

# INTEGRITY

- the right thing to do.

# F O R E W O R D

For us, integrity means doing the right thing, abiding by internal and external rules, acting according to our corporate values and listening to our conscience. This has been our conviction since the company was founded in 1996. It is the basis for our actions and without it the company would not be where it is today. „We“ - that is CPB SOFTWARE AG together with its subsidiaries in Austria and Germany and all employees up to the highest management level and the members of the executive bodies - can only be successful in the long term if we live up to our social responsibility, and in doing so it depends on each individual.

We always make decisions with our corporate values in mind, namely reliability, respect, team spirit, efficiency, innovation, sustainability and humanity. We share these seven corporate values and live them equally at all our locations.

Of course, this Code of Conduct cannot take into account every situation in which we make decisions, but it is intended to provide orientation for all of us in our everyday professional lives and in critical situations, and to help us make the right decisions.



  
Michael Draschl  
Vorstandsmitglied

  
Ing. Martin Schanda  
Vorstandsmitglied

  
Michael Gerlach  
Vorstandssprecher



### *Recipients of this code of conduct*

The provisions contained in this Code of Conduct apply equally to all employees of the Group companies up to the highest management level. Each employee is personally obliged to comply with the high standards set out in this Code of Conduct and thus contribute to the success of the company. The Executive Board, management and executives act as a guide and role model to all employees. The responsibility to comply with this Code of Conduct lies with each individual employee.

We also expect our business partners, such as customers and suppliers, to observe the principles of this Code of Conduct and to comply with the law. We choose our business partners on the basis of our corporate values.

### *Transparency & speak-up culture*

We are convinced that trust is created with honesty, openness and transparency. We strive to maintain these strengths both in our dealings with each other and in our dealings with business partners, and we also expect this honesty, openness and transparency from our respective dialogue partners.

We learn from the past and face new challenges. We encourage each individual to voice his or her opinion if he or she feels that something is not going right or there is a possible risk (speak-up culture), as this offers great potential for improvement and further development.

There is also a transparent and open approach to mistakes. Nobody is perfect, but you can learn and develop from mistakes. Our corporate culture is designed in such a way that wrong decisions are recognised and corrected. It is up to each individual employee to take responsibility and create a working environment in which there are no inhibitions about addressing possible mistakes. We perceive problems and tackle them together instead of looking the other way.

## *Principles of cooperation*

The most important asset of our company is the people who work for us and the passion with which they do so. We are committed to fostering a respectful and equitable environment for all employees. In doing so, we also respect their privacy and treat each other fairly.

Team spirit, mutual trust and appreciative interaction are important to us. We always adopt a friendly tone. Tolerance and respect are fundamental for us, because only in a tolerant working environment can people show and realise their individual potential. Managers promote a culture of respectful cooperation and are keen to strengthen their team's sense of belonging. New ideas, perspectives and approaches are heard and discussed in an appreciative manner. We are committed to promoting equal opportunities. Any form of discrimination, harassment or bullying has no place with us. This also applies in the area of social media.

A good culture of discussion is also important to us when dealing with our business partners. We meet at eye level and strive to ensure that everyone involved feels properly understood and fairly treated.

## *Health & well-being*

The health and well-being of our employees is of great importance. We create working environments in which employees can develop and support health promotion in the areas of workplace ergonomics and healthy nutrition. In addition, all locations have the option of consulting the respective company doctor, to ensure that our employees feel well looked after in this area too.

Various team events strengthen togetherness and create shared memories outside the office as well. In addition, we offer framework conditions that support employees in giving their best in their individual life situations, in remaining productive and, for example, in achieving a better work-life balance through the possibility of mobile working.





## *Compliance with laws & other requirements*

We comply with laws, current guidelines, case law and internal and external requirements. We respect the globally applicable regulations and standards for the protection of human rights. This includes, in particular, the rejection of child labor and any form of modern slavery.

Due to our highly sensitive operating environment, we also pay particular attention to money laundering and insider trading. We cooperate with the supervisory authorities in the event of regulatory investigations. The effectiveness and security of our internal control system are constantly optimised through regular reviews.

We observe all rules for fair competition, because our customers choose us based on the quality of our products and the reputation of our company.

All employees are responsible for keeping honest and accurate records. These records include, for example, emails, financial or sales data, presentations, minutes or accounting data. We do not add anything or leave anything under the table, but present things transparently as they are.

## *Prevention of bribery & corruption*

We never give or promise anything of undue value to people in order to win business, obtain more favourable terms or otherwise gain an undue advantage. Bribery and corruption are contrary to our corporate values. We convince our business partners with the quality of our products and services. We make decisions for objectively comprehensible reasons and do not tolerate corrupt behaviour or undue influence.

In our dealings with business partners, invitations and gifts are permissible to a reasonable extent, provided they are offered or given in a transparent manner. If there is any appearance of undue influence, we will refuse. We are also generally cautious about gifts and invitations to our business partners.

If there are concerns about the appropriateness of a gift, invitation or similar, this must be discussed with the respective manager.

## Conflicts of interest

Business decisions must not be influenced by personal or own financial interests, which is why such situations are avoided as best as possible. If conflicts of interest exist, we disclose them to the respective manager and seek a solution together with him or her.

Conflicts of interest can arise, for example, when one

- is a board member of another company: the acceptance of a mandate on the executive board, supervisory board, advisory board or other body of another business enterprise could lead to conflicts of interest. Such mandates require prior approval by the Executive Board.
- is engaged in secondary employment: any gainful secondary employment must be reported to the responsible manager prior to commencement so that it can be examined whether conflicts of interest may exist. If there is a conflict of interest, the secondary employment may be prohibited.
- is involved in competing companies: the participation must be disclosed to the manager so that it can be checked whether there is a possibility of a conflict of interest.
- has family members who have a personal or business relationship with the company or our business partners: such a relationship must be disclosed to the manager in order to clarify any conflicts of interest involved.

Conflicts of interest should be disclosed as early as possible so that a joint decision can be made on how to deal with them, because even the appearance of a conflict of interest can have a damaging effect on our reputation.





## *Information*

We handle information responsibly. This may include new developments, financial forecasts, emerging business relationships, strategic plans or trade secrets. The protection of information is of great importance, as it is one of a company's most important assets. All employees are therefore obliged to take part in regular information security training.

Neither professionally nor privately do we disclose information to outsiders that would give them unauthorized insight into business processes. Media contact is also reserved for authorized persons only.

## *Data Protection*

We protect the personal data of our employees and our business partners because their trust in us is essential. We ensure that the currently valid specifications and regulations of data protection are adhered to when processing personal data. Personal data is only processed to the extent permitted by law or by the persons concerned. Our employees and business partners should be able to rely on the fact that their data is safe with us.

All employees are obliged to participate in regular data protection training and are responsible for ensuring that personal data is protected against unauthorised access by third parties and that all necessary precautions are taken to prevent unauthorised use.

## Environmental protection & resources

A sustainable approach to the environment is important to us. Therefore, we treat its resources with care and always strive to operate sustainably. Unneeded equipment is switched off, we are economical when printing documents, and old equipment is not disposed of if possible, but reused by donating it to charitable associations. For longer journeys during the lunch break, we use, for example, bicycles or the company's own e-scooters as environmentally friendly alternatives to the car.

## Social & community engagement

For us, entrepreneurial success is inextricably linked with social responsibility. That is why we want to share our success with others through the „CPB helps“ programme. We are not pursuing any economic self-interest. We do not expect or demand anything in return. It is our concern to support where help is needed. As a sustainable company, we are also a member of various associations, such as „Leitbetriebe Austria“, where we discuss political, economic and social issues with like-minded people in order to find common potential and opportunities for improvement and to set a good example in the context of our social responsibility.





## Reporting of infringements

Violations of laws, guidelines, other rules or this Code of Conduct can lead to sometimes massive economic damage. Therefore, they must be detected in time to protect the company, its business partners and its employees. Therefore, if we observe a violation of the rules or we have reason to suspect that a violation may have occurred, we do not hesitate to address this. Should anyone report a reasonable suspicion of a violation or potential violation of this Code of Conduct, they are protected from any retaliation. Any employee who retaliates in this context, e.g. by exerting pressure, will be subject to disciplinary action. A whistleblowing system has been implemented in the CPB Group to enable completely anonymous reporting of irregularities such as fraud, corruption, financial market crime and others and to ensure maximum whistleblower protection. On our website [www.cpb-software.com](http://www.cpb-software.com), you can access the corresponding portal under „Contact“, where anonymous reports can be submitted.

## Assistance

If we are unsure how to act or decide in a certain situation, the following questions can help us:

- Do I have sufficient information to make the right decision?
- Would it be okay if other staff or the public became aware of my action?
- Could I justify my action to others in good conscience?
- Is my action legal and does it comply with the Code of Conduct?
- Is there a personal advantage that moves me to act in a certain way?

If we are unable to answer these questions clearly or if these questions do not provide us with sufficient support, we discuss the situation openly with our manager in order to find a solution together and thus ...

*... to act with integrity because  
it is the right thing to do.*



**Code of Conduct**  
Version: März 2025

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