

Code of Conducts

Principles of our behaviour and actions

We depend on the trust of our customers, employees, suppliers, shareholders and the public in the performance and integrity of conrizon AG (conrizon). This trust depends to a large extent on how we all behave and how we use our expertise for the benefit of our customers, shareholders and conrizon.

These rules of conduct relate to various aspects of our actions within the company and provide a general framework for the behaviour 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 Executive Board's goal of strengthening company-wide ethical standards and creating a working environment based on integrity, respect and fair behaviour. 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 Executive Board expects the same from the workforce. Everyone must therefore stand behind these principles. The rules of conduct are binding for all employees (hereinafter referred to as "employees"). For reasons of better readability, the masculine form of the word is used throughout for personal designations.

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

conrizon 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 conrizon secure the trust, acceptance and goodwill of its contractual partners and customers in the long term. conrizon's business success is the result of the joint efforts of all employees in fulfilling their responsibilities in an ethical manner. Every employee should endeavour to do so at all times:

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

II. Fair behaviour in competition

We are unreservedly 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 behaviour 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 agreements. conrizon is committed to complying with applicable antitrust laws and does not condone any activities that could constitute or appear to constitute an anti-competitive agreement. Violation of antitrust laws is a serious offence 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 conrizon's determination to act with the highest level of integrity and honesty. conrizon prohibits any form of bribery or corruption. In particular, conrizon requires that the employee:

- does not offer anything as a bribe or engage in any act of bribery or offer or give any unusual or unauthorised payments or inducements of any kind in the course of business;
- does not acquire any business in which a bribe, unofficial payment or inducement 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 of conrizon's funds or assets for any illegal, unauthorised 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 conrizon's business. Any lavish or excessive hospitality or entertainment (whether received or provided by conrizon) should be avoided. If there is a legitimate business reason for such entertainment or hospitality, it must be authorised in advance. With the exception of company promotional items or ceremonial items, you should avoid giving gifts, regardless of value.

Even modest gifts can be considered a bribe or inducement under current law. You may accept gifts, but only of nominal value. If you receive a gift of greater than nominal value (or are considering giving a gift) and are not sure how to proceed

you should contact the "Legal Department". In any case, the handling of gifts or hospitality should not be in conflict with the law, the principles of the donor or local customs

IV. Insider trading

conrizon requires its employees neither to trade in shares of conrizon SOFTWARE AG (conrizon 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 conrizon 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 conrizon shares during this period until the insider information is published.

V. Dealing with confidential information

Employees acknowledge that in the course of their employment with conrizon, they have access to confidential and proprietary information belonging to conrizon, clients, potential clients and business partners. This information may be of various types, including data stored in databases, recommendations and other content in reports, e-mail messages and attachments, research tests and results, customer lists and details of customers' assets, business operations, personally identifiable information and internal documents relating to conrizon's business approach, strategy and organisational structure. Regardless of how such information is created, communicated or stored, all employees are responsible for protecting it against unauthorised disclosure, preventing its improper destruction or modification, ensuring its access and availability based on business requirements, informing conrizon in the event of unlawful appropriation or unauthorised 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 organisation or made available to external persons without the express permission of conrizon. In this respect, conrizon only permits the storage of information on encrypted portable data storage devices to the extent necessary for business purposes in individual cases. Downloading to portable data storage devices may also be monitored.

Furthermore, employees may not copy, delete, retain, access, share or otherwise handle such information after termination of employment with conrizon. All confidential and proprietary information, including information stored on non-conrizon

media, networks or storage locations 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 come into conflict with the interests of the company. In particular, a conflict of interest exists when an employee's private interests conflict with the interests of conrizon. In such cases, the interests of conrizon must not be impaired.

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

Suppliers are selected according to 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 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 organisations must be expressly approved in writing by conrizon. This applies

- with the exception of investments in public companies, such as other stock corporations - also for significant, direct or indirect investments in competitors of conrizon.

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

VII. Occupational safety, environmental and health protection

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

This includes the following elements:

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

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

Every employee is jointly responsible for occupational safety; occupational safety, health and environmental protection regulations must be strictly applied. Managers must fulfil their role model function.

VIII. Social responsibility

conrizon 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 conrizon Group.

We condemn any discrimination or harassment in the workplace, be it on the basis of gender, race, disability, origin, religion, age or sexual orientation.

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

IX. Data protection and use of electronic means of communication

Each employee shall familiarise himself or herself with conrizon's electronic privacy and use policy, i.e. the status of information stored, processed or otherwise contained in, distributed or accessed through conrizon's electronic communications system (including access to the Internet). Access to and use of any part of this system is provided to authorised personnel for the sole purpose of operating conrizon's business. In addition, some aspects of conrizon's electronic communications system and some information on the Internet may be copyrighted or otherwise protected. No such information should be copied, uploaded, downloaded or distributed without the permission of the copyright holder or the publisher.

conrizon maintains a corporate presence on the worldwide web. Internet access, including access to certain social networks, is available to employees through the use of conrizon's electronic communication system solely 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 conrizon or our business partners should make it clear that they are acting as private individuals.

They should always take into account the interests of conrizon SOFTWARE AG and its business partners; accordingly, the rules of 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 conrizon 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 behaviour and integrity. Every employee is therefore requested to report any suspicion or even positive knowledge of money laundering or a financial offence to the "Compliance Officer" using the form for reporting suspicious activities.

XI. Whistleblowing

If an employee should come across malpractice in the course of their work, they must inform the whistleblowing centre in accordance with the following rules. These principles provide a secure and confidential procedure for employees to report suspicious illegal or unethical behaviour and activities within conrizon 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, conrizon 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. conrizon will observe 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.conrizon

XII. Arrangements for compliance with the Code of Conduct

conrizon ensures that all employees are aware of this Code of Conduct and expects them to observe 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 arise again and again. 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 enquiries 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 the internal regulations.

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

Essen, May 2025

the Management Board of conrizon AG