Code of Conduct

of the

comforte Group of Companies ("comforte")

Preamble

comforte provides its customers with innovative solutions to secure sensitive data, to minimize risk and to meet compliance and regulation requirements. With our help, organizations are protecting hundreds of millions of payment transactions, healthcare records, insurance records, and other confidential data applications and records.

We aim to be successful in the marketplace through our highly qualified employees, their innovative strength, and the reliability and regularity of our products and the services related thereto.

This Code of Conduct establishes the standards and policies that we follow to help us meet our own commitments and that of our national and international customers. Our management leads by example and is committed to fostering a culture of integrity, transparency and accountability. Everyone working for or on behalf of comforte must adhere to the standards set by this Code of Conduct, and each employee is responsible for upholding and promoting its principles. It is intended to protect both comforte and its employees. We are committed to abiding all applicable local and international laws and regulations that apply to our products and services across the world.

For us, compliance is an essential component in ensuring sustainable success. As a participant of the United Nations Global Compact, we are committed to upholding its ten principles, including the protection of human rights, fair labour practices, environmental responsibility and the prevention of corruption. We respect the right to freedom of association and apply a risk-based approach to identifying and addressing human rights and environmental impacts.

Our Code of Conduct is intended to help our employees and business partners to identify compliance risks and possible unlawful actions at an early stage. Unlawful conduct can cause substantial economic damage. Even the suspicion of a breach of law can affect comforte's market position. Each comforte employee is aware that his/her own actions may have an important impact on the reputation of comforte and the integrity of its employees and management.

This Code of Conduct sets out the framework for how comforte's values and objectives are to be implemented in daily work. It defines the basic principles for our conduct and our relationship with business partners and the public. It sets out the principles of our

corporate actions and expresses our corporate values. Although the Code of Conduct facilitates compliance with legal requirements and internal regulations, it cannot be a complete compilation of the obligations of all legal systems in which comforte operates. Employees are therefore obliged to seek competent advice in cases of doubt. Both supervisors/superiors and specialist departments such as Finance, People & Organization and Legal are available to answer questions.

1. General

comforte is committed to fulfilling its business and social responsibilities in a manner that reflects the highest degree of integrity and honesty. The relationship with business partners, third parties and the public in general has always been based on trust and good will. Only by continuing our commitment to these principles can we ensure the trust, acceptance and goodwill of our business partners and customers in the long term. The business success of comforte is the result of the joint efforts of all employees in fulfilling their responsibilities in an ethical manner. Each employee should always strive to do so in the execution of his or her duties:

- to serve our contractual partners honestly and fairly and to advise them comprehensively about their rights and obligations;
- to fulfil our contractual obligations and other commitments;
- to avoid placing a public official in a compromising position or impairing the judgement of a public official through gifts or compensation;
- to promote and sell our software and services in a responsible and lawful manner
- to maintain the integrity and reputation of comforte by protecting confidential and proprietary information that becomes known to an employee in the course of his or her employment
- to understand the proper use of our electronic communication systems, including social media; and
- to perform activities for comforte in compliance with all applicable laws and regulatory requirements, policies, guidelines and procedures.

2. Quality of our Software and Services

The quality and reliability of our software products and services have utmost priority. We strive to constantly continue to improve the quality of our software products and services.

3. Anti Bribery and Corruption

Compliance with laws against bribery and corruption around the world is not just a legal requirement; it reflects our determination to act with the highest degree of integrity and honesty. comforte prohibits any form of bribery or corruption. comforte requires in particular that the employee:

- does not offer or engage in any act of bribery or offer or give any unusual or unauthorized payments or incentives of any kind in the course of business;
- did not acquire any business in which a bribe, unofficial payment or incentive is offered to customers, potential customers or third parties;
- rejects any bribery or unusual payment offered in the course of business and that any such offers are reported to the competent supervisors;
- does not use any funds or assets of comforte for an illegal, improper or unethical purpose
- do not pay any bribes.

Even modest gifts may be considered a bribe or incentive under applicable law.

comforte does not tolerate any kind of corrupt behaviour.

Gifts, hospitality and invitations (e.g., to entertainment) shall not be accepted or granted by our employees if it is likely to influence a person's business decision or to obtain an improper advantage for comforte.

Monetary gifts may never be offered, granted, demanded or accepted. Gifts or other benefits must under no circumstances be given to authorities or officials.

Corruption, bribery and any other form of taking advantage or favouring persons through a benefit in connection with the award, acceptance or execution of a contract or an order is strictly prohibited.

As part of our system to ensure that corruption is prevented we have released an Anti-Bribery and Corruptions Guideline and a Gifts and Invitations Guideline. These provide guidance in everyday business.

4. Fair competition

comforte takes part in competition exclusively in a fair manner and without any illegal agreement or arrangements and undertakes in particular to comply with anti-trust law. Unfair measures such as price agreements with competitors, allocating customers, allocating geographical markets, allocating market shares, or dictating or controlling a customer's resale price are not permitted. We will not exchange with competitors on supply relationships, market strategies or supply behaviour.

We expect the same behaviour from our business partners.

5. How we treat our employees

We are committed to treating our employees with respect. We tolerate neither discrimination nor harassment. Regardless of age, gender, race, origin, political commitment, religion, physical constitution or sexual identity, we assess the results of each employee objectively. Fairness, respect, team spirit and openness characterize our work and our relationships within and outside of comforte. We expect the same from our business partners.

We respect and support the protection of international human rights within our sphere of influence, including the United Nations Guiding Principles on Business and Human Rights, and to upholding the principles of the United Nations Global Compact. We reject forced labour, modern slavery and human trafficking, as well as all practices that exploit people. All work must be voluntary. We do not tolerate any form of coercion, threats, deception or the withholding of identity documents. Employees must be free to leave their employment after reasonable notice in accordance with applicable laws. We do not tolerate child labour in our supply chain.

We respect the right of employees to freedom of association and collective bargaining in accordance with applicable laws.

We promote safety and health-conscious behaviour in order to protect and preserve the life and health of our employees. We are committed to a safe and productive working environment for our employees and comply with applicable health and safety laws.

We expect our business partners to uphold the same standards and to strive to ensure transparency and compliance within their own operations and supply chains. Any violations of these principles are taken seriously and may result in the termination of business relationships.

6. Money laundering

Every employee is responsible for being attentive and for preventing transactions that could potentially expose comforte to suspicion of money laundering. The acceptance of cash payments is strictly prohibited. Anonymous economic transactions are prohibited. When entering into a relationship with a customer, we need to watch out for warning signals that may indicate possible money laundering violations.

Compliance with anti-money laundering laws and the financing of terrorist or criminal activities in all jurisdictions in which we operate also reflects our commitment to professional and fair conduct and integrity. comforte is also obliged to identify and report such suspicious transactions or activities. Every employee is therefore requested to report suspicions or even positive knowledge of money laundering or a financial crime to the Chief Financial Officer. comforte will comply with all applicable anti-money laundering laws.

7. Conflict of Interest

Each employee shall perform his or her duties in such a way that actual or potential conflicts between personal or third party interests and the interests of comforte are avoided. We do not maintain personal relationships with customers, suppliers or competitors that could influence our business decisions

comforte also expects every employee who deals with public officials on behalf of the company to act in an honest and prudent manner. All contacts with authorities must be properly documented. Any payment of money or other consideration must be recorded in full in the correct account with supporting documents. It is prohibited to offer, promise or give money, assets or other consideration to any government official, political party or candidate for political office for the purpose of acquiring or continuing business or for the purpose of influencing the business climate to our advantage. Furthermore, it is prohibited to use assets or other consideration as a contribution or loan, directly or indirectly, to any political party, office holder or candidate.

We conduct our business in an open, honest and ethically responsible manner. Our actions are always characterized by fairness, good faith and integrity. We expect the same from all persons with whom we do business.

In particular, personal relationships must not influence the conclusion, amendment or settlement of an agreement or the extension or termination of a business relationship. Business transactions with companies in which an employee of comforte, his or her spouse, life partner or other close relative are involved or

employed in a managerial function may only be carried out with the consent of the management.

All employees are obliged to disclose any potential conflicts of interest to their supervisor.

8. Confidentiality and Security of Information and Data

Our employees acknowledge that in the course of their employment at comforte they have access to confidential and protected information belonging to comforte, customers, potential customers and business partners. This information may be of various kinds, including data stored in databases, recommendations and other contents in reports, e-mail messages and attachments, research tests and results, customer lists and details of assets, business operations of customers, personally identifiable information and internal documents relating to the business approach, strategy and organisational structure of comforte, customers, potential customers and business partners.

We are extremely concerned about the protection of such confidential information. Regardless of how such information is created, communicated or stored, all employees are responsible for protecting it against unauthorized disclosure, preventing its improper destruction or alteration, ensuring access to it and its availability due to business requirements, informing comforte in the event of illegal appropriation or unauthorized access or use of information, and complying with all applicable legal, regulatory and contractual requirements regarding the use and handling of information.

We are committed to maintaining high standards of cybersecurity and to protecting our systems and data against unauthorized access, breaches and misuse, supported by our Information Security Management System (ISMS) in accordance with ISO/IEC 27001.

Confidential and proprietary information may not be used for personal use, reproduced or illegally stolen. They may also never be discussed outside the organization or made available to outside persons without the express permission of comforte.

Trade secrets and other business knowledge may not be passed on to third parties or even made public. No employee may use intellectual property and business information of comforte, its actual or potential customers and/or business partners its customers for his or her own purposes.

All employees are required to treat data and information confidentially and to protect them from unauthorized access by third parties. Confidential information about our

business and that of our customers is highly sensitive and must be kept secret beyond the end of their employment with comforte.

comforte has policies in place that our staff need to follow for using smartphones, tablets or any other personal device for business purposes. We have password controls, device locking and remote erasure in place. Lost or stolen items must be reported immediately.

9. Data integrity, Data Protection and Use of Electronic Means

We maintain data integrity by making sure that information is accurate and stored correctly. Employees must use digital systems, data and emerging technologies such as artificial intelligence responsibly and in accordance with applicable laws, internal policies and ethical standards.

Every employee must familiarize himself with the guidelines of comforte regarding electronic data protection and use, i.e. the status of information stored or processed in or otherwise contained, distributed or accessed in the electronic communication system (including access to the Internet) of comforte. Access to and use of any part of this system shall be provided only to authorised personnel for the sole purpose of operating the business of comforte.

We have put safety measures in place that ensures that data cannot be accessed by unauthorised third parties.

In addition, some aspects of the electronic communication system of comforte and some information on the Internet may be protected by copyright or otherwise. No such information should be copied, uploaded, downloaded or distributed without the permission of the copyright owner or publisher.

To the extent that the Company provides access to and use of electronic media for business purposes, such electronic media may not be used for purposes that are contrary to laws, regulations, orders or our comforte policies.

We will collect, process and store personal data only in accordance with the EU General Data Protection Regulation (GDPR), other applicable German data protection legislation and the equivalent laws and regulations in other jurisdictions to the extent applicable.

We have appointed a data protection officer in accordance with the applicable legal requirements under German law to whom every employee can address questions and comments.

10. Trade Export Regulations

Our employees shall comply with all national and international customs, export and foreign trade regulations.

11. Business Continuity

We have implemented a Business Continuity Management System (BCMS) to ensure the resilience of our operations. This includes business continuity and disaster recovery plans designed to prevent, respond to and recover from potential threats such as natural disasters or cyber-attacks to protect our employees and assets and to make sure they can function quickly when disaster strikes.

12. Sustainability and Environment

We comply with applicable environmental laws and regulations. We are committed to improving environmental performance. We strive to minimize the impact of our business activities on the environment. We are committed to achieving Net Zero by the year 2050.

We achieve this goal through the economical use of resources, the careful use of consumables in everyday work, the prevention of air pollution, the limited use of packaging and the minimum generation of waste as set out in our Environmental Guideline.

13. No Political Contributions

We do not make political contributions to any individual, political party or organisation in any country. This helps us to operate independently and free from any political ties.

14. Following Correct and Established Procedures

Our financial, accounting and procurement controls are designed to ensure that we do not mislead any involved third party about the financial situation of comforte. When buying goods or services, we follow the correct procurement processes.

15. Whistleblowing

We encourage all employees and business partners to speak up if they observe or suspect misconduct. We do not tolerate retaliation against anyone who raises concerns in good faith.

If one of our employees encounters irregularities in the course of his/her work, he/she can either inform their superiors or inform or contact the Compliance Team (compliance@comforte.com) in accordance with our whistleblowing guideline.

These guidelines provide a secure and confidential procedure for employees to report suspected illegal or unethical acts and activities within comforte without fear of reprisals.

comforte treats all reports confidentially and sensitively. Unless comforte is expressly obliged to do so by law, only those employees of comforte who are investigating the report will be informed of the identity of the reporting person. The reported information will not be disclosed to any other person without prior written consent of the reporting person. Furthermore, all reports made according to these principles will be examined and investigated, even if they are made anonymously. If an employee makes a report that is not substantiated by the subsequent investigation, comforte will not take disciplinary or other measures against him/her, provided that these persons have not acted illegally or improperly in any way with regard to the report. However, the employee shall be required to exercise reasonable care when making the report. Deliberately incorrect reports are not protected.

16. Training

comforte is committed to maintaining a strong culture of compliance and integrity through regular and comprehensive training programs. All employees are required to participate in mandatory Information Security training to ensure the protection of sensitive data and systems. In addition, targeted training is provided on key compliance topics such as anti-bribery and corruption, the appropriate handling of gifts and invitations, and the responsible use of emerging technologies, including artificial intelligence.

17. Legal Consequences in Case of Non-Compliance

A breach of any of the rules set forth herein may result in financial loss, damage to comforte's image, or both. However, individual employees may also be liable for damages or even be liable to prosecution. Compliance with this Code of Conduct is therefore of great importance. Employees who violate legal regulations, internal regulations or this Code of Conduct must expect disciplinary and, if necessary, legal consequences.

In the event of questions or ambiguities, employees can always contact their supervisor/superior, a member of comforte's management or the Compliance Team.