

Code of Conduct

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Policy Overview

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| Issuing Organisation | Regnology Group GmbH (“Regnology”) |
| Purpose and Objective | The purpose of Regnology’s Code of Conduct (the “Code”) is outlining the ethical principles and legal standards of business conduct expected of all Regnology Employees and stakeholders. This Code serves as a guide to upholding our core values, acting with integrity, and protecting the trust placed in us by our customers, partners, and the market. |
| Applicability and Scope | All Employees |
| Geography | Regnology group-wide |
| Policy Owner | Compliance Department (Compliance), adopted by the Leadership Team |
| Relevant internal and external documents | All applicable laws and regulations All Regnology Policies |
| Share with external third parties | Yes |
| Replacement notes | Replacement of Code of Conduct Version 1.4., last reviewed in March 2025 |

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A Message from our Leadership

Our mission at Regnology is to bring stability and transparency to the financial markets. To pursue this mission and to expand our position as a leading international company, we must focus on a corporate culture characterised by integrity, ethical conduct, and personal responsibility. This is a profound responsibility, one that is built on a single, vital foundation of trust. The trust of our customers, our partners, regulators, and the trust we have in one another.

This Code of Conduct is our guide to earning and keeping that trust every day. It defines what it means to act with integrity as a member of the Regnology team. While it contains rules and policies, its true purpose is to empower you. We cannot create a rule for every situation, and we don't want to. Instead, we trust you to use your professional judgment and to be guided by our shared values.

When you face a difficult decision, this Code is here to help. Ask yourself: Is it legal? Is it consistent with our values? Would I be proud to see this decision on the news? If the answer to any of these is no, we need to pause and find a better path.

Integrity also means having the courage to speak up. If you see something that doesn't seem right, or that violates our principles or policies, you have our full support to raise your concern. We have a zero-tolerance policy for retaliation against anyone who reports an issue in good faith. We will have your back.

Our reputation is built on the choices that each of us makes. Thank you for your personal commitment to upholding the standards in this Code and for helping us build a company we can all be proud of.

Regnology's Leadership Team

1. Our Commitment to Integrity

At Regnology, our mission is to enable the transparency and stability of the financial markets. The trust of our customers, partners, and the public is our most valuable asset, and we earn it every day through our actions.

Our values are at the heart of our culture. They are the principles we live by and the standards we hold ourselves to in our daily work:

- Be reliable and responsible - Our interactions are built on trust and reliability. Our clients and our colleagues rely on us to deliver on our promises.
- Drive excellence and quality with passion - We actively seek feedback, use it to improve our processes, products, and services. We strive to be the best at what we do.
- Act with respect and embrace diversity - We nurture and elevate our different skills, backgrounds, and experiences. Respect is the foundation of all our actions.
- Collaborate for the greater good - We promote an inclusive environment and encourage active networking across all teams, locations and with our clients.

This Code of Conduct is your guide to putting these values into practice. It translates our principles into clear expectations for how we behave and make decisions, especially in complex situations. It is designed not just to ensure we comply with laws and regulations, but to help each of us navigate our work with confidence and integrity. Although we operate in many countries and are subject to many different laws, regulations, customs, and practices, we can only succeed if we follow a common set of values and standards. The personal commitment of each of us is essential and we must recognise that we are responsible and accountable for understanding and meeting the standards described in this Code of Conduct, because Regnology's success and reputation depend on the performance of each of us. Ultimately, safeguarding our reputation and living our values is a responsibility we all share. This Code belongs to every one of us.

The Code of Conduct applies to all Employees of Regnology Group GmbH and its associated companies (all together "**Regnology**"), at every level. "**Employees**" refers to all individuals, including selected consultants and contractors, as applicable, who are under terms of employment, work contracts, or apprenticeships with Regnology. This Code of Conduct establishes our global standards. In cases where local laws or regulations are stricter than the provisions of this Code, the stricter local law must always be followed. If you are ever unsure which standard is higher, you must consult with the Compliance Department.

This Code of Conduct is published on Regnology's website (www.regnology.net), on our Compliance Page, and is also part of the welcome package of each new Employee. Our Employees are regularly asked to acknowledge its contents and are being trained on its key principles; we expect all our Employees to understand and uphold the principles and duties described in this Code of Conduct.

2. We cultivate a Safe and Respectful Workplace

Our success is built on the talent, dedication, and well-being of our people. We are committed to maintaining a professional environment where every Employee feels safe, respected, and empowered to do their best work. All Employees receive regular training on all relevant Regnology Policies, depending on the scope of their professional duties. This section outlines the principles that are the foundation of our workplace culture.

2.1 Diversity, Inclusion and Fair Treatment

What does it mean?

At Regnology, we believe that a diversity of backgrounds, experiences, and perspectives is a strategic advantage that drives innovation and excellence. We are committed to fostering a truly inclusive culture where every voice is heard and valued. This commitment is detailed in our **Diversity & Inclusion Policy**.

We strongly condemn and strictly prohibit any form of harassment or discrimination based on race, colour, gender, age, religion, sexual orientation, disability, or any other legally protected status.

What is expected of me?

- Treat all colleagues, customers, and partners with dignity and respect at all times.
- Foster an inclusive environment by being open to different viewpoints and encouraging collaboration.
- Never engage in discrimination, harassment, bullying, or any behaviour that creates an intimidating or hostile environment for others.
- Use inclusive and respectful language in all professional communications.
- Complete all required training on diversity, inclusion, and preventing harassment.
- Speak up if you witness or experience behaviour that violates this principle, using the Regnology reporting channels.

2.2 Personal Conduct

What does it mean?

Every Employee is a representative of Regnology. Acting with professionalism, integrity, and good judgment is essential to maintaining our reputation and fostering a positive workplace. This principle applies at all times when you are conducting company business, whether on-site, at a customer's site, or at a company event.

What is expected of me?

- Act in accordance with all Regnology Policies and, where provided, the **Employee Handbook**, which outlines rules for workplace conduct.
- Act with integrity and professionalism, treating colleagues, customers, and partners with decency and respect.

- Consume alcohol in moderation at company events and never allow it to impair your professional judgment.
- The use, possession, or distribution of illegal drugs is prohibited on company property, while conducting company business, or any off-duty conduct that adversely affects your job performance, the safety of others, or Regnology's reputation and business interests.
- Compete fairly and only gather information on our competitors through proper and legal means, such as public research.
- Never attempt to acquire a competitor's confidential information improperly.

2.3 Health and Safety

What does it mean?

We are legally and ethically obligated to provide a work environment that is safe and healthy for all Employees. This commitment extends from preventing physical accidents in our offices to promoting Employee well-being and mental health. Our specific procedures for accident reporting, emergency response, and risk prevention are detailed in our **Health & Safety Policy**. Employee safety is our top priority.

What is expected of me?

- Be proactive in taking responsibility for your own safety and be mindful of the safety of those around you.
- Immediately report any workplace accidents, injuries, or unsafe conditions to your Development Manager and HR.
- Familiarise yourself with your local office's emergency plans, including fire escape routes and assembly points.
- Keep your work area, and common areas, clear of hazards that could cause slips, trips, or falls.

3. We Protect our Information and Assets

Our information, intellectual property, and physical assets are the engine of our business and the foundation of our competitive advantage. Protecting them is not just an IT or legal responsibility—it is the duty of every Employee. This section outlines how we safeguard the resources that drive our success and maintain the trust of our customers.

3.1 Confidential Information, Data Privacy, and Intellectual Property

What does this mean?

This principle covers three critical types of information:

1. **Confidential Information and Trade Secrets:** This refers to our business strategies, financial data, product roadmaps, and non-public customer information. Protecting them is vital to our success. Our rules for classifying and handling this data are further detailed in our **Trade Secrets & Information Classification Policy**.
2. **Data Privacy:** This refers to the personal data of our Employees, customers, and partners. We are legally and ethically bound to protect this information and handle it with the utmost

care, in line with all applicable laws and regulations, including but not limited to the GDPR. Our commitment is detailed in our **Data Protection and Data Retention Policies**.

3. **Intellectual Property (IP):** This includes the valuable code, software, patents, and trademarks that we create. Our IP is one of our most valuable assets. The use of any third-party IP, including open-source software, must follow our **Use of Third-Party Software for Software Developments Policy**.

What is expected of me?

- Understand the different information classification levels (Public, Internal, Confidential, Strictly Confidential) and handle data accordingly.
- Never share confidential or personal data with anyone who does not have a legitimate need to know, meaning the information is necessary for the individual to perform their specific job responsibilities for Regnology.
- Always lock your computer screen when you step away from the computer.
- Do not discuss confidential information in public places where you can be overheard.
- Dispose of sensitive documents properly, in line with our **Clean Desk & Information Disposal Policy**.
- Immediately report any suspected data breach, loss of a device, or information leak to IT Security, as detailed in our **IT Security Policy**.

Specifically for Personal Data, you must:

- Use personal data only for the specific and legitimate purpose for which it was collected.
- Collect only the minimum amount of personal data necessary for your work.
- Adhere strictly to the company's data retention schedules and securely delete personal data once it is no longer needed, as outlined in the **Data Retention Policy**.
- If you receive a request from an individual about their data (a Data Subject Access Request), do not try to answer it yourself. Immediately forward the request to the Compliance Department at compliance@regnology.net.

Specifically for Intellectual Property, you must:

- Safeguard Regnology's source code, methodologies, and trade secrets.
- Never use third-party or open-source software for company work without following the proper review and approval process.
- Promptly disclose any new inventions or work product that could be eligible for a patent or other IP registration to the Legal Department.

3.2 Responsible Use of Company Assets and Communications

What does this mean?

Regnology provides you with assets such as a laptop, phone, software, and access to company systems, to perform your job effectively. These assets are the property of Regnology and are intended for business use. While we permit incidental personal use, it should not interfere with your work or expose the company to risk.

Furthermore, how you communicate externally reflects on Regnology. You are a representative of our brand, and your communications, including on social media, should always be professional and in line with our values. Official company statements may only be made by authorised individuals.

What is expected of me?

- Use company assets responsibly and primarily for business purposes. Be mindful of Regnology's policies, including the **Mobile Device Management Policy**.
- Use AI tools in line with Regnology's **AI Development and Usage Policy**.
- Take care of your company-provided equipment and protect it from loss, theft, or damage.
- Do not install unauthorised software on your devices, as outlined in the **IT Security Policy**.
- Be professional and respectful in all external communications, including email and social media.
- Do not speak to the media on behalf of Regnology. Refer all media inquiries to Regnology's **Chief Marketing Officer**.
- When using social media, be clear that your personal opinions are your own and not the views of Regnology.

4. We act with Integrity in the Marketplace

Our reputation is one of our most valuable assets. We build it by acting honestly and fairly with our customers, partners, suppliers, and competitors. We compete to win based on the excellence of our products and the quality of our service, never by cutting ethical corners. This section outlines how we maintain our integrity in all our business dealings.

4.1 Legal Compliance and Accurate Records

What does this mean?

As a global company, Regnology must comply with all applicable laws and regulations in every country where we operate. This is the foundation of our license to do business and is essential for protecting our reputation. To prove our compliance and demonstrate our commitment to transparency, we maintain clear, truthful, and accurate records.

This principle covers everything from our official financial statements to individual timesheets and expense claims. Accurate records are not just an internal requirement; they are a legal obligation that shows our integrity to customers, auditors, and government authorities. Detailed rules related to specific legal areas can be found in our **Anti-Bribery and Anti-Corruption Policy, Antitrust Policy, Due Diligence Policy, Group Tax Policy, etc.**

What is expected of me?

- Always act in full compliance with the laws of the countries where you are working, with the principles outlined in this Code of Conduct and in Regnology's Policies.
- Keep truthful and accurate business records, including your own timesheets and expense reports, and submit them on time.
- Never create a false or misleading entry in any company book, record, or expense claim.

- Immediately report any formal legal notice, threat of a lawsuit, or communication from a regulatory authority to the Legal Department.
- Never alter, conceal, or destroy company records in response to a legal inquiry or investigation.
- Forward any external inquiries about the company's financial position to the Finance Department.

4.2 Anti-Bribery and Anti-Corruption

What does this mean?

Regnology has a zero-tolerance policy for all forms of bribery and corruption. Bribery is the act of offering, giving, or receiving anything of value to improperly influence a decision or gain an unfair advantage. This applies to everyone we do business with, in both the public and private sectors. Our legal obligations in this area are extremely strict, particularly under laws imposed by the member states of the European Union, the United Kingdom (UK Bribery Act) and the United States (US Foreign Corrupt Practices Act).

Employees and third parties acting on our behalf are prohibited from offering, promising, authorising, making, or receiving from customers, suppliers, public officials or any other business relations or partners, either directly or indirectly, any inappropriate monetary or other benefit or undue advantage, including cash, cash equivalents, shares, etc.

Gifts and entertainment may be offered and received to strengthen business relationships, but only if they are of moderate and not excessive value and do not create the appearance of improper influence. As such, offering or receiving any gifts of a combined value of above 50 EUR is only allowed with written pre-approval from Compliance. Our specific rules are further detailed in our **Anti-Bribery and Anti-Corruption (ABAC) Policy**, which also governs how we handle gifts, hospitality, and entertainment.

What is expected of me?

- Never offer, promise, authorise, or accept a bribe, kickback, or any other form of corrupt payment.
- Do not offer or accept gifts or hospitality that could appear to influence a business decision. You must receive pre-approval from Compliance for any gift given or received with a combined total value of over 50 EUR.
- Be especially cautious when interacting with public officials.
- Never make "facilitation payments" (small payments to speed up a routine government action).
- Immediately report any suspected bribery or requests for improper payments to Compliance.

4.3 Conflicts of Interest

What does this mean?

A conflict of interest occurs when your personal interests, relationships, or activities interfere, or even appear to interfere, with your ability to make objective, professional decisions in the best interest of Regnology. This can include having a financial stake in a competitor or supplier or having a close

personal or romantic relationship with another Regnology Employee. Our goal is to ensure business decisions are based on merit alone. Our detailed procedures for disclosure and management of potential conflicts of interest are found in the **Conflicts of Interest Policy**.

What is expected of me?

- Never engage in actions, directly or through associated parties, or with third parties, which may not be compatible with the interests or reputation of Regnology.
- Proactively disclose any situation that could be a potential or actual conflict of interest to Compliance.
- Never trade in shares while possessing material, non-public information.
- Obtain prior written approval before taking on any outside employment, significant investments (considered any investment that could be perceived as influencing your business judgment, such as owning a competitor's or supplier's stock options), or board memberships, especially if they are related to our industry.
- Do not use your position at Regnology for personal benefit.
- If a personal or romantic relationship develops with someone in your reporting line, disclose it to HR and Compliance so these potential conflicts of interest can be managed.

4.4 Fair Competition and Antitrust Laws

What does this mean?

Antitrust laws exist to ensure companies compete fairly. Regnology is committed to succeeding through innovation and superior service, not by illegally limiting competition. It is strictly forbidden to make agreements with competitors to fix prices, rig bids, divide markets, or boycott other companies. These rules are complex and violations carry severe penalties for both Regnology and the individuals involved. Our guidelines are further explained in our **Antitrust Policy**.

What is expected of me?

- Never discuss or agree with competitors on competitively sensitive topics, including pricing, bids, costs, customers, or market strategies.
- Be extremely cautious at industry events, trade shows, and association meetings where competitors are present.
- If a competitor attempts to discuss a prohibited topic, you must immediately stop the conversation, state that you cannot discuss it, and report the incident to the Legal Department.
- Do not make any arrangements that may unfairly restrict competition.

4.5 International Trade Compliance

What does this mean?

As a global company, we must comply with all international trade laws, including regulations on Anti-Money Laundering (“AML”), Combating the Financing of Terrorism (“CFT”), Sanctions and Export Controls (“SAN”). We conduct thorough due diligence on all our business partners to ensure we comply with these legal obligations. Our risk-based approach is detailed in our **Due Diligence Policy**.

What is expected of me?

- Strictly follow all "Know Your Customer" (KYC) and "Know Your Supplier" (KYS) procedures before entering into any business relationship and never attempt to bypass the Compliance check.
- Be vigilant for red flags that could indicate money laundering, such as requests for unusual payment structures or customers with overly complex or layered ownership structures. Flag these to Compliance.
- If you have any concern about a potential transaction or business partner, immediately escalate it to Compliance before proceeding.

5. We are Committed Global Citizens

Our responsibility extends beyond our immediate business operations. We are part of a global community, and we are committed to making a positive impact on society and the environment. This section outlines our dedication to operating as a responsible corporate citizen.

5.1 Environmental, Social, and Governance (ESG)

What does this mean?

We make conscious decisions to protect the environment, to support our people and communities, and to run our business with the highest ethical standards. This is a core part of our business strategy, as detailed in our **ESG Policy** and in our annual **Sustainability Report**. We believe that acting responsibly is essential for building a resilient company and earning the trust of our stakeholders.

What is expected of me?

- Consider the environmental impact of your work by reducing waste, conserving energy, and minimising resource usage.
- When traveling for business, choose the most sustainable transportation options available, in line with our **Travel Expense Policy**.
- Support our social goals by fostering an inclusive and collaborative workplace culture.
- Uphold our governance standards by acting with integrity, following this Code, and supporting our sustainability actions.

5.2 Respecting Human Rights

What does this mean?

Regnology commits to upholding fundamental human rights in all our operations and throughout our supply chain. We strictly prohibit all forms of modern slavery, including forced labour, child labour, and human trafficking. We expect our suppliers and business partners to share this commitment, as outlined in our **Supplier Code of Conduct**. We formalise this dedication in our annual **Modern Slavery Statement**, which details the steps we take to ensure our business does not contribute to these abuses.

What is expected of me?

- Treat everyone you interact with, whether colleagues, customers, or suppliers, with dignity and respect.

- Act as our first line of defence in maintaining ethical business relationships. When working with third parties (such as customers, suppliers, and partners) you must be vigilant for any "red flags" such as poor labour practices or human rights violations. When seeking to onboard new suppliers, always respect the **Procurement Policy**.
- If you encounter any such issues or have other ethical concerns, you have a responsibility to report them promptly to Compliance.

5.3 Charitable Donations and Sponsorships

What does this mean?

We believe in supporting the communities where we live and work through charitable donations and sponsorships. However, we must do so in a way that is transparent and ethical. To prevent the appearance of bribery or conflicts of interest, all corporate giving must be properly vetted and approved. Our approach ensures that our contributions serve the community without compromising our integrity, as guided by our **Anti-Bribery and Anti-Corruption Policy**.

What is expected of me?

- Do not promise or make any donation or sponsorship on behalf of Regnology without formal pre-approval from the Chief HR Officer.
- Submit all proposals for charitable giving for review by HR and Compliance.
- Never use corporate funds or resources to support any political party, candidate, or campaign.
- Ensure that any organisation we support is a legitimate, reputable non-profit that aligns with our company values.

6. We Speak Up

Our commitment to integrity depends on each of us having the courage to speak up when something does not feel right. We consider it a duty to raise concerns about potential misconduct, and we are committed to creating an environment where you can do so safely and without fear. This section explains how, when, and why to report a concern, and it details our absolute commitment to protecting those who do.

6.1 How, When, and Why to Raise a Concern

What does this mean?

You should raise a concern whenever you see or suspect behaviour that violates our values, this Code of Conduct, a company policy, or the law. A "good faith" belief that a violation may have occurred is enough to warrant reporting. This can include anything from witnessing discrimination or harassment, suspecting corruption or financial fraud, to observing a breach of data privacy or a serious safety hazard. Regnology provides several channels for you to raise concerns, so you can choose the one you are most comfortable with. Our **Whistleblowing Policy** governs this process, ensuring all reports are taken seriously and handled with discretion.

Please note: This process is for reporting misconduct. For IT security incidents (like a lost laptop or suspected virus), report them directly to IT Security. For personal data subject requests from individuals, forward them immediately to Compliance.

What is expected of me?

- Raise concerns promptly when you suspect violations of our policies. Do not assume someone else will handle it.
- Report your concerns in "good faith," meaning you genuinely believe a violation may have occurred.
- Use the reporting channel you are most comfortable with:
 - Your Development Manager
 - Compliance Department, at compliance@regnology.net
 - Regnology TrustLine, our confidential, externally hosted reporting system, which allows for anonymous reporting, available 24/7 at: <https://report.whistleb.com/en/regnology>.
- Cooperate fully and honestly if you are asked to participate in an investigation.
- Maintain confidentiality throughout any investigation process to protect its integrity.

6.2 Our Commitment to Non-Retaliation

What does this mean?

Regnology has a strict, zero-tolerance policy against retaliation. Retaliation is any negative action taken against an Employee for raising a concern or participating in an investigation in good faith. We will not tolerate retaliation, and anyone found to have engaged in it will face serious disciplinary action, up to and including termination.

What is expected of me?

- Never retaliate or discourage someone from raising a legitimate concern.
- If you raise a concern and believe you are being subjected to retaliation, you must report it immediately.
- Treat retaliation as a serious, independent violation of this Code. Report it through the same channels you would use for any other concern (your Development Manager, Compliance, or the Regnology TrustLine).

End of Policy