

Code of Conduct

for lawful and responsible behavior within the Softing Group



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TABLE OF CONTENTS

Preface	3
1. Acting lawfully and with integrity.....	4
2. Scope and binding nature.....	4
3. Principles for day-to-day work and social interaction	4
3.1 Diversity, equal opportunity and inclusion.....	4
3.2 Human rights	5
4. Freedom of association	5
5. Health and safety	6
6. Environment, energy and climate protection.....	6
7. Fair business practices	7
7.1 Handling company property	7
7.2 Private activities.....	7
7.3 Fair competition	7
7.4 Fighting corruption, and gifts and hospitality policy	8
7.5 Supply chain.....	9
7.6 Preventing money laundering	9
8. Handling information	9
8.1 Insider rules, and handling operational and intellectual property.....	9
8.2 IT security, data protection and information security	10
8.3 Whistleblowing and protection from retaliation	10
8.4 Avoiding conflicts of interest	11
8.5 Communicating in public	11
8.6 Conduct towards authorities	11
9. Export control, customs and taxation	12
10. Compliance with the Code of Conduct.....	12
10.1 Responsibility.....	12
10.2 Reporting breaches of the Code of Conduct	12

PREFACE

Dear employees of the Softing Group,

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

The companies of Softing AG have earned a good reputation in their respective markets by manufacturing high-quality products and conducting sustainable business, gaining the trust of stakeholders around the world. Although we operate in different companies under independent brands and in different locations and countries in large parts of the world, we all have something in common: our ethics and integrity standards that have guided us for many years.



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

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

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

With this in mind, I ask that they read these rules and incorporate them into their day-to-day work.

Kind regards,

A handwritten signature in black ink, consisting of the letters 'L.' followed by a stylized, cursive signature that appears to be 'VRS'.

1. ACTING LAWFULLY AND WITH INTEGRITY

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

Our goal is to continually increase the value of the Softing Group and generate significant added value for the benefit of all employees and shareholders of Softing AG as well as other stakeholders, particularly our customers. The conditions for achieving this goal entail legal compliance, social responsibility, high productivity, optimized efficiency and customer focus. Softing wants to maintain and nurture its good image.

Our business activities are governed by the legal systems of various countries and regions, the rules of living as part of society, and ethical standards which impose a number of obligations upon the Softing Group and its employees. It is not always easy to recognize and fulfill these obligations, but it is essential. Expertise and a sense of responsibility are the keys to success, and both spring from law-abiding, ethical conduct.

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

2. SCOPE AND BINDING NATURE

This Code of Conduct addresses some particularly important areas of responsibility, and it should motivate employees to seek advice when in doubt. Such advice may be sought from an employee's superior or from Softing's specialist departments (e.g., the legal department or human resources). It is especially important to seek advice if a situation could harm others or the company itself, if high risks are incurred or if the legal status of the situation is unclear.

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

3. PRINCIPLES FOR DAY-TO-DAY WORK AND SOCIAL INTERACTION

3.1 Diversity, equal opportunity and inclusion

The commitment to social and ethical responsibility is an integral part of Softing's corporate philosophy. We respect and protect the personal dignity of each and every one of our employees and foster a fair and mutually respectful corporate culture.

We are an international group of companies with employees in approximately 40 different countries and four continents. We rely on our employees to contribute their widely varied experiences, skills and perspectives. Their individual expertise helps us successfully exploit market opportunities. Safeguarding equal opportunities, diversity and fairness are therefore cornerstones of our HR policy. We take care to ensure salaries are not unfair, for example in terms of gender or age.

Our culture of equal opportunity and rights also requires a fair, performance-based remuneration system that ignores factors such as gender, background or age. Values such as openness, tolerance and diversity are part of our self-image as a modern, globally active company. We are therefore adamantly opposed to any form of discrimination and support inclusion in our company. Our employees embrace these values every day in a spirit of mutual appreciation, which we greatly value.

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

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

In a working environment characterized by respect and fairness, employees are strictly considered based on their skills and qualifications from the time of their application and throughout the entire period of their employment, ensuring and promoting equal treatment and opportunities. All applicants undergo a fair, performance-related selection process as part of an ethical recruitment approach. This approach is based on impartial criteria and standardized processes

Any form of reprisals and/or discrimination in the workplace is to be avoided. In the event of a long-lasting conflict, employees must consult with their superiors and the human resources department to find an acceptable solution.

All interaction among employees must be based primarily on trust. Communication is the foundation for sound decision-making. All employees must aim to contribute both their own expertise and knowledge from elsewhere in the company into their decision-making processes. Successful projects demand teamwork as well as personal initiative.

3.2 Human rights

Universal human rights must be strictly respected and safeguarded. We will not tolerate or profit from slavery, human trafficking, forced labor and child labor under any circumstances.

Softing takes great care to ensure that we respect all applicable local, national and international laws as well as traditional land, forest, water and resource rights. We pay particular attention to safeguarding the rights of indigenous peoples, local communities and minority groups along our entire supply chain in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

Softing's suppliers are prohibited from participating in land grabbing. They undertake to respect the ban on illegal forced evictions from land, forests and bodies of water, particularly where these are fundamental resources for humans.

To ensure that the rights of land users are respected, our suppliers undertake to obtain free, prior and informed consent (FPIC) in accordance with international standards as defined as part of the UN REDD Programme. Reasonable compensation is also provided once land use has been approved.

The use of private and public security personnel to protect business activities is permissible only if such personnel fully respects the entire catalog of human rights.

4. FREEDOM OF ASSOCIATION

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

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

5. HEALTH AND SAFETY

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

When it comes to employee safety, we are committed to maintaining the highest possible workplace health and safety standards. We are familiar with and comply with all internal and external quality and safety guidelines, procedures and laws.

In addition, we have an appropriate and effective occupational health and safety management system in place with regular information and training for employees to prevent accidents and work-related illnesses as effectively as possible.

6. ENVIRONMENT, ENERGY AND CLIMATE PROTECTION

Sustainability and environmental protection are key concerns for Softing, particularly when it comes to enhancing the environmental compatibility and efficiency of both our products and the manufacturing process. As part of our business processes, it is vital for us to take preventive measures and avoid environmental damage and its causes.

All of our employees across the globe are required to use our resources sparingly and play an active role in environmental protection. Our primary goals are to conserve and protect natural resources, use raw materials responsibly, avoid, reduce, recycle and properly dispose of harmful substances and waste, supplement our energy supplies with renewable energy, and avoid environmentally harmful incidents as far as possible.

We also acknowledge our responsibility for sustainability and environmental protection in relation to our suppliers, business partners and subcontractors. When it comes to using raw materials responsibly, we strive for conflict-free procurement of relevant raw materials.

We consistently observe all national environmental regulations and international environmental standards applicable to our business activities as well as the products and services we offer. We continually minimize burdens on and risks to people, the environment and the climate to the furthest possible extent. We consistently promote the use of effective mechanisms to reduce waste, optimize environmental protection, use resources sustainably and preserve the quality of soil, and work tirelessly to improve environmental protection, sustainability and our ecological footprint in our day-to-day business operations. We have implemented a suitable environmental management system in order to achieve these objectives. We take care to refrain from any activities that negatively impact biodiversity or accelerate the rate of deforestation along our entire supply chain. We favor suppliers who promote sustainable agriculture and forestry.

We are committed to protecting animals and endangered species. This includes avoiding animal suffering wherever possible along the entire supply chain. We treat national and international animal protection and welfare standards as minimum standards.

Recovery and recycling are crucial ways of conserving resources and reducing waste. By properly sorting and processing waste, valuable raw materials can be recovered and used in new production cycles.

At Softing, we recognize that optimizing energy efficiency is a key factor in reducing energy consumption and thus marks an important step towards decarbonization and our goal of reducing carbon emissions as far as possible.

This ultimately requires a switch to low-carbon or carbon-free energy sources that builds on the previous strong and reliable development of renewable energy sources by promoting electric mobility and implementing efficient technology to reduce carbon emissions. As a technological innovator and supplier to renowned manufacturers in the field of e-mobility, we are already part of this change.

Good air and water quality is crucial to the health and wellbeing of people and global ecosystems. Air quality improvement measures include reducing emissions of environmental pollutants, particularly air pollutants such as particulates, nitrogen oxides and volatile organic compounds. This can be achieved by using clean technologies, promoting sustainable transport systems and introducing stricter emissions standards.

To preserve water quality, we must reduce waste water emissions and protect water resources from contamination. Water consumption is another crucial aspect, particularly in an age where water is increasingly scarce. A sustainable water supply includes promoting efficient water consumption by using water recovery technology, for example, detecting leaks in the water supply system and making employees aware of the need to use water sparingly.

As a result, a comprehensive air quality monitoring and reporting system is vital for assessing health impacts and implementing targeted improvement measures. We play our part in protecting the environment and human health by maintaining air quality and largely avoiding noise emissions and light pollution.

Another crucial factor in protecting the environment and human health is responsible chemicals management, which includes handling chemicals safely, minimizing risks and promoting sustainable alternatives. We comply with relevant statutory provisions and legal standards as a matter of course.

Labeling and classifying chemicals in accordance with international standards is an important step in informing users about potential hazards and ensuring safe handling. This also means providing training sessions and information for employees to raise awareness of the risks and safe handling of chemicals.

Restricting the use of hazardous chemicals to the minimum required level and promoting environmentally-friendly alternatives are key elements of responsible chemicals management. Using less toxic substances, promoting the use renewable and sustainable raw ma-

terials, and developing and implementing recycling and disposal programs for chemical waste are effective ways of handling chemicals responsibly.

We can minimize potential risks, reduce environmental impacts and protect the health of people and ecosystems by taking a responsible approach to chemicals management, making this an integral part of our sustainable and environmentally-friendly development strategy.

We apply relevant rules and standards relating to “conflict minerals” and prohibit the use of raw materials in our own products that directly or indirectly finance armed groups accused of human rights violations.

7. FAIR BUSINESS PRACTICES

7.1 Handling company property

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

7.2 Private activities

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

7.3 Fair competition

Softing operates around the world and is therefore subject to a variety of legislation. For example, competition-related agreements between competitors must be

evaluated on the basis of the laws of the country affected by the agreements as well as those of the country in which the agreements are made. Under certain circumstances, if Softing is competing with companies from another country in any market in the world, Softing itself may be subject to the laws of that country.

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

7.4 Fighting corruption, and gifts and hospitality policy

According to the rules of free and fair competition, we follow only recognized and honest business practices in accordance with all applicable provisions of antitrust and competition law in particular. Softing is committed to the strict avoidance of corruption and bribery and to fair competition.

We firmly believe that sustainable business success can only be achieved based on legally compliant and responsible action. Bribery and corruption prevent healthy markets and impair the sustainable development of the economy and society.

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

No benefits of any kind may be offered to public officials – including those from foreign nations – or employees from another company. This rule applies to all types of benefits with the exception of customary token or promotional gifts that are purely symbolic and of little monetary value. This rule also applies if a particular contractual partner would have been chosen even without the prospect of such benefits. Here, too, the impression of inappropriate conduct must be strictly avoided. If employees are confronted with such an offer, they must immediately report this to their superior. Employees must

always bear in mind that improper behavior on someone else's part does not justify improper behavior on their own part. When participating in a call for tenders, any agreements with other potential bidders are strictly forbidden. If Softing itself issues a call for tenders, Softing's employees are prohibited from revealing information about a bidder or their offer to another bidder.

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

In order to build strong business relationships and express appreciation within these relationships, we often exchange courtesies such as gifts and hospitality with our customers, suppliers and other partners. However, such gifts and hospitality must reflect normal business conduct and must not influence or appear to influence business decisions. We should be guided by the principles of proportionality and common sense in such situations. Business courtesies are forbidden by law under certain circumstances and in certain countries. With this in mind, we must follow all guidelines applicable to us.

Gifts and hospitality include everything that has a value and that is offered or accepted for personal use in connection with a business relationship and for which the recipient does not pay fair market value. Examples include offers of goods, promotional items (such as bags, pens, calendars, diaries, caps, watches, etc.), services, meals, travel, hotels, invitations to events (such as concert tickets or tickets to sporting events) or discounts on such goods or hospitality.

The following specific rules apply in this regard: Monetary gifts including gift vouchers are never permitted. In the case of gifts such as goods and promotional items, statutory value limits in the relevant location outside Germany and which correspond to common ethically accepted practice are decisive. For example, the upper

limit at Softing in Germany is EUR 25. Business meals or similar business invitations such as catering and hospitality provided by customers and suppliers must be proportionate when taking legitimate business interests into account.

Any attempts by business partners or third parties to unfairly influence the decisions of employees (e.g. with extravagant gifts, privileges or similar) must be reported to the respective line manager.

7.5 Supply chain

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

7.6 Preventing money laundering

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

8. HANDLING INFORMATION

8.1 Insider rules, and handling operational and intellectual property

Inside knowledge must not be used for personal gain. Employees with internal knowledge about the activities of a company in the Softing Group – such as the planned sale of parts of a company, the acquisition of external companies, the establishment of joint ventures or other issues relevant to the share price (known as inside information) – are prohibited from using this knowledge for personal gain either directly or through a third party. Employees may not pass on any such knowledge to peo-

ple not involved directly in the respective project or to third parties. Information may only be shared with others involved directly in the project on a need-to-know basis and in compliance with all applicable rules of confidentiality.

All employees and business partners must be granted the right to informational self-determination. All employees are obligated to comply with all data protection provisions and regulations. Taking into account all applicable copyright and data protection regulations, all confidential and sensitive information and data must be protected against improper use and unauthorized disclosure, with personal data processed in strict compliance with applicable data protection requirements.

Protecting intellectual property and avoiding plagiarism are fundamental principles of ethical and lawful conduct. It is important for companies to recognize the value of intellectual property and educate their employees accordingly. This includes providing clear guidelines and procedures for protecting intellectual property, including copyright, trademark and patent legislation.

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

We are therefore extremely diligent in legally protecting our inventions. Employees must not share new findings or corporate secrets in any form with third parties. Such information is to be kept secret at all times unless it is already common knowledge. Any agreements with third parties which entail granting a license or transferring knowledge must be reviewed by the responsible department before being signed.

It goes without saying that we are similarly strict about respecting and safeguarding the intellectual property of third parties, both within Softing itself and with our suppliers. When developing products, employees must research the legal situation with respect to existing property rights. All employees must respect the effective property rights of third parties and refrain from their unauthorized use. Violating such a right can have negative consequences for us and our customers. These can range from claims for damages – which may be many times higher in the case of a deliberate patent violation than the amount that would have been paid otherwise – to the confiscation of goods on the borders of the countries we export to. As a result, it is also very important for us to handle the intellectual property of others in a professional manner in order to promote innovation and progress across a variety of sectors. By protecting intellectual property and avoiding plagiarism, organizations help to create a fair and responsible business environment.

Appropriating the development work of other employees or outsiders is forbidden, as is using fully or partially plagiarized work. No employee may acquire or make use of the secrets of a third party without authorization. As a result, it is vital to implement mechanisms designed to detect and report plagiarism. This can include using plagiarism software, verifying sources, and setting up internal control systems to ensure that intellectual property is protected and infringements are handled appropriately. The legal department is available to advise employees on intellectual property rights. Employees are informed about the significance of complying with guidelines and regulations and are made aware of the consequences of plagiarism and intellectual property infringements. Training sessions and information material help to raise awareness of the significance of intellectual property and inform employees about the legal and ethical aspects of this.

8.2 IT security, data protection and information security

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

The aim of information security is to preserve the:

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

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

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

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

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

8.3 Whistleblowing and protection from retaliation

Whistleblowers disclose information about breaches, negative developments or illegal activities within an organization that violate applicable laws, regulations or ethical standards. Provided that this is done altruistically and truthfully, we believe that whistleblowing makes a positive contribution to uncovering abuses and promoting integrity. We therefore need to increase the willingness of potential whistleblowers to uncover serious and structural abuses and above all, to protect them when they have already done this.

We expect whistleblowers within our company and with our business partners to be protected from retaliatory measures when they report ethical violations or mis-

conduct. The identity of whistleblowers must be treated confidentially and action must be taken to ensure that whistleblowers have no or as few negative consequences as possible to fear. Reporting mechanisms such as an anonymous reporting platform should be developed in advance to enable whistleblowers to report abuses confidentially.

In addition, clear procedures should be established to determine how reported violations are investigated and handled. This may include specifying who is responsible for the investigation and how the integrity of the process is maintained. We expect our suppliers to raise awareness within their companies by using initiatives such as training sessions and panel discussions to educate their employees on this matter. Employees should be informed about their rights and the procedure for reporting violations.

Protecting whistleblowers from retaliatory measures is particularly important to us. Clear guidelines and measures should be established to protect whistleblowers from any form of retaliation. This can include disciplinary measures against the perpetrators of retaliatory measures, legal support, anonymous reporting mechanisms, and measures to ensure the anonymity of whistleblowers.

Company management should set a good example, as they have an active role to play in protecting whistleblowers. Management should act as role models and ensure that whistleblower protection is taken seriously within their organization. At the same time, however, steps must be taken to ensure that these mechanisms are not misused to denounce individuals or cause intentional damage to the business.

8.4 Avoiding conflicts of interest

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

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

8.5 Communicating in public

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

8.6 Conduct towards authorities

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

Exercising this right or the “right to remain silent” is not an admission of guilt. In cases such, information or files should only be provided after consulting the legal department. If necessary, a trusted lawyer should be involved.

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

9. EXPORT CONTROL, CUSTOMS AND TAXATION

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

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

10. COMPLIANCE WITH THE CODE OF CONDUCT

10.1 Responsibility

All employees are obligated to follow the applicable laws, and all supervisors must ensure that their employees fulfill this obligation.

The principles listed above govern interactions with colleagues, customers, suppliers, other companies and the authorities. They should make it easier for employees to apply the rules of conduct in selected fields to their daily work. This program outlines some key points that are particularly important in practice.

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

10.2 Reporting breaches of the Code of Conduct

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

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

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

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

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