



Code of Conduct

Version: V.2023_07

Eperi GmbH

Gutenbergstrasse 4-6 / D-64319 Pfungstadt / Germany / T +49 6157 95 639 00
info@eperi.com / eperi.com

OUR CODEX	3
WE TREAT EACH OTHER FAIRLY AND WITH RESPECT	4
Inclusion and diversity	4
No discrimination	4
No mobbing, no bullying, no exclusion, no sexual harassment.....	4
Health and safety	5
WE ACT WITH INTEGRITY	5
Handling conflicts of interest.....	5
Free and fair competition	5
Prevention of financial crime	5
Compliance with economic sanctions	5
Gifts and hospitality	6
Compliance with insider information rules.....	6
Binding of business partners to our standards.....	6
WE ACT TRANSPARENTLY AND COMMUNICATE HONESTLY	6
Open and honest feedback	6
We address issues	6
Transparent products and services.....	7
External communication	7
Proper maintenance of books and records	7
Cooperation with regulatory authorities	7
WE TAKE RESPONSIBILITY	7
Corporate responsibility and sustainability.....	7
Respect for human rights.....	7
Responsible data management.....	8
Protection of assets	8
WE LIVE THE CODEX	8

OUR CODEX

This Code of Conduct is intended to remind all eperi® employees what we stand for and what values we represent! Because each of us, as part of the community, is jointly responsible for fair cooperation.

To this purpose, it is important to “always keep our eyes on the ball” with regard to our vision and mission.

Vision

Our vision is to become the go-to instance when it comes to data-centric security in Multi-Cloud environments.

Mission

We are on a mission to enable a trusted data-driven world by providing our customers innovative software solutions for data security. Wherever the data is stored, our customers stay in control.

In addition, at eperi® we define ourselves by our Purpose, which we formulate as follows:

Company Purpose

We believe that data privacy is a fundamental human right. Our aim is to allow people to always stay in control over their data. Without compromises and with the best technology. With the customer at the centre, we are driven to create a solution that is invisible to the user while meeting the highest security standards.

In doing so, we are committed to living a corporate culture in which we

- **treat each other fairly and with respect,**
- **act with integrity,**
- **act transparently,**
- **communicate honestly, and**
- **take responsibility for our actions.**

All eperi® employees, regardless of whether they are managing directors, executive or non-executive employees, interns, etc., are responsible for compliance with the principles contained in the Code. We are all expected to promptly report any known or suspected violations of the Code, company rules or applicable laws and regulations. In such cases, we may contact a trusted supervisor.

Important information, guidance for decisions to be made in day-to-day business, core values and principles are therefore reflected in the eperi® Code of Conduct.

Please take the time to read through this important document.

WE TREAT EACH OTHER FAIRLY AND WITH RESPECT

We are stronger together! How we act, how we work and the decisions we make are all about looking out for each other and treating everyone fairly and with respect.

INCLUSION AND DIVERSITY

The diversity of our team enables us to truly understand our equally diverse customer and partner landscape and their needs. Our inclusive corporate culture benefits our business and helps us being perceived as a credible partner who is trusted. We create a fair environment where people, regardless of gender, age, ethnicity, any disability, religion, sexual orientation, or cultural background, can develop freely with equal opportunities.

We welcome different ways of thinking and opinions, as they contribute to our ability to innovate, our future viability and our resilience.

Building an inclusive company requires ongoing commitment from all of us, every day. We respect and value the diverse approaches and different ideas of our colleagues.

NO DISCRIMINATION

We always treat our colleagues, business partners and customers with respect, regardless of personal characteristics. At eperi® we are judged on our performance and abilities, not on our personal background, beliefs, or personal characteristics. eperi® fosters an environment of trust, integrity, and mutual respect.

eperi® does not make employment-related decisions, such as hiring, promotions, assignment of duties or termination of employment, based on protected personal characteristics and attributes. Examples of protected personal characteristics and attributes include: Age, gender or gender identity, political affiliation, sexual orientation, family status, ethnic origin, pregnancy, nationality, language, disability, religion.

NO MOBBING, NO BULLYING, NO EXCLUSION, NO SEXUAL HARASSMENT

Where different perspectives and expectations collide, where requirements of the work task collide with personal possibilities and desires, where the operational framework conditions and the needs of people do not match, there is friction and conflict.

We all have a right to a collegial, fair, and respectful working environment. None of us want to be treated in a way that makes him or her feel uncomfortable, intimidated, or humiliated. We want to protect ourselves and others from such behaviour. Systematic hostility, harassment, and discrimination of employees among themselves or by superiors are unacceptable to us, as they contradict our values!

HEALTH AND SAFETY

We aim to create a compassionate work environment and consistently care for our physical, mental, and social health to maintain and improve our well-being in the workplace.

WE ACT WITH INTEGRITY

Securing the future of data security means we will still be there for our customers and partners years from now, just as we are today. The reputation and brand we've built will help us do that. Of course, we comply with all applicable laws, regulations and other external requirements that govern our business. The same applies to our internal rules.

HANDLING CONFLICTS OF INTEREST

It can happen to any of us! One day we may find ourselves in a business situation that also affects our personal interests, or those of our family members or friends. These personal interests may not be in line with the interests of the company. Therefore, transparency is key. Every employee should disclose any actual or potential conflict of interest to the supervisor at an early stage.

FREE AND FAIR COMPETITION

Free and fair competition is essential in order to offer our customers optimal solutions for securing their data. All employees are therefore expected to comply with applicable antitrust and competition law without exception. This requires, among other things, that we make decisions on prices and product and service offerings individually based, on our experience and knowledge of the market, and that we participate fairly and independently in tenders.

PREVENTION OF FINANCIAL CRIME

Financial crime is a violation of existing laws. Furthermore, the associated social and economic damage is enormous and endangers the future of all of us. eperi® condemns financial crime and does not tolerate any objects involved, such as corruption, bribery, money laundering, fraud, or falsification of financial statements.

COMPLIANCE WITH ECONOMIC SANCTIONS

The main purpose of economic sanctions is to bring about a change in the behaviour or foreign policy of another nation, to enforce human rights, to avoid the use of military force, and to prevent the proliferation of nuclear weapons and weapons of mass destruction. Economic sanctions are trade or financial sanctions imposed by one or more countries specifically against a state, group or individual.

eperi® is committed to conducting its business activities in full compliance with all applicable economic sanctions.

GIFTS AND HOSPITALITY

Gifts and hospitality are acceptable in principle to maintain business relationships. To avoid any appearance of impropriety, we may accept gifts or entertainment only up to a maximum value of € 20,00. In the event of a higher value, approval must be obtained from the supervisor.

COMPLIANCE WITH INSIDER INFORMATION RULES

As a member of the eperi® community, you may have access to non-public, market-relevant information. This information must be kept confidential and may only be shared with people who need it for legitimate business purposes. Always adhere to the principle that „information is given only to those who need it.“

If you have questions about how to handle insider information, please contact your supervisor.

BINDING OF BUSINESS PARTNERS TO OUR STANDARDS

It is important to us that our business partners share our values and apply the same high standards to their work as we do to ours. Business partners also have an obligation to follow our Vendor Code of Conduct.

WE ACT TRANSPARENTLY AND COMMUNICATE HONESTLY

Honesty is a cornerstone of our business model; it determines everything we do, both internally and externally. We are honest with our customers, partners, and our environment. This is a basic prerequisite for us to deliver solutions that serve the interests of all, now and in the future.

OPEN AND HONEST FEEDBACK

The first step is to deal honestly with each other. At eperi® we want an open exchange of opinions. We encourage each other to give and accept feedback. We can do this without fearing negative consequences. A feedback culture is important and helps to permanently improve products and business practices. We are equally open about our own mistakes. We share with each other what we have learned from mistakes. In this way, we prevent others from repeating the same mistakes. In this way, we help make our organization more resilient and minimize the error rate.

WE ADDRESS ISSUES

At eperi® you will always find a sympathetic ear. If you have a concern, first talk to your supervisor or the person you trust. Most likely, they can best assess the situation and help find solutions. eperi® is committed to protecting whistle-blowers. Employees who report illegal or dishonest activities they have learned about with good intentions do not have to fear any disadvantages, even if the suspicion later turns out to be unfounded. If we point out something that does not seem right to us, eperi® will take up this tip. Follow it up in an appropriate manner and, if necessary, carry out an investigation. If it turns out that there has been misconduct, eperi® will take appropriate action against the responsible persons.

TRANSPARENT PRODUCTS AND SERVICES

Fair and transparent communication about our products and services, including their exceptions and reservations, are the basic prerequisite for us to enjoy the long-term trust of our customers and partners.

EXTERNAL COMMUNICATION

We are proud to inform the public about the excellent work we do. To do this properly, it is important to make sure that we follow some basic rules. Probably the most important rule is to always act in compliance with the GDPR. When we express ourselves on social media about eperi®, we must not share there under any circumstances confidential information that is not publicly known or content that is exclusively for internal purposes.

In the private social media accounts of all employees where we express our personal opinions, we take care not to give the impression that we speak for eperi®.

PROPER MAINTENANCE OF BOOKS AND RECORDS

Proper documentation of our work helps each of us to our job to the best of our ability. Any records kept by us or created for eperi® must be accurate, complete, up-to-date and truthful. In this way, we ensure that we comply with the relevant legal requirements for proper record keeping. This helps ensure that we can make good decisions and keep any investors informed. Examples of relevant „books“ include: Expense reports, invoices, financial reporting, annual reports, contracts, emails, and other records we create or handle in the course of our eperi® activities.

COOPERATION WITH REGULATORY AUTHORITIES

Our cooperation with government agencies, such as the regulatory authority, is cooperative and respectful. This applies to all points of contact, i.e., regular contacts as well as special inquiries, audits, or investigations. We provide information carefully and promptly, thus enabling a transparent and fair view.

WE TAKE RESPONSIBILITY

As part of the community at eperi®, we share responsibility for acting responsibly on a personal, company-internal, but also global level.

CORPORATE RESPONSIBILITY AND SUSTAINABILITY

In line with our corporate responsibility strategy, we integrate environmental and social considerations into all our business activities. We offer sustainable products and services to our customers and partners.

RESPECT FOR HUMAN RIGHTS

At eperi®, we expect our employees to support the diverse manifestations of human rights in accordance with international standards and to integrate them into their daily actions.

RESPONSIBLE DATA MANAGEMENT

Our customers and partners entrust us with a wide variety of personal data, as do our employees. Personal data means individual information about personal or factual circumstances of a specific or identifiable natural person. We handle this data responsibly and transparently, process it with due care and in accordance with existing laws. We use them exclusively for precisely designated and permissible purposes and keep them only as long as necessary. Under no circumstances do we share them with anyone who is not authorized to know them.

To ensure confidentiality, we have established appropriate controls. Confidentiality means protecting information from being made available or disclosed to unauthorized persons or entities.

PROTECTION OF ASSETS

We treat eperi® assets as if they were our own. This contributes to the success of the company and helps us to do the best possible work for ourselves, our customers, and partners. We may only share our intellectual property with people who need it to do their jobs. We are equally prudent with respect to other companies' intellectual property. We never use it without permission.

Assets include, but are not limited to, equipment, premises, computers, network access and anything else that eperi® provides to us to accomplish our work. This also includes intellectual property such as work results, copyrights, trademarks, trade secrets or internally developed software products.

WE LIVE THE CODEX

Let us all contribute with our actions and commitment, every day anew, to live the vision and mission of eperi® and to implement it even better in the future.

At the end it's up to you! Take responsibility! Trust your inner values! Address things!

If you are unsure about a situation, bring it up at any time. You can always ask for help, turn to a trusted co-worker or a superior and be sure to be heard.