

CODE OF CONDUCT

Version: 5

Date: 2022-11-24

1. DOCUMENT INFORMATION

Purpose

This Code of Conduct sets out the general requirements for our actions.

Scope

This policy applies to SNP Schneider-Neureither & Partner SE and all affiliated companies and is binding for all managers and employees of the SNP Group worldwide.

Responsibilities

CEO

2. FOREWORD

Dear SNP colleagues,

This Code of Conduct defines the overarching set of rules for the compliance management system of SNP Schneider-Neureither & Partner SE and its affiliated companies. It defines the framework and minimum standards that employees worldwide use to make decisions and act according to uniform standards. It provides orientation and is intended to help employees if they are unsure about how to behave ethically in a certain situation. Our behavior is always based on the same binding principles. As management, we are committed to the principles and core values set out in this policy. Acting ethically and in accordance with the defined set of rules concerns us all.

Michael Eberhardt, CEO

Prof. Dr. Thorsten Grenz, CFO

Gregor Stöckler, COO

3.3. OBJECTIVE

It is our goal to constantly develop ourselves both in an entrepreneurial way and as people. In this regard, we also and especially focus on our employees (employees are used in a gender-neutral manner and for reasons of simplification refer to persons of any gender [m/f/d]). The SNP Group has experienced strong growth in recent years and with it major changes. Not only, but especially in times of change, a company and its employees must follow the principles of integrity, ethics and personal responsibility.

This Code of Conduct defines the principles of our actions. It is intended to combine our efforts to comply with laws and statutes with our requirements for ethical behavior, and to pave the way to a successful future for everyone. This Code of Conduct sets minimum standards and may be supplemented by further internal policies or regulations. We are aware of the impact that corporate change and changes in the economy, politics, innovation and the environment have on our work, which is why this Code of Conduct is not static. We will not close our eyes to new laws, policies and societal ideas and will adapt our guidelines as necessary.

We expect our employees to comply with the rules of conduct we have established, such as the SNP policies. Each and every one of us who has decided to share our corporate identity and culture takes on the responsibility of maintaining and promoting the trust and reputation we have earned through our work.

All employees are obligated to observe and comply with the relevant laws and regulations (e.g. from the areas of criminal law, commercial law, social law, protection of minors, data protection, copyright, tax law, accounting obligations and internal company regulations) and other contractual regulations with partners or customers. The same applies to the applicable fundamental rights and human rights. Negative financial and intangible consequences for SNP as well as for other employees due to violations must be avoided at all costs.

All employees fulfill this responsibility by completing all mandatory training courses, critically examining situations and contacting their manager or the Legal/Compliance department in case of doubt.

4. PRINCIPLES

What we stand for

In recent years, we have succeeded in establishing an excellent reputation worldwide in the area of ERP landscape transformation. We put companies in a position to successfully shape digital change with change-friendly IT and to exploit opportunities in the market. We want to become the international industry standard with our products and services.

In order to achieve this goal, it is particularly important to determine how we want to achieve it. Everyone at SNP must respect the core values described in the following sections and must comply with all applicable laws and regulations.

Our core values:

- Continuous improvement – for our customers/partners and ourselves
- Appreciation for all
- A trusting and open working relationship
- Keeping one's word
- Providing prospects

Our core values are explained in more detail in chapter 5.

Our responsibility: compliance with applicable laws – in particular with:

- Business relationships
- Bribery
- Trade controls
- Protection of business secrets, trade secrets and insider trading regulations
- Protection of people and the environment
- Data protection

Detailed explanations are available in chapter 6.

These principles are of great importance for dealing with our customers and partners and for dealing with each other. We want to fully stand behind everything we do and not violate the trust placed in us through misconduct. Therefore, our Code of Conduct is of great relevance; it instructs us how to gain this trust and, above all, not lose it by putting it at risk through unjust and unethical behavior.

The legal risks mentioned here are not exhaustive: We are honest and behave in an ethically correct manner. Further risks can arise from the following areas: gifts and invitations, dealing with public officials, money laundering and terrorist financing, fair and free competition (antitrust law), occupational safety and health protection, protection of intellectual property, and IT security.

Our Code of Conduct and the values and principles described within apply to management, managers and all employees of the SNP Group worldwide. The managers will help everyone at SNP to embody our values by setting an example. Everyone who wishes to report violations of our policies or other misconduct that could jeopardize our work and the trust placed in us should feel able to do so without fear of negative consequences and retaliation thanks to an appropriate working climate.

Our actions are based on and always follow applicable law and our guidelines. The latter are designed to guide us safely – even in the absence of rules that allow decisions to be made in accordance with laws and statutes. All decisions must comply with our established policies on ethics and morals. This shapes the way we deal with our customers, partners and service providers.

If employees are unsure about how to behave ethically in a certain situation, they should first ask themselves whether their behavior complies with SNP's core values. In case of doubt, every employee should contact their manager or the Legal/Compliance department.

The following questions can help our employees to make such decisions. If the question can be answered with yes, employees are acting in accordance with our values:

- Is my behavior in SNP's best interests?
- Is my behavior clearly business-related?
- Am I acting in accordance with proper business procedures?
- Do my planned actions correspond with SNP's core values, internal policies and applicable laws?
- Am I honest and fair in my interactions with colleagues, customers and business partners?
- Am I aware of the consequences of my behavior?

5. OUR CORE VALUES

Continuous improvement – for our customers/partners and ourselves

Even though we have earned ourselves an excellent reputation in the industry and among its experts, we still want to become that little bit better. We are committed to developing innovative software solutions and exceptional customer service while continuously improving our performance and success. We must fully appreciate and understand the requirements and needs of our customers and partners. To do this, we must be able to listen attentively and be free of preconceived opinions. We must be open to new ways of solving our customers' technical problems, but never lose sight of their worries and concerns. Therefore, we encourage innovative thinking and strive to continuously improve our decision-making processes. Our customers, partners and all people with whom we work trust not only our technical skills, but also our social competence.

We are aware of this responsibility towards our customers and partners. The trust placed in us also includes the careful handling of customer and partner data in accordance with the applicable data protection regulations. We will regularly review our internal processes and optimize them if necessary. For this purpose, we have an internal quality management system that is continuously reviewed in the context of certifications. Regularly reviewing our products, services and business processes also helps us to become better and better in our joint work and in the pursuit of common goals.

Appreciation for all

We appreciate our customers and partners as much as our employees. It is important to us that employees also appreciate each other and their performance and treat others with respect. The SNP Group has enterprises and customers and partners in multiple countries around the world. People from diverse cultural backgrounds work together at SNP every day. We can only achieve joint success if we are open to cultural diversity, respect people in their individuality, and create a working environment that is characterized by mutual appreciation as well as different perspectives and experiences. We do not make decisions based on national origin, ethnic background, age, gender, religion, disability, color, sexual orientation or personal characteristics and preferences, and we do not tolerate any form of discrimination or sexual harassment. In addition, human rights are respected. These principles are particularly taken into account in all business decisions.

A trusting and open working relationship

Every employee of the SNP Group has the opportunity to participate in the further development of our company, and we encourage every individual to do so. We maintain open communication, encourage informal communication right up to management level, and discuss issues honestly and directly. Balanced communication should always be maintained and expectations explicitly formulated. We listen carefully and find solutions together.

Anyone can voice their opinion and criticism, provided that they are expressed objectively and without personal offence. We can trust that the decisions made on this basis will be supported by everyone in the SNP Group. We share our knowledge with colleagues and answer their questions to the best of our knowledge and belief.

All employees of SNP are expected to work together in a climate of trust and to support each other when problems arise. Every employee assumes responsibility for their field of competence. In this way, we create a fair, trusting and open working relationship.

Keeping one's word

Our customers and partners can rely on our commitment. We always want to work on the tasks assigned to us in a solution-oriented and goal-oriented manner and to the best of our knowledge and belief. We use all means, expertise, experience and commitment available to us in order to fulfil these tasks to the highest satisfaction. The trust placed in us and our work must be maintained, and we must win the trust of new customers and partners. Within the company too, we must keep our promises made to our colleagues and to carry out our work in a conscientious, responsible and reliable manner. Possible challenges are not concealed, but rather openly addressed in order to find good solutions that are satisfactory for everyone.

We behave professionally towards customers and partners and observe the provisions valid for the respective work location. This also includes providing the customer or partner with exactly the

information and services they need and for which they have commissioned us. We avoid unnecessarily disclosing personal information to the customer or partner. We only talk about internal company information or third parties if this is directly related to an order of the customer or partner and it is essential to disclose the information.

On domestic business trips and those abroad, all employees at SNP must behave as one would expect good guests to behave. This includes, in particular, respecting local customs and people and complying with all laws when travelling abroad. Degrading treatment is not acceptable. The exploitation of local people is not acceptable behavior. This also applies to private travel for which benefits provided by the SNP Group have been used.

Providing prospects

The SNP Group owes its success to its employees and their daily commitment. Our task as a responsible employer is to support and encourage them in their professional and personal development. We also offer young people the opportunity to gain an insight into our work through internships, working student activities or as part of their final thesis.

We foster talent and acknowledge exceptional performance by trusting employees and quickly handing over responsibility. It is not uncommon at SNP to quickly become a manager or specialist. Through our extensive offerings and efforts to develop employees, we secure our future and enable ourselves to offer our customers consistent quality when executing their projects.

It is of particular concern to the SNP Group to offer a wide range of extra-occupational and sporting activities to match the efforts made in everyday working life. In order to strike a balance between professional and private life and to maintain and promote the health of our employees, we offer a large number of projects as part of our health management scheme and regularly encourage employees to make use of them. We also support group activities for our employees outside their working hours and are pleased with their popularity, which is a sign of good cooperation.

The aim of our efforts is to prepare our employees for the constantly changing working world and to motivate them beyond our efforts to take the initiative when it comes to their future employability. We would like to sensitize them to the importance of finding a balance between the demands of the working world on the one hand and personal, professional and social competences as well as health and the ability to work on the other hand.

6. OUR RESPONSIBILITY: COMPLIANCE WITH APPLICABLE LAWS

Business relationships

Personally and based on self-interest, we do not expect any benefits from our business relationships. Therefore, we avoid situations in which private and professional interests can collide and report potential conflicts of interest to the Legal department. Our teams from areas with customer contact are not allowed to offer customers products and services that they obviously do not need. In addition, they are not allowed to make false statements or promises that are untenable just because of the prospect of a business deal, as this can harm both our customers and our business.

We do not engage in anticompetitive activities and always comply with competition law. This means, for example, that we do not disclose information that is not publicly available to business partners who are in competition with the owner of the information and that we do not participate in private groups to coordinate anticompetitive practices (e.g. pricing, market segments, etc.).

Bribery

In accordance with the relevant national and international laws (e.g. StGB – German Criminal Code “Taking and giving bribes in commercial practice”), all employees of the SNP Group are prohibited from offering or granting benefits such as cash, gifts, entertainment offers, etc. to contacts in the public or private sector in order to influence their decisions for the benefit of the SNP Group. Thus, the acceptance or granting of unreasonable benefits is prohibited. All employees must inform their managers or the Legal department if a business partner or public official offers or demands personal benefits. If you have any doubts about a situation, please contact your manager or the Legal department for assistance.

Dealing with gifts therefore requires special attention. Gifts and invitations can only be accepted if they are a gesture of politeness and do not influence any business decisions. Gifts or invitations for public officials must be treated with special care and thus always require the approval of the Legal department or executives. Since this is not always easy to decide, the following information is intended to provide guidance for interacting with business partners.

Offering or accepting cash or equivalents is always prohibited. It is also prohibited to offer or accept gifts or invitations in the context of contract initiations and other concrete business decisions if the offer or gift would influence the business decision. In addition, gifts or invitations – must be transparent, i.e. they must be sent to a

company address and not to a private address. Frequently recurring invitations or gifts between the same business partners should also be avoided.

Exceptions from the stated prohibitions are advertising or courtesy gifts (such as giveaways) or business events with a reasonable value. In most countries, gifts and invitations above a certain value are considered taxable. Therefore, it must be ensured that the applicable tax regulations are strictly observed.

In addition, please inform yourself about additional national legislation or internal guidelines in place that for example set value limits for gifts (e.g. company regulations). If you find yourself in a situation where you are unsure how to behave, you can always contact your manager or the Legal department.

Trade controls

The SNP Group complies with international trade control laws and regulations. This includes in particular the export control and customs laws of the countries in which we operate and in which our customers are located.

We constantly monitor the validity of sanctions and embargoes and carry out comparisons with sanction lists and terror lists. We categorically refuse to do business with the countries concerned as well as the listed individuals and companies. In this way, we not only protect our company, but also reduce risks arising from such violations. At SNP, we promote business with the right partners.

Protection of business secrets, trade secrets and insider trading regulations

We protect the business and trade secrets of SNP and its customers and partners. We also comply with the legal requirements for the protection of personal data and those applicable to trading in financial instruments and to insider information. It is therefore important that every employee treats non-public information of SNP or of third parties confidentially. Unauthorized disclosures of sensitive information or the handing over thereof can damage SNP's competitiveness and market position, breach contractual obligations, and/or affect the value of the SNP share. Insider trading regulations prohibit the use of such information for personal gain or its disclosure to third parties such as friends and family. Therefore, information must always be protected against unauthorized disclosure and against loss through appropriate protective measures.

Protection of people and the environment

SNP strives to create a healthy working environment and to protect natural resources. This includes, among other things, compliance with occupational safety regulations and environmental laws, the

selection of business partners in accordance with the principles of sustainability, and various measures to improve the environmental balance sheet and thus reduce our impact on the environment.

Data protection and information security

We commit ourselves to respecting the privacy of our business partners and employees and act in accordance with applicable laws (e.g. the EU GDPR) when processing personal data. It is important that we treat personal data confidentially, use it in accordance with the intended purpose and do not process it without legal justification. This applies both to personal data of the company itself or employees and to data of customers, partners, suppliers or other third parties. All employees must be aware of the security and confidentiality of information and comply with all relevant SNP policies. Possible incidents concerning data protection or information security must be reported immediately via the channels provided.

Information and the processes, systems and networks that process information and data are important assets of SNP. Therefore, all employees are committed to making their contribution to ensure the availability, confidentiality and integrity of information, data and systems.

7. OBLIGATIONS

This Code of Conduct is binding. Violations will not be tolerated and can have serious consequences. These include, for example, measures under labor law, civil law, or criminal law.

8. DEALING WITH POSSIBLE MISCONDUCT

SNP maintains a reporting system that enables the reporting of relevant violations of this Code of Conduct. In particular, all employees who become aware of relevant events that run contrary to the interests of the company are requested to report these immediately via the channels provided. We take into account the requirements of national and international legislation on whistleblower protection. All notifications are treated as strictly confidential, and all suspected cases will be investigated. An employee does not suffer any disadvantage as a result of such a notification.

Employees can contact the Legal/Compliance department in the event of violations. Violations can also be reported via the [EQS Integrity Line](#). The system is designed for consultation in the event of possible compliance violations. The system must not be misused.

