



 **Proalpha Group**

Proalpha Group
Code of Conduct

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A message
from our CEO

Dear colleagues,

With more than 2,000 people in our growing organization, we work every day to make our customers more successful. Today, I would like to introduce you to the revised version of the Code of Conduct for the Proalpha Group. This code is a central component of our corporate culture and establishes the ethical and social behavior standards that we expect from every employee.

Our competitive strength is based on our closeness to our customers, which we all embody together. Our shared values such as integrity, respect, loyalty, diversity, openness, and determination are crucial in this regard. We must achieve our goals in a way that aligns with our value system and meets the expectations of our customers.

The reputation of the Proalpha Group is one of our most valuable assets. Therefore, independence, integrity, and legality are the guiding principles of our Code of Conduct. Leaders must ensure compliance with the Code of Conduct and serve as role models by actively living and communicating these principles.

Compliance violations can have significant consequences for the Proalpha Group. Adhering to compliance requirements protects us all. If you become aware of compliance violations, use the available reporting channels.

Leaders have a special and responsible role: they must prevent non-compliant behavior, protect their employees, and represent the company with integrity. The Code of Conduct serves as guidance and highlights potential risk and conflict areas.

Compliance with the Code of Conduct is binding for all of us. Violations will not be tolerated and may result in appropriate consequences. Each of us is responsible for familiarizing ourselves with the content of the Code of Conduct and considering it in our decisions. If in doubt, please consult your supervisor or the Compliance Office.

Our company's success depends on our collective commitment to act honestly, with integrity and ethically. This includes truthful, comprehensive, and timely reporting and communication. Our shared goal is to take responsibility for our company and protect the reputation of our brand while being aware of the economic, social, and environmental impacts of our actions.

Our Code of Conduct is based on three main areas: Our responsibility as a member of society, our responsibility as a business partner, and our responsibility in the workplace. Together, we want to embed these principles in our daily work and gain and maintain the trust of our customers, partners, investors, and society.

I thank you in advance for your unwavering support in implementing our Code of Conduct and wish you continued success and enjoyment in your work.

Best regards,
Eric



Scope of application

The following Code of Conduct is valid throughout the group. In countries where local laws impose stricter regulations than those contained in these principles, local laws take precedence.

For reasons of readability, the masculine form is generally used throughout this text. This decision is made solely for linguistic simplicity and clarity and is intended to include all genders and identities equally.

Wherever Proalpha is mentioned, this always refers to all group companies.

We comply with laws

At Proalpha, we observe all applicable laws, both domestic and foreign, in all business decisions and actions, and reject unfair business practices.

Sustainable business collaboration that benefits everyone is only possible with fair competition and strict compliance with the legal system. Corruption, collusion among competitors, breach of trust, fraud, and similar violations distort competition, lead to higher costs, can be associated with significant fines and reputational damage, and ultimately jeopardize jobs at Proalpha.

What does this mean for you?

- Regularly inform yourself about the regulations and guidelines applicable at Proalpha (including this Code of Conduct and applicable policies) and comply with them.
- Evaluate every professional behavior to ensure it is in line with the Code of Conduct, company policies, and all applicable laws and regulations.

Leaders have a role model function. They are responsible for their own behavior and the behavior of employees in their area of responsibility, as well as for the proper implementation of all procedures in place to avoid reputational and legal risks.



At Proalpha, we do not tolerate violations of the law and take appropriate disciplinary measures for breaches of legal and/or contractual obligations, regardless of the sanctions provided for by law.

Our
responsibility
as a member of
society



Our responsibility as a member of society



We respect human rights, labor, and social standards

At Proalpha, we respect, protect, and promote globally applicable regulations for the protection of human rights.

Proalpha pursues a zero-tolerance policy towards all human rights violations within the company, in all our activities, and throughout the entire supply chain.

As part of the German Supply Chain Due Diligence Act (LkSG), as well as comparable European and international regulatory frameworks, we bear responsibility for respecting human rights and environmental standards throughout our value chain. Every employee contributes to the early identification

and prevention of risks through attentive behavior and by using the available whistleblower channels.

We are expressly responsible for complying with the prohibition of any form of forced labor, slavery, and human trafficking, the prohibition of child labor, and the prohibition of any form of discrimination, as well as respecting freedom of association and the right to collective bargaining and ensuring a safe and healthy working environment.

We stand for equal opportunity and diversity, and we do not harass or discriminate against anyone

At Proalpha, we treat everyone as we would like to be treated ourselves: with respect, fairness, and appreciation for diversity. We do not tolerate any form of discrimination, racism, harassment, or bullying.

Proalpha is a global company that operates in different countries with diverse cultures. People of different ethnic backgrounds, religions, beliefs, ages, disabilities, languages, genders, or sexual identities are an asset to us. No one may be directly or indirectly discriminated against, sexually harassed, or personally demeaned based on any of these characteristics.

As part of the company's strategic orientation, its goal is to open up international markets and expand partnerships. In the course of this, we are increasingly using and expanding our language skills, recognizing the English language as a corporate language and thus as an important tool for inclusion.

If we believe a colleague has been discriminated against or harassed, we report this misconduct to our supervisor, People & Culture, the management board, or anonymously through our whistleblower hotline.

We are firmly committed to treating all employees and all qualified applicants for employment equally. Decisions to conclude an employment contract and design the employment relationship are based solely on objective reasons such as qualifications, proven skills, and performance. We ensure that we act in accordance with the labor law of the respective state/country.



We are committed to equal employment opportunities for all, regardless of ethnic origin, religion, belief, age, disability, gender, or sexual identity. The obligation to treat everyone equally applies to all aspects of the employment relationship, including promotion, transfer, training, and compensation, unless there are valid reasons for different treatment. We comply with the legal prohibition of victimization when employees exercise their rights. Those who, in good faith, point out problems or grievances or file complaints must not be harassed or suffer disadvantages.

We maintain respectful and cooperative relationships with each other

At Proalpha, employees work collaboratively with customers, business partners, and colleagues. They abide by agreements and implement decisions on time. If circumstances arise that could jeopardize the aforementioned behavior, employees proactively inform the necessary parties.

Smooth collaboration requires interest, understanding, and consideration for the concerns and work areas of others. Inconsiderate behavior and selfish striving for recognition are not accepted.

In collaboration, employees support each other. They work together to develop the best solutions. Dialogue is open, cooperative, and respectful. The interests of the entire company have a higher priority than those of individual departments, branches, or persons.

Proalpha places absolute trust in its employees. This trust must not be exploited for personal gain.

Employees at Proalpha are open to change and approach new tasks with a positive attitude. They question their work processes and continuously work on improving their own work. They consistently develop their skills further.

Employees' suggestions for improving processes and products in customer companies are a valuable contribution to the com-

pany's success and are expressly encouraged. Everyone strives to maintain a positive outlook and contributes to a good working environment.

The company fulfills its social welfare obligation to all employees.

We take responsibility, communicate effectively, and encourage initiative

When taking on tasks and objectives, employees assume responsibility for their implementation and actions.

When tasks are assigned, acceptance should be confirmed briefly. Agreed-upon deadlines must be met. In case of significant disruptions during execution, employees must inform others in a timely manner. After completion, employees report back to the person who assigned the task. This approach ensures necessary reliability in project work and customer satisfaction.

Employees should seek out the information necessary to fulfill their tasks. Relevant information for colleagues should be passed on to them promptly, adequately, and understandably. All employees proactively offer their help, ensuring continuous workload. They report foreseeable overloads or underloads early on. When assigning tasks, the executing employee is, as far as possible, equipped with the necessary competencies to carry them out.

We practice exemplary leadership through communication, promotion, and transparency

Leaders demonstrate exemplary behavior and appreciation towards their employees. They communicate effectively,

clearly, and directly, as well as respectfully and appreciatively. Leaders provide regular performance feedback depending on the situation and actively request feedback themselves (feedback culture). This feedback helps to identify high performers and involve, develop, and motivate employees.

Leaders actively inform, constructively address criticism and remain open to feedback. They also address unpleasant matters directly.

Leaders recognize the extent to which their role influences employee motivation, performance orientation, and well-being, and they align their actions accordingly.

When delegating authority, they ensure that it is exercised responsibly.

Leaders keep employees informed about all relevant information within and about the company (e.g., objectives, strategies, and changes). They think innovatively, derive their goals, strategies, and actions from the company strategy, and communicate them to their target audience.

Leaders identify, promote, and deploy employees based on their strengths. Work results are discussed, and, in case of deviations, corrections are worked on in a cooperative manner. Leaders ensure that all employees are familiar with the content of these principles and that they are supported and practiced by all employees. They create a work environment that encourages employees to act according to these principles.

Leaders ensure open communication with employees and encourage them to ask questions or express concerns in difficult situations. They provide employees with information and advice on complying with these principles and promptly investigate any reports of violations.

We commit to environmental protection, sustainability, and responsible action

At Proalpha, we strive to make our business activities as environmentally friendly as possible and minimize the negative environmental impacts of our business by significantly reducing energy consumption, waste generation, wastewater, and emissions.

Compliance with the respective local environmental protection laws, regulations, and standards is an integral part of our business conduct. As part of our sustainability strategy, we strive to continuously improve our environmental performance.



Every employee is encouraged to actively consider environmental aspects in decision-making and to use resources responsibly.

As a non-manufacturing company, we also contribute to sustainable resource use, environmental protection, and particularly climate protection. Through our actions today and the sustainability of our current economic and lifestyle practices, we respect and protect the living conditions of future generations. Our actions are increasingly guided by the principles of responsible corporate governance and sustainability. Our aim is to systematically identify, assess, and transparently address environmental, social, and business-related impacts.

We are committed to lawful and appropriate sponsorship and donation practices

Proalpha does not make charitable, political, or non-profit donations or investments with the aim of obtaining or maintaining inappropriate personal or business advantages, or persuading others to act or refrain from acting in relation to their duties. Likewise, Proalpha does not donate to charitable organizations if there is a close relationship between the organization and a client.

Sponsorship is a contribution in the form of money or in-kind support provided by the Proalpha Group, for example, by using the logo or mentioning the company name to increase the company's profile. All sponsorship activities must be transparent, documented in a written contract, intended for a legitimate business purpose, and proportionate to the value that the Proalpha Group receives. Contributions may not be promised, offered, or provided to unlawfully obtain business advantages for the Proalpha Group or pursue an inappropriate purpose.



We observe the standards for occupational safety and health protection

At Proalpha, we observe the legal and technical requirements and standards for occupational safety and health protection.

Proalpha takes its responsibility for the safety and health of its employees very seriously. We ensure occupational health and safety in accordance with the respective valid national regulations and based on the company's occupational health and safety policy.

By continuously improving working conditions and through various prevention and health promotion measures, we maintain and promote the health, performance, and job satisfaction of our employees.

For us as an IT service provider, where people and their knowledge represent our capital, the protection of our employees is an integral part of our corporate culture.

Our
responsibility
as a business
partner



Our responsibility as a business partner



We avoid conflicts of interest in our business relationships

At Proalpha, we avoid conflicts of interest because independence, integrity, and trust in our services are the basis of our credibility.

We put customer satisfaction and the success of our customers at the center of all our efforts, providing concrete benefits and prompt assistance.

We continuously approach our customers and develop sustainable, trustful relationships with them.

Every employee shapes the reputation and trust that customers place in Proalpha through their appearance.

Further details to be observed are recorded in our internal Code of Conduct.

Service rates, goodwill, or free services must not have any impact on the priority, quality, and completion of tasks.

In dealing with business partners, we always act so that we do not carry out any actions that would negatively affect the economic success of the partners. If third parties (e.g., customers of a partner) approach us with the intention of establishing a direct business relationship with Proalpha that could be detrimental to the economic success of a partner, we only accept this request if the customer has previously communicated their wish to work with Proalpha, independently and verifiably, to the partner.

At Proalpha, we also pay attention to avoiding the appearance of a conflict of interest.

We avoid any form of corruption or bribery

Our success in the market is based on innovation, flexibility, and service orientation and must not be obtained through illicit favors. Our business partners trust the professional judgment of our employees.

Gifts, business meals, and events for information, representation, or entertainment purposes can be a legitimate means of building and supporting business relationships.

However, they must never serve to gain unfair business advantages and should not be of a nature or extent that could call into question the professional independence and judgment of the parties involved.

Employees of the Proalpha Group may not accept any valuables, payments, loans, vacations, invitations, or other monetary benefits as gifts from existing or potential business partners of the Proalpha Group.

Further details to be observed are recorded in our internal Code of Conduct.

This regulation does not apply to customary promotional gifts of low value or to payments that have no connection to the employee's employment with the Proalpha Group and would therefore not be different if the payer were not a customer, seller, competitor, or partner of the Proalpha Group.

Those who do not observe the rules for gifts and invitations run the risk of being prosecuted for corruption offenses. Even promising or demanding unfair advantages can be punishable. In the case of invitations and benefits to public officials, their internal rules for gifts and invitations must always be observed.

Offering benefits to public officials can be considered accepting or granting advantages simply because it is done in connection with their official position. It is not necessary for the official act to be influenced in an improper manner. Anyone entrusted with the performance of public tasks can be a public official, not just civil servants and public service employees. In case of doubt, consult the compliance department.

We respect and promote fair and free competition

At Proalpha, we respect the fair and free competition between companies, which is protected by applicable competition and antitrust laws.

These regulations prohibit the formation of cartels and the abuse of market positions by dominant companies.

We trust that we will win contracts due to the quality of our services and our competitive prices, and we do not engage in antitrust agreements or illegal information exchange, e.g., about prices, terms, and market sharing with competitors.

Before employees deviate from standard contracts or the procedures provided for in cooperation agreements, they must first consult with the legal department to ensure that no impermissible antitrust implications are associated with these deviations.

When in contact with competitors and business partners, Proalpha employees do not discuss internal matters, such as prices and sales or financing conditions, costs, market overviews, organizational processes, or other confidential information from which competitors or business partners could gain competitive advantages.

We also refrain from other anti-competitive actions.

We do not participate in money laundering or terrorist financing

At Proalpha, we contribute to preventing the introduction of assets of illegal origin into the economic cycle.

We also condemn any form of terrorist financing. Therefore, we comply with the applicable national and international laws for combating money laundering and terrorist financing.



Through automated sanction list screening, we keep ourselves informed about the current sanction lists and check our employees, debtors, and creditors accordingly.

We comply with export control regulations

At Proalpha, we comply with the applicable export control and embargo restrictions.

Export control laws regulate the export and re-export of goods and services that can be used both militarily and commercially, as well as their transfer within the country.



These laws serve national security and other aspects or are intended to influence the behavior of a particular country, company, or person.

The provision of services by Proalpha may also be subject to restrictions due to (re-) export control and embargo regulations of the Federal Republic of Germany, the European Union, the United States of America, and/or other countries.

We maintain proper records and fulfill our tax and customs duties

At Proalpha, we are responsible for transparently, completely, and truthfully representing our business activities through our accounting and financial reporting.

This requires that all records are created with accuracy and integrity.

At Proalpha, we fulfill our tax and customs duties and ensure this through our internal control system.

We communicate responsibly

At Proalpha, we ensure that our statements are always accurate and transparent. We do not make misleading statements. We also ensure that the Proalpha brands and certifications are used adequately and correctly.

Media inquiries relating to Proalpha, or its business partners should be referred to Corporate Communications or a person authorized by the management board.

Inquiries from external supervisory bodies and/or other authorities should be referred to the management board or Compliance.

We do not publish confidential or protected company information, even when using social media platforms, blogs, or other public forums (such as Facebook, LinkedIn, Twitter, or Instagram). We are also aware that third parties may perceive posts made under our respective private accounts as expressions of opinion by Proalpha.

Publications and lectures by employees are generally welcome. However, if they relate to the employee's activities at Proalpha, prior written approval from the marketing department is required.

We commit to transparent and impartial procurement processes

At Proalpha, we carefully select suppliers and service providers based on objective criteria. When purchasing products and services, we involve the responsible purchasing department according to the relevant procurement principles.

Proalpha is contractually linked to numerous suppliers and service providers in its business activities. We do not unilaterally and without good reason favor a supplier or service provider and avoid any conflicts of interest.

We do not purchase products or services without first informing ourselves about the market and alternative providers and documenting this accordingly.



Our
responsibility in
the workplace



Our responsibility in the workplace

We focus on efficient work time management and structured organization

Working hours must be aligned with operational requirements. Communication with colleagues, customers, and business partners must be ensured. The limits of the working hours act must be observed.

Appointments and availability must be maintained in the Outlook calendar and be visible to every employee. Confidential appointments should be marked as private.

In the event of vacation or other absences, employees must coordinate with their respective managers to arrange for a substitute and handover ongoing tasks/projects to the substitute.

In case of absence and unavailability via Outlook, an out-of-office message with the substitute's name and return date must be activated. The regulation published in the intranet regarding the out-of-office message must be observed.

Further details to be observed are recorded in our internal Code of Conduct.

We maintain respectful internal communication

We communicate on an equal footing and practice a culture of addressing each other informally across all hierarchical levels.

Our communication is characterized by mutual respect, honesty, objectivity, and openness. Expressing differing opinions is encouraged and respected.

We communicate quickly and openly about mistakes and analyze the causes together. The focus is on finding solutions and identifying areas for improvement in the future.

Important information for colleagues and superiors is actively and purposefully communicated.

The use of email communication is appropriate and professional.

Further details to be observed are recorded in our internal Code of Conduct.

We value constructive feedback

Giving and receiving feedback is important to us for personal development and good collaboration.

We provide feedback as an appreciative response to a person's behavior or performance. This can include both positive and constructive critical aspects.

We provide feedback objectively, separating factually observed behavior from its impact on others and offering constructive suggestions for how the feedback recipient can act even more efficiently in the future.

We promote continuous improvement and customer satisfaction

Proalpha employees perform their tasks quickly and accurately, achieving high-quality work results. The respective workplace has no influence on this.

All employees work to constantly improve the quality and performance of Proalpha and actively contribute optimization suggestions.

Our commitment to high work quality and achieving high customer satisfaction are essential cornerstones of our daily work.



We behave professionally

Laws prohibit the possession, consumption, and distribution of illegal drugs. We comply with these laws and do not appear under the influence of such substances in the workplace.

Alcohol consumption in the workplace impairs our work performance and can pose a significant health and safety risk to ourselves and others. Therefore, alcohol consumption in the workplace must be avoided.

We do not interfere in the private lives of our employees. However, each employee is obliged to behave in such a way outside of work and their workplace that it does not damage the interests of the employer. Our clothing in the workplace or other places where we interact with customers and business partners is neat and strictly professional, in line with the customs of our customers.

We protect personal data

At Proalpha, we comply with applicable data protection laws when processing personal data.

To protect privacy, there are special legal regulations for handling personal data. In principle, the collection, storage, processing, and other use of personal data require the consent of the person concerned, a contractual agreement, or another legal basis.

We protect the personal data of employees, former employees, customers, suppliers, and other affected parties. We collect, record, process, use, and store personal data in accordance with legal requirements.

When processing personal data, we act carefully and in accordance with data protection laws. If you have any questions, please contact our data protection officer.

We protect trade secrets and other confidential and internal information

At Proalpha, we protect our own trade secrets as well as other confidential and internal information, as we possess valuable company-specific know-how and extensive trade secrets that form the basis for our successful business operations.

We are also aware that while providing our services, we may become aware of third-party trade secrets. We protect these as well from unauthorized disclosure.

Internal information must not be passed on to unauthorized third parties. Every employee who may become aware of confidential information will keep it strictly secret during their employment and afterwards. This applies to the operational matters of Proalpha and customer/business relations. In case of doubt, instructions from superiors or management board must be obtained before disclosing information.



We commit ourselves to the unrestricted confidential treatment of all data and information that our employees become aware of during cooperation. This applies to business and operational matters and incidents as well as financial circumstances, operational and personal matters of all persons working for Proalpha Group customers.

At the workplace, we take precautions against unauthorized access to the systems.

We secure our IT systems

At Proalpha, we ensure the security of information technology, as it plays a key role in fulfilling tasks at Proalpha.

All essential strategic and operational functions and tasks are significantly supported by information technology. Therefore, we handle information technology, including hardware and software, carefully.

Our employees play an important role in information security, so we train them in secure and careful handling of IT. Employees pay attention to IT security and adhere to the applicable rules.

We treat the property and resources of Proalpha carefully

At Proalpha, we handle company property carefully. We always remember that company property is not for the private use of employees.

Wasting company resources or otherwise careless or abusive handling of company assets harms all of us and the company. We also take this into account when making expenses on behalf of and for the account of Proalpha.

The assets and facilities, business documents, and work equipment of Proalpha may not be misused for private purposes or provided to third parties if this could harm the interests of Proalpha.

Employees should strive to protect natural resources in their work and ensure that Proalpha's business activities have as little impact on the environment as possible through material savings, energy-efficient planning, and the reduction and recycling of waste. When selecting suppliers, promotional materials, or other external services, employees should consider not only economic aspects but also ecological and social criteria.

We avoid personal conflicts of interest

When employees find themselves in conflicts between their personal interests and their professional duties or the interests of Proalpha, this can damage the reputation of these employees and Proalpha.

Employees should therefore avoid such situations in the interest of Proalpha as well as their own interest. Specifically:

1. No secondary activities that impair the scope of the contractual duties or the competitive interests of Proalpha. Before taking up secondary activities (e.g., advisory roles, training roles at educational institutions), employees must obtain written approval from their employer (supervisor

and People & Culture department). The written request must detail the intended activity, specifying its type, location, and duration. Approval will be granted unless there are valid reasons to deny it. Voluntary work with limited time commitment does not need to be reported.

2. No financial investments in companies that may be affected by professional decisions of the employee or Proalpha (exception: publicly traded stock corporations).
3. Awarding contracts to relatives, life partners, or other close persons of employees must be reported to the supervisor and compliance in advance, if known. This also applies to transactions with companies in which relatives are directly or indirectly involved.
4. As far as possible, no direct reporting lines between children, parents, spouses, or life partners.
5. No assumption of entrepreneurial responsible positions (e.g., board member, managing director, executive, supervisory board, advisory board) at customers, business partners, or competitors without prior approval from management board after reporting to compliance.

In case of doubt, involve compliance. The perception of third parties is crucial. Even the appearance of a personal conflict of interest is harmful.





How we deal with compliance reports and the protection of whistleblowers

How we deal with compliance reports and the protection of whistleblowers

How we report compliance violations and handle them

At Proalpha, we can address potential compliance violations at any time.

We have set up a telephone hotline and a web solution exclusively for whistleblower purposes, where every employee, business partner (service provider, supplier, etc.), and our customers can openly report compliance violations related to the company, either by name or anonymously:

Whistleblower System ([Link](#))

Reports can also be submitted via the telephone channel of this whistleblower system (also here: with name - if desired - or completely anonymous):

Mon - Fri: 09:00 - 17:00
+49 800 3800 999

Reports through our whistleblower system are received by the Compliance Office. If whistleblowers set up a mailbox in the whistleblower system, they can communicate anonymously with the Compliance Office.

We report well-founded suspicions of unfair practices, fraud, unauthorized disclosure of confidential information, or viola-



tion of the law to our superiors, Compliance, People & Culture, or management board as soon as possible.

Employees' concerns are treated confidentially, taken seriously, and investigated accordingly.

Employees can raise their concerns without fear of consequences, even if it turns out that they were wrong in their suspicions.



We protect whistleblowers and adhere to the principle of the presumption of innocence

At Proalpha, we protect every employee who, to the best of their knowledge and in good faith, reports a compliance violation.

These employees must not suffer any disadvantage because of their report.

This protection does not apply to employees who intentionally or grossly negligently provide false information about a compliance violation or an accusation. In such a case, we reserve the right to take legal and disciplinary measures against the whistleblower.

At Proalpha, we do not prejudge anyone and adhere to the principle of the presumption of innocence.

How we handle compliance violations

At Proalpha, we expect all employees to adhere to this Code of Conduct and share and respect the same values and standards.

Violations of these rules can result in significant reputational damage and legal disadvantages for the employees involved, their colleagues, and Proalpha, including fines, criminal proceedings, or restrictions on regulatory permits. In addition, violations that constitute a breach of contractual obligations may lead to labor law measures by Proalpha.

Contact

Please do not hesitate to contact our Compliance Office if you have questions or need clarification. We are happy to help.



Better decisions. For a better future.