

Doing
what's
right.

CODE OF ETHICS

Dear colleagues,

We see an increasing speed of change impacting our customers, markets and us at TAKKT Group, and this trend is set to continue. Despite these changes, some core principles remain constant in guiding us: adhering to applicable laws, ethical standards, as well as our core values, that are essential for our interactions and the success of our business.

At our company, integrity, respect, and responsibility guide all our actions. We believe that our success is built on the trust of our customers, employees, shareholders, and stakeholders, that we earn through our commitment to our values. By consistently aligning our actions with these principles, we ensure that we meet and exceed the expectations of those who rely on us. The Code of Ethics is designed to serve as a guide for our behavior in our professional daily life, acting as a compass for making the right decisions. It reflects our corporate culture and our shared commitment to fair and respectful cooperation.

Please familiarize yourself with our Code of Ethics which supports you in making responsible choices, acting with integrity, and spotting questionable practices should they arise.

In case you notice something concerning or believe something to not be right, please speak with your leader or use the Compliance Helpline.

If you have any questions or need assistance, feel free to reach out to the Compliance Team directly.

TAKKT Group's reputation starts with you. Thank you for upholding our standards.

Andreas Weishaar
CEO TAKKT Group



Whenever we encounter an ethical or legal dilemma, we resolve it in line with the Code of Ethics.

ABOUT THIS CODE OF ETHICS

This Code of Ethics is an expression of who we are and how we want to be perceived. We put the Code of Ethics into daily practice, and we are all expected to act in accordance with its content and spirit.

Every TAKKT employee is responsible for seeking advice in case of questions or uncertainty. Every employee is encouraged to report actual or suspected misconduct.

TAKKT is committed to maintain confidentiality where legally possible and protects those raising a concern against retaliation.

This Code of Ethics was approved by the Management Board of TAKKT AG on September 26, 2023 and has also been passed by all TAKKT companies. It applies to all employees of TAKKT regardless of rank or title. Breaches of this Code of Ethics, our internal Policies and Regulations or applicable law will result in remedial, corrective and, if necessary, disciplinary action up to and including termination of employment.

The Code of Ethics applies to the entire TAKKT, which means both TAKKT AG and all subsidiaries. It replaces the Code of Ethics of TAKKT AG dated December 2013.



DOING WHAT'S RIGHT

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We align our actions with TAKKT's eight principles.



ETHICS CHECK

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Dilemmas can come in all shapes and sizes. When you are uncertain about what to do, remember our TAKKT values impactful and caring and try this quick “ethics check”.



LET'S TALK

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All concerns will be handled in strict confidence in any case.



DOING WHAT'S RIGHT

We align our actions with TAKKT's eight principles.

**We shape new worlds
of work - for our
customers and you**

How do we know what the "right thing to do" is? We always must ensure that we do business in line with laws and regulations wherever we operate. That is a given. But there are many situations where the answer may not be so clear. Some things are black and white, like having to pay taxes when due. Others may be less so because the rules are imprecise, or you are left with a judgment call. This Code of Ethics sets out the principles we hold ourselves accountable to. It contains our commitment to doing what's right. But it also helps us make good choices and ensures we act with integrity.

OUR 8 PRINCIPLES



ANTI-TRUST & FAIR COMPETITION : PAGE 12

We compete fairly

**IT & DATA SECURITY AND
DIGITAL MEDIA : PAGE 14**

The efficient operation and security of our IT systems and data is the basis for the effective functioning of all our business processes

RESPECT FOR THE LAW : PAGE 8

We comply with all laws and Regulations

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Business decisions are made exclusively in the interest of TAKKT



**RESPONSIBILITY TO THE ENVIRONMENT AND
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Bringing new worlds of work to life by caring about environmental resources, people, and customer success

**FAIR EMPLOYMENT PRACTICES,
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We create fair and safe places to work and nurture fair relationships with each other

NO CORRUPTION : PAGE 11

We do not tolerate any form of corruption

**SAFEGUARDING ASSETS
AND INFORMATION : PAGE 13**

Each of us is responsible for protecting and preserving the company's property



RESPECT FOR THE LAW

We comply with all laws and regulations

» THE PRINCIPLE

We respect and comply with all applicable laws, regulations, our internal policies and guidelines. TAKKT respects internationally recognized human rights, such as the UN Global Compact, and supports their observance. We make sure we understand all relevant laws and regulations prior to starting any business, abide by their principles and ensure through our actions that we do not inadvertently violate those laws.



THE PURPOSE

At the center of TAKKT's compliance values is our commitment to the highest standards of integrity and ethical conduct. This starts with complying with the law and applicable regulations.

THE PURPOSE

TAKKT and society at large shall become better and safer places to live and work where everyone has equal opportunity to realize their potential. Furthermore, we are convinced that inclusive and diverse teams are more creative and drive necessary change more intensively – making us a better employer and a better business, bringing us closer to our employees and our customers.



FAIR EMPLOYMENT PRACTICES, DIVERSITY & INCLUSION

We create fair and safe places to work and nurture fair relationships with each other

► THE PRINCIPLE

We create fair and safe places to work where everyone can develop their potential. We will not tolerate discrimination. Harassment, retaliation, bullying or disrespect have no place within TAKKT. For us, the contribution of each individual counts.

We will actively take steps to build and foster a diverse and inclusive culture so that everyone is treated with dignity and respect. Our teams are educated on inclusiveness and including different perspectives and our business processes and decisions give all employees an equal opportunity to contribute to our goals.



HANDLING CONFLICTS OF INTEREST

Business decisions are made exclusively in the interest of TAKKT

➤ THE PRINCIPLE

Business decisions are made exclusively in the interest of TAKKT. Personal interests especially those of a financial nature, must not play a role at any level of decision-making. If employees experience an actual or even merely potential conflict between their business and private interests, the matter must be disclosed to the manager to seek a solution – if necessary, by consulting the next level of management or the team Legal & Compliance.



THE PURPOSE

To maintain trust and confidence within TAKKT and with all others dealing with us, we must ensure that we make decisions that are in the best interest of TAKKT.



THE PURPOSE

Corruption is corrosive and destroys trust in businesses. It reduces the chances of bringing the best products and services for the best price to those who need them most and supports the existence of unethical or illegal structures.

NO CORRUPTION

We do not tolerate any form of corruption

THE PRINCIPLE

Business decisions at TAKKT are based on objective criteria. Decisions must never be influenced by the prospect of giving or receiving personal benefits.

TAKKT employees are prohibited from offering, demanding or accepting inappropriate gifts and entertainment under any circumstances. We recognize that giving and accepting gifts and corporate hospitality can be a legitimate way to generate long-lasting business relationships. Specifically, gifts and hospitality must always be appropriate, represent bona fide business expenditures

and must not be offered or accepted if doing so could influence the outcome of a business transaction or be perceived as influencing such a decision. Gifts or hospitality involving government officials are prohibited.

When in doubt, employees must seek prior permission from their manager and report immediately when a favor has been given or received that might exceed these boundaries.

Transparency is the best means of avoiding even the appearance of bribery or corruption.

THE PURPOSE

Restricting competition is illegal. We believe that fair competition is in everyone's best interest, resulting in more dynamic markets with wider choice, better value and increased innovation. Free competition leads to the best possible allocation of human, financial and economic resources, benefiting all market participants and creating a future worth living.



ANTI-TRUST & FAIR COMPETITION

We compete fairly

► THE PRINCIPLE

We are mindful of our responsibility in the area of competition law. We compete energetically, fairly and always within the law, on the merits of our products and services alone. We will not take part in any collusive arrangements with competitors or conduct that unlawfully prevents or restricts competition. Specifically, we must not engage in any form of communication or agreement with competitors which tries to:

- a) fix prices, credit terms, discounts or rebates,
- b) allocate contracts, markets, customers or territories, or
- c) boycotts certain customers or suppliers.

SAFEGUARDING ASSETS AND INFORMATION

Each of us is responsible for protecting and preserving the company's property

➤ THE PRINCIPLE

We use our assets in a proper manner and for their designated purpose. All of us are responsible for the prevention and detection of fraud, theft, misappropriations, and other irregularities. Some of our most valuable assets are not tangible, but include our trade secrets, intellectual property and company confidential information. We must guard our intangible assets just as we would our company's equipment or money.



THE PURPOSE

Any improper use of TAKKT resources may result in significant added costs, disruption of business processes or other disadvantage to TAKKT. Theft, carelessness and waste hurt our financial performance.



THE PURPOSE

Attacks have increased in recent years – a downside of digitization. Receiving, processing and passing on information – this forms the basis for all business processes. Internal knowledge must not fall into unauthorized hands and we must ensure that we always have access to the correct and complete information to run the business without interruption and to comply with our financial reporting obligations.

Furthermore, responsible use of data and information provided to us by others is a key element to maintain trust. Unintentional copyright infringement and data protection violations can quickly result in legal disputes.

IT & DATA SECURITY AND DIGITAL MEDIA

The efficient operation and security of our IT systems and data is the basis for the effective functioning of all our business processes

► THE PRINCIPLE

We place great importance on information security including IT security and data protection, to protect TAKKT against threats and attacks. IT and Data Security is much more than a matter of IT Security department. All of us are asked to use technology in a proper and responsible way and in line with applicable standards as well as to adhere to company policies. This principle also extends to the use of digital and social media. These new channels allow us to communicate even faster and more effectively – but they also harbor completely new sources of danger. For this reason, we are all called upon to exercise the same caution when dealing with digital and social media.

RESPONSIBILITY TO THE ENVIRONMENT AND COMMUNITIES

Bringing new worlds of work to life by caring about environmental resources, people, and customer success



THE PURPOSE

We firmly believe that stopping climate change and protecting nature are important tasks for our generation. We know and accept the role we play in creating a more sustainable future for planet Earth and are doing our part. Social engagement helps create a livable future and supports the communities in which we operate. We do not take sides with any political party, but we will speak out and make our positions known when and where appropriate.

► THE PRINCIPLE

Responsible use of the environment and natural resources is a matter of course for TAKKT. We use natural resources appropriately and sparingly to ensure that our activities have as little impact on the environment as possible. We promote environmental awareness among our employees and are committed to the dissemination and application of environmentally friendly technologies through our product portfolio design, among other things.

As a responsible member of society, TAKKT supports social and humanitarian projects as well as projects that benefit the environment. TAKKT does not make political donations. Donations are made exclusively to reputable projects and organizations. We encourage our employees to engage in voluntary work and support them in doing so.



ETHICS CHECK

Dilemmas can come in all shapes and sizes. When you are uncertain about what to do, remember our TAKKT values **impactful** and **caring** and try this quick “ethics check”.

ETHICS CHECK

Asking yourself these three questions:



Is it legal?

This goes right to the core of the matter. Does it violate law, our policies or this Code of Ethics – or does it feel like it might? If the answer is yes or possibly, the action should definitely not be taken. Talk to your Legal & Compliance team about next steps.



Is it fair and balanced?

We aim for commercial success of TAKKT, therefore we should avoid great imbalances or unfairness of our actions in favor of long-term relationships and mutual respect.



How will it make us feel about ourselves?

Would the decision align with our own sense of right and wrong? Could we explain it to someone else in just one sentence? Would we feel proud of the decision we made when our action was on display for others to see?

Let the three questions sink in ...

... and talk to others about it to find out whether what you think of doing is truly the right thing to do. When in doubt, listen to what others think about it. Consider advice or objections from others. The contacts listed under section “Let’s Talk” are at your disposal for advice and can be consulted at any time.



LET'S TALK

All concerns will be handled in strict confidence in any case.

**Speak up
when things
aren't right**

At TAKKT, we strongly believe that long-term success can only be achieved together as a team in a trust-based and open environment. That is why TAKKT wants every employee to feel comfortable to ask questions about this Code of Ethics and seek guidance when they are uncertain about what's right in a particular situation.

But more importantly, we ask everyone to raise concerns when they witness something that is or could be in breach of our Code of Ethics, any of our policies or the law. Upholding our commitments is everyone's responsibility and we all are personally accountable for ensuring compliance with all applicable laws and regulations.

There are **several resources** you can turn to any time you are unsure about the right course of action or wish to report an issue that concerns you:



Immediate manager

HR Partner

Legal & Compliance Team



When it is difficult or impractical to communicate to any of the colleagues mentioned on this page, the **Compliance HelpLine** – a confidential hotline for anonymous reporting- is available if preferred.

In any case, your matter will be handled in strict confidence.

Anyone who raises a potential concern or provides information related to a compliance investigation will not suffer any negative consequences.

TAKKT will not tolerate but track any attempt to retaliate against employees who, in good faith, support us in our effort to uphold our commitment to doing what's right.

The English version shall prevail in the event of contradictions or ambiguities due to the translation.

**Do you have questions, comments,
or something to share?
Get in touch.**

Please contact your Compliance
Team at:
Compliance@takkt.com

**DO WHAT'S
RIGHT**