

Code of Conduct

Code of Conduct of the Mensch und Maschine Group "MuM" dated 14.11.2023

I. Objective and scope of application

MuM aspires to be a modern and sustainable company that provides first-rate services and is committed to fundamental social values. MuM is responsible for creating and maintaining a corporate culture in which the relevant statutory provisions and regulations, as well as ethical principles, are upheld to the best of the Group's ability.

Due to the large number of laws and official requirements in place, it is virtually impossible to provide a ready-made solution for every conceivable situation. MuM has, however, drawn up this Code of Conduct to ensure that we all act in accordance with the law and ethical values to the greatest extent possible. It defines general standards for behaviour in business, legal and ethical terms, and applies in our dealings with colleagues, customers and business partners alike.

The Code of Conduct is aimed at all employees, including management. Each and every individual is expected to comply with this Code of Conduct and any other internal policies that are relevant to their area of responsibility. The term "employee" is understood as encompassing all genders.

This Code of Conduct must be observed even if the applicable laws or regulations are less far-reaching. Please note, however, that it is impossible to rule out a scenario in which laws and regulations that are more stringent than those set out in this Code of Conduct apply. In such cases, these more stringent laws and regulations take precedence.

MuM would like to thank you in advance for your cooperation in complying with this Code of Conduct. This is the only way we can live up to our own high standards in our dealings with each other and with customers and business partners. By complying with the Code of Conduct, you will do your bit to help lay the foundation for a successful future in this company.

II. Specialist topics

1. Insider trading

In the course of their work, employees and management may become aware of non-public information that is relevant to securities trading. Using this information may constitute insider trading.

Insider trading refers to the unlawful use or disclosure of insider information.

Insider information is specific information about circumstances that are not known to the public relating to an issuer of insider securities (financial instruments of any kind, such as shares, bonds, warrants or derivatives) or the insider securities themselves that is of such importance that it could have a significant impact on decisions made by investors when buying, selling and holding securities.

In particular, the following information can constitute insider information:

- Takeover bids
- Company's research success
- Launch of new products
- Unexpected increases in profits or major orders
- Unexpected slump in profits
- Insolvency application due to inability to pay or over-indebtedness
- Company mergers
- Staff changes
- Planned IPOs
- Change in the company's management team

The applicable insider trading regulations are complex. Even suspected violations of insider trading laws and regulations are associated with the risk of reputational damage. Insider trading can also be a criminal offence.

As a result, you are prohibited from:

- buying or selling insider securities for your own account, or for the account of others, using insider information,
- disclosing or otherwise making available insider information you have become aware of to others without authorisation to do so, or
- recommending the purchase or sale of insider securities to others or inducing others to trade in insider securities on the basis of your insider information.

Please also ensure that insider information is only ever passed on internally to those individuals who are authorised to receive the information and need it to perform their work.

If in doubt, please contact compliance@mum.de to determine whether the information you have become aware of is indeed insider information, and whether you are prohibited from trading in securities, possibly also due to more stringent legislation in other countries.

2. Fair competition

MuM has a vested interest in complying with the applicable antitrust and competition law regulations, as non-compliance can have serious implications for MuM. In particular, fines or other forms of financial penalties may be imposed on MuM, agreements may be rendered invalid, third parties may be able to assert claims for damages against MuM and there is a risk of reputational damage and negative press if legal violations are made public.

As a result, it is important to bear the following in mind in particular in order to avoid damage to MuM resulting from antitrust and competition law offences:

Concluding agreements of any kind or concerted practices (e.g. informal cooperation) with competitors or customers that are aimed at restricting competition or that have an anti-competitive effect are

considered violations of antitrust law. Business meetings with competitors can also be regarded or interpreted as violations of antitrust law. If a business meeting is conducted with a competitor on one or more of the following topics, you should not participate in, or should opt to leave, the meeting, as discussions of this nature could constitute, or at least indicate, anti-competitive cooperation:

- Agreements to set or control prices (e.g. minimum prices, minimum fees or discounts);
- Exchange of information on prices, conditions of sale, discounts and sales promotion measures;
- Agreements to divide markets into territories;
- Specific invitation to tender or tenders;
- Agreements on customer allocation;
- Restrictions on production or the sale of products;
- Agreement to boycott certain suppliers or customers;
- Agreements on vertical restrictions (e.g. ban on passing on discounts).

Written documents must always be worded carefully. Unclear statements that can be misunderstood or misinterpreted must be avoided.

3. Data protection

Data protection is aimed at protecting each individual's right to informational self-determination, i.e. the right of each individual to decide for themselves how their personal data, such as their name, postal address, e-mail address, telephone number, financial circumstances, etc., is to be disclosed or used. Data protection is necessary to prevent a violation of fundamental rights to privacy.

Protecting personal data is a top priority for MuM. As a result, MuM only processes (i.e. collects, stores, modifies, transmits, blocks, erases, etc.) or uses personal data where full compliance with the applicable legislation has been ensured in advance. The handling of personal data must be transparent for the data subject. The data subject must also be guaranteed the right to receive information on the handling of personal data and to request that it be rectified if need be. The same applies to the right of the data subject to object to the processing of personal data if the statutory requirements are met, or to request the erasure or blocking of personal data.

In countries in which data concerning legal entities is protected to the same extent as data concerning natural persons, this data also has to be processed in compliance with the applicable legislation.

You may only process personal data that has been disclosed to you or to which you have access in the course of your work for MuM if there is a legal basis for doing so (which may also include the need for storage or use for purposes related to a contractual relationship, in cases involving employee data, the need to do so in order to establish, implement or terminate the employment relationship) or with the consent of the data subject. This also applies if personal data is exchanged between companies in the Group.

You can find out which specific standards and requirements the applicable legislation imposes for the use of personal data in your area of responsibility by writing to compliance@mum.de and during training courses.

4. Protection of third-party intellectual property (e.g. copyright, trademark, design and patent rights)

Unauthorised use of the intellectual property rights of third parties is prohibited and will not be tolerated by MuM. In particular, copyright laws prohibit the reproduction, performance, distribution, licensing or display of copyrighted works without the prior permission of the copyright holder. The permission of the copyright holder is also required for the creation of derivative works. Trademark laws protect names, logos and other company symbols.

You must ensure that you have an agreement with the rights holder if you use their intellectual property. This means that you should consult your local Legal department if you are unsure, and in particular before using a name, logo or other trademark in business transactions.

5. Compliance with anti-money laundering laws

MuM is obliged to comply with the applicable anti-money laundering laws. This includes the obligation to confirm the identity of contractual partners, select authorised forms of payment and determine how possible money laundering transactions can be brought to light.

You should report any suspicions of money laundering to the internal reporting office without delay (see section V. 2.). You should pay particular attention to transactions that catch your eye because they involve an unusually considerable volume of cash. The same applies if you pick up on transaction structures designed to avoid reporting obligations or to circumvent proper accounting.

6. Accounting and documentation

MuM requires that all business records, documents, accounts and other forms of documentation (hereinafter referred to as "documentation") that are relevant for accounting purposes meet the very highest standards of accuracy and reliability. MuM maintains documentation so as to accurately record all transactions, enabling financial statements to be prepared in accordance with the applicable law and the generally accepted accounting principles.

If your work involves documenting MuM's financial transactions, you must ensure that these principles of conduct are observed. Within this context, the deliberate misrepresentation or omission of material facts constitutes an infringement of the law. The same applies to the wilful inducement of others to misrepresent or omit material facts.

Insofar as accounting duties are part of your remit, you are expected to be familiar with all of the latest financial and accounting principles and to be vigilant with regard to violations of these principles. You are responsible for ensuring that all cash, bank accounts and other assets are accurately and promptly recorded in the official records; obtaining or creating false invoices or other misleading documentation,

or making payments into unknown bank or numbered accounts, is strictly prohibited. It must be possible to consult all documents at any time. If payment is made in case, a signed receipt or comparable document must be presented. If payment is made by cheque, proof of identity, a declaration of purpose and an order must be presented. In addition, you must always cooperate with the company's internal and external auditors.

7. Dealing with the media

As a company with international operations, our reputation depends to a considerable degree on our external image and impact, and in particular on how we deal with the media. As a result, it is crucial for our public image that we present "one face" to the outside world and provide truthful information.

This means that all enquiries from the media first of all have to be forwarded to the PR department at pr@mum.de. You are prohibited from making written or verbal statements in the name of MuM or about MuM to media representatives without the prior consent of MuM.

Publications, presentations and interviews relating to MuM should also be agreed with the PR department in order to maintain a consistent public image.

If you speak to media representatives or in public about our business after receiving permission to do so, you should always use your good judgement. If you have any concerns about specific media enquiries, our PR department will provide you with all of the necessary information and assistance.

III. Behaviour in the workplace and in a business environment

1. Drugs and alcohol

Drug and alcohol abuse pose a serious risk to MuM, especially to the safety, health and productivity of its employees.

This is why MuM does not tolerate the possession, consumption or purchase of drugs on company premises. The term "drugs" refers to substances whose possession, consumption, purchase or attempted purchase is prohibited or only permitted to a limited extent in accordance with the local legislation. In particular, we do not tolerate scenarios in which employees are under the influence of drugs during working hours.

Alcohol consumption on company premises is strictly prohibited. Exceptions must be approved by your manager and can be granted, for example, for events organised by the company. Employees must not be under the influence of alcohol during working hours.

2. Non-discriminatory and harassment-free workplace

All employees, customers and suppliers have the right to fair, respectful, dignified, courteous and non-discriminatory treatment. We are committed to this principle and to safeguarding this right within our company.

MuM observes the principles of equal opportunities in the workplace. HR decisions (e.g. regarding recruitment, selection, training, promotion and remuneration) are based on qualifications, experience and other work-related criteria. MuM does not discriminate on the basis of gender, race, ethnic origin, religion or ideology, disability, age or sexual orientation.

It is MuM's duty to protect employees' right to a working environment that is free from sexual harassment or other unlawful forms of discrimination. Any form of sexual harassment or other unlawful discrimination based on gender, race or ethnic origin, religion or ideology, disability, age or sexual orientation will not be tolerated and is strictly prohibited.

Sexual harassment refers to unwanted sexually motivated behaviour, including unwanted sexual acts and requests for such acts, sexually motivated physical contact, comments of a sexual nature and the unwanted display and visible attachment of pornographic images, with the purpose or effect of violating the dignity of the individual affected, in particular if this creates an environment characterised by intimidation, hostility, humiliation, degradation or insults. Sexual harassment is unlawful. Examples of unauthorised sexual harassment include:

1. Asking for, or offering, sexual acts in return for advantages in the workplace;
2. Cornering, fondling, groping or touching or other unwanted physical contact of a sexual nature;
3. Public speculation or repeated enquiries about an individual's sex life;
4. Jokes, remarks or innuendos of a sexual nature about a specific individual or men and women in general; or
5. Visibly displaying pornographic images in the workplace.

Examples of other unlawful forms of discrimination that are prohibited on grounds of their links to gender, age, race, ethnic origin, religion or ideology, disability or sexual orientation include:

1. Violating an employee's dignity by making insulting or degrading remarks or using insulting or degrading behaviour (e.g. due to their foreign roots);
2. Threats or insinuations suggesting that continued employment depends on the individual tolerating certain behaviour;
3. Forcing an employee to perform degrading or humiliating acts, such as harassment because of sexual orientation.

If you have been sexually harassed or discriminated against in any other inadmissible way, you should report this to the internal reporting office (see section V. 2.) or the local HR department. MuM assures all employees that complaints will be treated as confidentially as possible and that no employee will suffer any disadvantages due to reporting an incident, unless he or she is responsible for abusing the system.

It is the responsibility of MuM to take all reasonable precautions to prevent all forms of sexual harassment and other unlawful discrimination and to take immediate action if it is informed of any unlawful discrimination.

MuM reserves the right to take disciplinary action against employees who treat or harass other employees, customers or suppliers in an inadmissible manner as described above. These disciplinary measures can also involve termination of their contract for convenience or for cause.

3. Dealing with property and rights of MuM

The Internet, intranet and e-mail communication are essential tools in our day-to-day work.

Inappropriate use of the Internet, intranet, e-mail or computer systems is prohibited. Inappropriate use includes, in particular, unauthorised access to another user's e-mail account, unauthorised transmission of secret or confidential information, sending offensive material or messages, transmission of material that infringes third-party copyrights and other illegal or unethical activities. Please make sure that you comply with all internal regulations regarding the use of information and communication technology.

4. IT security

MuM's activities are heavily dependent on functioning IT systems (our network and the hardware required for it). This is because it is no longer possible to imagine running our business processes without these technical systems. All relevant security guidelines must be followed and all e-learning courses for IT security must be completed. This also applies to the functionality of our customers' IT systems which you use to perform your work. As a result, you also have to comply with all of our customers' security policies.

5. Protection of intellectual property

In addition to the property under section 3, MuM also holds key rights and licences to intellectual property, such as copyrights, associated rights and trademark rights. When dealing with these intellectual property rights, you should always take the appropriate steps to protect MuM's interests. Unauthorised use can lead to the loss of ownership rights or to a substantial loss of value.

6. Use of company resources

MuM provides all of the equipment and resources (e.g. company and pool vehicles, laptops, mobile phones) you need to perform your work efficiently, and relies on you to use the resources provided responsibly and not wastefully. This also applies to any resources that our customers make available to you.

7. Storage of documents and records

In order for MuM to fulfil its retention obligations, you must store documents and records in your area of responsibility properly and carefully. You are also responsible for ensuring that the documentation is complete, and must be aware of data storage and retrieval with regard to the documents and records for which you are responsible.

Please also enquire as to which documents and records must be retained in which form (e.g. as originals or in electronic form) and for how long in your area of responsibility. The destruction or alteration of documents and records subject to retention requirements before the retention period expires may

significantly impede or obstruct investigations, (tax) audits and the successful conduct of judicial proceedings, inflicting considerable damage on MuM as a result.

8. Confidential information

MuM entrusts you with a great deal of information every day in the course of your work and tasks. Information that is marked as confidential or is evidently confidential ("confidential information") must be protected and kept secret. The same confidentiality obligation applies to information disclosed to MuM by business partners subject to a confidentiality obligation.

You must bear the following in mind in order to protect confidential information:

- Confidential information must not be disclosed to any other individuals inside or outside MuM (including colleagues or family members), either during or after your employment with MuM, unless this is necessary for the performance of your work for MuM.
- Confidential information must not be discussed in public places (entrance areas, corridors, public transport, public places, toilets, etc.) where a conversation might be overheard (in person or on a mobile phone).
- Store documents containing confidential information in such a way that they cannot be seen by unauthorised individuals.
- Particular care must be taken to ensure that visitors do not have access to MuM documents. As a result, visitors are not permitted to enter MuM's business and office premises unaccompanied.
- Send confidential information using suitable means of communication that guarantee that the information remains confidential. If you have any questions, please contact the IT officers at isb@mum.de.

9. Gifts and inducements

MuM is committed to ensuring transparency in its dealings with customers, suppliers and public authorities. International anti-corruption standards, as well as national and local anti-corruption and anti-bribery regulations, must be complied with.

Business decisions and contracts should be made and concluded exclusively on the basis of transparent, performance- and quality-related criteria. This can only be achieved if every employee shares responsibility for compliance with the following regulations:

Accepting and giving gifts of money or other financial benefits from/to third parties is prohibited without exception. This also includes donations to a "coffee kitty", granting discounts and price reductions for privately purchased goods or services, invitations to private events and promotional gifts. This does not, however, include promotional gifts worth up to EUR 35 (e.g. calendars, pens, etc.).

The Compliance Officer must approve any gifts in excess of EUR 35 or hospitality that exceeds "the scope of what is generally customary and appropriate" in advance. If this is not possible, approval must be applied for immediately afterwards. This may be linked to conditions, for example requiring a sum of money equal to the estimated value of the inducement to be paid to a charitable organisation.

Incidentally, the approval of your line manager is not sufficient; the Accounting/HR department is usually responsible.

You must obtain the approval of your line manager and possibly the Compliance Officer before accepting invitations to customer events that are not purely work-related, leisure events, etc. Employees must be informed of the potentially taxable non-cash benefit associated with attending such an event.

Occasional hospitality is permitted within the customary framework (no luxury restaurants, no excessive alcoholic beverages, etc.). Employees must then inform the Compliance Officer of the circumstances surrounding the hospitality, the occasion, the party extending the invitation and the location.

Demanding any inducements not set out in a written contract with a business partner is prohibited.

It is prohibited to instruct employees who report to you to induce third parties, in particular customers and/or suppliers, to conclude business transactions with the company by granting personal advantages (bribery). Within this context, it is irrelevant whether a line manager uses, or instructs the use of, company benefits in kind or funds, his/her own or those of third parties.

If you are unsure as to whether your behaviour is permissible in a specific case, or if you have been offered benefits that could exceed a minor value, you should contact your line manager or compliance@mum.de.

10. Dealing and cooperating with public authorities

MuM strives to cooperate with government authorities in the spirit of trust and on the basis of the applicable law. This means that all lawful orders issued by government authorities must be complied with, while safeguarding the statutory rights of MuM at the same time.

In the ordinary course of business or in the context of a formal official investigation, representatives of public authorities or public officials may address specific enquiries to MuM. If you are confronted with official enquiries or investigations, you must always involve the local Legal department immediately by notifying compliance@mum.de, adopt a cooperative stance and comply with the relevant internal regulations.

IV. Conflicts of interest

Conflicts of interest can cast doubt on the quality of the business decisions made and on the integrity of the individuals making such decisions. Conflicts of interest or even scenarios that appear to constitute conflicts of interest must be avoided at all times. If this sort of conflict cannot be avoided, it must be dealt with actively, openly and honestly. In the event of potential conflicts, you are asked to actively approach your line manager and agree on how to proceed. In particular, the following conflicts of interest are to be avoided:

1. Secondary employment

Taking up any form of secondary employment is subject to the provisions of your employment contract. If your employment contract does not contain any provisions on secondary employment, you must obtain written authorisation from the HR department responsible for you. The HR department will authorise

secondary employment if the work does not conflict with MuM's legitimate business interests and can be proven not to have any influence on your work for MuM.

As an MuM employee, you cannot take on a management position (e.g. as managing director, member of the Management Board, Supervisory Board or Advisory Board) at another company without MuM's approval if this other company is either in competition or does business with MuM.

2. Political activities

Commitment to, and support for, political parties on MuM's behalf, as well as donations or other contributions in cash or in kind on MuM's behalf, require MuM's prior consent. The same applies to any organisation of political events on MuM's premises.

You are, of course, free to engage in private political activities as long as you are not acting as an employee or representative of MuM. If MuM's interests are affected by a political commitment, you again have to obtain MuM's prior consent.

3. Transactions with related parties

Employees are prohibited from acting on behalf of the company in their own affairs or in the affairs of persons related to them. In such cases, employees must inform their line manager, who will decide which employee will process the business transaction for the company. Related parties in this sense include, in particular, spouses, partners, unregistered and registered civil partners, siblings, siblings of spouses or partners, as well as relatives and in-laws in a direct line (e.g. parents, parents-in-law, grandparents, children, children-in-law, grandchildren). Unrelated individuals can also be a related party if the close relationship gives rise to a conflict of interest due to close personal contact or friendship. In cases of doubt, you must always inform your line manager, who can consult the Compliance Officer if necessary.

4. Concluding private contracts with customers, suppliers, business partners

Employees must inform their line manager of any private business transactions with customers, suppliers and business partners of the company, insofar as they are aware of the business relationship. They must check carefully whether the conditions granted to them constitute a benefit that is only granted to them because of their business relationship with the company. In this case, the prohibition referred to in section 2 must be observed.

5. Equity investment

Equity investments by employees and their spouses or partners in the companies of business partners and competitors must be reported in writing to the company management (Accounting department). This notification obligation does not apply to the purchase of marketable securities or pure asset investments that have no impact on the company.

V. Implementation of the Code of Conduct

1. Questions and instructions

This Code of Conduct cannot provide detailed instructions on how to behave in every single situation. The application and implementation of the standards set out in this Code of Conduct and in other internal behavioural policies in day-to-day business may require clarification in some cases.

If you are unsure about how to behave correctly, please contact your line manager, the relevant specialist department or the Compliance Officer by writing to compliance@mum.de.

2. Notification of violations (Whistleblower Protection Act)

If you become aware of any conduct that violates the rules on accounting, finance and banking set out in this Code of Conduct or in other laws and regulations and/or constitutes a criminal offence (e.g. bribery offences, prohibited insider trading, environmental offences) ("violation"), you should inform the internal reporting office, details of which can be found on the intranet. If you provide information, you should do so disclosing your identity. While anonymous reports are generally not welcome, they will also be noted and investigated.

You should cooperate in any investigations of an alleged violation.

MuM ensures that the identity of any employee involved is treated as confidential – insofar as the identity is known to MuM and insofar as this is legally permissible. To begin with, reported violations are only made available to the internal reporting office. They look into the allegations and conduct further investigations if necessary. If a suspicion is substantiated, the internal reporting office will take appropriate follow-up measures. Later on in the investigations, it may become necessary to disclose the identity of an employee involved to other individuals involved in the further investigations, in particular also to investigating authorities. The same applies to any subsequent judicial proceedings. If an employee involved has concerns regarding such disclosure, they must voice these concerns when reporting the violation. A corresponding note will then be added to the system.

MuM ensures that no reprisals are taken against an employee for reporting an offence or cooperating in an investigation, provided that the employee has acted in good faith and is not responsible for abusing the system.

MuM will comply with the applicable data protection regulations, in particular the rights of the employee involved and the accused. Information is only used for the purpose of investigating violations and potentially imposing penalties.

The accused will be informed of any allegations against him/her as soon as this no longer jeopardises the investigation. Data that is no longer required will be deleted within the periods defined by law after the investigations have been completed.

3. Part of the employment relationship

This Code of Conduct is an integral part of the employment relationship and is indispensable for MuM's business operations. Violations of the binding provisions set out in this Code of Conduct cannot and will

not be tolerated. Failure to read or accept this Code of Conduct does not release you from your responsibility to comply with it.

Depending on their severity, violations of this Code of Conduct can have consequences under labour law, including termination of the employment relationship for cause. If a violation of this Code of Conduct also constitutes a breach of applicable law, there is a risk of claims for damages and/or criminal prosecution.

With this in mind, MuM urges you to act responsibly and to follow this Code of Conduct for your own benefit and for the benefit of MuM.