

# Code of Conduct



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# Code of Conduct

## 1. Document Information

### 1.2 Purpose

This Code of Conduct sets out the general principles and standards of behavior expected from all employees of the SNP Group to ensure integrity, accountability, and ethical practices within our organization.

### 1.3 Scope

This policy applies to SNP Schneider-Neureither & Partner SE and all affiliated companies and is binding for all managers and employees of the SNP Group worldwide.

## 2. Foreword

### Dear SNP colleagues,

At SNP, our mission extends beyond delivering innovative software and service solutions. We are committed to fostering a culture of integrity, respect, and ethical behavior. This Code of Conduct is a testament to our dedication to these values and serves as a common guideline for our actions and decisions.

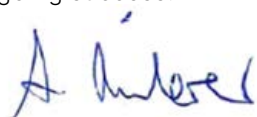
Our success is built on the trust and confidence of our customers, partners, investors, and each other. Upholding the highest standards of conduct is essential to maintaining this trust.

This Code of Conduct outlines the principles that define who we are and how we operate, ensuring that we act with honesty, fairness, and accountability in all our interactions. We expect every member of our team to embrace these principles wholeheartedly. By adhering to this Code, we uphold our reputation and cultivate a positive, inclusive work environment where everyone can thrive, while respecting each other and the environment.

Thank you for your commitment to these standards and for your contributions to our ongoing success.



Jens Aml, Group CEO  
SNP Schneider-Neureither & Partner SE



Andreas Röderer, Group CFO  
SNP Schneider-Neureither & Partner SE

## 3. Objective

The SNP Group has experienced significant growth and major changes in recent years. Particularly in times of change, it is crucial for a company and its employees to adhere to principles of integrity, ethics, and personal responsibility. This Code of Conduct defines basic principles that guide our day-to-day actions. It aims to align our efforts to comply with laws and regulations with our commitment to ethical and environmentally responsible behavior, thus paving the way for our continuous entrepreneurial and personal development.

This Code of Conduct defines a set of globally valid principles and standards of behavior, which may be supplemented by additional local internal policies or regulations. We recognize the impact that corporate changes and shifts in the economy, politics, innovation, and the environment have on our work. Therefore, we will remain vigilant to new laws, policies, and societal beliefs, adapting our guidelines as necessary.

Each of us who has chosen to share our corporate identity and culture is responsible for maintaining and promoting the trust and reputation we have earned through our work. All employees are obligated to observe and comply with fundamental and human rights, with relevant laws and regulations (e.g. criminal law, commercial law, social law, protection of minors, data protection, copyright, tax law, accounting obligations, and internal company regulations) as well as contractual agreements with partners or customers. It is essential to avoid any negative impacts on people and the environment as well as financial or intangible consequences for SNP and its employees due to any violations. All employees fulfill this responsibility by completing all mandatory training courses, critically examining situations, and consulting their manager or the Legal/Compliance department in case of doubt.

## 4. Principles

### What we stand for

In recent years, we have succeeded in establishing an excellent reputation worldwide in the field of enterprise resource planning (ERP) landscape transformation. We put companies in a position to successfully shape digital transformation with change-friendly IT and to exploit opportunities in the market. We want to become the international industry standard with our products and services.

To achieve this goal, it is particularly important to determine how we want to achieve it. Everyone at SNP must respect the corporate values described in the following sections and must comply with all applicable laws and regulations.

Our corporate values:

- Customer Success
- Community
- Excellence

Our corporate values are explained in more detail in chapter 5.

Our responsibility: compliance with applicable laws – in particular with:

- Business relationships
- Bribery
- Trade controls
- Protection of business secrets, trade secrets and insider trading regulations
- Respect for human rights and the environment
- Data protection

Detailed explanations are available in chapter 6.

These principles are of great importance for dealing with our customers and partners and for dealing with each other. We want to fully stand behind everything we do and not violate the trust placed in us through misconduct. Therefore, our Code of Conduct is of great relevance; it instructs us how to gain this trust and, above all, not lose it by putting it at risk through unjust and unethical behavior.

The legal risks mentioned here are not exhaustive: We are honest and behave in an ethically correct manner. Further considerations may arise in the following areas: gifts and invitations, dealing with public officials, money

laundering and terrorist financing, fair and free competition (antitrust law), occupational safety and health protection, protection of intellectual property, and IT security.

Our Code of Conduct and the values and principles described within apply to management, managers and all employees of the SNP Group worldwide. The managers will help everyone at SNP to embody our values by setting an example. Everyone who wishes to report violations of our policies or other misconduct that could jeopardize our work and the trust placed in us should feel able to do so without fear of negative consequences and retaliation thanks to an appropriate working climate.

Our actions are based on and always follow applicable law and our guidelines. The latter are designed to guide us safely – even in the absence of rules that allow decisions to be made in accordance with laws and statutes. All decisions must comply with our established policies on ethics and morals. This shapes the way we deal with our customers, partners, and service providers.

If employees are unsure about how to behave ethically in a certain situation, they should first ask themselves whether their behavior complies with SNP's corporate values. In case of doubt, every employee should contact their manager or the Legal/Compliance department.

The following questions can help our employees to make such decisions. If the question can be answered with yes, employees are acting in accordance with our values:

- Is my behavior in SNP's best interests?
- Is my behavior clearly business-related?
- Am I acting in accordance with proper business procedures?
- Do my planned actions correspond with SNP's corporate values, internal policies, and applicable laws?
- Am I honest and fair in my interactions with colleagues, customers, and business partners?
- Is my behavior respectful to other people, their rights, and the environment?
- Am I aware of the consequences of my behavior?



## 5. Our Corporate Values

### 5.1 Customer Success

Guiding our customers in their journey towards success is what drives us every day. In this shared journey, we are deeply committed to developing innovative software solutions and offer exceptional customer service. In a spirit of true ownership, we take responsibility by listening carefully and empowering customers to manage even the most complex projects. We stay curious and open-minded to find the best solution for each customer, across teams and time zones.

We recognize our responsibility to our customers and partners. The trust they place in us reflects the high importance we place in the careful handling of their data – always in accordance with applicable data protection regulations. We regularly review our internal processes and optimize them as needed. To support this, we maintain an internal quality management system that undergoes continuous reviews and certifications. By consistently evaluating and improving our products, services, and business processes, we foster long-term partnerships and mutual growth.

### 5.2 Community

#### Respect for all

We greatly value and appreciate all our employees, customers, and partners around the world. Our commitment to collaboration, open communication, mutual respect, and reliability ensures that together, we form a winning team. We achieve joint success by fostering an inclusive environment where diverse perspectives and talents are valued and encouraged. In making decisions, we disregard national origin, ethnic background, age, gender, religion, disability, color, sexual orientation, or personal characteristics and preferences, and we do not tolerate any form of discrimination or sexual harassment. In addition, human rights are respected.

#### Our employees

The SNP Group's success is driven by our employees' daily commitment. Every employee of the SNP Group can participate in the further development of our company, and we encourage every individual to do so. We maintain supportive, trusting, and open working relationships – we discuss issues honestly and directly, yet always politely. It is important to us that employees also appreciate each other, appreciate their performance, and treat others with respect.

As a responsible employer, we support the professional and personal development of our employees, offering opportunities like internships and working student positions. Furthermore, we address the unique circumstances of our employees, such as childcare, caring for family members, or pursuing professional time off. We prioritize a balance between work and personal life, promoting health through various projects. Our goal is to prepare employees for the evolving work environment and encourage them to take initiative for their future employability, emphasizing the importance of balancing work demands with personal and social competencies and health.

#### Societal and environmental responsibility

We highly value maintaining a healthy environment for ourselves and our communities. By making responsible choices, we not only support businesses but also the planet, save natural resources, and promote the sustainable development of society and the economy. We actively work to continuously reduce our carbon footprint and implement eco-friendly practices. We promote respect for human rights and engage in initiatives that support social well-being within the scope of our influence.

### 5.3 Excellence

Our customers and partners can rely on our commitment – we know how to get things done. Our holistic understanding of how technology can bring business success comes from the combination of our extensive experience and our enthusiasm for new and innovative solutions. We use all means, expertise, experience, and commitment available to us to fulfill tasks to the highest standard. We continuously strive to improve our performance, always aiming for excellence. Further, we encourage unconventional thinking and a collaborative approach, allowing us to find unparalleled solutions.

We maintain professionalism with customers and partners, adhering to local regulations and providing only the necessary information and services. We avoid the unnecessary disclosure of personal information and only share internal or third-party details when essential for an order.





## 6. Compliance with Applicable Laws

### 6.1 Business relationships

Personally, and based on self-interest, we do not expect any benefits from our business relationships. Therefore, we avoid situations in which private and professional interests can collide and report potential conflicts of interest to the Legal/Compliance department. Our teams from areas with customer contact are not allowed to offer customer products and services that they obviously do not need. In addition, they are not allowed to make false statements or promises that are untenable just because of the prospect of a business deal, as this can harm both our customers and our business.

We do not engage in anticompetitive activities and always comply with competition law. This means, for example, that we do not disclose information that is not publicly available to business partners who are in competition with the owner of the information and that we do not participate in private groups to coordinate anticompetitive practices (e.g. pricing, market segments, etc.).

### 6.2 Bribery

In accordance with the relevant national and international laws (e.g. StGB – German Criminal Code “Taking and giving bribes in commercial practice”), all employees of the SNP Group are prohibited from offering or granting benefits such as cash, gifts, entertainment offers, etc. to contacts in the public or private sector to influence their decisions for the benefit of the SNP Group. Thus, the acceptance or granting of unreasonable benefits is prohibited. All employees must inform their managers or the Legal/Compliance department if a business partner or public official offers or demands personal benefits. If you have any doubts about a situation, please contact your manager or the Legal/Compliance department for assistance.

Dealing with gifts therefore requires special attention. Gifts and invitations can only be accepted if they are a gesture of politeness and do not influence any business decisions. Gifts or invitations for public officials must be treated with special care and thus always require the approval of the Legal/Compliance department or executives. Since this is not always easy to decide, the following information is intended to provide guidance for interacting with business partners.

Offering or accepting cash or equivalents is always prohibited. It is also prohibited to offer or accept gifts or invitations in the context of contract initiations and other concrete business decisions if the offer or gift would influence the business decision. In addition, gifts or invitations must be transparent, i.e. they must be sent to a company address and not to a private address. Frequently recurring invitations or gifts between the same business partners should also be avoided.

Exceptions from the stated prohibitions are advertising or courtesy gifts (such as giveaways) or business events with a reasonable value. In most countries, gifts and invitations above a certain value are considered taxable. Therefore, it must be ensured that the applicable tax regulations are strictly observed.

In addition, please inform yourself about additional national legislation or internal guidelines in place that, for example, set value limits for gifts (e.g. company regulations). If you find yourself in a situation where you are unsure how to behave, you can always contact your manager or the Legal/Compliance department.

### 6.3 Trade controls

The SNP Group complies with international trade control laws and regulations. In particular, this includes export control and customs laws of the countries in which we operate and in which our customers are located.

We constantly monitor the validity of sanctions and embargoes and carry out comparisons with sanction lists and terror lists. We categorically refuse to do business with the countries concerned as well as the listed individuals and companies. In this way, we not only protect our company, but also reduce risks arising from such violations. At SNP, we promote business with the right partners.

### 6.4 Protection of business secrets, trade secrets, and insider trading regulations

We protect the business and trade secrets of SNP and its customers and partners. We also comply with the legal requirements for the protection of personal data and those applicable to trading in financial instruments and to insider information. It is therefore important that every employee treats non-public information of SNP or of third parties confidentially. Unauthorized disclosures of sensitive information or the handing over thereof can

damage SNP's competitiveness and market position, breach contractual obligations, and/or affect the value of the SNP share. Insider trading regulations prohibit the use of such information for personal gain or its disclosure to third parties such as friends and family. Therefore, information must always be protected against unauthorized disclosure and against loss through appropriate protective measures.

### **6.5 Consideration of sustainability aspects**

Our commitment to sustainability and ethical practices ensures that our actions positively impact the environment and society. This commitment is reflected in compliance with occupational safety regulations and environmental laws, the selection of business partners in accordance with the principles of sustainability, and various measures to improve the environmental balance sheet, thus reducing our impact on the environment.

We respect the uniqueness of every person, regardless of their gender identity, ethnic or national origin, skin color, religion, sexual orientation, age, disability, or any other characteristic. We are committed to promoting human rights within our sphere of influence and fostering an inclusive environment where diverse perspectives and talents are valued and encouraged.

During both domestic and international business trips, all employees at SNP are expected to conduct themselves as exemplary guests. This includes respecting local customs and people and complying with all laws when travelling abroad. Degrading treatment is not acceptable behavior, nor is the exploitation of local people. This also applies to private travel for which benefits provided by the SNP Group have been used.

### **6.6 Data protection and information security**

We commit ourselves to respecting the privacy of our business partners and employees and act in accordance with applicable laws (e.g. the EU GDPR) when processing personal data. It is important that we treat personal data confidentially, use it in accordance with the intended purpose, and do not process it without legal justification. This applies both to personal data of the company itself or employees and to data of customers, partners, suppliers, or other third parties. All employees must be aware of the security and confidentiality of information and must comply with all relevant SNP policies. Possible incidents concerning data protection or information security must be reported immediately via the channels provided.

Information and the processes, systems, and networks that process information and data are important assets of SNP. Therefore, all employees are committed to making their contribution to ensure the availability, confidentiality, and integrity of information, data, and systems.

## **7. Obligations**

This Code of Conduct is binding. Anyone who experiences or witnesses a possible breach of this Code of Conduct in any way is obliged to report it. Violations will not be tolerated and can have serious consequences. These include, for example, measures under labor law, civil law, or criminal law.

## **8. Dealing with Possible Misconduct**

SNP maintains a reporting system that enables the reporting of relevant violations of this Code of Conduct. All employees who become aware of relevant events that run contrary to the interests of the company must report these immediately via the channels provided. We implement the requirements of national and international legislation on whistleblower protection. All notifications are treated as strictly confidential, and all suspected cases will be investigated. An employee does not suffer any disadvantage because of such a notification.

Employees must either contact the Legal/Compliance department in the event of Code of Conduct violations or report them via the EQS Integrity Line (<https://snp.integrityline.com>). The system is also designed for reporting possible compliance violations. The system must not be misused.



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