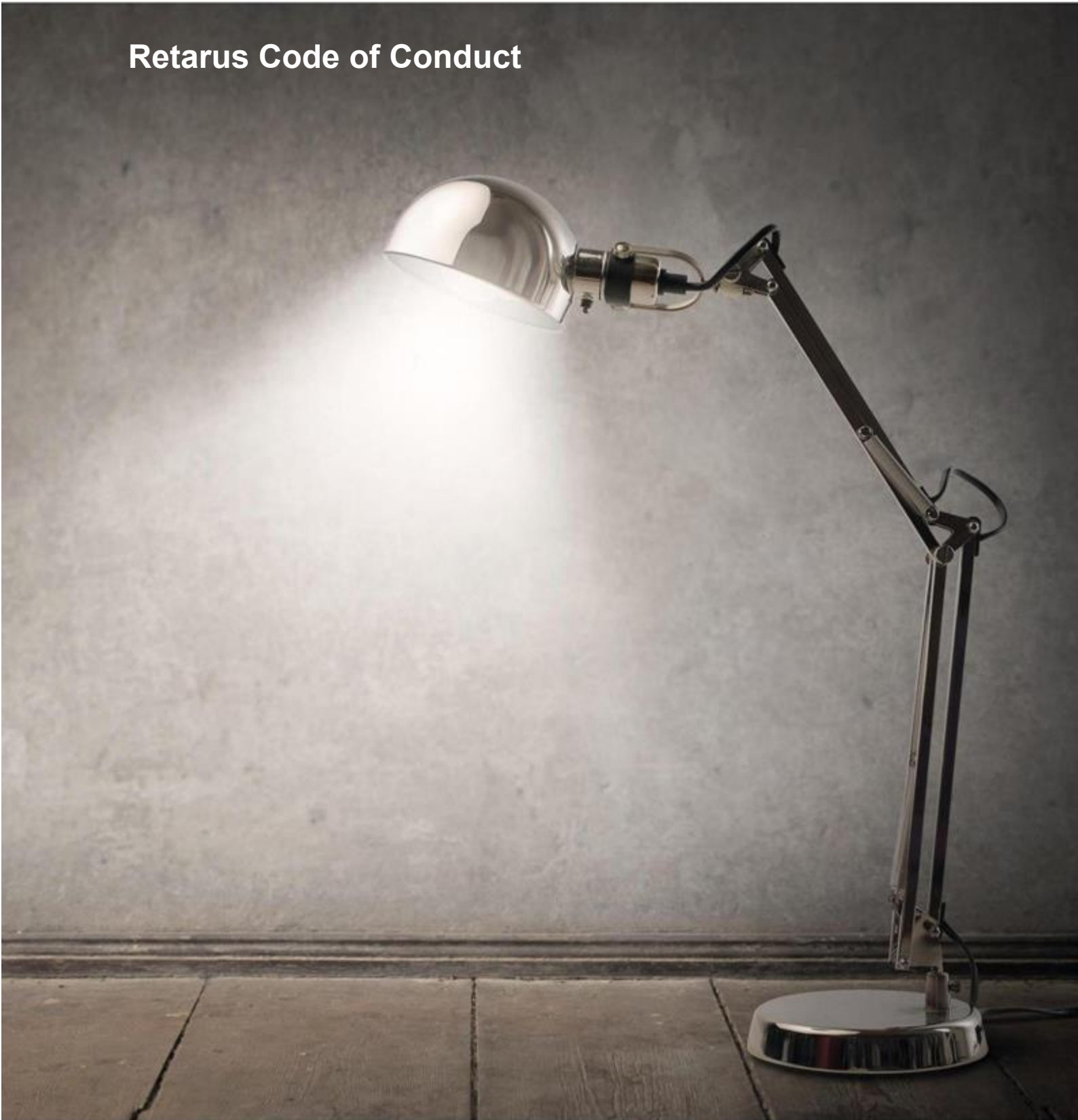


Retarus Code of Conduct



1. Introduction

The retarus GmbH and its affiliated companies ("Retarus" or "We") are committed to conducting their business in a lawful and responsible manner. Adherence to ethical, social, and environmental standards is deeply rooted at Retarus and forms the foundation for our long-term business success. This Code of Conduct ("CoC") reflects our values and principles, providing each individual employee ("Employee" or "we") with guidance for their actions and decisions. At Retarus, we are convinced that responsible behavior and respect form the basis for sustainable business success.

2. Compliance with Law and Regulations

We are committed to comply with all applicable laws and regulations as well as this CoC and other voluntary codes within our company. This CoC establishes binding requirements for all employees in addition to the applicable laws, regulations, provisions, and guidelines. This CoC is supplemented by numerous internal policies, such as those on information security and data protection. Furthermore, we align ourselves with international and industry-standard "Best Practices".

3. Human Rights and Fair Working Conditions

Retarus adheres to and supports the observance of internationally recognized human rights as well as fair working conditions. We strictly reject all forms of forced labor, compulsory labor, child labor, slavery, and human trafficking. The right to fair compensation is recognized for all employees. Compensation and other benefits meet at least the respective national and local legal standards or the level of the national economic sectors, industries, and regions. We comply with applicable laws regarding working, rest, and recovery times.

Retarus promotes an inclusive work environment and values the diversity of its employees. We are committed to equality and equal opportunity for our employees, and we do not tolerate any discrimination or harassment based on gender, ethnic, social, and national origin, race, skin color, religion, worldview, age, disability, sexual orientation and identity, or any other characteristic protected by law.

Freedom of association, as well as the right to form interest groups, is respected. All employees have the right to unite, form or join a union/employee representation.

4. Health and Safety at Work

Our objective is to establish safe and health-promoting working conditions through a preventive approach. We are committed to fostering an advanced culture of safety and health.

Retarus has implemented an occupational health and safety management system at a high level, tailored to the nature of our business. We adhere to applicable health and safety regulations and ensure a working environment that promotes the health and safety of our employees, protects third parties, and prevents accidents, injuries, and work-related illnesses. This includes regular risk assessments in the workplace, training on health and safety matters, and the implementation of appropriate measures for hazard control and preventive care.

5. Data Protection, Information Security, and Protection of Trade Secrets

The protection of personal data, particularly of employees, customers, and business partners, is of central importance to Retarus. We process personal data only in accordance with applicable legal and/or contractual provisions.

Furthermore, we recognize the value of information and ensure its appropriate technical protection against unauthorized access. Retarus has established an Information Security Management System (ISMS) to sustainably maintain and continuously improve information security. Our ISMS is based on the ISAE 3000 SOC 2 criteria for Security, Availability, Confidentiality, and Processing Integrity, and is supported by an Internal Control System (ICS) through which we implement technical and organizational measures.

The effectiveness of the ISMS is audited annually by an external, accredited auditing firm according to the ISAE 3000 SOC 2 Type II standard. The effective implementation of the ISMS and ICS is further confirmed by our certification according to ISO/IEC 27001:2017.

All employees receive regular training in the areas of data protection and information security.

The protection of trade secrets is of utmost significance. We implement all necessary measures to ensure their appropriate safeguarding against unauthorized access.

6. Anti-Corruption and Anti-Money Laundering Measures

Retarus firmly opposes any form of corrupt behavior by its employees, business partners, and customers. Decisions influenced by corruption distort competition, harm our company, and undermine the public good. We take steps to avoid even the mere appearance of improper influence. Through regular training and monitoring, we ensure that corrupt practices are prevented, identified, and penalized.

Retarus is committed to preventing any involvement in money laundering activities. We have established comprehensive internal procedures to mitigate the risk of money laundering within our company, ensuring compliance with the applicable legal and regulatory standards for countering money laundering.

7. Fair Competition

Retarus believes in fair competition. We do not engage in anti-competitive business practices or exchange sensitive competitive information with competitors.

8. Avoidance of Conflicts of Interest

Transparency is our top priority in matters of potential bias or competing interests. We proactively avoid any situations that may give the appearance of a conflict of interest. Employees are required to promptly disclose any actual or potential issues related to their professional responsibilities, ensuring timely resolution.

9. Environmental Protection and Sustainability

At Retarus, environmental protection and sustainability are integral to our corporate values. We actively support and prioritize IT systems and solutions designed to reduce environmental impact.

We are committed to the principle that economic success and ecological responsibility are not at odds. On the contrary, the effective integration of economic growth, environmental stewardship, and social responsibility serves as the cornerstone of sustainable business success. In the area of 'Environmental, Social & Governance' (ESG), we particularly support the following United Nations Sustainable Development Goals (SDGs): (<https://www.retarus.com/environmental-social-governance/>).

In addition, the Retarus Global Environmental Policy establishes binding internal standards to minimize the company's ecological footprint and applies to all employees worldwide.

Retarus has implemented an effective system to identify and address potential environmental risks. We actively consider environmental impacts in our operations by setting and monitoring climate protection targets. Since 2007, Retarus has consistently applied a Green IT policy in its data centers, utilizing hydropower and efficient energy management systems.

[EcoVadis](#), the world's largest and most trusted provider of corporate sustainability ratings, has ranked Retarus in the top third of the "Computer Programming, Consultancy, and Related Activities" industry in its universal sustainability assessment. Additional details can be found in Retarus' sustainability profile on [Integrity Next](#). Furthermore, Retarus has successfully passed the legally mandated energy audit in accordance with DIN EN 16247-1:2012, achieving outstanding results.

10. Business-Continuity-Planung/ Operational Resilience

Retarus is well-prepared to respond to potential disruptions to its business operations, such as natural disasters, acts of terrorism, supply chain interruptions, outbreaks of infectious diseases, epidemics or pandemics, information security issues, and cyberattacks. These preparations encompass comprehensive business continuity plans aimed at maintaining operations and protecting employees, business partners, and the environment from the effects of significant disruptions within our operational sphere.

11. Reporting of Potential Risks and Violations

Any indications of (potential) risks or violations of this CoC must be reported immediately through our [contact form](#). In addition, all employees have access to the digital "[Suggestion Box](#)" on the intranet, allowing anonymous emails to be sent to the HR department. All reports will be treated confidentially. If necessary, a confidential discussion with the HR department can be arranged at any time. The HR department is responsible for following up on the reports and taking appropriate action in case of violations.

12. Implementation of the CoC

All employees are required to comply with this CoC. Without prejudice to other legal remedies, Retarus reserves the right to take disciplinary action in the event of a violation.