



Code of Conduct of the conet Group



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Message From the Management of the conet Group



„Our goal is to be one of Germany's top 10 IT consultancies. We can only achieve this goal if we act responsibly and in compliance with the law at all times. We are convinced that this is the only way we can build and maintain long-term and sustainable business relationships with customers, partners and employees. This is more important to us than short-term profit-oriented success.

This claim to 'long-term relationships' is a cornerstone of our corporate constitution conet LIFE, in which we have laid down our unmistakable identity. It defines our guiding principles, our mission, our vision and common rules for fair, open and trusting cooperation within our teams as well as with our customers and business partners – our culture. Our Code of Conduct summarizes this as an ethical and legal guide.

We expect all members of the management and employees to behave in accordance with the Code of Conduct and to act as role models.“



Martin Wibbe
CEO



Daniela Bünger
CFO

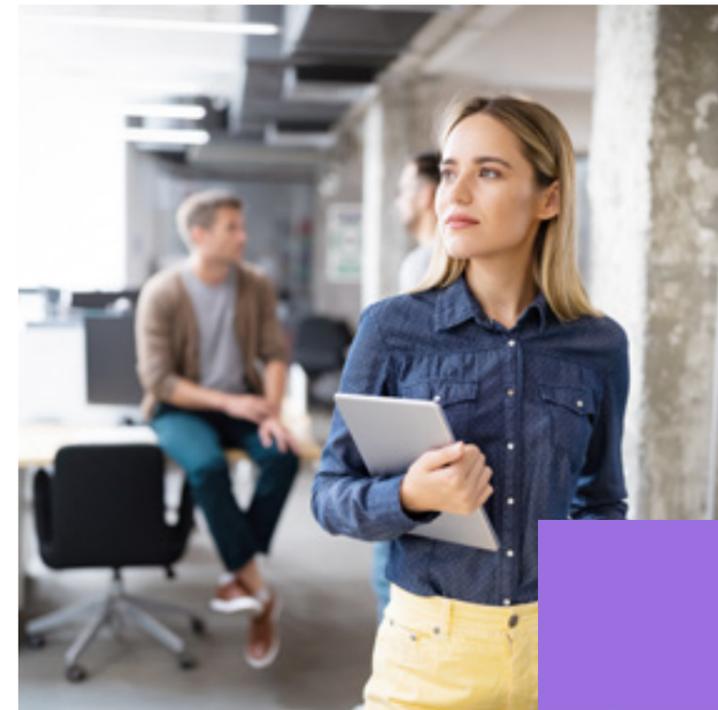
Introduction



This Code of Conduct was adopted by the management of the conet Group and is part of our compliance management system. It summarizes the legal regulations and ethical standards relevant to conet and provides the groups of people listed above with a binding guideline. It applies to the respective management, executives and all employees of the conet Group companies* (hereinafter referred to as „employees“).

As conet, we act in accordance with the law. All employees are obliged to familiarize themselves with this Code of Conduct and to comply with it. All employees bear equal responsibility for their colleagues and for our company.

Due to their importance for our mutual cooperation, some of the points listed here are supplemented in separate and more detailed guidelines. We refer to these at the appropriate places.



[Conet Group Companies](#)

Our Employees & Our Workplace



Fair & Respectful Cooperation

At conet Group, we treat everyone with the respect they deserve – regardless of whether they are employees, managers or customers. For us, every person is unique and valuable and is respected for their individual abilities. We communicate constructively so that we can develop personally in the best possible way. We create a working atmosphere in which everyone can develop freely and feel comfortable. In case this should not work, we address the issue openly and respectfully.

Diversity and Equal Opportunities

Discrimination on the basis of color, age, gender, sexual orientation, ethnic origin, disability, religious affiliation, political conviction, membership of an employee organization or marital status has no place at our company. We condemn and prohibit bullying and, in particular, sexual harassment in any form. We take decisive action against discrimination.

What's more, we at conet Group are convinced that diversity and inclusion drive us to develop new ideas, products and innovative solutions. That is why we are actively committed to a corporate culture characterized by diversity and inclusion. We have the courage to stand up for each other.

Positive Working Environment

The health of our employees is important to us. A compassionate working environment and programs that promote physical, mental and social health are important for maintaining well-being in the workplace. This also includes the opportunity to balance family and career. A positive working environment increases the resilience, commitment and cooperation of all employees. We also regularly assess working conditions for health hazards and derive suitable measures from this. It goes without saying that we also support each other in crisis situations. For us, people come first.

Avoidance of Conflicts of Interest

A conflict of interest can arise if you allow yourself to be guided by personal interests in a business transaction. At conet, we keep these interests strictly separate and undertake to disclose any existing conflict of interest or the appearance of such to our managers or our Compliance Team without delay. Regardless of how conflict situations arise, they must not have a negative impact on conet Group.

Protection of Employee Rights

We offer our employees appropriate and fair remuneration and fair working conditions. We reject any form of forced or child labor, as well as the obstruction of lawful representation of interests. We adhere to the recommendations of the ILO conventions, in particular the minimum age for the employment of children (No. 138). We do not employ anyone who is younger than 15 years old, is still of school age or has not yet reached the legal minimum age for employment. We only deviate from this if a legal exception is permitted and its requirements are met.

Acting in Competition

We want to convince our customers with the benefits of our services and products and therefore attach great importance to fair competition. Compliance with applicable antitrust and competition law regulations is an absolute must for us! We therefore reject any practices that restrict free competition in an unfair or inadmissible manner. This includes, in particular, agreements on prices and conditions or the division or allocation of customers or markets. Communication with partners and competitors is essential in our business area. Here too, competition-sensitive information such as prices or other information from which competitors could gain an advantage is only disclosed after review and approval by the Legal Team.

Dealing With Public Contracts

Particularly in the context of public tendering procedures, our employees pay attention to competition-compliant conduct and involve the Legal Team at an early stage in the event of uncertainties and questions.

Zero Tolerance for Corruption

The public sector is a key customer of conet Group. Due to the frequent contact with public officials, anti-corruption prevention is particularly important. All employees of conet Group always comply with all relevant local anti-corruption laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act, and refrain from offering, promising or granting advantages in business dealings in the public sector, but of course also to private companies, in order to achieve favorable behavior for conet. We act in the same way when we are promised or granted advantages. As this topic is particularly important to us and we want to protect our employees, we have drawn up our own anti-corruption guidelines for this topic. This provides us with guidelines for compliance with anti-corruption laws and additional internal rules.

Dealing With Official Investigations

Law enforcement authorities and/or competition authorities such as the Bundeskartellamt (Federal Cartel Office) may conduct searches at our business premises. We support official investigations within the scope of the applicable requirements and behave cooperatively. In addition, we adhere to our guideline „Conduct during searches and seizures“.

Business Partner Compliance

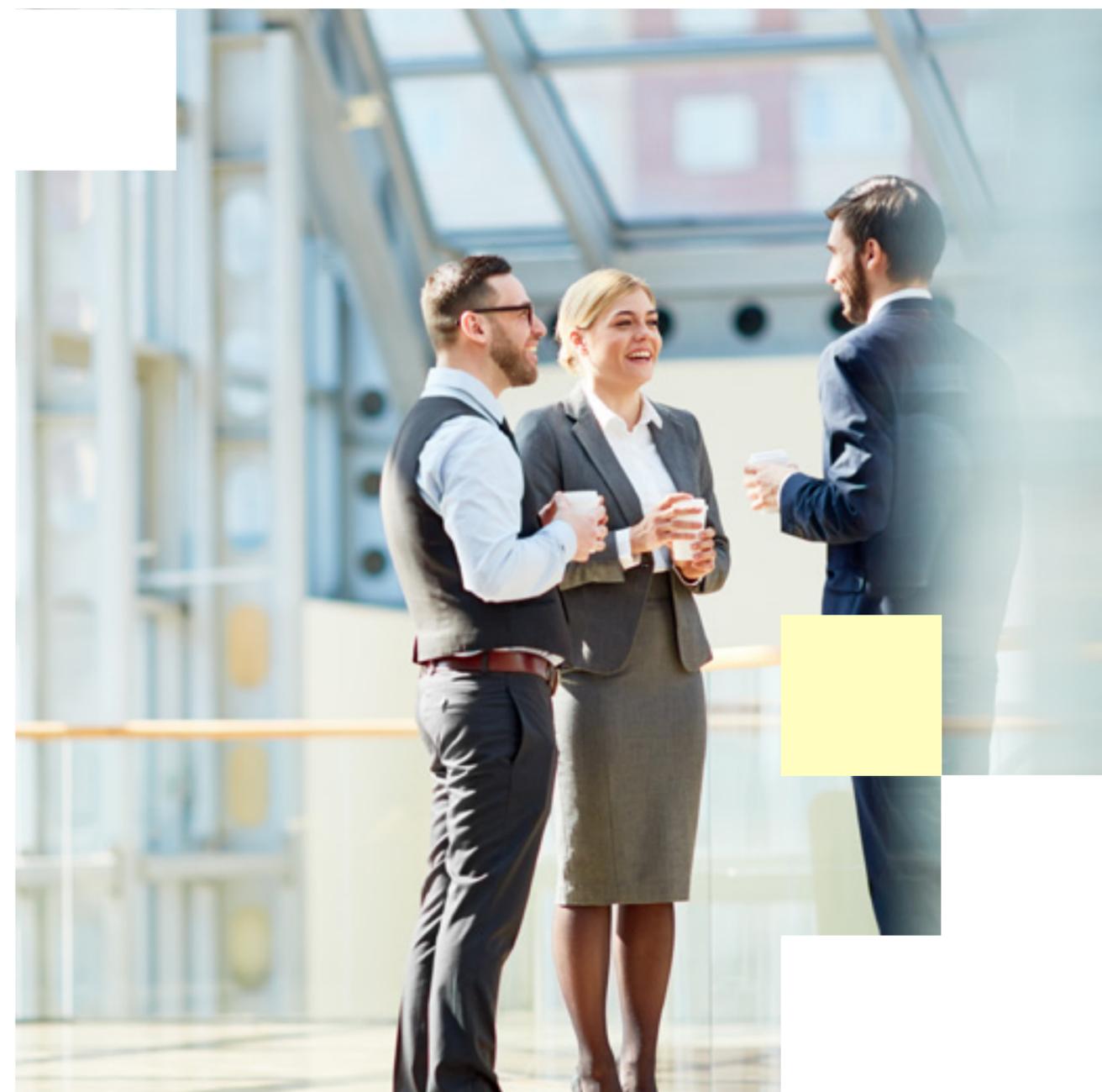
We expect compliance with the principles of conduct set out in this Code not only from ourselves, but also from our business partners. We therefore always check whether our business partners are committed to comparable principles of conduct. We include the Code of Conduct for Business Partner Companies of the conet Group in our contract documents as a binding requirement. We do not enter into business relationships with suppliers or other potential business partners who have been convicted of money laundering or corruption or who are on sanctions lists.

Some internal and external projects involve the use of external personnel. In order to avoid risks such as pseudo self-employment or hidden employee leasing, we always comply with the provisions of our guideline on the use of freelancers. For prevention purposes, we offer appropriate training to the groups of people who typically come into contact with external personnel.

Moderate and Responsible Lobbying

Lobbying is a form of political participation in which interest groups attempt to influence political decisions. Representation of the interests of conet Group is carried out responsibly and transparently. We always comply with the relevant applicable laws.

Dealing With Business Partners & Third Parties



Finances & Taxes



Our financial reporting complies with the applicable accounting standards. It reflects the actual net assets, financial position and results of operations of the companies in the conet Group and is audited by independent auditors.

Our tax planning is also carried out responsibly and always in accordance with the applicable tax laws and regulations in the countries and regions in which we do business. In order to minimize tax risks, we have implemented processes and controls to ensure compliance with tax obligations, which we are constantly developing.

Although it goes without saying for us, it should not go unmentioned that we do not participate in money laundering activities and terrorist financing. We always comply with legal obligations to prevent money laundering. All employees of conet Group are required to report unusual financial transactions that could give rise to suspicion of money laundering or terrorist financing to their managers, the Compliance Team or our whistleblower system if in doubt.



Protecting Our Property

The assets of our company must be protected. This also applies to intellectual property and copyright. Intellectual property includes, among other things, research, product development, the development of new technologies and internally generated software. If it is essential to provide business partners with such information, it must always be ensured that this information is also protected by the recipient, for example by signing a non-disclosure agreement.

Protection of Third-Party Property

Accordingly, we also respect the property of our partners and customers, including intellectual property. The use of copyrighted content or trademarks such as images, texts or logos is not permitted without the permission of the copyright holder. Approved material is centrally managed and made available by us.

Private Use of Company Property

conet provides its employees with modern working environments and equipment to enable a pleasant working atmosphere and efficient work. In return, company property must always be treated with care and protected against damage and theft. For any private use of company property the regulations of the respective companies of the conet Group must be observed.



Protection of Company Assets



Handling Information & Data



Cyber Security

Cyber security is not only crucial for the continued existence of our company, but also for the security and trust of our customers and business partners. In order to protect the data we process from cyber risks such as unauthorized access, theft, destruction, unauthorized disclosure and other misuse, it is the duty of all employees to take appropriate security precautions. Our employees receive regular training on cyber security so that if an attack or security breach is suspected, the internal departments and channels can be contacted immediately to close the security gaps.

Data Protection

Our business is data-driven. The protection of privacy is therefore a key concern. That is why we strictly adhere to the laws on the protection and security of personal data. We only disclose personal data within and outside our group of companies if we are legally authorized to do so and there is a legitimate business need. We are all committed to observing the principle of data minimization. This means that only the necessary amount of personal data is collected, stored and used. Our employees are supported by our data protection training and our conet Group Data Protection Policy.

External Communication

Naturally, we would like to proudly report on our work and successes in the companies of the conet Group. In doing so, we must always ensure that the reputation of our companies, which has been built up over the years, is not damaged by careless statements.

For this reason, we do not contact media representatives unless this has been approved and coordinated by our Marketing & Corporate Communications Team. If we are contacted by journalists or the media, we also do not speak on behalf of the conet Group companies, but refer journalists or media representatives to Marketing & Corporate Communications, which can be contacted externally at presse@conet.de.

Social Media

Regardless of whether we use social media such as LinkedIn, Facebook, Xing, YouTube and the like for business or private purposes, inappropriate use of them can cast a bad light on our companies. It is therefore imperative that we act responsibly.

It is important to ensure that the information published online is correct (e.g. with regard to the job title). Copyright and data protection rights must also be observed. The publication of confidential or internal company information is prohibited.

Our employees can find more information on the correct use of social media in our conet Social Media Guideline and our Policy on the Use of the Internet and E-mail.

Social Responsibility

Protection of Human Rights

Everyone has the right to be treated fairly, respectfully and with dignity. The protection of human rights in our own business areas and along our supply chains is an important concern for us. In addition to national laws and regulations, conventions such as the Universal Declaration of Human Rights (UN), the European Convention for the Protection of Human Rights and Fundamental Freedoms, the ILO core labor standards and the OECD Guidelines for Multinational Enterprises serve as binding guidelines for our daily interactions.

Social Commitment

We take our social responsibility seriously and contribute to making the world a better place. Among other things, we make donations in the form of cash or in kind to promote social, scientific or charitable causes. However, we can only really make a difference if we all work together. For this reason, we have founded the conet Social Club. All conet Group employees can propose and organize social projects through this club.

Artificial Intelligence

As an IT company, we want to be up-to-date and at the forefront of technical development when it comes to using the full potential of new technologies – for the benefit of our customers, but also for ourselves. In doing so, we never lose sight of our values and always act responsibly and in accordance with our business ethics.

When using Artificial Intelligence, we always pay attention to security, privacy and data protection, and we also adhere to our internal Guidelines on the Use of Artificial Intelligence Applications.



Sustainable Action



Declaration of Principles of Our Environmental Policy

For conet, treating the environment and resources responsibly is directly linked to our corporate strategy. We recognize that a holistic view of all dimensions of sustainability is necessary to ensure the long term success of our company.

Our corporate culture and our convictions provide us with the necessary guidance for future action. To ensure that sustainability can be effective, the management has formulated the clear goal of expanding, promoting, and actively living awareness throughout the entire company.

Only the combination of active environmental responsibility with clear processes, binding regulations, suitable technologies, and practical tools can lead to an effective environmental management system. We are therefore committed to continuously developing this system in order to constantly improve our environmental performance and thus our contribution to protecting the environment.

Our environmental policy is based on the principles of the UN Global Compact and the Sustainable Development Goals (SDGs). We see these frameworks as important points of reference on our path to more responsible and sustainable action. Even though we are still in a development process, we are expressly committed to the global climate goals of the Paris Climate Agreement—in particular, to limiting global warming to well below 2°C and, if possible, to 1.5°C above pre-industrial levels.

Role of Employees and Operational Priorities

Effective environmental protection begins with each and every one of our employees. Only when everyone understands the relevant processes, is trained accordingly, and is aware of their responsibilities can we achieve our environmental goals and continuously improve our environmental performance. We want to continuously minimize the environmental impact of our business operations and use resources sparingly – especially in the operation and cooling of servers and data centers, in the procurement of IT equipment, and in our office and mobility processes. Environmental protection is also a management task. Through this Code of Conduct, the management obliges all managers and their employees to contribute to the prevention and reduction of environmental impact. To this end, our employees are made aware of the issue and kept up to date.

This attitude leads to high standards of prevention: „Prevention rather than cure“ and „conserving resources from the outset“ are key principles for us.



Goals of the Environmental Management System

Compliance with legal and regulatory requirements is a matter of course for us and forms the basis of our environmental protection activities. We implement all binding obligations and legal requirements with the necessary care and integrity and fulfill them reliably. Wherever possible, we take measures to promote environmental protection that go beyond legal and regulatory requirements.

The introduction and maintenance of our environmental management system at conet should also contribute to:

- Reducing energy consumption, especially in our data centers and IT infrastructures, thereby measurably reducing our CO2 emissions
- Establishing and continuously improving resource-saving and environmentally friendly processes
- Systematically taking environmental aspects into account in procurement and service provision
- Creating transparency in environmentally relevant processes and making them comprehensible for all employees
- Promoting awareness of each individual's personal responsibility for environmental protection
- Identifying and avoiding risks to the environment at an early stage
- Ensuring knowledge transfer in the area of sustainable action and facilitating the training of new employees in our environmental standards

Standards, Monitoring, and ISO 14001

Our environmental management system is continuously monitored, improved, and ensured in the long term. It is based on the requirements of ISO 14001. This standard provides us with a recognized framework that gives our customers and partners the assurance that we operate and monitor environmental management according to an established standard. At the same time, the requirements of ISO 14001 serve as the basis for our management system. conet Holding GmbH is certified according to ISO 14001 at its headquarters in Bonn, among other locations.



Violations, Reporting & Contact

Risk Management & Audits

We are committed to identifying risks to human rights and environmental risks in our own business areas and along our supply chain and, if necessary, initiating appropriate remedial measures as quickly as possible. To this end, we carry out appropriate risk analyses and audits both in our business divisions and, if necessary, in the business divisions of individual suppliers.

Complaints Mechanism

In accordance with legal requirements, we have set up an effective complaints procedure with our [digital whistleblower system](#). Both our employees and external parties can use it to report environmental and human rights violations within our supply chain.

Violations of Our Code of Conduct

With this Code of Conduct, we want to protect our customers, business partners and the companies of conet Group as well as their employees. Only by complying with the rules listed here can risks be minimized and damage to us averted.

Serious violations of applicable laws, our Code of Conduct or other conet Group policies may result in disciplinary action and other consequences.

Reporting

The groups of persons falling within the scope of this Code of Conduct should first contact their superiors if they have any indications of breaches of this Code of Conduct or other irregular behavior. There is also the option of contacting our Compliance Team or submitting information via our digital whistleblower system. Violations can also be reported anonymously via the digital whistleblower system.

Contact

It is not always easy to maintain an overview of all the topics addressed in this Code of Conduct due to the large number of legal regulations.

If you have any questions about this Code of Conduct or other conet Group guidelines, please contact our Compliance Team (compliance@conet.de).



