

Guideline

Principles of our behavior and actions / Code of Conducts (CoC)

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Principles of our behavior and actions (Code of Conduct)

We live from the trust of our customers, employees, suppliers, shareholders and the public in the performance and integrity of EASY SOFTWARE AG (easy). This trust depends to a decisive degree on how we all behave and how we use our know-how for the benefit of our customers, shareholders and easy.

These rules of conduct relate to various aspects of our actions within the company and provide a general framework for the conduct expected of employees, in particular members of management, towards the company, other employees of the company and third parties (in particular customers and suppliers).

The rules reflect the Management Board's goal of strengthening ethical standards throughout the company and creating a working environment based on integrity, respect and fair conduct. The Management Board is convinced that strict adherence to the law and principles as well as socially responsible business policies best serve the long-term interests of the company.

The Management Board expects the same from the workforce. Everyone must therefore stand behind these principles. The Code of Conduct is binding for all employees (hereinafter referred to as "employees"). For reasons of better readability, the masculine form of the word is used throughout to refer to persons.

I. General conduct, compliance with laws, ordinances and regulations

easy is committed to fulfilling its business and social responsibilities in a manner that reflects the highest level of integrity and honesty. Relationships with contractual partners, third parties and the public in general have always been based on trust and goodwill. Only by continuing our commitment to these principles can easy ensure the trust, acceptance and goodwill of its contractual partners and customers in the long term. easy's business success is the result of the joint efforts of all employees in fulfilling their responsibilities in an ethical manner. Every employee should always strive to fulfill these responsibilities:

- behave honestly and fairly towards the contractual partners and advise them comprehensively about their rights and obligations;
- to fulfill easy's contractual obligations and other commitments;
- avoid putting a public official in a compromising position or impairing the judgment of a public official through a gift or remuneration;
- to promote and sell easy's products in a responsible and lawful manner;
- protect the integrity and reputation of easy by safeguarding confidential and proprietary information disclosed to an employee in the course of employment;
- the proper use of easy's electronic communication systems, including social media;
- Perform activities for EASY in compliance with all applicable policies, procedures, laws and regulatory requirements

II Fair conduct in competition

We are fully committed to fair competition.

We therefore reject any business activity that is aimed at gaining an economic advantage in an unfair manner under competition law or through behavior that violates antitrust law.

Antitrust laws are designed to promote a fair and open market by prohibiting certain agreements and the sharing of information with competitors. Examples of prohibited agreements include price fixing or bid rigging, territory or customer allocations, boycotts of customers or suppliers, and tying arrangements. easy is committed to complying with applicable antitrust laws and does not condone activities that could constitute or appear to constitute an anticompetitive agreement. Violation of antitrust laws is a serious offense that may result in disciplinary action, including termination, criminal prosecution and the risk of civil penalties. All employees are responsible for complying with applicable antitrust laws.

III. Bribery and corruption

Compliance with anti-bribery and anti-corruption laws around the world is not just a legal requirement; it reflects easy's determination to act with the highest level of integrity and honesty. easy prohibits any form of bribery or corruption. easy requires in particular that the employee:

- does not offer anything as a bribe or engage in any act of bribery or offer or give any unusual or unauthorized payment or inducement of any kind to anyone in the course of business;
- does not acquire any business in which a bribe, unofficial payment or incentive is offered to customers, potential customers or third parties;
- reject any bribes or unusual payments offered in the course of business activities and report such offers;
- does not use any funds or assets of easy for an illegal, impermissible or unethical purpose;
- does not pay bribes.

Hospitality and entertainment, such as tickets to sporting events, lunches or dinners, can be, and often are, a normal and customary part of easy's business. Any lavish or excessive hospitality or entertainment (whether received or provided by easy) should be avoided. If there is a legitimate business reason for such hospitality or entertainment, it must be approved in advance. With the exception of company promotional items or ceremonial items, you should avoid giving gifts, regardless of value. Even modest gifts may be considered a bribe or inducement under applicable law. You may accept gifts, but only of nominal value. If you receive (or are considering giving) a gift of greater than nominal value and are not sure how to proceed, you should contact the Legal Department. In any case, the handling of gifts or hospitality should not conflict with the law, the donor's policy or local custom

IV. Insider trading

easy requires its employees not to trade in EASY SOFTWARE AG shares (easy shares) on the basis of insider information, nor to pass on insider information.

Insider information is any specific information about circumstances that are not publicly known and that is likely to have a significant influence on the stock exchange or market price of the easy share. Such information is suitable if a reasonable investor would take the information into account when making an investment decision.

Employees who have access to insider information may not use this information themselves or pass it on to other persons until it is published and may not buy or sell easy shares during this period until the insider information is published.

V. Dealing with confidential information

Employees acknowledge that, as part of their employment with easy, they have access to confidential and protected information belonging to easy, customers, potential customers and business partners. This information may be of various types, including data stored in databases, recommendations and other content in reports, email messages and attachments, research tests and results, customer lists and details of customers' assets, business operations, personally identifiable information and internal documents relating to easy's business approach, strategy and organizational structure. Regardless of how such information is created, communicated or stored, all employees are responsible for protecting it against unauthorized disclosure, preventing its improper destruction or modification, ensuring access to it and its availability due to business requirements, informing easy in the event of unlawful appropriation or unauthorized access or use of information and complying with all applicable legal, regulatory and contractual requirements regarding the use and handling of information. Confidential and proprietary information may not be used for personal use, reproduced or unlawfully misappropriated. It may also never be discussed outside the organization or made available to external persons without the express permission of easy. In this respect, easy only permits the storage of information on encrypted portable data storage media if this is necessary for business purposes in individual cases. Downloading to portable data storage devices can also be monitored

Furthermore, employees may not copy, delete, retain, access, share or otherwise handle such information after termination of employment with easy. All confidential and

proprietary information, including information stored on media, networks or storage locations not belonging to easy, must be returned before the end of the employment relationship.

VI. Conflicts of interest

Our employees are required to avoid situations in which their personal interests conflict with the interests of the company. A conflict of interest exists in particular when an employee's private interests conflict with the interests of easy. In such cases, the interests of easy must not be impaired.

In order to avoid conflicts of interest, the following rules of conduct must be observed:

Suppliers are selected on the basis of objective criteria (price, quality, reliability, technological status, certification, existence of quality management). Business decisions must not be guided by private interests and relationships.

Employees are encouraged to do charitable work in their private lives and to get involved in charitable causes. However, it must be ensured that all external activities do not lead to a conflict of interest. In addition, paid activities for other companies and organizations must be expressly approved in writing by easy. With the exception of participation in public companies, such as other stock corporations, this also applies to significant, direct or indirect participation in easy's competitors.

Employees may not exploit company property, information or their position in favor of private interests. This does not apply to company property that employees are permitted to use privately on the basis of special regulations (employment contract, guidelines, etc.). This includes, for example, company cars and cell phones.

VII. Occupational safety, environmental and health protection

The health and safety of all employees, neighbors, customers and other persons affected by the Group's business activities is a high priority for easy, as is the protection of the environment.

This includes the following elements:

We are committed to sustainable, future-oriented development that seeks to reconcile economic and ecological goals in such a way that people's needs can be met and the development of future generations is protected.

easy takes its responsibility for occupational safety and health and environmental protection seriously and works continuously to improve them, i.e. easy assumes its responsibility.

Every employee is jointly responsible for occupational safety; occupational safety, health and environmental protection regulations must be strictly applied. Managers must act as role models.

VIII. Social responsibility

easy is convinced that social responsibility is an important factor in the company's success.

We are committed to creating equal opportunities for all employees of the easy Group.

We condemn any discrimination or harassment in the work environment, whether based on gender, race, disability, origin, religion, age or sexual orientation.

We expect our employees to contribute to a corporate culture that is characterized by objective, fair and cooperative collaboration.

IX. Data protection and use of electronic means of communication

Every employee must familiarize themselves with easy's principles regarding electronic data protection and use, i.e. the status of the information stored or processed in easy's electronic communication system (including access to the Internet) or otherwise contained therein, distributed or accessed. Access to and use of any part of this system is granted to authorized personnel for the sole purpose of operating easy's business. In addition, some aspects of easy's electronic communication system and some information on the Internet may be protected by copyright or otherwise. No such information should be copied, uploaded, downloaded or distributed without the permission of the copyright holder or the publisher.

easy maintains a corporate presence on the worldwide web. Internet access, including access to certain social networks, is available to employees through the use of easy's electronic communication system exclusively to support the company's business activities.

When dealing with social networks and the media, employees who express themselves in a public discussion, to the press or in social networks on topics that affect easy or our business partners should make it clear that they are acting as private individuals.

They should always take into account the interests of EASY SOFTWARE AG and its business partners; accordingly, the rules of conduct regarding confidentiality and data protection must be observed.

In this context, all employees should bear in mind that statements in emails or on social networks and media may be made informally and spontaneously, but are then nevertheless recorded and visible to the recipient or the Internet public for a long time. Accordingly, the employee's comments should be level-headed and factual.

X. Money laundering

Every employee is responsible for being vigilant and preventing transactions that could potentially expose easy to suspicion of money laundering. Compliance with the laws against money laundering and the financing of terrorist or criminal activities in all jurisdictions in which we operate is also an expression of our commitment to professional and fair conduct and integrity. Every employee is therefore requested to report any suspicion or even positive knowledge of money laundering or a financial crime to the Compliance Officer using the form for reporting suspicious activities.

XI. Whistleblowing

If an employee should come across wrongdoing in the course of their work, they must inform the whistleblowing office in accordance with the following rules. These principles provide a secure and confidential procedure for employees to report suspicious illegal or unethical actions and activities within easy without fear of reprisals.

The respective reports are received by an appointed ombudsman and treated anonymously if desired. All reports made in accordance with these principles will be examined and investigated, even if they are made anonymously. If an employee makes a report that is not substantiated by the subsequent investigation, easy will not take any disciplinary action or other measures against them, provided that these persons have not acted unlawfully or improperly in any way in relation to the report. However, the employee is required to exercise reasonable care when making the report. Deliberately incorrect reports are not protected. easy will comply with all reports in accordance with the legal requirements of the "Whistleblower Protection Act".

Further information, in particular on how to make a report, can be found at [\(9+\) Whistleblower system - hi.easy](#)

XII. Precautions for compliance with the Code of Conduct

easy ensures that all employees are aware of this Code of Conduct and expects them to comply with it.

Only regular engagement with the rules of conduct creates the necessary awareness to live a corporate culture of integrity and trust. We therefore make a commitment to our employees to make this Code of Conduct the subject of company training and further education.

Questions about this Code of Conduct will always arise. We promote a corporate culture in which issues of integrity can be addressed openly.

Our employees are therefore encouraged to seek advice from a manager or the specialist departments if they have any doubts about compliance with this Code of Conduct. Confidential treatment of these inquiries is assured.

Special situations in everyday working life in which this code of conduct does not provide clear guidelines for our employees are to be assessed by their manager and the specialist departments and decided within the framework of internal regulations.

Our managers are expected to act as role models in the implementation of the Code of Conduct through their personal behavior and to lead their employees accordingly.

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EASY SOFTWARE AG
The Management Board

Version history

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1.0	08.11.2023	Initial version	Law firm Linnemann RA Dr. C. Holtermann
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