

Code of Conduct

Initially adopted by the Management Team in 01/2021

Last review: 03/2025

Overview

Issuing Organization	Regnology Group GmbH ("Regnology")
Purpose and Objective	This Code of Conduct outlines the standards for our business conduct, emphasizing mutual respect, recognition, and appreciation in our daily business. It protects Regnology's reputation and legal standing by mandating adherence to laws, regulations and internal policies, while encouraging our Employees to act with integrity.
Applicability and Scope	All Employees
Geography	Regnology firmwide
Owner	Compliance (adopted by the Management Team)
Relevant internal and external documents	Applicable laws and regulations All Regnology Policies
Share with external third parties	Yes
Replacement notes	Replacement of Code of Conduct last reviewed June 2024

Table of Contents

Message from Regnology's CEO and CFO	4
1. Introduction	5
1.1. Purpose and Objective.....	5
1.2. Scope and Applicability	5
1.3. Principle	5
2. Principles and Legal Requirements.....	5
2.1. Confidentiality	5
2.2. Data and Information Governance	6
2.3. Intellectual Property	6
2.4. Compliance with Laws, Regulations, and Accurate Books	7
3. Relationship Management	7
3.1. Personal Conduct	8
3.2. Diversity, Harassment and Discrimination	8
3.3. Conflict of Interest	9
3.4. Corruption and Bribery	9
3.5. Company Representation.....	10
3.6. Environment, Social, and Governance (ESG)	10
3.7. Donations – Sponsorships.....	10
3.8. Competition	11
3.9. Relationships with Government and Public Organizations	11
3.10. International Sanctions and Export Control	11
3.11. Seeking Help – Reporting Concerns	11
4. Conclusion	12

Message from Regnology's CEO and CFO

It is our mission to enable the transparency and stability of the financial markets by providing innovative solutions along the regulatory value chain. To pursue this mission and to expand our position as a leading, international provider of regulatory, supervisory and tax reporting solutions we must focus on a corporate culture characterized by integrity, ethical conduct, and personal responsibility.

Beside excellent products and solutions, our reputation is one of the key factors for sustainable growth and success. Conduct that complies with the law and regulations, as well as with integrity and responsibility, creates trust, credibility, and reliability, and is the basis for the relationships with our Employees, customers, partners, shareholders, suppliers, and competitors.

This document defines the standards for our business conduct including mutual respect, recognition, and appreciation in our daily business. It combines the requirement to comply with the law and regulations as well as the special requirements for acting with integrity, and it is supplemented by internal policies and guidelines where necessary.

Due to the group-wide applicability of the Code of Conduct, we must consider the international environments in which we operate and support our customers. Hence, the implementation of the Regnology Code of Conduct must respect both the applicable national law and legislation, as well as the individual culture and the political and economic environment of the countries in which we conduct our business.

We expect all Regnology Employees to comply with this Code of Conduct and to ask for guidance whenever questions arise, or situations require to do so.

Anything less than total commitment to act with integrity and respect is unacceptable in the conduct of the Regnology business.

Our reputation and success depend entirely on the personal commitment of each Regnology Employee and on how consistently the Regnology values are applied. It is up to all of us to shape the Regnology future with great opportunities and lasting success by living our values and principles, both individually and collectively.

Rob Mackay
Chief Executive Officer

Sascha Pistora
Chief Financial Officer

1. Introduction

1.1. Purpose and Objective

The purpose of the Regnology Code of Conduct is to highlight applicable laws, standards and risks relevant for our business and summarizes important and basic rules when conducting business on behalf of Regnology. As part of Regnology's corporate governance and social responsibility the Code of Conduct is based on the Regnology values and principles and provides guidance for our Employees in the most appropriate legal, ethical, responsible, and transparent way.

Although we operate in many countries and are subject to many different rules, 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 recognize 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.

1.2. Scope and Applicability

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.

1.3. Principle

This Code of Conduct is published on the Regnology website (www.regnology.net), in our Intranet and is part of the welcome package of each Employee. Our Employees are regularly asked to acknowledge its content and are being trained on its key principles; we expect all our Employees to understand its content and to follow it.

2. Principles and Legal Requirements

When conducting business on behalf of Regnology we must operate within the legal framework, regulations, and internal guidelines applicable in the countries in which we operate.

2.1. Confidentiality

In the financial markets confidentiality is one of the most important values, due to high sensibility of non-public information. That is why Regnology's success in the financial marketplace, along the regulatory value chain, requires that we maintain and retain the trust of our customers and the investment community at large. Any information concerning Regnology, its customers, suppliers, products, services, projects, or its business that is not generally publicly available, must be treated confidential and only used for the purpose for which it was provided to us. Unauthorized disclosure of confidential information can significantly damage Regnology's reputation and financial stability and can be in violation of applicable data protection or secrecy law and our contractual obligations.

It is important to remember that the obligation to maintain the confidentiality of Regnology and customer confidential information remains in effect even after Employees no longer work for

Regnology. Likewise, Regnology requires new Employees to honour any continuing confidentiality obligations that they have with previous employers.

Please note that all Regnology Employees are prohibited from trading, while having access to material, non-public information.

2.2. Data and Information Governance

Adequate management of data and information is crucial for Regnology, and we are aware of the enormous importance of data security in our daily business.

In addition to respecting and protecting our Employees' privacy, and their personal or sensitive information, we are also committed to respecting and protecting our customers' and business partners' information and data. It is essential that we have a clear understanding of the rules for handling different types of information. Regnology's policies, processes and guidelines apply to all information and personal data (independent of being given in written, electronic, visual, or verbal form) entrusted to Regnology and must be applied and followed by all Employees.

- We manage data and information with good care and do not retain them unnecessarily, specifically not beyond finalization of a project or termination of a service.
- We dispose of data or information in a timely and secure manner.

This is done in compliance with the legal frameworks and the national laws.

We maintain a certified Quality Management System compliant with ISO 9001 and a certified Information Security Management System compliant with ISO 27001. If you have experienced or observed possible cases of non-compliant quality levels in our projects, products, services, or business processes, please address all non-compliant quality aspects to the Regnology RQM Team / IT Security Officer.

We all rely on Regnology's information technology and management resources (physical and financial assets, technology, information, research, strategies, name, image, systems, and processes) to perform our duties. It is important to remember that these are to be used solely for business purposes. Incidental personal use is tolerated (or permitted) if it does not compromise the integrity and security of our, and our customers' data and the principles outlined in this Code of Conduct. We live in times of rapid and extensive technological advancements and understanding new technologies can greatly assist us in our daily tasks. But technology, and specifically the data and information we share through this technology, must be managed properly and adequately safeguarded. We are all responsible for reducing our information security risks and protecting personal and sensitive data. Only use Regnology IT or customer approved assets and software. Always be vigilant and safeguard the data and information entrusted to us.

2.3. Intellectual Property

We all have the obligation to protect Regnology's property and assets from loss, damage, misuse, or theft – this includes the protection against any cyber-attacks.

We are contributing to the implementation of the stability in the financial markets by creating regulatory solutions on an international basis. Key for Regnology is the intellectual property (IP) resulting from our investments in Research & Development (R&D) and our Regnology knowledge and know-how which is an important factor to achieve competitive advantages and sustainable growth.

Intellectual property is one of the most valuable assets we have, and we will do our very best to protect and maintain our intellectual property rights.

Regnology's know-how, tools, methodologies, patents, trademarks, copyrights, and trade secrets are all considered Regnology's intellectual property and Employees have an obligation to protect them. All work product that may be the subject of patents or other intellectual property rights subject to registration or recordation, must always be promptly disclosed to Regnology's Legal Department.

In addition, all work product that may subsequently be incorporated to, or used as standard software or a tool, or otherwise be re-utilized in multiple customer projects, as well as any use of third-party products including, but not limited to, open-source software, should, whenever possible, be promptly disclosed to Regnology's Legal and IT Security Department. Notwithstanding the foregoing, use of any third-party products, including open-source software is subject to Regnology's 'Use of Third-Party Software for Software Developments' Policy. Protecting Regnology's IP needs commitment from all of us.

Any assets entrusted to us by our customers are only for that customer's use. Information obtained, and work developed by our Employees or third parties during work-related activities belongs to Regnology or the customer and must be protected accordingly. We are all prohibited from downloading, distributing, publicly displaying, publicly performing, or deriving modifications of copyrighted documents, graphics, software, music, or video games without permission of the copyright owner when using Regnology time, property, and resources. Content must be in line with our core values and business conduct.

2.4. Compliance with Laws, Regulations, and Accurate Books

The principles in this Code of Conduct are not meant to be exhaustive. Above all we should always ensure that we comply with all mandatory laws and regulations of the countries in which Regnology operates in or which are internationally applicable, that specifically includes rules on sanctions, export control, anti-money laundering (AML) and anti-bribery and corruption. Please be aware that for the Financial Sector, matters such as AML are of particular importance.

Regnology and its Employees must maintain clear, truthful, complete, and accurate business and financial records, including time and expense recording, and should retain such records in accordance with legal requirements. If you have concerns or information regarding any actual or suspicious payments or potentially fraudulent activities within Regnology, you should contact Compliance at: compliance@regnology.net.

Whenever we receive a notice, written demand or threat of litigation or legal proceeding from a third party, as well as any communication from legal or regulatory authorities, we must inform the Legal Department immediately. We must not alter or destroy documents or records in response to an internal or external investigation or any other legal request. Requests from financial institutions or creditors about our financial position must be forwarded to the Chief Financial Officer.

3. Relationship Management

Regnology as a company maintains different types of relationships, within the organization and with external third parties. The following chapters are dealing with the conduct of our Employees and our understanding of serving our customers and managing co-operations with business partners.

3.1. Personal Conduct

All our Regnology Employees represent the Regnology business. Each one of us must consider, that our individual actions affect Regnology's reputation and can have legal consequences. That is why we ask our Regnology Employees to:

- act with a high sense of integrity, responsibility, loyalty, dignity, decency and respect for your colleagues, customers, and all other business partners, in accordance with our values and principles.
- not use or possess illegal drugs or substances and consume alcohol only in moderation on Regnology or customer property or while engaged in any business-related activity, including events.
- apply the rules regarding workplace health, safety, and security very seriously.
- fulfil their duties and legal or contractual obligations in accordance with professional standards, the governing terms and conditions, and Regnology's long-term interests.
- not engage in unfair trade practices. While it is necessary and proper to obtain information about our competitors through market research, product evaluation and information that is already in the public domain, competitive information must not be obtained by improper or illegal means.
- not acquire, accept the offering, or attempt to acquire, a competitor's confidential information from their current or former employees or business partners.

3.2. Diversity, Harassment and Discrimination

Regnology aims to maintain a work environment in which our Employees are treated with dignity, decency, and respect.

Regnology's success derives from the success of our Employees and development of our Employees is one of the three main pillars of our Regnology growth strategy. We recognize and value the unique contributions that Employees with different backgrounds, experiences and working styles have to offer and this enables us to interact with different cultures and global stakeholders.

We do not discriminate against anyone because of race, colour, sex, gender identity, gender reassignment, age, family status, marital or civil partnership status, pregnancy status, religion or belief, disability, national origin, sexual orientation, trade union affiliation or other legally protected status. Regnology's policies and practices value diversity, provide equality of opportunity and ensure that no Employee, job applicant, customer, and other business partner receives less favourable treatment on any of the grounds set out above. We are committed to treat Employees fairly, promoting an integrated way of working and always respecting the dignity of our Employees. This commitment to the equal treatment of all our Employees creates a positive work environment where the right of everyone to dignity at work is recognized and protected.

We will not tolerate threatening language or behaviour, or acts of violence, against our fellow Employees, visitors, customers, or any other person at any time and we are committed to maintaining a safe, healthy, free of harassment, and rewarding work environment.

Furthermore, it is the responsibility of management to embody these values and behaviours, foster a positive environment, and make ethical decisions.

3.3. Conflict of Interest

We all have the responsibility to safeguard the integrity of Regnology, which also protects our customers and other stakeholders. This means all business decisions must be made independently, informed, reasonable, and solely based on what is best for Regnology, in alignment with our values and the principles of this code and are not improperly influenced or corrupted by our personal interests. A conflict of interest arises in any situation where there is an actual, potential or appearance of competition between our personal interests and our obligations to Regnology.

Accordingly, we must not:

- engage in actions, directly or through associated parties, or with third parties, which may not be compatible with the interests or reputation of Regnology
- derive personal benefits from a business decision or action, nepotism, using confidential information for purposes other than the interest of Regnology or disclosing such information to associates, family or friends
- speculate directly or indirectly through another person and must not engage in transactions or dealings based on information obtained in connection with our work for Regnology.
- pursue any outside business opportunity for ourselves that we find through Regnology nor use such opportunity to compete with Regnology directly or indirectly
- trade in our customers' shares while possessing material, non-public information.

Each Employee must dedicate 100% of their professional working time to Regnology. Any other business activities, including but not limited to board memberships, significant investments, professional activities, must be approved by management, HR, and Compliance.

Individual involvement in political activities or groups is a matter of personal choice. However, we must ensure that any political opinions we express are clearly identified as personal views and not representative of Regnology.

We recognize that people can develop a close personal or romantic relationship with another Regnology Employee, customer, business partner, or supplier representative with whom we have regular professional contact. No Employee should work in a position in which he or she has the authority to hire, directly or indirectly supervise or influence the employment action of an immediate family member or romantic partner. The same principle applies in relation to any active or prospective business relationship with a third party. In situations where a romantic partnership develops between two Regnology Employees where one is in a direct line of performance or supervision, the most senior Employee must, unless otherwise prescribed by applicable local law, disclose the relationship to management, HR, or Compliance for appropriate action. Management or HR may choose to transfer one or both Employees, change management or reporting lines or introduce any other appropriate measures to protect the business.

3.4. Corruption and Bribery

Employees and third parties acting on our behalf are prohibited from offering, promising, authorizing, making, or receiving from customers, suppliers, public officials or any other business relations or partners, either directly or through a third party, any inappropriate monetary or other benefit or undue advantage and in this respect must always comply with applicable laws and regulations. This may include cash, cash equivalents, shares, services, products, travel, lavish entertainment, event participation, promotional programs, lavish gifts, or employment opportunities, including internships.

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 that our Employees are influenced in their decisions as a result.

When dealing with government and public sector entities we must keep in mind that special rules may apply.

3.5. Company Representation

The only persons with the authority to legally represent any Regnology company are those expressly appointed by management and granted such power by applicable law or by relevant powers of attorney.

To protect Regnology's reputation and avoid exposing the company to contractual liability, all representations made concerning Regnology products, services and solutions must be current, accurate and clear, and not misleading or false.

We recognize that social media assets can and should be a valuable tool for enhancing communication and promoting Regnology and its values. Keep in mind that we promote a safe, professional, and appropriate online conduct. Any unacceptable behaviour online, including social media, will be addressed just as we would handle other form of misconduct, so always remain vigilant.

Employees are prohibited from disclosing any non-public information relating to Regnology or its business activities to the media including social media, without the prior approval of the Chief Marketing Officer.

Any enquiries and requests from the media must be forwarded to the Chief Marketing Officer.

3.6. Environment, Social, and Governance (ESG)

At Regnology, we care about sustainability and strive to implement ESG best practices within our organization to create a positive impact on society and make sustainability an integral part of our business.

We are committed to delivering sustainable products and solutions for our customers and our business. We believe that it is our corporate responsibility and social duty to contribute to economic development while at the same time considering environmental sustainability, meaning that our and our customers' processes and actions have the lowest possible impact on our environment and the societies we operate in. We shall continually search for new ways to improve efficiency, reduce waste, and minimize our carbon footprint wherever we operate.

We observe international human rights and related laws and regulations and strongly condemn child or forced labour and are guided by the UN recommendations and other international standards in this respect. We aim to build a better society through our actual business practices and by encouraging our Employees to pursue opportunities to contribute their time, experience, skills, and resources to local community development initiatives.

We promote relations with suppliers, business partners and sub-contractors operating under the same values.

3.7. Donations – Sponsorships

As a responsible member of society Regnology assumes social responsibility in the countries where it operates. Based on the respective legal systems and internal guidelines all charitable donations

and sponsorships are managed and authorized by the Chief HR Officer in consultation with Compliance.

3.8. Competition

Competition laws are designed to ensure free and fair competition in the marketplace. Violations of those laws may result in substantial fines and damages to both the individuals and the company involved. We are dedicated to promoting fair competition across all business areas and relationships. We do not enter into any agreements with competitors, customers or suppliers that restrict competition on prices, market, or territorial divisions, especially in the context of tenders. Entrepreneurial decisions are made independently and without prior agreements with competitors.

3.9. Relationships with Government and Public Organizations

Regnology provides its products and services and works actively with public organizations around the world. Our Employees and partners observe and comply with the rules governing public tendering procedures to ensure fair competition. All enquiries about public policy positions should be referred to the Chief Marketing Officer. No public policy statements must be made without prior approval from the Chief Marketing Officer.

3.10. International Sanctions and Export Control

Regnology operates in international marketplaces and is subject to international sanctions and export controls. Trade embargoes and economic sanctions prohibit or severely restrict business activities with certain countries, as well as with specifically listed entities and individuals.

Compliance with relevant trade controls, import and export control and embargo regulations is mandatory. When conducting business across borders, all Employees and business partners must be aware of and adhere to these specific regulations. Given the complexity and frequent changes in these laws, Employees shall consult with the Compliance or Legal department whenever necessary to ensure compliance with the relevant trade restrictions.

3.11. Seeking Help – Reporting Concerns

Failure to comply with our Code of Conduct can expose Regnology to substantial fines, criminal prosecution, loss of licenses, and access to government contracts. Employees involved may also face fines, criminal prosecution, and other disciplinary measures. Therefore, it is crucial to seek help and guidance whenever there is uncertainty about the best course of action.

If you believe you have experienced, observed, or are otherwise concerned about possible instances of non-compliant conduct by an Employee, customer, supplier, or other business partner, you are encouraged to immediately raise your concern. Regnology has implemented a **confidential helpline “Regnology TrustLine”**, designed to provide a secure and anonymous environment for raising such concerns. Regnology TrustLine can be accessed via: <https://report.whistleb.com/de/regnology>.

Should a concern lead to an allegation requiring investigation, Regnology will assign an appropriate expert to ensure that a full and fair investigation is completed as promptly as possible. Investigations are overseen by Compliance. Regnology does not tolerate retaliation against any Employee who, in good faith, reports a potential violation or cooperates with an internal investigation.

4. Conclusion

Safeguarding the reputation, assets, and interests of Regnology is the responsibility of everyone conducting business on Regnology's behalf. While common sense, professionalism, and personal integrity guide most of our action we must remain vigilant and aware of our responsibilities to prevent potential issues.

Additional information is available on our Intranet and Teams Channel. Please also review the information provided on other functional pages and channels, which complement our Code of Conduct. We expect all our Employees to learn and abide by our Code of Conduct.

The Compliance team manages day-to-day operations of the Compliance Program, including Code of Conduct investigations. A key objective of the Compliance Program is to enforce the Regnology Code of Conduct and related policies. Compliance works closely with business and other infrastructure departments and advisors, as needed.

For questions about the Code of Conduct and its application please email compliance@regnology.net. If necessary, your inquiry will be forwarded to the appropriate person within the relevant functions.