

Supplier Code of Conduct

Effective Date: April 13, 2026

Initially adopted by the Leadership Team in January 2021

Version 2.0

Policy Tracking Code: POL-FW-COM-SCOC-2026-04



Overview

Issuing Organization	Regnology Group GmbH (“Regnology”)
Purpose and Objective	The purpose of this Supplier Code of Conduct (the “Code”) is to articulate the minimum standards of ethical and professional conduct we require from all our suppliers and business partners. It serves to translate Regnology's core values into actionable requirements, ensuring our supply chain operates with integrity, complies with all applicable laws, and ultimately protects the trust placed in us by our customers and the market.
Applicability and Scope	Regnology Suppliers
Geography	Regnology group-wide
Owner	Compliance Department (Compliance), adopted by the Leadership Team
Relevant internal and external documents	Applicable laws and regulations All Regnology Policies
Share with external third parties	Yes
Replacement notes	Replacement of Supplier Code of Conduct Version 1.4., last reviewed in March 2025

Version number	Version date	Created / Updated by	Summary of changes	Chapter	Review & sign-off date	Reviewed & signed-off by
V.1.0	01.01.2021	Compliance	Initial creation	All chapters	01.01.2021	Compliance Officer
V.1.1	01.01.2022	Compliance	Content review	All chapters	01.02.2022	Compliance Officer
V.1.2	01.01.2023	Compliance	Content review	All chapters	01.02.2023	Compliance Officer
V.1.3	01.01.2024	Compliance	Content review	All chapters	01.02.2024	Compliance Officer
V.1.4	01.03.2025	Compliance	Content review	All chapters	26.03.2025	Policy Governance Committee

V.2.0	01.01.2026	Compliance	Content review and changes	All chapters	13.04.2026	Policy Governance Committee
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A Message to Our Suppliers

At Regnology, our mission is to bring stability and transparency to the financial markets. We pursue this mission by creating innovative solutions along the entire regulatory value chain. Our success is defined by the integrity with which we operate and the trust we earn from our customers, partners, and the wider community.

This trust is built on our core corporate values:

- 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.

We view our Suppliers as an extension of our own team and an integral part of our success. Just as we hold our own employees to the highest ethical and professional standards, we require the same commitment from our Suppliers.

This Supplier Code of Conduct is the formal expression of that commitment. It translates our values into a clear set of minimum standards that we require from every Supplier who works with us. In some cases, the standards detailed in this Code may be higher than those required by local law, that we are committed to upholding alongside our Suppliers as part of our dedication to global best practices.

This Code applies to any third-party that provides products or services to Regnology, collectively "Suppliers". Compliance with this Code is a condition of doing business with Regnology. Furthermore, we expect you to cascade similar principles throughout your own supply chains, ensuring our shared commitment to integrity extends to every link in the supply chain.

We are proud of the partnerships we build and believe that by working together with integrity, we can achieve commercial success while fostering responsible business practices. Thank you for your partnership and for your commitment to upholding these essential standards.

Regnology's Leadership Team

1 Conducting Business with Integrity

Our reputation is one of our most valuable assets. We build it by acting honestly and fairly with our customers, partners, and competitors. We expect our Suppliers to share this commitment in all their dealings with and on behalf of Regnology. This section outlines the non-negotiable principles of integrity that govern our business relationships.

1.1 Legal Compliance and Accurate Records

What this means

The foundation of our business relationship is a shared commitment to comply with applicable laws and regulations. As a global company, Regnology and its Suppliers are subject to a complex set of laws and regulations in the jurisdictions where we operate. Adherence to these legal and ethical standards is the baseline requirement for any partnership with us.

What we require of our Suppliers

- Comply with all applicable national and international laws and regulations relevant to your business operations and your engagement with Regnology.
- Hold and maintain all necessary permits, licenses, and registrations required to provide your products or services.
- Align your business practices with the principles of international ethical standards, such as the ones highlighted by the United Nations and the International Labour Organization (ILO).
- Maintain a strict compliance program and control frameworks designed to ensure adherence of applicable laws and regulations.

1.2 Anti-Bribery and Anti-Corruption

What this means

Regnology has a zero-tolerance policy for all forms of bribery and corruption. Bribery is the act of offering or receiving anything of value to improperly influence a decision or gain an unfair business advantage. This applies to all business dealings, in both the public and private sectors. Gifts and hospitality must also be handled with care to ensure they are never perceived as a bribe. We strictly adhere to all anti-corruption laws in the countries where we operate, including the laws imposed by the member states of the European Union, the United Kingdom (UK Bribery Act), and the United States of America (U.S. Foreign Corrupt Practices Act - FCPA) and we expect all our Suppliers to do the same.

What we require of our Suppliers

- Prohibit all forms of bribery, kickbacks, extortion, embezzlement, and other corrupt practices, whether dealing with the public or private sectors.
- Ensure any business hospitality (such as meals, gifts, or entertainment) offered to Regnology employees are of modest value, infrequent, legal, and never given with the intent to improperly influence a business decision.
- Strictly prohibit the offering of cash, cash equivalents, or any lavish gifts or entertainment, especially during an active bidding or contract negotiation process.

- Never use third-party agents, consultants, or intermediaries to make improper payments on Regnology's behalf.
- Prohibit the use of charitable or political donations to disguise or facilitate bribery.

1.3 Conflicts of Interest

What this means

A conflict of interest arises when personal interests, relationships, or activities interfere or appear to interfere with objective, professional decisions. Acting in the best interest of our business partnership requires that all decisions are made based on merit, free from any competing loyalties.

What we require of our Suppliers

- Avoid any situation that creates, or appears to create, a conflict of interest in your dealings with Regnology.
- Immediately disclose any potential or actual conflict of interest in relation to Regnology to Regnology's Compliance Department at compliance@regnology.net. Specifically disclose any family, romantic, or close financial relationships between your employees and Regnology employees who are involved in the business relationship.
- Refrain from using confidential information obtained through your work with Regnology for personal gain or to benefit any other party.
- Do not offer employment, internships, or other personal benefits to Regnology employees or their relatives in an attempt to secure an improper business advantage.

1.4 Fair Competition and Antitrust Laws

What this means

We believe in and are committed to free and fair competition. Antitrust laws are designed to ensure a level playing field for all market participants. Any agreement or action that unlawfully restrains trade or reduces competition is strictly forbidden and undermines the integrity of the market.

What we require of our Suppliers

- Compete fairly, ethically, and independently in the marketplace.
- Never enter into agreements or coordinate with your competitors regarding prices, market allocation, production limits, or customers.
- Prohibit any form of bid-rigging or collusive bidding, ensuring all tender and proposal processes are conducted independently.
- Do not exchange competitively sensitive information (such as pricing strategies, costs, or customer lists) with your competitors.
- Never agree with other companies to boycott or refuse to do business with a particular customer, supplier, or competitor.

1.5 International Trade Compliance

What this means

As a global company, Regnology must comply with all international trade laws, including those related to Anti-Money Laundering (AML), Combating the Financing of Terrorism (CFT), economic sanctions,

and export controls. We are prohibited from doing business with sanctioned individuals, entities, and jurisdictions.

What we require of our Suppliers:

- Strictly comply with all applicable laws and regulations governing AML, CFT, sanctions, and export controls in the jurisdictions where you operate.
- Conduct robust due diligence to ensure that you, and any third parties you engage with, are not owned or controlled by or acting on behalf of a sanctioned party.
- Ensure that all funds related to your business with Regnology originate from legitimate sources and are fully transparent.
- Obtain all necessary licenses and permits before exporting or re-exporting any goods, software, or technology, as required by law.
- Ensure transparency regarding your operations and collaborate with Regnology regarding our Know-Your-Supplier (KYS) process by providing timely, accurate and sufficient information regarding your compliance standing.

2 Respecting People and Upholding Human Rights

We believe that every individual who contributes to our success, whether directly or through our supply chain, deserves to be treated with dignity, fairness, and respect. Upholding fundamental human rights and ensuring safe, fair, and inclusive working conditions is not just a legal obligation, but a moral imperative. We are committed to fostering a positive environment within our own company, and we require that our Suppliers provide the same for their employees.

2.1 Diversity, Inclusion and Fair Treatment

What this means

We believe that a diverse and inclusive environment is a catalyst for innovation and a cornerstone of a healthy, successful business. All employment-related decisions must be based on merit, skill, and performance, not on personal characteristics. We are committed to a workplace free from harassment and discrimination, and we expect our Suppliers to foster a culture of respect and diversity.

What we require of our Suppliers

- Prohibit discrimination in all aspects of employment (such as hiring, compensation, promotion, and termination) based on race, color, religion, gender, age, nationality, disability, sexual orientation, gender identity, or any other legally protected status.
- Maintain a workplace that is completely free from all forms of harassment, abuse, corporal punishment, and intimidation.
- Make employment decisions based on the principle of equal opportunity, ensuring all individuals are treated fairly and judged on their abilities and qualifications.
- Establish an effective and accessible grievance mechanism that allows employees to raise workplace concerns without fear of retaliation.

2.2 Health and Safety

What this means

The health, safety, and well-being of all workers is paramount. A safe work environment is a fundamental human right and a prerequisite for a productive and sustainable partnership. This involves proactively identifying and mitigating workplace hazards before they can cause harm.

What we require of our Suppliers

- Provide a safe workplace that complies with all applicable health and safety laws and international standards.
- Implement a robust system for identifying, assessing, and controlling workplace hazards through appropriate procedures and training.
- Ensure all employees receive regular health and safety training.
- Provide all necessary personal protective equipment (PPE) to workers at no cost and ensure they are trained on its proper use, as the case may be.
- Establish and test clear emergency response plans (i.e.: procedures for fire safety).

2.3 Respecting Human Rights and Abolishing Modern Slavery

What this means

Regnology is committed to upholding fundamental human rights in alignment with the United Nations Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We have zero tolerance for any form of modern slavery, including forced, bonded, or child labour. All work must be voluntary, and workers must be treated with dignity.

What we require of our Suppliers

- Prohibit and actively work to eradicate all forms of forced, bonded, indentured, and involuntary prison labor within your operations and extended supply chain.
- Ensure that no person under the legal minimum age for employment is engaged in any form of labor.
- Guarantee that all work is voluntary. Employees must be free to leave their employment at any time upon reasonable notice without penalty.
- Never require employees to surrender passports, identity documents, or pay recruitment fees as a condition of employment.
- Respect employees' right to freedom of association and to bargain collectively as permitted by and in accordance with local law.

3 Protecting Information and Assets

The trust of our customers and partners depends on our collective ability to protect sensitive data from unauthorized access, use, or disclosure. As a Supplier, you may be entrusted with confidential information belonging to Regnology, our employees, or our customers. Protecting this information is a fundamental responsibility of our partnership.

3.1 Confidentiality and Intellectual Property

What this means

During our engagement, you may gain access to non-public information, including our business strategies, financial data, product roadmaps, and intellectual property (IP). This information is the engine of our business and our competitive advantage. It must be treated with the utmost care and used only for the specific purpose of our business relationship. Regnology's name, brand, and trademarks are also valuable assets that cannot be used without explicit permission.

What we require of our Suppliers

- Safeguard all non-public information received from Regnology and use it only for the express purpose for which it was shared.
- Prohibit the disclosure of Regnology's confidential information to any employee or third party who does not have a legitimate need-to-know for the performance of your contractual duties.
- Respect Regnology's intellectual property rights. Any IP created by you specifically for Regnology during our engagement becomes the property of Regnology, unless otherwise agreed in writing.
- Do not use Regnology's name, logos, or trademarks in any marketing materials, press releases, or on your website without prior written consent from Regnology.
- Upon termination of our business relationship, securely return or destroy all of Regnology's confidential information in your possession, as contractually agreed with us.

3.2 Data Privacy and Security

What this means

Protecting the personal data of our employees, customers, and partners is a legal and ethical obligation. In addition to confidentiality, all data must be protected by robust technical and organizational security measures to prevent data breaches. This includes implementing appropriate controls to secure systems, networks, and data both at rest and in transit.

What we require of our Suppliers

- Strictly comply with all applicable data protection laws, including GDPR, when processing any personal data on behalf of Regnology.
- Implement and maintain appropriate technical and organizational security measures (such as encryption, access controls, and vulnerability management) to protect data from unauthorized access, loss, or destruction.
- Process only the minimum amount of personal data necessary to fulfill your contractual obligations and do not use it for any other purpose.
- Immediately notify Regnology of any suspected or actual data breach or security incident involving our data and cooperate fully with our investigation and response efforts.
- Ensure that any of your own subcontractors who may handle Regnology data are bound by the similarly stringent confidentiality and data protection obligations.

4 Our Commitment to a Sustainable Future

At Regnology, we believe that long-term success is linked to the health of our planet and the well-being of our communities. Our commitment to Environmental, Social, and Governance (ESG) principles is a core part of our business strategy. We seek partners who share our vision and are

dedicated to operating in a manner that is environmentally responsible, socially conscious, and governed by the highest ethical standards.

4.1 Environmental Responsibility

What this means

We recognize the need to protect our planet and minimize our environmental impact. This means going beyond simple legal compliance to proactively minimize our environmental impact across our entire value chain. We expect our Suppliers to be responsible of the environment in their own operations.

What we require of our Suppliers

- Comply with all applicable environmental laws and regulations, including those related to emissions, waste disposal, and pollution control.
- Implement effective programs to reduce your environmental footprint, with a focus on minimizing greenhouse gas (GHG) emissions and conserving energy and water.
- Actively work to reduce waste.
- Strive to source raw materials from sustainable sources and work to eliminate hazardous substances from your products and processes.
- Demonstrate a commitment to continuous improvement in your environmental performance.

4.2 Social and Governance Reporting

What this means

A sustainable business is one that contributes positively to society and is managed with transparency and accountability. We believe in being a good corporate citizen and expect our Suppliers to demonstrate strong governance and a commitment to their communities. This includes being transparent about your ESG performance and willing to work with us to drive improvement.

What we require of our Suppliers

- Operate with the highest standards of ethical governance within your own organization, aligning with the principles of integrity and transparency outlined in this Code.
- Strive to make a positive impact on the communities in which you operate, through local engagement and responsible business practices.
- Maintain accurate records of your ESG performance, including data on environmental metrics, labor practices, and safety incidents.
- Be transparent in reporting your ESG performance. Where feasible, we encourage Suppliers to align their Greenhouse Gas (GHG) emissions reporting with established frameworks such as the GHG Protocol. Furthermore, to enhance transparency across our value chain, we encourage our suppliers to utilize recognized sustainability rating platforms to report on their ESG performance.

5 Working Together: Enforcement and Reporting

This Code of Conduct is the foundation of our business relationship. Upholding these principles requires a shared commitment to transparency, accountability, and continuous improvement. We are dedicated to working collaboratively with our Suppliers to ensure our entire value chain operates with the highest level of integrity.

5.1 Our Shared Commitment to Compliance

We expect our Suppliers to not only adopt the principles of this Code but also to be able to demonstrate their compliance. This ensures accountability and protects the integrity of our shared ecosystem.

What we require of our Suppliers

- Acknowledge and adhere to this Supplier Code of Conduct. If you have your own code, it must contain standards materially equivalent to those outlined in this Code.
- Extend these principles throughout your own supply chains, requiring your suppliers to adhere to the same standards.
- Maintain accurate records to demonstrate compliance with this Code. To verify compliance, we reserve the right, upon reasonable notice, to request appropriate records demonstrating compliance, or to require you to complete a self-assessment questionnaire.
- Promptly inform Regnology's Compliance Department of any situation that causes, or could cause, a material violation of this Code in relation to your business with us.
- Understand that a failure to comply with this Code or to provide necessary documentation to verify compliance may lead to a re-evaluation and potential termination of our business relationship.

5.2 How to Raise a Concern

Creating a culture of integrity means providing a safe and reliable way for our Suppliers and their employees to speak up about potential misconduct without fear. We take all reports seriously and are committed to investigating them promptly and fairly. We expect you to encourage your employees to report any suspected violations of this Code or any unethical behavior related to your business with Regnology.

You should utilize the following channels to raise a concern:

- Directly to Regnology's Compliance Department via email at compliance@regnology.net.
- Through our Confidential Hotline, for secure and, if desired, anonymous reporting, available 24/7 and managed by an independent third party, at: <https://report.whistleb.com/en/regnology>.

Regnology has a strict, zero-tolerance policy against retaliation. We will not tolerate any negative action being taken against anyone who, in good faith, reports a concern or participates in an investigation. This principle is fundamental to building trust and ensuring transparency.

What we require of our Suppliers:

- Establish and maintain effective grievance mechanisms for their own employees and contractors, allowing them to raise workplace concerns related to the principles in this Code without fear of reprisal.

- Strictly prohibit any form of retaliation by your company or its employees against any individual who reports a concern in good faith.
- Investigate any internal allegations of retaliation and take appropriate disciplinary action.
- Understand that any retaliatory action taken by a Supplier in response to a concern raised with Regnology will be considered a serious breach of this Code and may result in the immediate termination of our business relationship.

5.3 Where to find information

For additional information on Regnology's compliance and sustainability approach, please consult: [Regnology Corporate Sustainability | Regnology](#) or contact Regnology's Compliance Department at compliance@regnology.net. If you seek to raise an anonymous complaint, please use our designated Whistleblowing channel at <https://report.whistleb.com/en/regnology>.

End of Policy