



DATAGROUP

Code of Conduct for DATAGROUP Employees



IT's that simple.

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DATAGROUP

Foreword from the Executive Board

Dear colleagues,

Since DATAGROUP was founded in 1983, our actions have been guided by corporate values. With this Code of Conduct we seek to give you a guide that summarizes and explains the basic principles by which we work at DATAGROUP. It is intended to provide security and orientation in our dealings with each other, with our customers and business partners, and within the team. Our goal is to live and experience our values such as responsibility, partnership, stability, security, and sustainability every day.

As an IT service provider, we and our integrity have a special significance. Our reputation and the quality of our work depend largely on how we behave as individuals, as a team, and as an overall organization.

For all these reasons it is very important to us that everyone should be familiar with this Code of Conduct and adhere to its guidelines.

We ask you all to read the Code of Conduct carefully and implement the basic principles in your daily work. By our behavior and our consistent orientation to our values, we strengthen ourselves in our daily work and our customers' and business partners' trust in us.

Thank you for your commitment and support.

Andreas Baresel

Oliver Thome

Dr. Sabine Laukemann



DATAGROUP

Respect for people and the environment

Our respect and appreciation are the same for everyone we¹ come into contact with in the course of our work for DATAGROUP.² Our interactions with co-workers and outside parties are characterized by the fact that we treat others fairly and openly, with understanding and tolerance. Accordingly, we are all committed to respectful, appreciative, businesslike, and friendly interaction with our co-workers across all hierarchy levels and in all areas of the company, as well as with people outside DATAGROUP.

COMPLIANCE WITH HUMAN RIGHTS, NON-DISCRIMINATION, EQUAL OPPORTUNITY

We respect the dignity of every human being. No one is discriminated against or disadvantaged on the basis of nationality, place of residence, gender, age, ethnicity, skin color, political opinion, sexual orientation, religious beliefs, social background, physical abilities, or other personal characteristics.

At DATAGROUP, everyone has the same opportunities to develop and grow.

Discrimination and harassment have no place at our company – we create a working environment characterized by respect.

LABOR AND SOCIAL STANDARDS, OCCUPATIONAL HEALTH AND SAFETY

Our wages, salaries, and benefits meet or exceed the applicable national legal requirements. We respect the right to freedom of association and promote constructive, trusting, and fair cooperation with our Works Councils.

We take the necessary measures at all workstations to prevent workplace accidents and work-related illnesses, whether physical or mental. We ensure a safe working environment and take the protection of health seriously.

ENVIRONMENT

Our aim is to keep the impact of our work on people and the environment to a minimum. We have a responsibility to the international community to protect the environment in all our activities and along the entire value chain. In order to reduce the burden on the environment as much as possible, we use natural resources sparingly, are gentle on the environment, and avoid or reduce energy and water consumption, emissions, and waste.

We also expect our business partners to show respect for people and the environment.

We expect our business partners to behave in accordance with the law and to observe appropriate social and legal standards. This applies in particular to the areas of human rights, treatment of employees, equal opportunity, occupational health and safety, wages, and freedom of association.

¹ "We" always includes all employees, management staff, and members of management bodies of DATAGROUP, including the Executive Board.

² In this Code of Conduct, DATAGROUP stands for DATAGROUP SE and all affiliated enterprises within the meaning of Section 15 of the German Company Law (AktG).



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Behavior towards DATAGROUP

Our integrity towards DATAGROUP is also reflected in our day-to-day business practices. We always handle the company's assets and the assets of business partners responsibly and in compliance with the law.

COMPANY PROPERTY

We take care to protect the property of DATAGROUP and property that is entrusted to us by customers and business partners from loss, theft, and misuse. We act carefully and responsibly when using and handling company property such as work tools, IT equipment, and intellectual property. We use consumable materials sparingly.

We protect company property from misuse, and in particular we do not use it for illegal or unauthorized personal purposes.

DATA PROTECTION AND INFORMATION SECURITY

We are committed to protecting privacy and complying with all applicable laws and regulations on the protection of personal data, in particular the EU General Data Protection Regulation (GDPR).

We collect, process, and use personal data only to the extent necessary for specified, explicit, and lawful purposes. We take all measures to protect data the company receives from employees, business partners, and customers. The use of data must be transparent for the data subjects and we uphold their rights of information and correction, as well as their rights of objection, blocking, and deletion if necessary.

Reliable IT systems are crucial for the trust that users, employees, and customers place in us. Each and every one of us takes appropriate security precautions to adequately protect data from cyber risks such as destruction, theft, unauthorized access, unauthorized disclosure, or other misuse. DATAGROUP's security guidelines set out the requirements for this and we are all committed to observing them.

CONFIDENTIALITY

We protect all trade and business secrets from disclosure to unauthorized persons – both during and after our employment at DATAGROUP.

All information and documents not suitable or intended for disclosure to third parties must be treated as strictly confidential and protected from unauthorized access and misuse; this includes employee information, expertise, inventions, copyrights, pricing, strategies, customer information, and other business secrets and sensitive data.

This goes both for internal company and business secrets and those of customers.

We carefully protect inventions, patents, trademarks, copyrights and other business secrets of DATAGROUP and keep them secret. We particularly observe the rules and regulations for the protection of intellectual property when developing software. We always respect the intellectual property rights of third parties.



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INSIDE INFORMATION

We do not misuse inside information. DATAGROUP is required to publish inside information immediately in an ad-hoc announcement so that all shareholders and potential investors have the same level of information. Until such publication has been performed we do not share the information in question without authorization and we do not use it for securities trading.

We help to ensure that inside information is published immediately and in the legally prescribed manner. Until then we make such information available only to persons who need it to perform their duties.

If we have inside knowledge as a result of our work at DATAGROUP, we do not trade in securities that could be affected by such confidential information, neither personally nor through third parties such as family and friends. Our insider trading policy regulates this in more detail.

Conduct towards business partners and other third parties

When dealing with business partners (customers, suppliers, service providers, etc.) and representatives of government agencies, we draw a clear line between the normal framework of a business relationship and our personal interests. We apply the highest standards to avoid and combat corruption of any kind and comply unconditionally with the applicable anti-corruption laws.

We keep accurate business books and records and provide accurate and transparent evidence that does not obscure the true nature of any transaction. We document all business transactions completely and accurately in accordance with legal requirements (e.g. tax and commercial retention requirements for annual financial statements, accounting records, business letters).

CONFLICTS OF INTEREST

We maintain loyalty to DATAGROUP and its business partners. A conflict of interest exists if our personal interests and the interests of DATAGROUP might conflict with each other. Employees must disclose or avoid conflicts of interest.

We avoid situations in which our personal or financial interests conflict with those of the company or of business partners. Such conflicts may arise for us from a personal relationship, a financial interest in an organization that is a business partner or competitor of DATAGROUP, taking personal advantage of an opportunity, or other things. We do not use DATAGROUP property or business opportunities for our own benefit and do not compete with DATAGROUP.

SOCIAL MEDIA

Expressions of personal opinion in connection with our function at DATAGROUP on social media (such as Twitter, Facebook, Instagram, online message boards, and blogs) may lead to conflicts. We are aware of our responsibility for DATAGROUP's reputation when using social media.

GIFTS AND ENTERTAINMENT

Small gifts and entertainment are permitted within reasonable limits when interacting with business partners and customers.



DATAGROUP

We do not request, solicit, or accept gifts, entertainment, or other benefits for ourselves or others if this could create even the appearance of undue influence.

Small gifts such as gifts pertinent to the occasion, promotional gifts, or reasonable business meals and event tickets are not a problem provided they are unsolicited, are not unreasonably frequent, serve a business purpose, and the gift or entertainment is proportional to the purpose. A value of 35 euros can be considered a reasonable guideline.

Conversely, we do not offer our business partners any inappropriate gifts or other benefits in order to avoid even the appearance of undue influence. Here, too, the principle applies that benefits are permissible in appropriate amounts and within the bounds of ordinary business activities.

If there is any doubt about the appropriateness of gifts or entertainment, we will consult with our supervisor.

In any case, we document in expense reports all gifts and entertainment that we extend to third parties. This does not affect reporting obligations under statutory provisions such as tax laws.

CHARITABLE GIVING

DATAGROUP has the goal of supporting charitable projects. Charitable contributions can occasionally pose a risk, however. For example, they can be misused as a pretext for bribes and other improper payments or they might be misinterpreted by others as an attempt to exert improper influence. It is therefore important that we avoid any appearance of undue influence. Our donations are made without expectation of anything in return.

Similarly, we do not make charitable contributions to organizations that are not in line with DATAGROUP's business principles.

COMPETITION

We are bound by the applicable competition and antitrust laws that regulate our dealings with competitors and business partners. We are committed to lawful and ethical competition.

We make no agreements with competitors improperly hindering free, fair, and open competition or influencing prices or conditions. Nor do we make any agreements on prices, the allocation of sales territories, customers, or products. In particular when bidding on contracts from public clients or private companies that are subject to a comparable contracting process, we do not enter into any competition-restricting or anti-competitive agreements with the parties involved.

Applicability, compliance with, and implementation of the Code of Conduct

AVAILABILITY OF THE CODE OF CONDUCT

The current version of the Code of Conduct is made available to all employees.



DATAGROUP

QUESTIONS AND REPORTS

In case of questions and/or an actual or suspected violation, the first point of contact that employees have regarding the topics mentioned here is always their direct supervisor. In addition the legal department, HR department, and Works Council are trustworthy resources.

It is also possible to make a report using our electronic [whistleblower system](#). The whistleblower system is available not only to employees but also to outside persons as a reporting system. The anonymity of whistleblowers is always guaranteed within a protected mailbox if necessary.

VIOLATIONS AND SANCTIONS

Violations of the Code of Conduct (as amended) can result in consequences for employees including dismissal, as well as claims for damages.