

## Code of Conduct for all employees and freelancers

### Preamble

The purpose of our Code of Conduct is to create a transparent and solid corporate culture and to preserve the integrity of SKope GmbH by supporting employees in maintaining and promoting standards of good business practices. Our Code of Conduct encompasses our core values as well as our Corporate Social Responsibility Principles. All employees (including temporary employees and freelancers) and directors must comply with SKope's Code of Conduct and other company policies. If you are not sure whether an activity is acceptable, you should contact the managing directors.

### Personal Conduct

As an employee of SKope, you are expected to conduct your business responsibly and show respect for business partners, colleagues and others, including different cultures and customs. SKope does not accept any kind of harassment, violence, discrimination or other unacceptable behavior.

### Ethics

The company's policies require its employees to maintain high standards of business and personal ethics in the performance of their duties and responsibilities. Employees must pay attention to fairness, honesty, and integrity in every aspect of their dealings with others.

### Human rights

The company supports and respects the protection of internationally recognized human rights and we want to ensure that we do not participate in human rights violations. Any violation of basic human rights is completely unacceptable.

### SKope and the environment

SKope expects its employees, suppliers and service providers to reduce their negative environmental impact by protecting the environment, conserving natural resources and continuously striving to act ecologically.

For our employees, this means, above all, checking business trips in general and the use of the aircraft for their necessity and meaningfulness and using online formats/tools and public transport and long-distance transport accordingly. In addition, paper and non-recyclable materials should be avoided as far as possible.

### Equal opportunity

SKope is committed to an inclusive work culture and will provide equal employment opportunities and treat all employees fairly. SKope does not accept any form of harassment or discrimination based on race, color, religion, sex, sexual orientation, national origin, age, disability, or veteran status.

## **Work**

The company supports freedom of association and the effective recognition of the right to collective bargaining. We support the elimination of all forms of forced labour as well as the effective elimination of child labour.

## **Legislation**

The Company will comply with all applicable laws and other government regulations in the country in which it operates. It is the personal responsibility of each employee to adhere to the standards and restrictions imposed by these laws, rules, and regulations.

## **Occupational health and safety and the environment**

The Company's policies state that the Company shall operate in a manner that protects the health and safety of its employees, its customers, the public, as well as the environment, and complies with all applicable occupational health and safety, safety, and environmental regulations to ensure the protection of the Company's environment, employees, and assets

## **Relationships with customers, service providers, competitors and authorities**

The company wants fair and open competition in all markets, both national and international. Customers should be treated with insight, respect and understanding. Suppliers and service providers must be treated impartially and fairly. Cooperation with public authorities must be carried out in an appropriate and open manner.

## **Corruption**

The company fights corruption in all its forms, including extortion and bribery. Loyalty and conflicts of interest The company requires all employees to be loyal and to refrain from any action or representation of interests that makes it difficult to carry out their work objectively and efficiently. Conflicts of interest are to be avoided.

## **Confidentiality and data protection**

It is important that every employee protects the confidentiality of company data. Confidential data includes data such as non-public information about the Company's operations, financial results and prospects, and potential corporate transactions. The processing of personal data must be limited to what is necessary and must be carried out in compliance with the due diligence obligations required by law.

## **Proper use of company assets**

Employees have a responsibility to protect the company's assets from theft and loss and to ensure their efficient use. The Company's assets may only be used for legitimate business purposes and only by authorized employees or their designees.

## **Drugs and alcohol**

The Company's policies prohibit the illegal use, sale, purchase, transfer, possession or consumption of alcohol and other substances subject to legal restrictions other than medically prescribed medications on the Company's properties, unless authorized by the Company.

### **Corporate communications**

Only certain authorized employees are allowed to communicate with the media, securities analysts and investors about the company. All enquiries from regulators or representatives of public authorities must be forwarded to management.

### **Money laundering**

The company strictly rejects money laundering in any form. It will take the necessary steps to prevent their financial transactions from being used by others for money laundering.

### **Integrity of company records**

All business records, expense reports, vouchers, invoices, reports to authorities, and other reports must be accurate. The company's books and records must be prepared carefully and honestly and must accurately reflect our transactions.

### **Reporting Violations**

Employees who observe or become aware of a situation that they consider to be a violation of the Code of Conduct are required to inform their immediate superiors or a member of the company's management. All such reports will be taken seriously and all reports of breaches will be investigated where necessary. The Company will not impose or permit sanctions based on reports made by an employee in good faith.

*This summary of the Code of Conduct of SKope GmbH was approved by the management on August 12, 2020. The full Code of Conduct and other policies are [www.skope.de](http://www.skope.de) available on our corporate website .*