate our aspirations into our daily activities.

The **materiality analysis** helps us to identify those areas where we see the greatest environment, social and governance impacts, considering the nature of our primary business activities, our supply chain and our business relationships.

For this analysis, we take the approach of taking both an inside-out and an outside-in perspective. Based on our industry context and our locations, we have currently primarily identified customers, employees, owners, suppliers, and legislation as stakeholder groups and, where possible, as dialogue partners on sustainability issues. Depending on the target group, surveys, audits and interviews are used.

Based on our existing analysis of our primary business activities, the following focus areas have been further confirmed, where we see the **greatest impacts of our business activities** and where we also want to continue to proactively contribute to the achievement of the United Nations' Sustainable Development Goals:
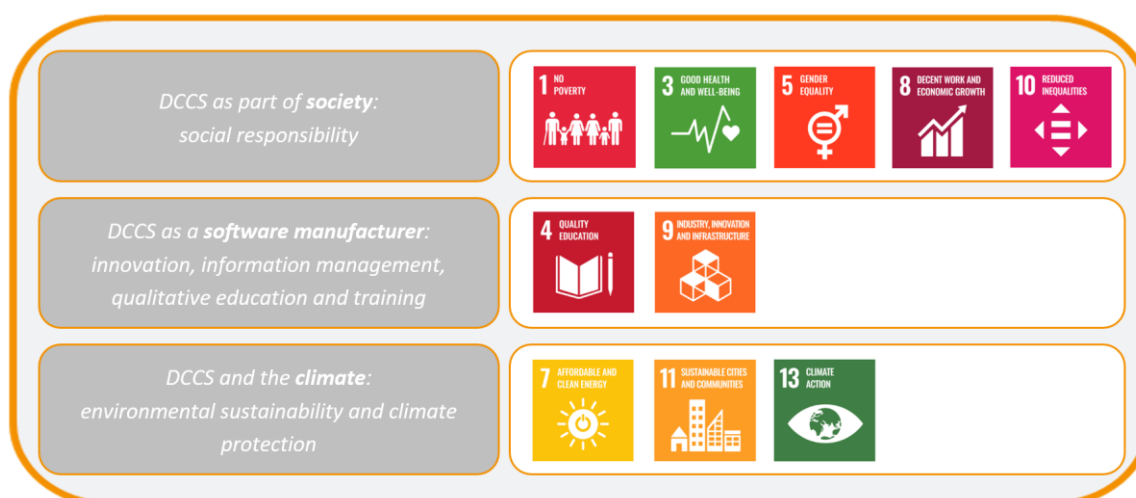

Figure 2: Focus Areas and Contribution to the SDGs

DCCS as part of society: social responsibility

> SDG 1: No poverty
> SDG 3: Good health and well-being
> SDG 5: Gender equality
> SDG 8: Decent work and economic growth
> SDG 10: Reduce inequalities

DCCS as a software manufacturer: innovation, information Management, qualitative education and training

> SDG 4: Quality education
> SDG 9: Industry, innovation, infrastructure

DCCS and the climate: environmental sustainability and climate protection

> SDG 7: Affordable and clean energy
> SDG 11: Sustainable cities and communities
> SDG 13: Climate action

The next materiality analysis as part of the due diligence process is planned for the course of 2026 in order to respond both to the changed framework conditions due to the pandemic and the socio-political situation as well as to legal developments, especially with regard to the **European Sustainability Reporting Directive** and its effects.

1.1.3 Eliminating, avoiding and mitigating negative effects, tracking implementation and results – risk management

Based on the areas identified in the materiality analysis with the greatest impact, we analyze their effects in both positive and negative terms. In order to eliminate, avoid or at least reduce negative effects to the best of our ability in the future, they are incorporated into the risk management process, which is part of our integrated management system.

1.1.4 Communicating how to deal with effects – internal and external integrated reporting

As part of the entire due diligence process, it is important to us to establish a reliable reporting system - integrated into our quality management tool and connected to our learning and information platform.

We make our actions transparent, underpin our measures with KPIs and strive for continuous improvement of the set goals, both in qualitative and quantitative terms. An essential part of this is the continuous evaluation of our internal and external communication with the various stakeholders.

Our concrete measures, objectives and initiatives on sustainability issues, including their assessment, are therefore evaluated on a regular basis and published in the CSR report in the future.

In addition, 2.10 Disclosure of information should also be noted in this context.

1.1.5 Complaint and reporting management

For those situations in which negative effects have occurred despite our efforts, there are various ways to get in touch and dialogue with us as a company and our employees, depending on the stakeholder group and concerns.

More detailed information and corresponding contact details can be found in this document in chapter 5.2 Complaint and reporting management.

2 DCCS as part of society: social responsibility

As a company, we see social responsibility as part of our mission and would like to make a conscious contribution to this through our actions.

2.1 Declaration of principles on human rights

Respect for human rights is a cornerstone of our actions and therefore **part of our integrated management system** and its processes.

We strongly reject any form of forced and child labour or forms of modern slavery.

Each of our employees is free to choose to join or not to join a trade union/employee representation of his/her choice without threat or intimidation. We recognize and respect the right to negotiate collective agreements and/or collective bargaining agreements within the limits of applicable laws, **collective bargaining** and the right to **freedom of association**.

In addition, a risk analysis has shown that the business activities, the value chains and the industry context of DCCS currently do not pose a risk of serious impacts on human rights violations. Nevertheless, we hereby reaffirm our responsibility to observe, and respect human rights in accordance with the international **UN-Charter of Human Rights**, both internally and externally in our cooperation with our business partners.

When creating guidelines and processes, we are also guided by the **SA8000 standard of Social Accountability International** and thus also by the conventions of the **International Labour Organization (ILO) and the United Nations.**

2.2 Working conditions, health and well-being

The safety, health and well-being of our employees is a very high priority for us. We attach great importance to compliance with existing employee protection regulations and protective measures at all locations, which are also regulated in the separate **workplace instruction manual for DCCS employees**, on which employees are trained at the start of work and annually thereafter. Based on our analysis, this handbook contains the topics of **emergency preparedness, incident and accident management, workplace ergonomics and fire protection**. Due to the activities of our employees, the topics of **personal protective equipment, machine safety and the handling of chemical and/or biological substances** are currently not addressed. For special areas of responsibility of employees with special requirements in the areas of human rights, working conditions and occupational safety, additional separate instructions and trainings are carried out.

In addition, compliance with **the Working Time and Rest Acts** is regulated in detail in Working Time Guidelines as a binding element of every employment relationship (see **Works Agreement Flextime Agreement**). Compliance with working time legislation is checked organizationally and tool-supported on a daily, weekly and monthly basis, based on the respective legal provisions of our legal entities.

The annual (working time) coverage check as well as the annual income review for all legal entities represents a further, additional audit instrument to ensure compliance with the **LSD-BG (Wage and Social Dumping Prevention Act).** This ensures that all working hours are compensated and that there is no underpayment or misclassification.

As an entrepreneur, we also undertake to provide control authorities and bodies at any time the possibility to check the remuneration due and to inspect the necessary documents (employment contract, working time records, salary slips, wage records, **proof of payment of wages and social benefits**, bank transfer receipts and documents relating to salary classification).

In addition, as a company, we are periodically audited by an external authority as part of a GPLB **(Joint Audit of Payroll Taxes and Amounts).** All wage-related contributions (all social security contributions and levies, wage tax, municipal tax, employer's contribution to the Family Burden Compensation Fund and surcharge to the employer's contribution) are checked as part of an audit process.

It is also checked whether the individual employees have been accounted for and paid all wage components to which they are entitled within the meaning of the Wage and Social Dumping Act. **Compliance with the law is therefore checked several times.**

Healthy and satisfied employees are the basis for long-term entrepreneurial success. We support our employees in a healthy and active lifestyle in the office and beyond the immediate workplace (home office).

We offer our employees various preventive health promotion measures, which can also be individually expanded as part of our voluntary social benefits (e.g. health and sport programs, supplementary insurance packages, psychological counseling, fitness center, etc.). Due to our entrepreneurial activities, the focus is on work-life balance, mental health, resilience and stress prevention as well as accident prevention training, ergonomics at the workplace and healthy working in the home office. (Psychological) stress evaluations consciously address all aspects of working conditions and occupational health and safety at DCCS.

If necessary, trained first aiders as well as safety representatives enable rapid action in the event of emergencies and accidents occurring at the locations.

As a precautionary measure, the **Emergency Manual** will also be supplemented and expanded to include the topic of black-out management as a separate crisis scenario.

2.3   Diversity, equity, and non-discrimination or harassment

For us, trust also means that we stand up for openness, **equal treatment and entitlement** and that we strictly reject and do not tolerate discrimination, harassment and stereotyping.

It's the **diversity**

1.   of different genders

2.   different sexual orientations

3.   different religions, cultures, minorities, and worldviews

4.   different languages

5.   of the age groups or the age

6.   and different skills

which enriches our cooperation and which we would like to expand consciously. In particular, the selection of our employees is based solely on individual skills and qualifications. In our **recruiting process, we commit ourselves to adhering to our basic ethical principles** by asking applicants about their values on the one hand and consciously focusing on the topic of diversity in the preparation and selection decision-making process on the other hand, as well as addressing stereotyping as a risk assessment. Our recruiting hiring managers and teams are specially trained in this during their interview preparation.

We expressly reject any form of discrimination based on gender, ethnic and national origin, race, skin colour, religion, age, disability, sexual orientation, identity and other legally protected characteristics.

We strongly oppose any kind of personal harassment or discrimination, including workplace harassment, unwanted sexual advances, or indecent offers. With our gender officers, employees

also can contact an independent help and counselling centre (even anonymously) and report injuries.

We oppose all forms of violence and assault, including threatening and intimidating behavior.

Appreciation and recognition of each other are therefore part of our shared values (illustrated in our "DCCS Why and Hows"). We see mutual feedback as well as active and open communication as an essential prerequisite for this.

2.4   Behavior in digital and social media

Respect, tolerance, honesty and integrity towards employees, customers and partners in the general public also determine our presence in digital, especially social media. As members of the company, we therefore always express ourselves respectfully and professionally.

2.5   Prohibition of corruption and bribery

Corruption harms both our company and our stakeholders, so we do not tolerate corrupt behavior. We have submitted to strict anti-corruption policies that go beyond existing anti-corruption laws.

In our dealings with business partners and public officials, we do not grant or accept any benefits that are intended or may appear to influence business decisions or obtain any other improper advantage.

2.6   Dealing with conflicts of interest

When dealing with conflicts of interest, we expect ethical conduct. This means that we assume that the existence of conflicts of interest will be disclosed promptly by those affected to be able to take measures that enable independent and fair decision-making.

2.7   Free competition

We believe in fair competition, which is why we are committed to the principles of free market and open competition. We conduct our business according to the performance principle and based on free, unhindered competition. To this end, we strictly adhere to all applicable rules of antitrust and competition law.

Our business activities are not subject to undue restrictions such as illegal agreements or agreements with competitors.

2.8   Plagiarism - intellectual property

In addition to office equipment and IT systems, our company assets also include intangible assets. This includes, but is not limited to, software, trademarks, copyrights and other industrial property rights, confidential information and know-how. End-to-end contractual safeguards in customer and supplier contracts, in confidentiality agreements with employees and partners form the basis for the protection of our intellectual property.

In addition, we respect all intellectual property and will not use or publish it without authorization.

2.9 Financial responsibility (accurate records)

We assume our financial responsibility and ensure that bookkeeping and accounting are carried out in accordance with all applicable rules and rules for proper accounting to give a true and fair view of the company's business performance, assets and financial situation.

2.10 Disclosure of information

Even though we are not listed on the stock exchange, we are invariably committed to transparency and fairness in the economic markets, including through the careful handling of non-public information of the company to avoid its misuse and unlawful disclosure. We publish company-related material information about our business and new developments, considering all relevant legal information, disclosure and disclosure obligations.

2.11 Export controls and economic sanctions

We comply with international agreements and national laws on the control of international trade and financial transactions, as well as the laws on import and export controls, sanctions and embargoes.

Our employees in international business must know, understand and strictly comply with the applicable laws, regulations, policies and procedures.

In addition, the risk analysis has shown that the primary business activity, the value chain as well as due to the industry context of DCCS, there is currently no risk of serious negative effects to be expected in the following areas:

1. Land, forest, and meadow rights
2. Use of private or public security forces

During the ongoing process, however, these topics are repeatedly evaluated for effects as part of the due diligence process at least once every 12 months or, if necessary, ad-hoc.

3 DCCS as a software manufacturer: innovation, information management, qualitative education and training

Since the primary activity in our value creation process is the management of knowledge, information and data, our success is based on well-trained employees and the appropriate organizational and technological framework that makes this possible effectively and efficiently. That is why we see the areas of information management and qualitative education and training as essential for us.

3.1 Innovative, sustainable software development

Sustainable software development is the practice of creating and maintaining software systems that minimize environmental, social, and economic impacts while meeting user needs and quality standards. It is not only about reducing energy consumption or carbon footprint, but also about ensuring long term usability, adaptability, and maintainability of the software. Because of that we always try to keep the following principles in mind.
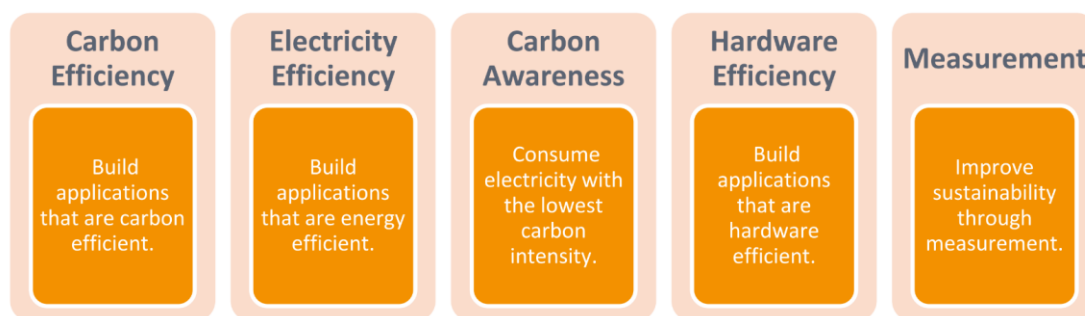

Carbon Efficiency	Electricity Efficiency	Carbon Awareness	Hardware Efficiency	Measurement
Build applications that are carbon efficient.	Build applications that are energy efficient.	Consume electricity with the lowest carbon intensity.	Build applications that are hardware efficient.	Improve sustainability through measurement.

Figure 3: Principles of sustainable software engineering

3.2 Information management

3.2.1 Information security and data protection

Strict information security standards and the protection of data are essential for our business success by protecting information about our company, our customers, business partners and employees. Corresponding safety requirements are in force at our company, are constantly being developed and compliance with them is strictly monitored.

We also protect our intellectual property from uncontrolled access or manipulation.

To ensure that confidential information of any kind is not passed on to unauthorized persons, strict confidentiality agreements with employees, suppliers and customers are in place.

The Information Security Policy for all DCCS employees forms an integral part of this document.

These requirements and behaviors regarding information security and data protection are also reflected in processes, documents, etc. as part of the integrated management system and have been or are regularly certified by **ISO 27001:2022 as well as TISAX® assessments. TISAX® (Trusted Information Security Assessment Exchange)** is an information security standard and verification mechanism based on ISO27001.

In accordance with ISO 27001 standards, the aim is to ensure the confidentiality, integrity, and availability of information through a robust Information Security Management System (ISMS). The standard helps improve our risk management by systematically addressing and mitigating cyber risks. Additionally, it strengthens operational resilience, enabling effective handling of

unexpected challenges. At the same time, ISO 27001 certification contributes to and enhances customer trust.

3.2.2   Organizational knowledge

The knowledge (know-how) of a company is the basis for a successful existence in the market. To impart this knowledge, both classic training and further education measures as well as modern measures (communities, agile methods) for the transfer of knowledge from one employee to another are used.

To always be up to date with the latest technology in terms of services, services and products, especially in the environment of the rapidly developing ICT market, qualitative training and further education of our employees is particularly important to us. To this end, we offer various internal training courses as well as the opportunity to participate in external trainings. Each employee has a training budget available for this purpose.

The establishment of an in-house academies combined with individual development opportunities, such as access to e-learning platforms, mentoring, etc. underlines our aspirations.

We would also like to make visible how important a culture of learning is to us by assuming social responsibility in this focus area of information management and qualitative education and training. We have set ourselves the goal of actively passing on IT knowledge through offers that we organize and finance.

The development of knowledge is complemented by deliberate knowledge management initiatives, designed to categorize and render existing knowledge accessible, while also facilitating a dynamic exchange of knowledge in the context of daily operations. Through the utilization of various forums and platforms, including Communities of Practice and our Knowledge Base, we provide a conduit for the effortless sharing of experiences and expertise, thereby fostering a culture of collaboration and innovation.

3.3   Artificial Intelligence

The rapid advancement and adoption of artificial intelligence (AI) technologies present significant opportunities as well as responsibilities. At DCCS, we leverage AI to drive innovation, efficiency, and value creation, while committing to its responsible, ethical, and lawful use in line with our corporate values and applicable regulations, including the EU AI Act.

Our objective is to design, develop, deploy, and use AI systems that are **reliable, trustworthy, transparent, and fair**, and that deliver clear added value in well-defined use cases. We apply a risk-based approach to ensure that potential adverse impacts on individuals, society, the environment and fundamental rights are identified and mitigated.

To support this commitment, DCCS has implemented an **AI Management System in accordance with ISO/IEC 42001**. This system is integrated with our existing, standardized, and externally

audited management systems for quality management (ISO 9001) and information security (ISO 27001 and TISAX). Compliance with these standards is regularly reviewed through internal and external audits and continuously improved.

Key principles and measures governing the use of AI at DCCS include:

- **AI Governance and Accountability**
  A defined AI governance structure is in place, with clearly assigned roles and responsibilities to ensure oversight, accountability, and decision-making throughout the AI lifecycle.

- **Risk and Impact Management**
  AI systems developed or used within DCCS are subject to systematic risk and impact assessments. These assessments are conducted prior to deployment and continuously monitored throughout the system lifecycle.

- **Legal and Regulatory Compliance**
  Appropriate technical and organizational measures are implemented to ensure compliance with applicable laws and regulatory requirements, including transparency, reliability, and risk mitigation obligations under the EU AI Act.

- **Documentation, Transparency, and AI Literacy**
  We maintain appropriate documentation to support traceability and accountability of AI systems. In addition, we promote AI awareness and training initiatives to strengthen AI literacy across the organization.

Through these measures, DCCS ensures that AI technologies are developed and used in a manner that is responsible, compliant, and aligned with our commitment to ethical conduct and social responsibility.

4 DCCS and the climate: environmental sustainability and climate protection

The contribution to ecological sustainability and environmental and climate protection is important to us and is therefore **part of our integrated management system** and its processes.

4.1 Policy statement on environmental sustainability and climate protection

Of course, we comply with all environmental regulations and requirements applicable at the respective locations.

While we do not see any immediate, serious effects on the environment and **climate** due to our industry context and location conditions, we are aware of the importance and presence of this topic and strive to take initiatives to jointly contribute to climate protection goals beyond **compliance with legal requirements** and the general avoidance of negative effects.

4.2 Greenhouse gas emissions, energy efficiency, renewable energy and decarbonization

In order to help reduce greenhouse gases, we are focusing on mobility and energy efficiency. We have already implemented the following measures for Scope 1 and Scope 2 emissions at our headquarters and wherever possible at other locations within our sphere of influence:

1. Increasing our own energy supply by expanding the existing PV system installed on the building, including storage capacities. In addition, making available existing energy surpluses by feeding them into the public grid.
2. Heating and cooling requirements via air heat pumps.
3. Expanding the purchase of additional green electricity at locations.
4. Consistent and continuous continuation of the conversion of the vehicle fleet to electric cars.

For possible future leases of additional office space, the selection criteria will be expanded to include the sustainability aspects described above, such as **energy efficiency, renewable energies**, and **decarbonization**.

For the reasons mentioned above, we see the greatest potential for **reducing CO2 emissions** in the establishment of a suitable **mobility management** system. To this end, we are making our company car fleet more environmentally friendly by gradually switching to electric vehicles and, for example, not including vehicles with excessive fuel consumption (e.g., SUVs) in our model range. Awareness of **environmentally friendly mobility** is also being promoted by providing charging infrastructure at our locations and encouraging charging at home. On the one hand, this should help us achieve our goal of reducing CO2 emissions caused by our vehicle fleet to below 60 tons of CO2 per year. If this value is exceeded, we invest in suitable compensation projects. On the other hand, we see mobility management as a future lever for further CO2 reductions in relation to business travel.

To increase our energy efficiency, motion detectors have been installed and the selection criteria for light sources and electrical appliances have been extended to include special attention to energy efficiency.

As a further contribution to energy savings, the room temperature was reduced by 2°C at all locations. We also adjusted the air conditioning to be more energy efficient by reducing the cooling by 1°C.

At the same time, we are working with an external partner on **continuous greenhouse gas reporting (GHG)** in order to obtain meaningful evaluations of our corporate carbon footprint for our Scope 1-2 emissions. We are also planning to collect data on Scope 3 emissions.

This will be an important part of the database on which we will build our further initiatives and goals in the future.

4.3 Sustainable resource management and waste prevention

For building operation and procurement, we attach great importance to considering the entire life cycle of resources when making decisions and thus striving for sustainable resource management. For us, this means saving resources, as in the case of the paperless office, procuring resources sustainably, such as using renewable energies or ecological resources, but also, where possible, returning resources to the cycle by recycling or reusing them. With this holistic approach, we strive to make a fundamental contribution to waste avoidance.

We do not see the different CSR goals in isolation from each other, but also try to use synergies by supporting the further use of hardware in social projects, as in the context of sustainable resource management.

In addition, the risk analysis has shown that the primary business activity, the value chain as well as due to the industry context of DCCS, there is currently no risk of serious negative effects to be expected in the following areas:

1. Water quality, consumption and management

2. Air quality

3. Chemical management

4. Protection of animals

5. Biodiversity, land use and deforestation

6. Soil

7. Noise emission

During the ongoing process, however, these topics are repeatedly evaluated for effects as part of the due diligence process at least once every 12 months or, if necessary, ad-hoc.

5 Supply chain management and complaint and reporting management

5.1 Collaboration with suppliers

We maintain an ongoing dialogue with our suppliers and share with them our core principles of ethical conduct, compliance with legal standards and environmental action. We expect them to base their actions on the same principles. This also includes the careful examination and analysis of their own business activities in the fields of corporate social responsibility. This is not only intended to respect the principles described in this Code of Conduct, but also to consider any

environmental and social impacts resulting from the individual business activities of our suppliers.

Compliance-led Supplier Selection

As early as the selection of our suppliers, we focus on compliance with legal and social standards. It is not only excellent professional competence and economic performance that are important to us in the selection process, but above all a clear commitment to the behavior that we impose on ourselves in our actions.

To this end, the supplier commits itself to the principles set out in this Code of Conduct and to which we commit ourselves when placing an order within the framework of the '**Declaration of Commitment for Suppliers'**.

If suppliers work for us on an ongoing basis or on a regular basis, we check compliance with the voluntary commitment by means of supplier self-disclosure or audits. We act in partnership and also support our suppliers in the elimination of violations and continuous improvement as part of supplier development. **Regular supplier evaluations, audits and supplier development meetings** ensure a consistently high level of achievement of the goals we have set ourselves.

5.2 Complaint and reporting management

5.2.1 Whistleblowing and protection against retaliation

Compliance is the personal responsibility of every employee. To this end, every employee must know and understand the content of the Code of Conduct. If you have any questions about appropriate ethical behavior or if you have any doubts about compliance with rules and codes of conduct, our employees are expressly encouraged to seek advice. Their superiors, compliance officers or CSR officers are available for this purpose. Our employees are encouraged and encouraged to report possible violations of the Code of Conduct. As a rule, the supervisor or the compliance officer is responsible.

Employees who do not want to report a violation of the compliance guidelines to their supervisor or the compliance officer can use the confidential whistleblowing system. This makes it possible to anonymously report violations or possible misconduct.

Every business partner is required to report violations.

In this context, protection against retaliation is particularly important to us. We do not tolerate sanctions, discrimination, or discrimination against a partner or employee who reports a compliance incident in good faith. The notifier is assured of confidentiality.

Violations, suggestions for improvement and complaints regarding this policy can be reported to **csr@dccs.eu** , **compliance@dccs.eu** or **hr@dccs.eu** or **betriebsrat@dccs.eu**.

6 Document Control

6.1 Validity

This document is mandatory for all employees in the DCCS IT Group and for our business partners and stakeholders for an indefinite period. Changes are only valid in written form and must be documented in the versioning (6.3).6.3

6.2 Release

Revision	Date	Review / Approval
1.0	01.01.2023	Michailowitsch Eva
2.0	14.04.2023	Michailowitsch Eva
3.0	23.11.2023	Michailowitsch Eva, Mraz Wolfgang
4.0	16.12.2025	Michailowitsch Eva

6.3 Versioning

Revision	Date	Person	Change Description
0.1	Oktober 2022	Michailowitsch Eva, Angelika Strmschek	Start Initial Version
1.0	Jänner 2023	Michailowitsch Eva, Angelika Strmschek	Initial Version
2.0	April 2023	Michailowitsch Eva, Angelika Strmschek	-Content revision and addition -Informationen Integrated Managementsystem: addition and detailing of CSR-elemtns in the IMS -Addition supply chain management, Complaint Management
3.0	November 2023	Michailowitsch Eva, Angelika Strmschek, Sandra Fuchsbichler	-addition of principles of sustainable softwareengineering -update of Complaint, reporting management and whistleblowing
4.0	December 2025	Michailowitsch Eva, Katja Marchel, Ingo Grasenick	-Content revision and addition -supplementing environmental measures -addition of current certifications -addition Chapter 3.3 Artificial Intelligence

6.4 Overview relevant internal documents

Workplace Instruction Policy
Emergency Manual
Information Security Policy
Compliance Policy
Anti-Korruptionsrichtlinie der DCCS IT Gruppe
DCCS Why&How Booklet
Prozess Kunden-Beschwerde und Eskalation
Rechtsregister
AI Guidlines

7   Appendix

Abbreviation / Term	Description
CSR	Corporate Social Responsibility
CSRD	Corporate Social Responsibility Directive
CoC	Code of Conduct
GHG	Greenhousegas
IMS	Integrated Management System
LSD-BG	Wage and Social Dumping Prevention Act