

Code of Conduct
of the CONTACT Software Group



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Introduction

The CONTACT Software Group is an independent family business. For over 30 years, we have combined technological excellence and comprehensive consulting expertise gained from thousands of projects with a clear focus on our customers' business objectives. We see ourselves as a strategic partner that provides holistic support for the digital transformation of industry. We provide companies with the best software to exploit the full potential of their data along the entire product life cycle - from development to the shop floor and service to recycling.

All products and consulting services are designed to optimally develop industrial expertise, accelerate digital transformation, and reconcile economic efficiency with ecological responsibility. From the use of artificial intelligence to sustainable manufacturing processes and energy-saving factories. As a digitalization partner, we identify the potential, derive digitalization roadmaps from this, and implement them hand in hand with our customers.

At the heart of our solutions is the modular CONTACT Elements platform. With its flexibly combinable application modules, open standards, and open-source technology, companies connect their IT systems with the Internet of Things to create end-to-end business processes - on premises and in the cloud. This enables them to improve their collaboration, draw the right conclusions from data, and increase their added value by automating processes.

Our roots are in Bremen - but we feel at home anywhere in the world. With more than 500 employees and a global network of innovative partners, we work every day to achieve our customers' goals faster.

With this outstanding position in the market, which we aim not only to maintain but also to expand, the level of responsibility that CONTACT Software assumes increases - towards our business partners, towards our employees, but also towards society.

To meet this requirement, even against the backdrop of an increasingly difficult regulatory environment, this Code of Conduct, together with the rules of conduct based on it, is intended to provide not only legal but also ethical guidance. The Code of Conduct contains the fundamental and binding rules for our conduct within the CONTACT Software Group of companies and towards our business partners and the general public.

The management of the CONTACT Software Group, therefore, expects all employees and, in particular, managers to consistently adhere to the Code of Conduct in order to ensure our joint success in the future.

Karl Heinz Zachries



Maximilian Zachries





I. Scope of application and responsibility

This Code of Conduct is binding for our daily actions and applies to all bodies, management, executives, employees, and temporary workers, regardless of management level or function in the company. In the following, all these persons are referred to collectively as “staff” or “staff members”. The Code of Conduct applies to all companies of the CONTACT Software Group in Germany and abroad that are controlled or managed by CONTACT Software.

Managers and employees in leading positions have an obligation to set a good example, both in terms of their own compliance with the Code of Conduct and in ensuring compliance by others. If there are any difficulties or questions regarding the interpretation or application of the Code of Conduct, staff members should contact their supervisor or CONTACT Software's Compliance Officer.

Respectful and cooperative collaboration, as well as the conscious perception of social responsibility, form the basis for our long-term corporate success. This Code of Conduct summarizes our key principles and basic rules for our own actions and our conduct towards our business partners, customers, and the public. This Code of Conduct provides all employees with an orientation framework on topics such as compliance with the law, fairness, equal treatment, sustainability, data protection and much more.

II. Guidelines

1. Compliance with the law

Compliance with the law is a matter of course for us. This includes compliance with all laws and regulations that affect our business areas. We observe the applicable legal prohibitions and obligations at all times, even if this entails short-term economic disadvantages or difficulties for CONTACT Software or individual staff members. All managers are responsible for knowing the applicable laws and regulations within the scope of their tasks and areas of responsibility and for ensuring that they are communicated and implemented by their employees.

2. Data protection and information security

The protection of personal data in general, but especially the data of employees, business partners, customers, and suppliers, is very important to us. As a matter of principle, we only collect and process personal data in accordance with the statutory provisions and only if this is necessary or legally required for the fulfillment of the respective task. Otherwise, we only process personal data after obtaining the consent of the data subject, which always complies with the regulations and principles set out in the European General Data Protection Regulation. In all cases, we pay attention to data security, confidentiality, and data minimization. Personal data is only disclosed to authorized persons. All employees treat personal data as strictly confidential and store it securely so that it cannot be misused.

3. Dealing with artificial intelligence

We are committed to using artificial intelligence responsibly and ethically by prioritizing transparency, fairness, and data protection, considering the impact of our AI systems on people, and actively preventing misuse.

4. Equal treatment and non-discrimination



CONTACT Software lives a culture of equal opportunities and inclusion as well as mutual trust and respect, in which all employees, partners, and customers are valued equally. We maintain an open dialog at all levels that is characterized by tolerance and respect; this applies both in the relationship between managers and employees as well as between employees and managers themselves, and in dialog with business partners. We do not tolerate discriminatory behavior for any reason whatsoever.

We treat all employees equally. Neither ethnic origin, descent or other origin, gender, sexual identity or orientation, religion or belief, disability, or age may lead to personal or professional disadvantages and influence the access, promotion, and qualification opportunities of individuals. We are committed to promoting diversity and ensuring that decisions are made solely based on skills, qualifications, and performance.

We also do not tolerate inappropriate treatment of employees, such as psychological hardship, sexual harassment or discrimination, including gestures, language and physical contact that is sexual, coercive, threatening, abusive, or exploitative.

5. Prohibition of corruption

Corruption, i.e. bribery, corruptibility, granting and accepting advantages, has devastating effects worldwide. That is why we do not accept any form of corruption. This also applies to the preliminary stages of acts of corruption. Any appearance of a conflict of interest when granting or accepting benefits must be avoided.

6. Environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are among our key objectives. We comply with environmentally relevant laws and regulations and strive to act in a sustainable and environmentally friendly manner. Violations can lead to fines and claims for damages by third parties against CONTACT Software and damage the public reputation of CONTACT Software.

7. Fair competition

CONTACT Software stands for expertise, innovative strength, customer focus, and motivated, responsible employees. Our sustainable economic success is based on this. Bribery, corruption, or competition violations threaten this success and are not tolerated by us. We act fairly and transparently towards our business partners, customers, and suppliers and do not make any false or misleading statements. CONTACT Software complies with the applicable provisions of competition law. This includes, in particular, compliance with antitrust prohibitions, such as the ban on restrictive price agreements in tenders or unfair competition methods that impair fair competition.

We consistently reject corruption and behavior that is detrimental to the company or unfair business practices on the part of employees or third parties. This means that CONTACT Software employees may not offer, promise or accept any incentives, favors, preferential treatment, or other benefits in connection with their business activities that are intended to influence fair, objective, and appropriate decisions or that are only suitable for creating the appearance of such. Further details are set out in our compliance guidelines, which must be observed by all employees in addition to this Code of Conduct. In cases of doubt, each employee is obliged to seek advice from their supervisor or the Compliance Officer.

8. Human and employee rights

We respect internationally recognized human rights, dignity, and personal rights and are committed to upholding them. We are committed to fair working conditions, including remuneration, regulation of working hours, and protection of privacy. Labor law and the resulting agreements must be complied with.

9. Occupational Health and Safety

We ensure a healthy and hazard-free working environment for our employees. All employees are jointly responsible for occupational health and safety in their area. Occupational health and safety regulations must be strictly adhered to. CONTACT Software's high safety requirements are also taken into account when awarding subcontracts and searching for suitable business partners.

10. Confidentiality of information / publicity

Business and trade secrets as well as information that becomes known to us in the course of our activities and that is not public are subject to the strictest confidentiality. It is irrelevant whether this is internal company information or information from business partners. Information of this kind is neither passed on externally nor to employees who are not involved in the specific business transaction.

11. Reporting

Reliability, honesty, credibility, and integrity are among our fundamental principles. CONTACT Software therefore engages in open and truthful reporting and communication on the individual business transactions of the respective companies and towards business partners, customers, employees, the public, and governmental institutions. All staff members must ensure that both internal and external reports, information, and communications are complete and correct and comply with the applicable laws.

12. Protection of company property

All staff members are obliged to use CONTACT Software's property and resources properly and carefully and to protect them from loss, theft, or misuse. The intellectual property of our companies represents a competitive advantage and thus an asset worth protecting, which we defend against any unauthorized access by third parties.

CONTACT Software's tangible and intangible property is always used by us for business purposes, unless private use has been expressly permitted. In the case of business trips and other company-related expenses, we are also committed to the principle of economic efficiency and thus to an appropriate relationship between the costs and the type and scope of the event.

III. Implementation of the Code of Conduct

1. Commitment to compliance

Management, authorized signatories, executives, employees, temporary employees, and consultants are obliged to comply with the relevant laws and regulations as well as internal rules in their working environment and to align their actions with the values and principles of conduct of CONTACT Software.

2. Behavior in conflict situations

In principle, we expect all staff members to be familiar with the laws and regulations applicable to their area of work. In addition, personal integrity, a sense of responsibility and reflective, sensitive judgment are indispensable. These principles characterize the daily actions of our staff.

We also expect situations to be avoided in which staff members' business and private interests overlap and come into conflict. All staff members are therefore required to keep their private interests separate from those of the company.

In doubtful situations, it is particularly important for our own protection and that of CONTACT Software that every decision is made in accordance with the law, statutes, rules of procedure, guidelines, and our Code of Conduct.

If staff members are confronted with a difficult situation and are unsure how to behave, they must contact their supervisor or the Compliance Officer.

CONTACT Software's managers have a special role to play in this context. They are responsible for ensuring that all employees in their area of responsibility are familiar with the Code of Conduct and the company's internal guidelines and comply with them. Managers have the task of creating a positive environment of trust in which all employees have the opportunity to openly ask for help or address grievances. Only in such an environment can the lawful conduct of all employees be guaranteed in the long term and effective protection against violations be ensured.

3. Reporting and investigating information

All staff members are obliged to report violations or suspected violations of applicable laws, this Code of Conduct, or the Compliance Guideline. To this end, we will set up and operate an internal reporting system that complies with the applicable legal requirements and adequately protects whistleblowers. This is not intended to create a climate of mistrust. Compliance with the law, the Code of Conduct, and the Compliance Guideline is an essential cornerstone for a successful future together and is therefore in the interests of the whole staff.

We therefore promote a climate of fear-free dialog. If staff members bring criticism or misconduct to our attention, attempts at intimidation or reprisals will not be tolerated, regardless of which side they come from.

Once a violation or suspicion has been reported, an assessment is first carried out to determine the scope of the investigation. The person concerned will be informed of the outcome of the assessment and, if necessary, asked to participate in further interviews to obtain further information from them.



The person concerned will be kept informed of the progress of the investigation to the extent that this is permissible for reasons of confidentiality. All information in connection with the investigation must be treated confidentially.

CONTACT Software assures that any report of possible compliance violations will be treated fairly and appropriately. All staff members can help to achieve this by complying with this Code of Conduct.

4. Raising awareness and training

All staff members must be familiarized with the Code of Conduct in a suitable form. Managers must ensure that awareness is raised through preventative measures and by sharing any weaknesses. In addition, training courses are offered where necessary to raise compliance awareness among the staff.

5. Your contact persons

If you have any questions or require support in doubtful situations, your supervisor, the management of the respective company, and the Compliance Officer are available to you at any time. Any contact made by a staff member will be taken seriously.

If you have any further questions about our Code of Conduct or our principles, the Compliance Officer is your neutral point of contact. He or she will investigate all reported information and, if necessary, initiate appropriate measures. All data, information, and reports will be treated with strict confidentiality and respect at all times.

In addition to the possibility of contacting the Compliance Officer of the CONTACT Software group of companies, there is also the possibility of contacting the (external) ombudsman of the CONTACT Software group of companies, Mr. Markus Klindwort, attorney at law, in the event of reportable violations. The external ombudsman, Mr. Klindwort, also acts as an internal reporting channel of the CONTACT Software Group within the meaning of the Whistleblower Protection Act.

The (external) lawyer appointed as ombudsman receives the information in strict confidence, checks it in advance, and forwards it to the Compliance Officer with the consent of the whistleblower, anonymously if desired.

Contact options:

Compliance Officer:	Frank Steffens
Email:	compliance@contact-software.com
Telephone:	+49 421 20153 207

Compliance ombudsman and internal reporting channel in accordance with the Whistleblower Protection Act:

Representative:	Attorney Markus Klindwort Attorney Johannes Kolb
Email:	contact-meldekanal@rmk-partner.de
Telephone:	+49 421 6485563



IV. Coming into effect

This Code of Conduct comes into force immediately for all employees on 01.01.2025. It will be published in its current version via the means of communication used in the company.

This Code of Conduct is drawn up in two language versions: German and English. In case of discrepancy or contradiction, the German version shall prevail for the interpretation of individual provisions.