

» Our EQS Group Code of Conduct «

Dear Colleagues,

As EQS Group grows in an ever-changing global marketplace, one thing remains consistent – our firm commitment to doing the right things for the right reasons. Integrity is at the core of our Values – Passion, Team Spirit, Transparency, Ownership and Trust.

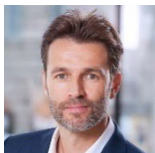
These Values foster trust among our various stakeholders, which is crucial to our long-term success. They also make EQS Group a place where all of us can be proud to contribute to the company’s success together. We have established our presence in many countries and cultures around the world, always based on our shared Vision, Mission and Values. We make it our absolute priority to champion these Values throughout our business.

Our *Code of Conduct* is designed to provide a shared understanding of EQS Group’s Values and the standards that govern our business. It also serves as a compass for navigating successfully through ethical challenges. Our experience has made us realize that in our competitive global environment, we sometimes encounter situations that can test our judgment and integrity. When this happens, the Code helps us respond in ways that truly reflect our Values and comply with both the letter and spirit of applicable laws and regulations. It lays the groundwork for how we engage with our various stakeholders such as our customers, investors, suppliers, regulators and, importantly, with each other.

We count on all of our colleagues worldwide to not only follow this Code, but to raise questions and report violations of it without fear of retaliation. We respond to all reports of Code of Conduct violations and concerns, and we will not tolerate retaliation against any employee who makes a report or raises a concern in good faith.

All of our senior leaders, including the EQS Group AG Management and our Supervisory Board, support this Code and are committed to keeping its principles at the heart of our business.

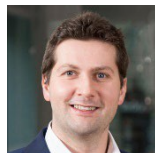
We encourage you to be thoroughly familiar with the Code and to bring our Values to life in your daily business conduct.



Achim Weick
Founder & CEO



Christian Pflieger
COO



André Silverio
Marques
CFO



Marcus Sultzer
CRO

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Code of Conduct – Summary

Our success as a company is built on a foundation of commitment by each of us to make decisions with the long-term value of the company in mind. The Code of Conduct sets the standards by which each of us commits to behave. This summary provides you with a quick overview of the principles which are explained in more detail in the Code of Conduct.

Our Values

PASSION – We love what we do and are driven to achieve.

TEAM SPIRIT – We have empathy and support/respect each other.

TRANSPARENCY – We are open minded and actively share information.

OWNERSHIP – We think like owners and act sustainably towards our planet and society.

TRUST – We are honest, trust each other and value a flat hierarchy.

Our Commitment to Integrity

Our Commitment to Ethical Behavior and Compliance with Applicable Laws

Integrity drives everything we do at EQS. Complying with applicable laws, regulations and external standards sets the floor for our behavior; while behaving ethically – doing what is right – may demand that we go beyond what is legally required of us.

Speaking Up Without Fear of Retaliation

Operating with Integrity every day means doing the right thing when it comes to our own behavior, being aware of what is going on around us, and being willing to speak up when we see or suspect activity that could harm us, our colleagues, the company, our customers, the community or the environment. Without fear of retaliation.

Addressing Non-Compliance

No director, officer, manager or supervisor has the authority to violate – or require conduct by another employee or any third party that violates – the Code of Conduct, other EQS policies or applicable laws.

Our Workplace Commitments

Working Principles

- › Put the customer first (company, result)
- › Be ambitious and humble
- › Have integrity and demand it from others
- › Confront brutal facts, yet never lose faith
- › Challenge decisions, but once they are made, commit wholly to them
- › Take responsibility for poor results (“look in the mirror”)
- › Give praise for good results (“look out of the window”)
- › Make mistakes, but learn from them (“fail well”)
- › Support and develop your team members
- › Lead by example

Team Spirit

We have empathy and support/respect each other. We earn trust by treating each other with respect and by communicating openly and transparently.

Equal Opportunity and a Non-Discriminatory Working Environment

We are committed to the principles of equal employment opportunity and inclusion. We embrace diversity of gender, ethnicity, generation, geography and thought. We will not tolerate discrimination, harassment or unfair employment practices in our workplaces. We are opposed to child labor or the use of forced or compulsory labor.

Protecting the Privacy of Personal Information

We must follow all applicable laws and regulations in relation to the protection of personal information and ensure that private, personal information is used only for the reasons for which it was gathered, unless further use is allowed by law or we have received written permission to use/share it.

Protecting Company Information, Technology and Other Assets

Each of us is responsible for safeguarding and ensuring the efficient use of the company’s assets, including but not limited to buildings, equipment, inventory, supplies, company-issued credit cards, funds and information.

Financial Integrity

Recording and reporting accurate, complete and understandable financial information about our business is an essential responsibility for each of us, not just those who work in the finance department.

Our Relationships and Behavior in the Marketplace

Product and Service Excellence

Product and service quality and reliability are essential to the success of EQS.

Honesty, Transparency and Fair Dealing

We treat customers, business partners and others in our marketplace network fairly and honestly at all times, in a manner that conforms to the Code of Conduct and all applicable laws.

Information Protection

Information privacy and confidentiality is one of the most important issues in today’s marketplace and to us, and we take very seriously our role in protecting the private and confidential information of our employees, customers and business partners

Conflicts of Interest

We may not engage in any activity that would create a Conflict of Interest between our personal interests and the best interests of EQS. Please familiarize yourself with the “Conflict of Interest Policy” for additional guidance.

Anti-Corruption and Preventing Bribery /Gifts, Hospitality and Entertainment

We do not offer, pay or accept bribes or improper payments in the course of doing business, and we do not engage or allow others

to do so on our behalf. Please familiarize yourself with the “Gifts, Hospitality & Entertainment Policy” for additional guidance.

Antitrust and Competition

We will not discuss or agree with competitors on prices, production, volumes, where to sell or on other competitive matters

We will not interfere with a competitor, customer or supplier’s business relationships through false disparagement or other means, or unlawfully block competition in dealing with customers or suppliers.

Anti-Money Laundering

We will not condone, facilitate or support money laundering.

How We Engage with our Communities, Regulators and the Public

Environmental Protection and Sustainability

We are committed to protecting the environment and the health and safety of our communities and the public.

Political Activity and Community Engagement

No political contributions on behalf of the company without obtaining prior written approval.

Interacting with Regulators and Other Government Personnel

We are committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance and product performance.

Speaking on Behalf of or About the Company

We must not speak with regulators, the media, investors or industry analysts on behalf of the Company, unless authorized to do so by a member of senior management.

1. Our Commitment to Integrity

1.1. Introduction

Our success as a company is built on a foundation of commitment by each of us to make decisions with the long-term value of the company in mind. This Code of Conduct (“Code”) sets the standards by which each of us commits to behave.

This Code is based on (i) the UN Global Compact, (ii) the Universal Declaration of Human Rights, (iii) the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, (iv) the Rio Declaration on Environment and Development, and (v) the United Nations Convention against Corruption.

Ethical behavior begins as an individual responsibility. Behavior reflecting our Values, high ethical standards, and compliance with applicable laws is expected by each of us, regardless of position or location. That is our commitment to *Operating with Integrity*.

1.2. A Culture Rooted in Our Values

Even more than our products, our technology or our financial performance, the day-to-day behavior of each one of us defines who we are as a company and how the world will see us.

Think about how we get to know other people. First, we listen to what they say about themselves: their interests, their hobbies, their families. In time, they may talk about their goals, what they believe in, what they worry about, and what is most important to them. As they reveal more about themselves, we start to get a sense of who they are and what they stand for.

More importantly, though, we watch their behavior. Are the decisions they make and the actions they take consistent with their values? When they don’t live up to those values, do they speak up honestly and take responsibility? Do they hold themselves accountable and hold others to account as well? If so, we know we’re dealing with a person of integrity. This is someone we trust and respect.

The same is true for the companies where we choose to work and do business. Compliance with applicable laws and regulations is crucially important and is non-negotiable, but to earn and maintain trust, we must also be clear about our core Values and what we stand for.

In every aspect of the company’s operations – from design processes to the behavior of every one of us, at every level – we must strive to be unfailingly consistent with these Values:

- › **PASSION:** *We love what we do and are driven to achieve.*
We are driven to deliver the best digital solutions. We know this business better than anyone else. That’s what our customers say. And it encourages us to become even better. For our customers, for our company and for ourselves.
- › **TEAM SPIRIT:** *We have empathy and support/respect each other.*
We know that our customers’ requirements are very complex. We can only meet their expectations by collaborating. We support and engage each other.
We also know that it’s more fun to be successful together.
- › **TRANSPARENCY:** *We are open minded and actively share information.*
We understand that every good relationship is based on trust. We create and sustain an open culture to collaborate and speak freely and respectfully. We can only succeed together with trust.
- › **OWNERSHIP:** *We think like owners and act sustainably towards our planet and society.*
We share the commitment to do the right thing with a sense of purpose and urgency. We are proactive in finding the best solutions, while considering our impact on the environment and society.
- › **TRUST:** *We are honest, trust each other and value a flat hierarchy.*
We trust each other to bring our best intentions and efforts to our work. This allows us to maintain a flat hierarchy and, even as we grow, it allows each of us to make an impact.

Our Values set the foundation for this Code. Each of us, without exception, is obligated to follow and uphold our Code and any other company policy and procedures. If you are ever concerned that our Code, company policies or procedures are not being followed, or if you simply feel unsure about any situation, it is essential that you speak up, ask a question, or share your concerns. The Code explains several ways in which you can do this, and it emphasizes our legal and ethical obligation to ensure confidentiality when such concerns are raised.

1.3. Our Commitment to Ethical Behavior and Compliance with Applicable Laws

Integrity drives everything we do at EQS. Complying with applicable laws, regulations and external standards sets the floor for our behavior; while behaving ethically – doing what is right – may demand that we go beyond what is legally required of us. Laws and standards vary among countries and cultures; but, as a global company, our common goal and ongoing commitment is to maintain equally high standards wherever we operate.

There are countries in which common trading or negotiating practices are based on customs or laws that are different from or less stringent than our Code or our policies or procedures. Nevertheless, we follow the Code and good ethical and business judgment in such countries; and we seek guidance if we have any questions about the application of local law, the Code, or about any apparent conflict between them.

We are honest in our business dealings with one another and with our customers and any third parties, and we do not promise what we cannot deliver. If we make a commitment in good faith and find later that we cannot keep it, we are transparent and candid in our communication and drive the conversations to produce a shared understanding of revised deliverables.

1.4. Addressing Non-Compliance

Failure to carry out these responsibilities may lead to disciplinary action, including dismissal. Non-compliance on the part of third parties will be addressed swiftly and may lead to termination of our business relationship with them. Civil or criminal violations may also be prosecuted.

The Code does not alter the terms and conditions of our employment. Rather, it helps each of us to know what is expected of us legally and ethically.

1.5. Applicability

The obligations described in this Code apply to EQS Group AG and all other entities that are directly or indirectly controlled or managed by EQS Group AG (“EQS”), the employees and directors of these entities, as well as suppliers, contractors and other third parties in their work on behalf of EQS. No director, officer, manager or supervisor has the authority to violate – or require conduct by another employee or any third party that violates – the Code, other EQS policies or applicable laws.

1.6. Speaking Up Without Fear of Retaliation

Operating with Integrity every day means doing the right thing when it comes to our own behavior, being aware of what is going on around us, and being willing to speak up when we see or suspect activity that could harm us, our colleagues, the company, our customers, the community or the environment. We understand that acting ethically isn't always easy – and sometimes takes courage – but we trust that we will be supported by EQS leaders. They, too, are being held to account for upholding our values and our commitments to one another and to our customers.

› We Report Suspected Violations of Law, this Code or Other Company Policies

If we learn of or suspect a violation of this Code, we must *immediately* report it in accordance with our Whistleblowing Policy, which permits any report to be made anonymously. We must come forward with any such information without regard to the identity or position of the suspected offender. EQS will treat the information in a confidential manner and will ensure that no acts of retribution or retaliation will be taken against anyone for making a report in good faith.

› Our Commitment to Our Colleagues and to "Speaking Up"

EQS is a team of colleagues who trust, respect, support and engage each other. We share the commitment to honor our responsibilities and to do the right thing with a sense of purpose and urgency. We commit to one another to create and sustain an open environment in which we speak freely and respectfully to air our views and opinions, seek collaborative solutions to problems, and can feel comfortable making suggestions about how things can be done more safely or in a more productive or effective way.

› Prohibition Against Retaliation

Retaliation is prohibited in any form against an individual, who in good faith reports a concern regarding a violation of law, the Code or other company policies – even if the report is mistaken – or who assists in the investigation of a reported violation. Every employee may report such violations without fear of retaliation by co-workers, managers, senior leadership or others who may be the subject(s) of the report.

› How to Report a Concern or Ask for Guidance

Sometimes it can be confusing or challenging to do the right thing. If you find yourself in a situation, in which you don't know what to do – or are confused about how to apply our policies or procedures – talk it over with someone or ask for guidance.

We have many resources to help you do the right thing – talk to your direct manager, to the Culture & People department, to our Chief Legal Officer or another member of senior leadership.

You can also ask questions, make suggestions, voice concerns or report suspected violations by using EQS's whistleblowing application "[EQS Ethics Line](#)". Whatever channel you choose to use, we will ensure that your comments and concerns will be heard and addressed.

We can always get to a better decision with the input and support of one another. Feeling more confident in our decision-making can also help us find the courage to do the right thing.

› Investigations

It is our policy and intent to investigate any reported violation of the Code, other EQS policy, or applicable law, and to take appropriate action, as determined by EQS, based on the results of the investigation. We are all expected to cooperate in the investigation of reported violations.

› Confidentiality

The investigators will protect the identity of anyone who reports a suspected violation or who participates in the investigation. We should be aware that the investigators, EQS leaders and the Supervisory Board are obligated to act in the best interests of EQS and inline with legal requirements and do not act as personal representatives or lawyers for EQS employees.

2. Our Workplace Commitments

We bring our Core Values to life guided by our 10 Work Principles:

1. Put the customer first (company, result)
2. Be ambitious and humble
3. Have integrity and demand it from others
4. Confront brutal facts, yet never lose faith
5. Challenge decisions, but once they are made, commit wholly to them
6. Take responsibility for poor results ("look in the mirror")
7. Give praise for good results ("look out of the window")
8. Make mistakes, but learn from them ("fail well")
9. Support and develop your team members
10. Lead by example

Just as a person of integrity does not behave one way at home and the opposite way "out in the world," ethical companies hold equally high standards for their behavior internally as well as externally. To put it simply, we strive to do the right thing at all times, even when no one is watching.

2.1. Team Spirit

We have empathy and support and respect each other. EQS' employees are one of the company's greatest strengths. We earn trust by treating each other with respect and by communicating openly and transparently.

We know that new ideas from diverse perspectives lead to better business results. We embrace diversity of gender, ethnicity, generation, geography and thought. Different perspectives enable us to better understand the complexity of our customers' needs and to deliver innovative solutions and products in an ever-changing marketplace.

We appreciate that learning from the breadth of individual experiences, strengths and perspectives enriches all of us and makes EQS stronger and more globally competitive.

We will not tolerate discrimination, harassment or unfair employment practices in our workplaces.

We aspire to create and sustain a workplace in which each of us

- › knows and understands what is expected of us in our role;
- › communicates openly about our ideas and our concerns;
- › can be honest with brutal facts and obstacles and collaborate on solutions;
- › can expect to have open, constructive conversations about our performance with our manager;
- › can count on being rewarded fairly for our performance;
- › can expect support for managing our personal priorities and developing our capabilities;
- › can expect full respect of personal privacy in the spirit of our Code and the literature of laws; and
- › will be involved in improving team performance.

We will:

- › Treat every individual with respect, fairness and dignity.
- › Listen openly and be inclusive, in order to take full advantage of what each of our colleagues has to offer.
- › Provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success.

We will not:

- › Tolerate harassment or bullying of any kind.
- › Tolerate dishonest or untrustworthy behavior.
- › Tolerate violence in our workplaces.

2.2. Equal Opportunity and a Non-Discriminatory Working Environment

We are committed to the principles of equal employment opportunity and inclusion. We recognize the personal value and contribution of every employee to the overall value of the business. We understand that diverse and highly productive employees are essential to our success and should be given opportunities to flourish in a barrier-free, non-discriminatory environment.

We will:

- › Conduct business without regard to, and do not discriminate because of, race, color, religion, creed, gender, sexual orientation, gender identity, pregnancy, age, disability, national origin, ancestry; as well as citizenship, marital, veteran, family and medical leave status; or any other status protected by law.
- › Conduct all employment practices in a non-discriminatory manner, including activities relating to recruiting, hiring, benefits, leaves of absence, training, transfer, promotion, job assignments, compensation, corrective action and dismissal.
- › Make employment-related decisions based on company needs, job requirements and individual qualifications.
- › Comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in-country.

We will not:

- › Tolerate discrimination in our day-to-day interactions, our business-dealings or employment decisions.
- › Tolerate discrimination against anyone – colleagues, customers, business partners or other stakeholders – on the basis of race, color, religion, national origin, sex (including pregnancy), age, disability, health status, sexual orientation, gender identity, marital status, past or present military service or any other status protected by the laws or regulations in the locations where we operate.

2.3. Human Rights

We are opposed to child labor or the use of forced or compulsory labor. Unscrupulous labor practices such as these have been called, “modern-day slavery,” including deceiving workers over conditions of employment, charging employees unreasonable recruitment fees and confiscating or otherwise denying access to identity documents such as passports and travel passes. We prohibit these practices, and we expect our suppliers, vendors, consultants and contractors to do the same.

2.4. Protecting the Privacy of Personal Information

The protection of personal information and privacy is of great importance to us. Our colleagues’ personal data is only collected, processed and used in accordance with applicable data protection regulations and data security, as noted below in the “Information Protection” section.

We must follow all applicable laws and regulations in this regard and ensure that private, personal information is used only for the reasons for which it was gathered, unless further use is allowed by law or we have received written permission to use/share it. Please refer to our intranet for further information. Contact your direct manager, our Chief Legal Officer, or our IT Security Department for guidance before sharing any customer or third-party confidential information with others.

2.5. Financial Integrity

Recording and reporting accurate, complete and understandable financial information about our business is an essential responsibility for each of us, not just those who work in the finance department.

We will:

- › Maintain accurate and complete financial records, reporting and accounting, fully compliant with company policies and procedures, and applicable laws and regulations.
- › Speak up if we feel that we are being pressured to prepare, alter, conceal or destroy documents or other financial records in violation of EQS policy.

Speak up if we have any reason to believe that someone has made a misleading, incomplete or false statement in connection with an investigation, audit, examination or filing, either internally or externally.

2.6. Protecting Company Information, Technology and Other Assets

Each of us is responsible for safeguarding and ensuring the efficient use of the company's assets, including but not limited to buildings, equipment, inventory, supplies, company-issued credit cards, funds and information. We should treat company assets with the same care we would use if they were our own. We may not, however, use our corporate name, any brand name or trademark owned or associated with EQS for any personal purpose. We only use company resources to conduct company business. Misuse of company assets has a direct impact on our profitability and could be considered theft, fraud or embezzlement.

2.6.1. Protecting EQS' Confidential Information

One of our most important assets is our confidential information. In the course of our business, we have access to information about our company as well as our customers and partners that is proprietary or confidential. We also may learn about sensitive information regarding new developments in the company or within our customers' companies before it is available to the public. While we are committed to communicating honestly and transparently, we also take care to keep this information confidential.

Confidential information includes non-public information that might be of use to competitors or harmful to EQS or its customers if disclosed, such as: business, marketing and service plans, financial information, product architecture, source codes, designs, databases, customer and prospective customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our employees, customers or other individuals, and similar types of information provided to us by our customers, suppliers and partners.

Each of us has a duty to refrain from disclosing confidential or proprietary information learned in the course of employment about EQS or any other company, as well as not acting upon such information for personal gain, until that information is disclosed to the public through approved channels (see also "Dealing with or Trading on Non-Public Information," below, in the "Information Protection" section).

We will:

- › Take steps to protect the company's proprietary and confidential information.
- › Be cautious and thoughtful when sharing confidential information, in writing including e-mails and during private conversations. We consider our surroundings when talking on a mobile phone or in a public place.
- › Use social media responsibly.
- › Report any data security breach promptly in accordance with our Code and procedures.

We will not:

- › Discuss confidential or competitive information in online groups, blogs, or any other form of social media (Facebook, Twitter, LinkedIn, etc.).
- › Share proprietary or confidential information outside the company without ensuring that an appropriate confidential disclosure agreement is executed.
- › Forward or otherwise share company emails, voicemails or other communications outside the company, except where required for legitimate business purposes.
- › Make comments on behalf of EQS without proper authorization.
- › Copy or otherwise disseminate EQS information for personal gain.
- › Benefit personally on such information at a cost to company's business operation, regulation, and integrity (see also "Dealing with or Trading on Non-Public Information," below, in the "Information Protection" section).

2.6.2. Intellectual Property and Trade Secrets:

Our intellectual property is important to our success. "Intellectual property" includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible commercial property. We must protect and, when appropriate, enforce our intellectual property rights.

We will:

- › Protect intellectual property from illegal or other misuse by making sure it is identified by appropriate trademark, service mark, copyright notice or patent marking.
- › Disclose to management any innovation developed on company time or using company information or resources, so that the company can decide whether to seek formal protection.
- › Obtain licenses to use intellectual property (including logos and trademarks) belonging to someone else or purchase the outright ownership of the property.

We will not:

- › Knowingly infringe upon the intellectual property rights of others.
- › Use a previous employer's intellectual property without that company's permission.
- › Hire a competitor's employee to obtain that competitor's trade secrets.

2.6.3. Information Security Management:

Our information systems and security measurements are designed in accordance with applicable law pertaining to safeguarding private information and cybersecurity integrity, including the European General Data Privacy Protection (EU GDPR). If you believe our information security has been compromised or breached, please report such incident immediately via the Incident Management process described in our intranet (<https://insight.egs.com/display/ISMS/Incident+Management++Contacts+and+Communication>) and/or contact immediately our IT Security Team and consult any member of our Information Security Management System (ISMS) Steering Committee for next steps. Additional resources can be found on the Information Security Knowledge Base on our intranet.

Using the Company's Information Technology and Systems Responsibly and Securely:

EQS provides information technology to maximize our efficiency in doing our work, such as: computers, computer applications, networks, the internet, the intranet, facsimile machines, telephones, mobile phones, other wireless communication devices, and voice mail systems. These tools are company property and we use them responsibly.

Occasional, limited personal use of these resources is permitted, but cannot interfere with our work performance, or the work performance of our colleagues. We cannot tolerate inappropriate or illegal use of these assets and reserve the right to take appropriate disciplinary actions, as needed, up to and including dismissal. Such inappropriate use of these resources can include the following:

- › Hacking
- › Pirating software or video/audio files
- › Soliciting or distributing literature for outside entities
- › Sending inappropriate e-mail
- › Accessing inappropriate web sites (such as those advocating hate, violence, sexually-explicit material, or promoting illegal activities)
- › Distributing confidential, proprietary or trade secret information outside the company

EQS reserves the right to monitor and inspect, without notice, the use of the company's information and technology resources, if allowable under applicable local law. Our monitoring and inspection activities will be conducted in accordance with regional and international regulations, such as the European General Data Protection Regulation.

3. Our Relationships and Behavior in the Marketplace

A company's reputation is one of its most valuable assets, and EQS's reputation is in our hands. Only we can develop, earn and protect our reputation in the marketplace.

When we accept full responsibility for ethical behavior and compliance, as outlined in this Code, we consider the entire network of our internal and external associations and relationships; because we understand that our decisions can have a powerful impact on the reputations of those with whom we do business, which in turn reflects back on us – individually and as an organization.

3.1. Product and Service Excellence

Product and service quality and reliability are essential to success in any company, large or small. Consistent excellence in this regard is the single most powerful indicator of our trustworthiness as a service provider, partner and employer.

We understand that taking shortcuts at the expense of quality or reliability is not consistent with our Values and could damage our business and our reputation in the marketplace. Each of us, regardless of our specific role, plays a critical role in ensuring the quality and reliability of our products and services; so, we strive not simply to meet but to exceed customer expectations of quality and reliability. If you are concerned that our standards for quality and reliability are not being followed, or if you believe that anyone is attempting to persuade another employee to disregard or circumvent those standards, you are encouraged and expected to share your concerns, using any of the channels described in the "Speaking Up" section of this Code.

3.2. Honesty, Transparency and Fair Dealing

EQS's global reputation as an ethical company and good corporate citizen depends on each of us being honest and transparent in doing our work. We treat customers, business partners and others in our marketplace network fairly and honestly at all times, in a manner that conforms to this Code and all applicable laws.

We will:

- › Make realistic commitments when we provide price quotes, product and feature descriptions, timelines, delivery dates and other aspects of our agreements with customers and third parties.
- › Represent EQS accurately in our marketing, advertising and sales materials
- › Make only factual and accurate statements that can be easily verified or reasonably relied upon, if we find it necessary to make comparisons between our products and services and those of our competitors.

We will not:

- › Promise what we cannot deliver. If we later find that a commitment, we made in good faith cannot be met, we communicate promptly and transparently, both internally and externally.

3.3. Information Protection

Information privacy and confidentiality is one of the most important issues in today's marketplace and to us, and we take very seriously our role in protecting the private and confidential information of our employees, customers and business partners. Our information systems and security measurements are designed in accordance with applicable laws pertaining to safeguarding private information and cybersecurity integrity, including the European General Data Privacy Protection (EU GDPR).

3.3.1. Data Privacy

The global nature of our business requires awareness of and compliance with a wide range of local, regional, national and international laws and restrictions related to data privacy and data sharing.

Private or confidential information includes, but is not limited to, such things as a customer's (or business partner's) financial information, details about their business operations, and the names and contact information of their employees. We protect this information just as we protect the company's confidential information and the private information of our colleagues.

We must follow all applicable laws and regulations in this regard and ensure that private or confidential information is used only for the reasons for which it was gathered, unless further use is allowed by law or we have received written permission to share it. Contact a representative of the legal department for guidance before sharing any customer or third-party confidential information with others.

3.3.2. Dealing with or Trading on Non-Public Information in the Marketplace

Under the securities laws of most countries, it is generally unlawful to trade in a company's securities (including EQS's) while in the possession of material non-public information about that company. It is also generally unlawful to provide material non-public information about a company (including EQS) to others who then trade on the basis of that information. Please direct all inquiries regarding these prohibitions to our Chief Financial Officer.

3.3.3. Gathering Business Information Ethically and Lawfully

As part of our day-to-day business, we gather intelligence about competitors, suppliers, and customers, and we must do so in ethical and lawful ways. Most useful information is available from public sources through hard work and persistence.

In most countries, individuals and companies who improperly take trade secrets are subject to civil lawsuits for damages and injunctions, as well as potential criminal liability.

We will:

- › Protect information provided on a confidential basis by others to EQS by following procedures described in confidentiality agreements relating to the information.
- › Report the receipt of any erroneous communications or those that contain proprietary or sensitive information (for example, a competitor's marketing plans or engineering drawings), to the Legal Department or the Chief Operating Officer, so that appropriate action can be taken.

We will not:

- › Seek, obtain, or use any information from non-public sources, if it would violate this Code or any applicable law, including data privacy, antitrust, trade secret or other confidential information laws.
- › Improperly take confidential information from others or bring any confidential information from a previous employer to the company.
- › Accept or misdirect communications not meant for us.

3.4. Conflicts of Interest

We may not engage in any activity that would create a Conflict of Interest between our personal interests and the best interests of EQS. Personal interests may include commercial, industrial, banking, consulting, legal, accounting, charitable and financial relationships, among others.

If we face a situation in which one of our decisions or actions, e.g., finding the most cost-effective sourcing, solution or service for EQS might be influenced by some personal interest or relationship, we must disclose this potential conflict and seek guidance promptly. Any actual or potential conflict between our personal interests and the Company's interests are prohibited unless specifically approved via the [Approval Manager](#) (or in the case of an officer or director, by the Supervisory Board).

In addition, neither we nor a Related Person may accept membership on the board of directors of any competitor, supplier of products or services, or customer of EQS, without the prior written approval of the Management Board.

Related Persons are spouses, non-marital partners, unregistered and registered partners, siblings, brothers and sisters of spouses or partners, as well as relatives and in-laws in the direct line, e.g., parents, parents-in-law, grandparents, children, children-in-law, grandchildren. Non-related persons may also be a related person for whom the relationship of proximity gives rise to a Conflict of Interest if there are close personal or friendly contacts.

The following should be considered in determining the presence or absence of a Conflict of Interest:

- › The amount of the employee's financial interest;
- › The employee's position with EQS and the influence that he or she may have in business dealings that impact (or may be impacted by) the matter; and
- › Any other relevant factors.

Please familiarize yourself with the "Conflict of Interest Policy" for additional guidance and examples.

3.5. Gifts, Hospitality and Entertainment

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, no Gift, Hospitality, or Entertainment may be provided (or accepted – such as from a supplier, customer or other third party), if it will obligate ourselves or a third party, or appear to obligate to behave or make a decision in a certain way.

The giving or receiving of inappropriate, lavish or repeated gifts or other benefits is not permitted, even if acceptable by local custom. The only permitted exception is providing (or accepting) normal sales promotion items, occasional meals, or other non-cash items, provided that the value of the gift is in line with the company thresholds and could not be construed as improperly influencing our good business judgment. Any Gifts, Hospitality and Entertainment needs to be recorded in the [Approval Manager](#), independent of its value or thresholds.

In general, no Gift, Hospitality or Entertainment should be provided to customers, suppliers, or other third parties that an employee would not be able to accept from a customer, supplier, or other third party, unless approval was given via the EQS's [Approval Manager](#) application.

Please familiarize yourself with the "Gifts, Hospitality and Entertainment Policy" for additional guidance.

3.6. Relationships with Suppliers, Vendors and Contractors

We maintain our reputation as a dependable customer and business partner by being reliable and trustworthy in dealings with suppliers, vendors and contractors (“Third Parties”). We treat them fairly and transparently at all times and in a manner conforming to all applicable laws.

We expect Third Parties to conduct themselves in an ethical and responsible manner that supports the protection of and respect for human dignity in their workplaces, consistent with EQS’s standards and policies. We also expect them to share our commitment to producing high-quality products and services and to the other commitments in this Code (such as prohibiting bribery, as addressed below in the “Anti-Corruption and Preventing Bribery” section).

3.7. Antitrust and Competition

We strive to win against our competitors, while being mindful of the appropriate boundaries for our competitive behavior and complying with applicable antitrust and competition laws. Gaining a leading market share by selling better products or operating more efficiently is lawful and an appropriate goal for any competitor.

We will not:

- › Interfere with a competitor, customer or supplier’s business relationships through false disparagement or other means, or unlawfully block competition in dealing with customers or suppliers.
- › Discuss or agree with competitors on prices, production, volumes, where to sell or on other competitive matters. To “agree” with a competitor in this context can mean not only formal contracts, but also oral agreements and informal understandings. Some agreements with competitors are lawful in some circumstances, such as joint ventures, technology license agreements, supply agreements, and joint approaches in government lobbying. It is important to involve the Chief Legal Officer in discussions for such agreements, so that any violation and the appearance of any violation can be avoided.

3.8. Anti-Money Laundering

Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. We will not condone, facilitate or support money laundering. Two areas that deserve special awareness are: (1) unusual ways in which payments may be requested; and (2) customers or Third Parties who appear to lack integrity in their operations.

We will be alert for:

- › Requests for cash payment, travelers checks or checks from an unknown third party.
- › Complex payment patterns.
- › Unusual transfers to or from countries not related to the transaction.
- › Customers or Third Parties who seem eager to avoid recordkeeping requirements.
- › Transactions involving locations previously associated with money laundering or tax evasion.
- › Transactions which are inconsistent with usual business practices, or which do not match the customer’s or Third Party’s normal pattern of activity.

3.9. Anti-Corruption and Preventing Bribery

We do not offer, pay or accept bribes or improper payments in the course of doing business, and we do not engage or allow others to do so on our behalf. We will follow anti-bribery legislation.

The anti-bribery and corrupt payment provisions of most legislations worldwide make illegal any corrupt offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official, or any foreign political party, candidate or official, for the purpose of: influencing any act or failure to act, in the official capacity of that foreign official or party; or inducing the foreign official or party to use influence to affect a decision of a foreign government or agency, in order to obtain or retain business for anyone, or direct business to anyone.

Some local legislation (like Germany and the UK) extend these prohibitions to commercial relationships that do not involve a government official and makes illegal not only the offering, promising or giving of a bribe, but also the requesting, agreeing to receipt, or acceptance, of anything of value as an improper condition of doing business. For purposes of example only, the UK Anti-bribery Act would prohibit both the representatives of a vendor and of a customer from offering or soliciting a gift, or the promise of a gift, as a condition of transacting business.

No contract or agreement may be made with any business in which a government official or employee holds a significant interest, without the prior written approval of the Chief Legal Officer.

We will:

- › monitor continued compliance with anti-bribery legislation to ensure compliance with the highest moral, ethical and professional standards of EQS.

We will not:

- › Make any direct or indirect payments – including loans, gratuities, funds, gifts, hospitality or anything else of value – to any government official, employee, political party or candidate of any country, nor to any private entity or party, in order to (1) obtain or retain business; or (2) direct business to any other person or entity; and
- › Authorize any such payments – whether in cash or otherwise – to be made through a third party, if we know or are substantially certain that any portion of the payment will be used to do so.

Under some laws some payments are explicitly allowed, such as “facilitation payments”, however only in very narrow circumstance. As a result, EQS prohibits any payments of any kind without the prior express written approval of the Chief Legal Officer.

If you are uncertain about offering, paying or receiving any payment or gift – or a payment or gift that is being made on our behalf by any Third Party – consult with your manager or the Chief Legal Officer.

3.10. Trade Compliance

We operate our business in compliance with all applicable trade-related laws. It is our responsibility to implement and maintain the necessary internal controls for trade compliance, exercise reasonable care in all import and export activities, and make best efforts to assure we understand and comply with all applicable import and export laws. We also comply with the stringent laws and regulations relating to secondary boycotts.

Most countries maintain laws and regulations that restrict exports of certain products, services, and technologies. We must ensure that anything we export may be lawfully exported (or re-exported) and that they may be sold into the country and to the ultimate end-user. This includes certain technology or intellectual property, even if only shared in discussions with a citizen or entity from outside of our country (which can be a “deemed export”). Such restrictions can range from almost total bans on the exports to certain embargoed countries to prohibitions on selling/sharing certain items to specified individuals or organizations.

The sanctions for violating these controls, even when inadvertent, can be severe and can result in fines, imprisonment, and even the denial of all export privileges to a company.

3.11. Legal Hold

A legal hold suspends all document destruction procedures in order to preserve appropriate records under special circumstances, such as litigation or government investigations. The Legal Department determines and identifies what types of company records or documents and custodians are required to be placed under a legal hold. Every company employee, agent and contractor must comply with this policy.

The Legal Department will notify you if a legal hold is placed on records for which you are responsible. You then must preserve and protect the necessary records in accordance with instructions from the Legal Department. Records or supporting documents that have been placed under a legal hold must not be destroyed, altered or modified under any circumstances.

A legal hold remains effective until it is officially released in writing by the Legal Department. If you are unsure whether a document has been placed under a legal hold, you should preserve and protect that document while you check with the Legal Department.

If you have any questions about this policy, you should contact the Legal Department.

4. How We Engage with our Communities, Regulators and the Public

Each of us must share in the responsibility for earning and protecting EQS's reputation as a good corporate citizen and neighbor. We appreciate that earning this trust and respect is critical to our company's long-term success and resiliency.

4.1. Environmental Protection and Sustainability

For us, sustainability means taking responsibility for the future by contributing to a sustainable development: economically, environmentally, and socially. We are committed to protecting the environment and the health and safety of our communities and the public, just as we are with the health and safety of our employees and our own families. We live up to this commitment through full compliance with all applicable laws and continuous improvement of our performance. We strive for an efficient and responsible use of resources.

When we make significant business investments or acquisitions, we take into account sustainability and other ethical considerations.

4.2. Interacting with Regulators and Other Government Personnel

We must be vigilant in meeting our responsibilities to comply with relevant laws and regulations. We are also committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance and product performance, as well as being respectful and cooperative when interacting with any other government personnel.

We will:

- › Be alert to any changes in the law or new requirements that may affect our business
- › Notify our manager, the Legal Department, the Chief Operating Officer or another member of senior leadership, if we become aware of any regulatory or legal concerns, including investigations.
- › Contact the Legal Department or the Chief Operating Officer if we are contacted by any regulatory agency or government official seeking information regarding the company or its employees.
- › Contact the Legal Department or the Chief Operating Officer immediately, if we receive any communication, subpoena, summons or other inquiry as a representative of the company from a law enforcement official, court, or lawyer.

4.3. Political Activity and Community Engagement

We comply fully with all laws regulating corporate and employee participation in political activities and public affairs. EQS encourages employees to exercise their rights and assume their obligations as citizens, however:

We will not:

- › Make political contributions on behalf of the company without obtaining prior written approval by the Management Board.
- › Seek reimbursement from the company for personal political contributions.

4.4. Speaking on Behalf of or About the Company

We must not speak with regulators, the media, investors or industry analysts on behalf of the company, unless authorized to do so by a member of senior management.

EQS encourages employees to exercise their rights to speak freely about their personal opinions, however:

We will:

- › Be clear, when speaking about our personal opinions, that they are not those of the company.

We will not:

- › Give the impression that we are speaking on behalf of EQS in any communication that may become public, unless we are authorized to do so. This includes posts to online forums, social media sites, blogs, letters to the editor and endorsements of products or services.

5. Conclusion – How Do We Decide What is Right?

5.1. Deciding What is Right

Ultimately, when it comes to our business decisions and actions, each of us is responsible for recognizing ethics and compliance issues and doing the right thing. Even with clear corporate Values, understandable policies and strong support from EQS' senior management, knowing what is "right" isn't always easy.

This Code is a statement of (1) what EQS expects of us and why, and; (2) what we can expect from the company. It is also a promise that our senior leadership will stand behind those who do right and hold accountable those who do not.

Not everyone will see a situation in the same way; and every day, we face conflicting pressures and points of view when we are making decisions about how to operate or behave. It sometimes takes courage to behave with integrity and transparency. Diversity of experience and opinion is a powerful business asset. We are a team, and when we are faced with a difficult choice, it is a best practice to talk it through with trusted colleagues and subject-matter experts.

5.2. A Framework for Making Decisions with Integrity and Transparency

When you find yourself confronted by a compliance challenge or an ethical dilemma, and you aren't sure whether your plan of action (or someone else's) is right, ask yourself the following:

Would the planned action violate a rule – applicable law, the Code or a company policy? If so, then the plan of action should be clear.

If you are concerned that doing the right thing might result in retaliation, you should raise this with the Culture and People department, the Chief Legal Officer, or another member of senior leadership. You can also use EQS's whistleblowing application "[EQS Ethics Line](#)".

If there is no clear rule that applies to the situation, would the planned action violate any of our Values?

Remember, our Values (and this Code) set our ethical standards and go beyond just doing what is legally required.

Have you considered and weighed the potential impacts (both positive and negative, potential benefits and harms) of the planned action on all relevant stakeholders – and not just yourself, your department, the company?

Have you discussed your decision with a trusted colleague or appropriate member of the management team? Usually, getting other perspectives can help ensure that your reasoning is thorough.

When you have finally made your decision about the action to take, would you be comfortable taking accountability for your decision and being transparent about your rationale?

How would a close friend or relative react, if you told them about your decision and how you got to it?

Imagine that the words you are using or the action you are taking is going to be fully disclosed in the media with all the details, including your photo. If a reasonable person could be uncomfortable with the idea of this information being made public, perhaps you should think again about your words or your course of conduct.

If you feel that you're "stuck in a hole" and unable to make the right decision, don't keep digging the hole deeper. If you aren't comfortable that you or others are doing the right thing – or you fear retaliation if you do what you think is right – remember that there are many resources available to help you. The company, and particularly our senior leadership, will support you. In all cases, if you are unsure about the appropriateness of an event or action, please seek assistance in interpreting the requirements of these standards by contacting the Legal Department

PROCESS AND ENFORCEMENT

Applicability of this Code

The obligations in the Code apply to the entities, directors, officers and employees of EQS, its subsidiaries, affiliates, joint ventures and all other entities that are directly or indirectly controlled or managed by EQS. Each of us may be asked to certify to this commitment periodically.

No director, officer, manager, supervisor or employee has the authority to violate – or require conduct by others that violates – the Code, other EQS Policies or applicable laws.

Suppliers, contractors and other third parties must behave in accordance with EQS's Values in their work on behalf of EQS through compliance with this Code, to which they may be asked to periodically certify their compliance.

Discipline for Non-Compliance

Failure to comply with laws, the Code or company policies may result in disciplinary action, up to and including dismissal. Civil or criminal violations may also be prosecuted.

Investigation of Non-Compliance

It is EQS's policy and intent to investigate any reported violation of the Code, other EQS Policy, or applicable law, and to take appropriate action, as determined by EQS, based on the results of the investigation. Reports of violations of accounting, accounting controls and audit matters will be investigated under the supervision of the Board of Directors. All other violations will be investigated under the supervision of the Chief Legal Officer. Employees are expected to cooperate in the investigation of reported violations. The investigators will not disclose the identity of anyone who reports a suspected violation or who participates in the investigation, unless required to do so by applicable law.

IMPORTANT DISCLOSURES

Employees should be aware that the Legal Department, Management, Senior Leadership and the Supervisory Board are obligated to act in the best interests of EQS and do not act as personal representatives or lawyers for employees.

This Code does not create a contract, nor does it alter the terms and conditions of our employment; rather, it helps each of us to know what is expected of us – and what we can expect of one another – to make sure we always act with Integrity.