Code of Conduct of Syserso Networks GmbH

1. Purpose and Scope

This Code of Conduct defines the binding principles and requirements of Syserso Networks GmbH (hereinafter referred to as “Syserso Networks”) for all executives, employees, business partners, suppliers and subcontractors.

Its purpose is to ensure responsible, lawful and sustainable conduct throughout all business activities and across the entire value chain and supply chain.

This Code applies worldwide to all locations and business activities of Syserso Networks, as well as to all natural and legal persons acting on behalf of or under the authority of the company.

2. Principles of Responsible Corporate Governance

Syserso Networks is committed to environmentally, socially and economically responsible corporate governance in accordance with the principles of sustainable development.

We systematically integrate human rights, environmental and governance considerations into our business processes, decision-making structures and risk management systems.

Our objective is to prevent, minimize or eliminate adverse impacts of our business activities on people and the environment while promoting positive impacts.

Compliance with all applicable laws and regulations in the respective countries is our minimum requirement. In addition, we are guided by internationally recognized standards, in particular:

- United Nations Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Principles of the United Nations Global Compact

3. Respect for Human Rights

3.1 General Principle

Syserso Networks respects and protects internationally recognized human rights and is committed to fulfilling its human rights due diligence obligations in accordance with applicable legal requirements.

3.2 Prohibition of Child Labor and Forced Labor

All forms of child labor, forced labor, modern slavery and human trafficking are strictly prohibited.
We expect the same commitment from our business partners throughout the entire supply chain.

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3.3 Non-Discrimination and Equal Treatment

Discrimination based on ethnic or social origin, gender, religion, beliefs, age, disability, sexual orientation or other personal characteristics will not be tolerated.

We promote a working environment characterized by respect, equal opportunities and diversity.

3.4 Working Conditions and Remuneration

We ensure that working conditions comply with applicable legal requirements and internationally recognized minimum standards.

These include, in particular:

- Fair remuneration (at least the statutory minimum wage)
- Working hours in compliance with applicable laws
- Compliance with mandatory rest periods
- Access to fundamental employee rights

3.5 Freedom of Association

We respect employees' rights to organize, establish employee representative bodies and engage in collective bargaining.

4. Occupational Health and Safety

The safety and health of our employees are of the highest priority.

We are committed to complying with all applicable occupational health and safety laws and continuously improving working conditions.

This includes, in particular:

- Risk assessments and preventive measures
- Regular training and instruction
- Provision of safe work equipment
- Promotion of physical and mental health

Employees are required to actively contribute to workplace safety and promptly report any identified risks.

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5. Environmental Protection and Sustainability

Syserso Networks is committed to protecting the environment and ensuring the sustainable use of natural resources.

We follow a risk-based approach to identifying, preventing and minimizing the environmental impacts of our business activities.

This includes, in particular:

- Reduction of emissions and energy consumption
- Responsible use of resources
- Proper disposal of waste and hazardous substances
- Protection of biodiversity and natural habitats

We integrate sustainability considerations into our corporate strategy and continuously develop our range of services with a focus on energy-efficient and resource-conserving IT solutions.

6. Integrity and Compliance

6.1 Compliance with Laws and Regulations

All employees and business partners are required to comply with all applicable laws, regulations and internal policies.

6.2 Anti-Corruption and Anti-Bribery

Syserso Networks maintains a strict zero-tolerance policy towards corruption and bribery.

Gifts, benefits or other advantages must neither be offered nor accepted if they could influence business decisions.

Gifts and invitations are permitted only within the scope of customary business practices and up to a value of EUR 150 per person.

Any benefits exceeding this amount must either receive prior approval or be declined.

6.3 Anti-Money Laundering and Counter-Terrorist Financing

We are committed to complying with all applicable laws and regulations aimed at preventing money laundering and terrorist financing.

Business partners are subject to risk-based due diligence checks. Any suspected violations must be reported immediately.

6.4 Fair Competition and Antitrust Law

We are committed to fair competition and comply with all applicable competition and antitrust laws. Unlawful agreements, price-fixing arrangements and market manipulation are prohibited.

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6.5 Conflicts of Interest

Business decisions must be made exclusively on the basis of objective criteria.

Conflicts of interest must be avoided or disclosed.

Employees are required to promptly report any identified conflicts of interest.

7. Data Protection and Information Security

The protection of personal data and confidential information is of the highest priority.

We are committed to complying with the General Data Protection Regulation (GDPR) and all other relevant legal requirements.

This includes, in particular:

- Lawful processing of data for specified purposes
- Protection against unauthorized access
- Secure transmission and storage of data

Any data protection violations must be reported immediately.

8. Protection of Company Assets and Intellectual Property

Company assets must be used responsibly and protected against misuse, loss or theft.

This applies equally to tangible and intangible assets.

We respect the intellectual property rights of third parties and protect our own proprietary knowledge and know-how.

9. Requirements for Business Partners and the Supply Chain

Syserso Networks expects all business partners to comply with the principles defined in this Code.

This includes, in particular:

- Respect for human rights
- Prohibition of child labor and forced labor
- Occupational health and safety and fair working conditions
- Environmental protection and sustainable use of resources
- Compliance with applicable compliance standards

We reserve the right to verify compliance with these requirements through appropriate measures (e.g., audits and self-assessment questionnaires).

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10. Risk Management and Due Diligence Obligations

Syserso Networks implements a systematic risk management approach to identify, assess and minimize human rights and environmental risks.

This includes, in particular:

- Regular risk assessments
- Development of appropriate preventive and corrective measures
- Documentation and monitoring
- Continuous improvement

11. Complaints Mechanism (Whistleblowing)

We provide a confidential and accessible whistleblowing system.

Employees and external third parties may report suspected violations of this Code or applicable laws and regulations.

All reports are treated confidentially. Whistleblowers are protected against retaliation or any form of disadvantage.

12. Reporting and Transparency

Syserso Networks regularly reports on material human rights, environmental and corporate risks, measures taken and progress achieved.

Reporting is carried out in accordance with applicable legal requirements and voluntary sustainability reporting commitments.

13. Implementation and Monitoring

Compliance with this Code of Conduct is ensured through appropriate organizational measures.

These include, in particular:

- Training and awareness-raising
- Internal controls and audits
- Clearly defined responsibilities

Violations of this Code may result in consequences under employment law or contractual provisions.

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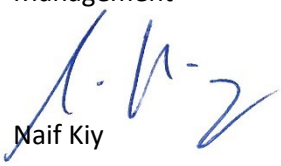
14. Publication

This Code of Conduct is publicly accessible and is regularly reviewed and updated as necessary.

Syserso Networks GmbH
Management



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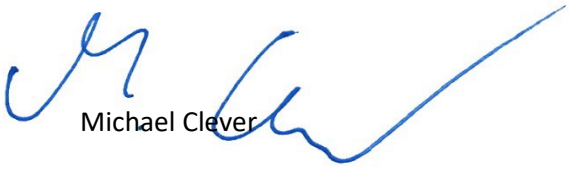

Michael Clever

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