

# Code of Conduct

SCOPE.....	2
CODE OF CONDUCT .....	2
PROTECTION OF COMPANY PROPERTY .....	2
COMPLIANCE WITH THE LAW .....	3
REPORTING MISCONDUCT .....	3
SANCTIONS FOR VIOLATIONS OF THE CODE OF CONDUCT .....	3
COMBATING MONEY LAUNDERING AND TERRORIST FINANCING.....	3
HANDLING CONFLICT OF INTEREST.....	3
CORRUPTION .....	4
HANDLING OF INSIDER INFORMATION.....	4
DONATIONS .....	4
PROPER COMPREHENSIVE BEHAVIOR.....	4
PROTECTION OF INTELLECTUAL PROPERTY.....	4
INNOVATION.....	5
DATA PROTECTION .....	5
CYBER SECIRTY .....	5
SUSTAINABILITY.....	5
DIVERSITY AND EQUAL OPPORTUNITY .....	5

## SCOPE

This policy applies to all our employees regardless of employment agreement or rank.

## CODE OF CONDUCT

The SimplyConnect GmbH Code of Conduct sets the values and principles that we as employees follow in our interactions with each other and with our stakeholders such as customers and other business partners, our shareholders and the regulatory authorities. It forms the basis for our behavior and for the public image of SimplyConnect.

We expect and foster in our company a culture of openness and mutual trust and the courage to take responsibility. By acting with integrity, all employees throughout the Group help to reduce or avoid risks for SimplyConnect. In this way, everybody makes a contribution to the long-term success of SimplyConnect.

All SimplyConnect employees adhere in their daily work to the values and principles defined here. Our members of management live up to these values and principles and ensure compliance with them. This enables us to protect and strengthen our reputation. The Code of Conduct is binding for all employees and members of the Board of Directors of SimplyConnect.

## CONFLICT-OF-INTEREST POLICY

Conflicts of interest occur when an employee, contractor, or job applicant's personal interests may not align with company needs or interests. If an employee uses their position for personal gain, engages in activities that will increase competitor profits, or acts in ways that could compromise the company's legal position, these behaviors are considered conflicts of interest. Conflicts of interest may also occur during the hiring process. All job applicants must apply the same way, through the applicant tracking system platform, before being interviewed. If an employee feels that a conflict of interest is likely to occur, that employee is instructed to discuss conflicts directly with the CEO. The CEO is responsible for monitoring potential conflicts in the workplace, and working to prevent them. In the event that conflicts cannot be prevented, employees are instructed to work with the CEO to mitigate risks and exposure to the greatest extent possible. In general, personal and financial interests should be kept entirely separate from activities that may oppose the company's interests. Violation of the conflict of interest policy may result in suspension or termination.

## PROTECTION OF COMPANY PROPERTY

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse company equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

## COMPLIANCE WITH THE LAW

We operate within the laws and regulations of the countries in which we operate and within the framework of our own internal directives and regulations. The purpose is not only to ensure the legality of our actions, but also to do the right thing. We constantly ask ourselves if our actions are in keeping with the principles of behavior of this Code of Conduct. We maintain an open, transparent and cooperative relationship with public authorities. SimplyConnect respects internationally recognized human rights and supports compliance with these rights. In particular, we have no tolerance for forced, slave or child labor or any other form of exploitation. With our transparent way of doing business and our Code for Suppliers, we promote respect for these fundamental rights across our entire value-added chain.

## REPORTING MISCONDUCT

SimplyConnect does not tolerate any violation of applicable laws or internal rules. Employee reports on misconduct are an important tool for exposing wrongdoing in the workplace and protecting SimplyConnect from risk. In addition to measures such as controls and trainings, it also requires the courage of our employees to openly address wrongdoing and to report any compliance concerns in order to detect and prevent misconduct. Employees who report compliance concerns in good faith have nothing to fear, as they are acting correctly and in the interests of SimplyConnect and of all our employees.

## SANCTIONS FOR VIOLATIONS OF THE CODE OF CONDUCT

Violations of this Code of Conduct could result in sanctions. This may include both disciplinary employment measures (including dismissal) and, depending on the circumstances, criminal proceedings. This applies not only to employees who are accused of having violated mandatory rules, but to all those who know of a specific instance of misconduct and tolerate this (for example, as a member of management) without reporting it. SimplyConnect has high standards for members of management particularly in this regard.

## COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

SimplyConnect does not tolerate any form of money laundering or terrorist financing and complies with all relevant economic and financial sanctions. Through their integrity and compliance with due diligence, all employees help prevent illegal activities. In addition, we have systems and processes in place to detect and prevent economic crime. SimplyConnect never engages in dubious transactions.

## HANDLING CONFLICT OF INTEREST

Both SimplyConnect and all our employees make potential conflicts of interest transparent or avoid them whenever possible. Such a conflict can arise when personal interests or related third parties are involved in a business situation. An open and proactive approach to conflicts of interest serves the long-term interests of the company.

## CORRUPTION

SimplyConnect does not tolerate any form of corruption. We always make our business decisions on the basis of economic facts in order to avoid even the appearance of bribery or corruption. It can happen, however, in everyday business that small gifts, invitations and other benefits are offered, or we may ourselves offer some such benefit. SimplyConnect wants to ensure that gifts, invitations and benefits stay within reasonable limits and are in keeping with the law and that our employees who are affected are protected. We have therefore implemented clear rules of conduct for receiving and giving gifts, invitations and other benefits.

## HANDLING OF INSIDER INFORMATION

In our daily business, we process confidential, price-sensitive information in many areas. SimplyConnect requires all employees and members of management to handle this data carefully and responsibly. This information is used for business purposes only and we do not tolerate any improper own-account trading. We have put in place strict measures to prevent and detect insider transactions.

## DONATIONS

As a company that operates globally, we believe we have a responsibility towards society as a whole and to the communities in which we are located. We make donations for the environment and social issues, supporting organizations that, based on their stated purpose, supplement our own corporate responsibility. SimplyConnect makes donations on a voluntary basis, without expecting any consideration in return. In doing so, we always comply with the framework of the respective legal system and act in accordance with the applicable internal regulations.

## PROPER COMPREHENSIVE BEHAVIOR

We are aware of our system-relevant function as infrastructure provider, and therefore avoid any suspicion of discriminating against customers, competitors or business partners. Price-fixing, restrictions on services offered, discrimination and all other forms of unfair competitive behavior will not be tolerated by us. SimplyConnect is committed to competition and the free play of market forces as the fundamental principles of the legal and economic systems found in all countries where we operate.

## PROTECTION OF INTELLECTUAL PROPERTY

SimplyConnect respects the property rights of others for products, publications and software, such as patents, copyrights and brand rights. If we want to use the intellectual property of others, we always obtain a license from the rights holders. We treat our own intellectual property with care and protect it from misuse by third parties.

## INNOVATION

Success in today's competitive environment requires initiating developments on the market and actively help shape them. SimplyConnect therefore encourages new ideas and innovations in the company. In order to offer our customers efficient solutions and services, we closely collaborate with strategic partners. To remain internationally competitive as well, SimplyConnect must stay one step ahead of the global competition. Innovation is the engine that keeps us alive and constantly evolves our business.

## DATA PROTECTION

Our activity requires us to obtain and process a large amount of data. Thus, data protection is a central issue for us. The basic principle is that wherever data is processed, a high level of data protection and security must be guaranteed. This applies to data from customers and business partners as well as to employee data. Because privacy is above all protection of the person. That's why we attribute such a high priority to compliance with the applicable laws and to protecting privacy and the private sphere of affected persons in order to adhere to national and international legal requirements. For us, this is the basis of a trusting business relationship and the prerequisite for an excellent reputation.

## CYBER SECURITY

The threat of cyberattacks is a major risk and one that SimplyConnect takes very seriously. In particular, this has to do with the ongoing functioning of our systems, maintaining our reputation as a reliable service provider. With strict security guidelines and a strong cyber-defense, we protect assets such as data centers, confidential information and our property as well as that of third parties.

## SUSTAINABILITY

Our business and our company are geared towards sustainability and longevity. This means that we are committed to a clear ESG strategy on corporate and business level, and we comply with applicable laws and standards.

## DIVERSITY AND EQUAL OPPORTUNITY

SimplyConnect stands for equal opportunity. We create an environment in which people are appreciated for their contribution, regardless of hierarchy, country of origin, ethnic background, gender, nationality, age, sexual orientation, physical abilities or religion. Fair and respectful interaction – free from discrimination, harassment or reprisals – is anchored in our values and forms the basis for a healthy and inspiring work environment. We actively promote diversity as part of our ESG strategy in our teams, as it is our firm conviction that diversity will generate new ideas, innovative approaches and growth in general. Together we can achieve more.

Jan. 2022