

3DSE Code of Professional Conduct

Dear colleagues,

this Code of Conduct brings together in one document the important basic rules and principles that are binding for us both today and in the future. It provides a framework for orientation and applies to each of us equally – to management, to executives and to each individual employee. It places a demand upon us, and at the same time, it is a promise to the outside world of responsible conduct toward business partners and the public, as well as in our dealings with one another within the company. Together, we have responsibility for the reputation of our company. The misconduct of individuals can cause harm to us all. Therefore, we ask all colleagues of 3DSE Management Consultants GmbH and 3DSE Management Consultants AT GmbH to read this Code of Conduct carefully and to use it together with us as a guideline for our behaviour every day.

Munich, August 16, 2021

A handwritten signature in black ink, appearing to be "Armin Schulz".

Managing Director 3DSE Management Consultants GmbH, Dr. Armin Schulz

A handwritten signature in black ink, appearing to be "Stefan Wenzel".

Managing Director 3DSE Management Consultants GmbH, Dr. Stefan Wenzel

A handwritten signature in blue ink, appearing to be "Thomas Haim".

Managing Director 3DSE Management Consultants GmbH, Thomas Haim

Preamble

What we stand for. Our mission is to optimize and transform our customers' R&D for results. Together with our customers, we find sustainable and future-oriented solutions and set new standards according to our claim: "Where we are is upfront." We create profitable innovation. We provide answers to key challenges of digitalization, innovation and increasing complexity in R&D. Engineered products, i.e. complex services and digital business models, are at the centre of our consulting. With our tried-and-tested and constantly evolving approach to consulting, which combines expert knowledge with behavioural orientation and a minimally invasive approach at the neuralgic points, we create the highest level of trust and customer satisfaction through inspiring project results.

We live shared values. We act in the overall interest of the company and build on strong shared corporate values: Personal responsibility, appreciation, loyalty, courage and determination. In addition, we are guided by our 3DSE Leadership Guidelines.

We assume responsibility for society. Therefore, we are guided by the [ten principles of the United Nations Global Compact](#). We are also committed to the [United Nations Universal Declaration of Human Rights](#).

These guidelines and agreements apply without restriction to all employees* and are binding. Any of our employees who do not behave in accordance with the guidelines can expect appropriate consequences within the framework of the legal regulations.

Building on this, this Code of Conduct summarizes the key principles and rules governing our actions and sets out the standards we expect of ourselves, including vis-à-vis our business partners and stakeholders.

* For better readability, the masculine form is used in part. This does not imply any discrimination against the other sexes.

Behaviour in the business environment

Compliance with law and order. For us, compliance with laws and regulations is an essential basic principle of economically responsible action. We observe the applicable legal prohibitions and obligations at all times, even if this entails short-term economic disadvantages or difficulties for the company or individuals. If the national laws are more restrictive than those in effect at 3DSE, national law prevails.

Fair competition. 3DSE stands for consulting competence, innovative strength, customer orientation and motivated employees who act responsibly. Our high reputation and the sustainable economic success of the company are based on this. Corruption and antitrust violations threaten these guarantors of success and will not be tolerated. We do not consider bribes or cartel agreements to be a means of obtaining a contract. We would rather forgo business and the achievement of internal goals than violate laws. Violations will not be tolerated and will result in sanctions against the individuals involved. All directors, partners, officers and other employees must be aware of the extraordinary risks that a corruption or antitrust case could pose to 3DSE, as well as to them personally.

avoiding conflicts of interest. At 3DSE, business decisions are made solely in the best interest of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organizations, should be avoided from the outset. If they nevertheless arise, they must be resolved in compliance with the law and the applicable Group policies. A prerequisite for this is the transparent disclosure of the conflict.

Money Laundering Prevention. 3DSE does not engage in money laundering activities. Each employee is encouraged to have any unusual financial transactions, particularly involving cash, that could give rise to the suspicion of money laundering reviewed by the Finance Department, an attorney or a privacy officer when in doubt.

Behaviour toward colleagues and co-workers.

Equal treatment and non-discrimination. A culture of equal opportunity, mutual trust and mutual respect is of great importance to us. We promote equal opportunities and prevent discrimination in the hiring of employees, as well as in the promotion or granting of training and development measures. We treat all employees equally, regardless of gender, age, colour, culture, ethnic origin, sexual identity, disability, pregnancy, political beliefs, social background or marital status, religious affiliation or world-view.

Human and workers' rights. We respect internationally recognized human rights and support their observance. We strictly reject any form of forced, prison and child labour. In addition, we reject any form of rough or inhumane treatment. Specifically, this includes sexual harassment, physical punishment, mental and physical coercion, and the verbal abuse of employees. Employees must also not be threatened with such behaviour. We recognize the right of all employees to form trade unions and employee representative bodies on a democratic basis within the framework of the national regulations. The right to adequate compensation is recognized for all employees. Compensation and other benefits are at least in line with the respective national and local legal standards or the level of the national industries and regions.

Occupational health and safety. The safety and health of our employees are equally important corporate goals alongside the quality of our services and our economic success. Occupational safety and health protection are an integral part of all operating processes. We cooperate with BGM experts and implement all the necessary measures in the field of occupational health management. Each of our employees promotes health and safety in their work environment and complies with occupational health and safety regulations.

Behaviour within society

Sustainable environmental and climate protection. Environmental pollution shall be avoided or at least reduced as far as possible by proportionate means. Environmental and climate protection, as well as the promotion of biodiversity, is an ongoing task that can only be met by constantly improving the level of protection through the permanent reduction of resource consumption and waste reduction. Business partners shall make reasonable efforts to this end as part of their business activities. Each employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through individual behaviour. Our employees, together with their supervisors, bear responsibility for ensuring that the nature and extent of business trips are always in reasonable proportion to the purpose of the trip and are planned and carried out economically, taking into account time and cost aspects.

Donations. We see ourselves as an active member of society and therefore get involved in various ways. We grant monetary and in-kind donations for education, science, culture and social causes. When making donations, we ensure that the donation is transparent, i.e. the use and recipient are clearly traceable. Our sponsorship activities are aimed at fulfilling our social responsibility and promoting the company's image and brand awareness. Sponsoring thus involves exchange transactions. Care must always be taken to ensure that performance and consideration are in reasonable proportion to each other. We do not make any financial contributions, especially donations and sponsoring measures, to political parties in Germany and abroad, party-affiliated or party-like organizations, individual elected officials or candidates for political offices.

Political advocacy. We communicate our memberships and involvement in social groups and their associations (including business and trade associations and unions) transparently. We follow the legal requirements for lobbying and avoid undue influence on policy and legislation at all costs.

Public appearance and communication. We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that he or she can be perceived as a part and representative of 3DSE in private life as well, and is therefore required to safeguard the company's image and reputation through their behaviour and appearance in public, especially in dealings with the media. Our social media guidelines help raise awareness among employees.

Handling information

Reporting. We attach importance to open and truthful reporting and communication on the company's business transactions to employees, customers, business partners, the Advisory Board, the public in general and government institutions. Each employee shall ensure that both internal and external reports, records and other documents of the Company are in compliance with the applicable legal rules and standards and, therefore, are always complete, accurate, timely and system-compatible.

Privacy and information security. Personal data will only be collected, processed or used if this is legally permitted or if the person concerned agrees to it. We are committed to the principles of the economical storage of personal data and the transparency of data processing. The instruction of 3DSE staff takes place through data training sessions.

Confidential Company Information. We take the necessary steps to appropriately protect confidential information and business records from access and inspection by non-involved colleagues and other third parties.

Protection of corporate property.

We use the company's property and resources properly and carefully and protect them from loss, theft or misuse. The intellectual property of our company represents a competitive advantage for 3DSE and therefore is an asset worth protecting, which we defend against any unauthorized access by third parties. We use tangible and intangible Company property solely for Company purposes and not for personal use unless specifically permitted.

Implementation and contact person

3DSE promotes the communication of the policies underlying the Code of Conduct. Our managers have a special role model function and their actions are measured against the Code of Conduct to a particular extent. They are the point of contact for questions about understanding the regulations and ensure that all employees know and understand the Code of Conduct. As part of their management duties, they prevent unacceptable behaviour or take appropriate measures to prevent violations of rules in their area of responsibility. Trust and good cooperation between employees and managers is reflected in honest and open information and mutual support.

For any further questions about the Code of Conduct, the management of 3DSE Management Consultants GmbH and 3DSE Management Consultants AT GmbH, as well as HR, are available to all employees and to third parties (customers, suppliers, etc.).

All information will be treated confidentially.