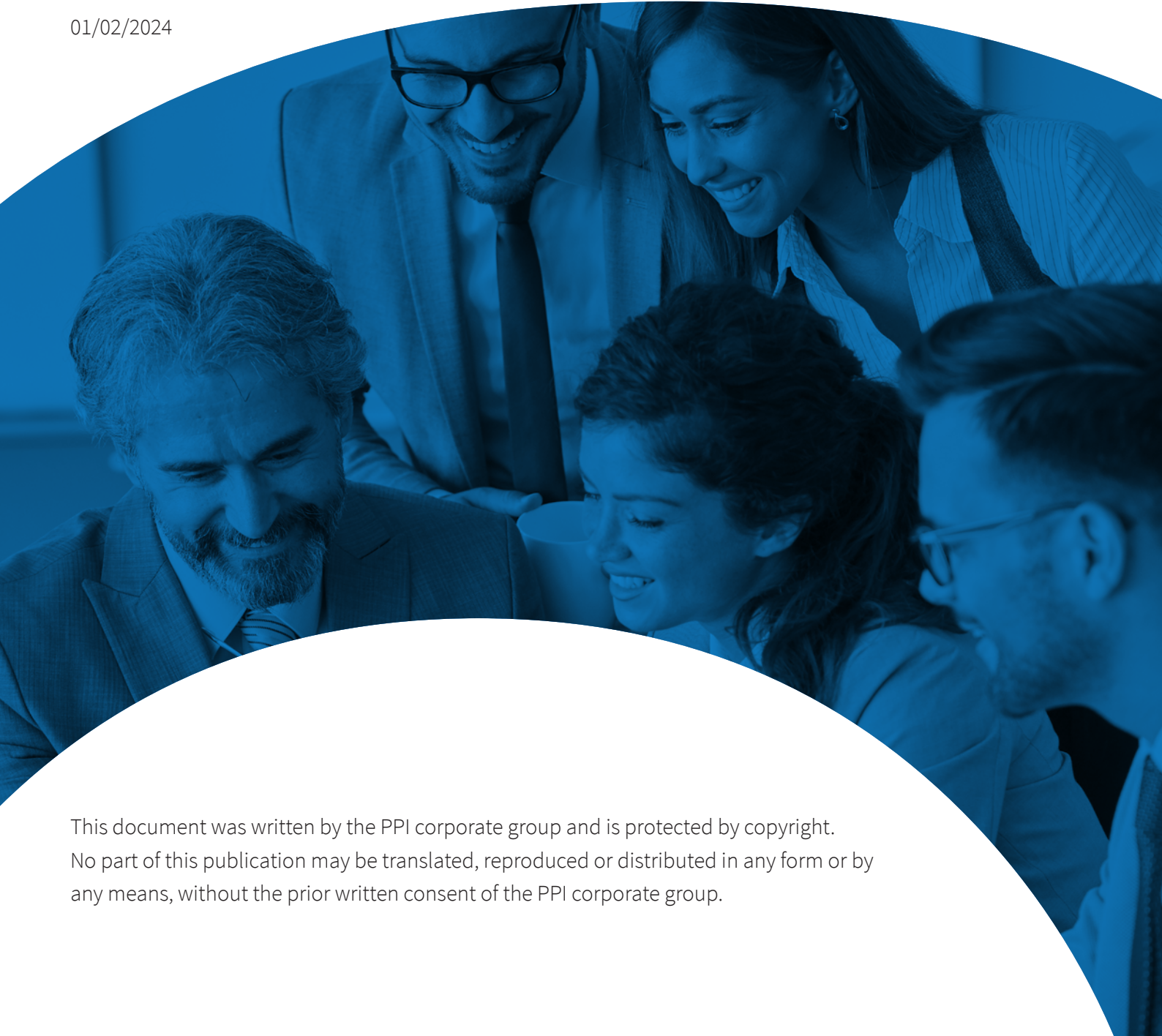


Principles of responsible conduct

01/02/2024



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Our mission

“Inspired by simplicity” – that means for us: we design the cooperation with our customers with confidence, flexibility and simplicity. We are driven by the idea of making it as easy as possible for our customers to successfully implement complex projects, despite the complexity of the digital transformation – in partnership and with a focus on the essentials.

We are strengthening the profitability and market position of our customers on a sustainable basis. Our work is based on quality, adherence to deadlines and adherence to budget. This makes us one of the first contacts for consulting and a quality leader in software development.



“Our thinking and actions are based on solid values – responsibility, integrity, respect and ethical behaviour. The Code of Conduct is the central guideline for all people at PPI.”

Dr Thorsten Völkel,
Chairman of the Board of Directors

CONTENT

Our mission	2
1 Our values	4
2 Our company principles	4
3 Our Code of Conduct	5
4 Our customers	6
4.1 Our behaviour towards customers	6
4.2 Our communication is open and maintains discretion	6
4.3 Our handling of internal information and company secrets	7
4.4 Our commitment to data protection	8
4.5 Our IT security measures	8
4.6 Our commitment to the protection of intellectual property	9
4.7 Our position on copyright and licensing terms	9
4.8 Our position on insider trading	9
5 Our relationship with the competition	10
5.1 How we deal with competitors	10
5.2 Our measures against corruption	11
6 We at the PPI corporate group	12
6.1 We treat each other with respect	12
6.2 We do not tolerate discrimination	12
6.3 We take occupational health and safety seriously	13
6.4 We promote the compatibility of family and career	13
6.5 We support professional development and further education	13
6.6 We welcome applicants	13
7 Our business partners and service providers	14
7.1 Our purchase of external services	14
8 Our commitment to society and the environment	15
8.1 Our commitment to sustainable business	15
8.2 How we deal with conflicts of interest	16
8.3 Our company property	16
8.4 Our approach to mobility and business travel	16
9 Our compliance officer	17
The PPI corporate group	18

1 Our values

The economy, like information technology, is created for the people. As an IT company we bring modern technology to the people and strive for economic success and continuous healthy growth. For us the people are as

important as the technological advancement. In doing so, we are guided by solid values as the basis for our thinking and actions. These include partnership, community, openness, initiative, competence and quality.

2 Our company principles

The company principles of the PPI corporate group form the starting point for this Code of Conduct. In this document, we explain how we implement the company

principles in our daily business and how we want to meet customers, competitors, business partners, service providers and each other.

- We are reliable and fair.
- We assume responsibility and act independently.
- We treat our customers with esteem and act according to their requirements.
- We lead every project to a reference.
- We are a team and work for the good of the company.
- We all contribute together to a culture of family friendliness.
- We respect the personal interests and circumstances of each individual.
- We communicate openly, honestly, self-confidently and impartially.
- We cultivate a climate of partnership and trust that makes work a fun environment.
- We have high demands on the quality of our work and are constantly improving.
- We use criticism as a learning opportunity and take praise as motivation.
- We act both cost-consciously and profit-oriented.

3 Our Code of Conduct

The foundation of our success are long-lasting and trustful customer relationships. This trust is based on the professionalism and loyalty of each and every employee. Our aim is to base our business success at all times on the law and ethically correct conduct.

This Code of Conduct shall provide all employees with an orientation framework for responsible conduct. It is at the same time a promise to our customers and business partners. Violations do not correspond to our values and we do not tolerate them.

The Code of Conduct applies to all employees of the PPI corporate group: to employees, executives, managing directors and the management board. In addition, it applies to all those who work on behalf of the PPI corporate group.

Our Code of Conduct does not cover all the guidelines that apply at the PPI corporate group. Our PPI Quality Management System (PPI-QMS) contains additional and more detailed documents that we take into account within the PPI corporate group. If additional regulations are in effect for a customer or in another country, we will apply them. Those affected may only refuse this on valid grounds.



4 Our customers



The foundation of our success are long-lasting and trustful customer relationships.

4.1 Our behaviour towards customers

The trust of our customers and business partners is crucial for our success. The goal of our conduct is always oriented towards long-term partnerships. Our cooperation is based on the values defined in our Corporate Identity: partnership, community, openness, initiative, competence and quality.

Our customers from the financial and insurance sectors are subject to special legal and regulatory requirements. In addition, every customer has individual guidelines and processes.

Our employees inform themselves comprehensively about the respective customers and their values prior to a project assignment. In addition, every employee can confidentially contact his supervisor, the account manager or responsible PPI colleagues who know the customer in case of questions before a customer appointment or customer assignment.

4.2 Our communication is open and maintains discretion

Our customers' trust in the integrity and reliability of the PPI corporate group is our core foundation for sustainable business success. Violations of law and integrity shape public attitudes and influence the views of customers, shareholders and business partners.

The PPI corporate group maintains open communication with employees, customers and business partners. This is essential for trust and constructive cooperation. We are particularly careful when passing on confidential information: we only pass it on to employees and persons who need it for their work. This applies in particular to business-critical information relating to the business activities or strategy of the PPI corporate group or our business partners.

We only pass on confidential information to customers, suppliers or partners if it has been agreed that they will not remain confidential.

Confidential information about our customers, suppliers or partners will under no circumstances be passed on to other business partners.

We avoid personal conversation or telephone calls in public (e.g. on public transport) about confidential information. In these situations, it is not certain who in the vicinity may have an interest in this information in order to use it illegally.

When sending business e-mails, we comply with all applicable laws. In addition, confidential information in e-mails may only be sent in encrypted form.

We coordinate publicly impactful communication with customers and business partners as well as the content of publications and presentations internally in advance. This can be done with a central office or the supervisor. Any comments made by our employees in public that are relevant to the company must be consistent with the interests and goals of the PPI corporate group. This also includes comments by PPI employees in social media.

4.3 Our handling of internal information and company secrets

In our professional activity we have daily access to confidential information. This includes any documents, data, files and reports relevant to our business that are not publicly available. In particular, we treat information on the development of products and services, prices and

trade secrets strictly confidential. An unauthorised disclosure can lead to misuse of the information and seriously damage the competitiveness of the PPI corporate group.



On principle, information that we receive while working for a customer or in cooperation with business partners is confidential. The confidential handling of this information is essential for cooperation between partners.

All of us at PPI are aware that all confidential information must be protected. Accordingly, information will only be passed on to authorised persons.

Project and customer-related information that is used or developed in our customer projects enjoys special protection. The PPI guidelines for information security contain binding stipulations for this.

When working with business partners, it is particularly important to us to protect confidential information, know-how and company secrets. When sharing information on social networks – where permitted – we expect all employees of the PPI corporate group to be particularly cautious.

It is prohibited to disclose business and company secrets or technical know-how of the PPI corporate group or third parties without authorisation. We are obliged to keep secret from third parties any business and trade secrets which have been entrusted to us or have become known to us in the course of their business activities or for any other reason. We keep silent on all work and procedures which are essential for us or our business partners and have not been made public.

4.4 Our commitment to data protection

The protection of the personal data of employees, applicants, customers and business partners entrusted to the PPI corporate group has the highest priority for us. We collect, process, use or store personal data only with the consent of the person concerned, or if permitted by law.

The personal data will also only be used to the extent necessary and only for the purposes required. We expect every employee to protect confidential information from others from misuse and unauthorised disclosure.

All employees are required to maintain the confidentiality of personal data and strictly comply with applicable data protection laws for the protection of personal data.

We expect sensitive data from us and our employees, customers and business partners to be collected, processed, used and disclosed only for legitimate business purposes and to the extent permitted by law.

4.5 Our IT security measures

In order to protect information from unauthorised access, misuse or loss, the PPI corporate group has introduced technical and organisational measures for IT security. We all protect confidential information and adhere to the stipulations.

PPI laptops and mobile devices must be used with particular care when used at customer sites or on the move. We encrypt all sensitive data. Furthermore, every employee must always lock their laptops as soon as they leave their workplace.

As soon as we use a laptop or sensitive documents in public, we protect data from unauthorised access.



4.6 Our commitment to the protection of intellectual property

The protection of intellectual property is of particular importance to the PPI corporate group. The intellectual property created by our work is instrumental for the business success of the brand PPI. Protected intellectual property includes all products of the intellectual work within the PPI corporate group: software, patents, copyrights, trade secrets, source and object code, marketing plans, customer and employee address lists, or other confidential and proprietary information.

The rights to these are exclusively owned by the PPI corporate group and are therefore particularly worthy of protection. The PPI corporate group invests in every employee, in the development of products and services, and in the protection of related intellectual property, and expects every employee to respect and protect intellectual property of every kind. We also respect the intellectual property and data protection rights of others.

4.7 Our position on copyright and licensing terms

The PPI corporate group complies with copyright and licensing laws. We only use third-party software in accordance to the terms and conditions of the licence.

In addition, we respect the intellectual property rights (see section 4.6) and do not use copyrighted materials without authorisation. This includes, for example, video, music and image files from the Internet and on audio and video media.

4.8 Our position on insider trading

We must be particularly vigilant with regard to non-public information about listed companies that may have a significant impact on the stock market value of the company, e.g. a new business strategy or upcoming capital measures.

The PPI corporate group prohibits employees from using such insider information for themselves or others to buy or sell securities or other tradable financial instruments or to attempt to do so.

Under no circumstances do we use insider information about our customers, their customers, suppliers or affiliates to pursue personal interests, those of third parties or those of the PPI corporate group. Likewise, we may not pass on insider information to third parties so that they act accordingly. This prohibition remains in force until the insider information has been published or is no longer relevant.

Banks are subject to special regulatory requirements in order to prevent insider trading. We take this into account.

Employees of the PPI corporate group who work in particularly confidential areas at the customer's site and who have access to compliance-relevant information – i.e. information that enables insider trading – comply with the additional special obligations applicable there if these regulations are required by law in order to avoid insider trading (including reporting their own securities accounts and employee transactions to the bank's compliance department).

5 Our relationship with the competition

As an integral market participant, we are committed to the principles of free competition.

5.1 How we deal with competitors

The PPI corporate group does not tolerate agreements or arrangements with competitors regarding prices, terms of sale or market sharing. If in individual cases it is necessary to pass on information about prices and services to a business partner who is also a competitor, then only to the extent necessary and permissible under antitrust law.

It is also prohibited to gain a competitive advantage unfairly, for example by disseminating false information about our competitors or spying on them.

When dealing with competitors, we do not discuss internal matters such as prices and terms of sale, costs, market overviews, organisational procedures or other confidential information from which competitors may gain an advantage over the PPI corporate group.

For strategic planning, the PPI corporate group is interested in obtaining and evaluating information about competitors. However, this may only be publicly available information that we have obtained legally (e.g. through websites or information brochures).



We will not under any circumstances gain access to confidential information of competitors without being authorised to do so by them and will not give the PPI corporate group an unauthorised competitive advantage.

5.2 Our measures against corruption

The PPI corporate group does not tolerate any form of corruption, be it bribery, acceptance of bribes or any other granting of advantages.

It is strictly prohibited to offer, promise or grant services or material assets to any decision maker to influence them to unfairly favour the PPI corporate group over the competition. This does not refer to benefits that affect the whole company, such as discounts on products and services. Bribery occurs as soon as a service or a tangible asset is made available to an individual for personal gain.

Likewise, we prohibit all employees from demanding, being promised or accepting benefits and material assets in order to unfairly favour a business partner over the competition.

Those who give gifts and invitations to or accept them from business partners must avoid any appearance of corrupt conduct. In cases of doubt, employees contact their immediate supervisor and the compliance officer.



6 We at the PPI corporate group

Our reputation and trust is based on the professionalism, loyalty and health of each and every employee. Our managers are particularly challenged as role models. They act according to firm principles. In that way, they take responsibility for the achievement of goals. They lead with trust and respect, give guidance and clearly communicate their expectations. Confidence and active implementation of changes guide their thinking and actions. They encourage and demand personal initiative from employees.

6.1 We treat each other with respect

The values defined in our Corporate Identity (see page 4) include partnership, community and openness. These are the guidelines of our coexistence. Everyone respects each other's individuality, and we promote individual and cultural diversity within the PPI corporate group.

The PPI corporate group does not tolerate harassment, threats or any other form of workplace bullying. It is the responsibility of the affected and observers to discuss this with their managers, the management or the compliance officer and to remedy the situation. Anonymous reports are also possible. For neutral and confidential discussions, there is also the PPI employees' interest group as a contact.

6.2 We do not tolerate discrimination

The PPI corporate group expects all employees to treat each other, customers and business partners fairly and to respect their rights and privacy.

We do not tolerate differences in treatment based on age, gender, origin, religion, ideology, ethnicity, disability or sexual orientation.

6.3 We take occupational health and safety seriously

We have responsibility for the safety and health of our employees and support them in promoting their health. To this end, it is essential that everyone complies with the regulations on occupational health and safety.

In a motivating and respectful working environment, employees can contribute their full potential. The PPI corporate group provides a modern workplace that complies with current occupational safety standards, thus enabling productive work. The PPI corporate group expects customers to also provide such a workplace to the PPI employees who work for them.

In addition to safety at work, the health and well-being of our employees have top priority. The PPI corporate group actively supports this by means of a corporate health management system.

6.4 We promote the compatibility of family and career

The PPI corporate group maintains a family-friendly corporate culture that balances family and career. Family-friendly measures promote the balance between work and leisure and can thus reduce the stress and health risks of employees.

For instance, the PPI corporate group supports employees in helping those affected and their relatives in family emergencies. We provide the necessary freedom and stability.

6.5 We support professional development and further education

Excellent employees are a decisive success factor for the PPI culture and our further development. The PPI corporate group offers career prospects that support personal development and consistently promotes talent.

6.6 We welcome applicants

The PPI corporate group is constantly looking for new people to join our team. We are happy to welcome any applicant who, like us, is committed to openness and initiative. Each application is treated with respect. We do not tolerate any form of discrimination against applicants.



7 Our business partners and service providers



The trust of our business partners and service provider is crucial for our success.

In the financial sector we stand for quality, the adherence to delivery dates and budget compliance. The PPI corporate group has the same high demands towards its business partners and service providers and requires them to behave responsibly and in accordance with the rules. To this end, we review the business relationships as appropriate and possible if there is a reason to do so.

We expect our business partners, service providers and third parties to observe the applicable occupational health and safety regulations and the relevant environmental regulations.

The PPI corporate group does not conduct business with or support organisations that are considered to be anti-social forces or terrorist or criminal organisations.

7.1 Our purchase of external services

The PPI corporate group maintains trusting and fair business relationships with suppliers and subcontractors. Respectful interaction is essential for long-term successful partnerships.

We obtain several offers for all major purchasing processes. We treat all potential suppliers equally. The necessary information and requirements are communicated to all in the same way and uniform offer deadlines are set.

When selecting a supplier, the interests of the PPI corporate group are the focus. Personal advantages of individuals must not influence the decision. In addition to the total costs, factors such as product and service quality, delivery times and the importance of a long-term partnership must also be taken into account when making a decision.

We require subcontractors providing services to our clients on behalf of the PPI corporate group to comply with the Code of Conduct described in this document before commencing their activities. We lay down the basic obligations in framework agreements with the respective companies.

In addition, each individual external contractor must sign a confidentiality and security agreement.

8 Our commitment to society and the environment

It is part of our social responsibility to avoid conflicts of interest and to protect property, health and the environment.

8.1 Our commitment to sustainable business

From service offerings to internal processes – sustainability is part of the strategy of the PPI corporate group.

With a wide range of services around sustainable finance, we support our customers in anchoring sustainability in their business strategy, structures and concrete processes – for example, in the areas of compliance and risk management.

Within the PPI corporate group, we are committed to the environment, an inspiring working environment and responsible corporate governance in line with the ESG criteria.

Environment: we take responsibility for our environment by reducing CO₂ and acting ecologically. The company's environmental protection is firmly anchored in our organisation.

Social: partnership, community and openness are among the defined values of the PPI corporate group. Our reputation and trust is based on the professionalism, loyalty and health of each and every employee.



Governance: we are committed to responsible corporate governance and support the professionalism and integrity of all employees. Measurable quality standards are just as important as clear rules of conduct.

8.2 How we deal with conflicts of interest

In order to avoid conflicts of interest or disadvantages for the PPI corporate group, we separate private and business interests. We base all business decisions exclusively on the interest of the PPI corporate group. We avoid a conflict of private interests with the interests of the PPI corporate group. This includes disclosing or coordinating corporate, social or professional commitments to or with the PPI corporate group.

Our employees do not take up any secondary jobs in competition. Any secondary activities must be compatible with the main activity at the PPI corporate group and agreed in advance with the direct supervisor. A secondary activity is any activity in which employees make their labour available to a third party outside their main employment relationship – regardless of whether it is paid or unpaid. This also includes a self-employed activity.

In everyday business life, conflicts can arise in various situations between the interests of our clients and those of the PPI corporate group. There may also be situations where an employee's personal and financial interests differ from those of the client or the PPI corporate group. We avoid such situations as far as possible. In case of doubt, those affected seek a conversation with their superior. Under no circumstances may our employees use their professional activities to gain private advantages or advantages for third parties close to them.

If employees find themselves in a situation in which a conflict of interest is unavoidable or in which they are uncertain as to whether it is a conflict of interest, they should contact their superior or the compliance officer to coordinate possible measures.

8.3 Our company property

We handle our company property and resources properly and responsibly. We protect it against loss, theft, damage or misuse.

Our employees may only use our company property (work equipment or other objects) for business purposes unless private use has been agreed.

We treat the customer's resources with equal care and in accordance with the purpose and observe regulations for environmental protection and sustainable business practices of the customer.

8.4 Our approach to mobility and business travel

The PPI corporate group supports mobile working in a modern and flexible way and promotes environmentally friendly and healthy mobility.

We use natural resources sparingly. This applies in particular to the national and international business trips to our customers' sites. We plan and conduct business trips in an environmentally sound manner. We have also defined respective environmental action objectives.

9 Our compliance officer

The responsibility for the Code of Conduct and compliance with the requirements lies with our board of directors. In addition, the PPI corporate group has appointed a compliance officer. Nils Purwin answers all our employees' questions about the Code of Conduct. He is also responsible for regularly reviewing and updating the Code of Conduct in consultation with the board of directors.



We resolutely clarify cases of doubt or questions about our own behaviour and the behaviour of others. Our compliance officer receives any information about possible violations of our Code of Conduct or criminal law issues in confidence and initiates further steps. This could be an investigation or countermeasures, for example. The compliance officer protects the identity of the one providing the information at all times and treats the situation discreetly. If other responsible persons or contact persons are named in our internal guidelines, they will also be contacted, for example the IT security officer in the event of security breaches.

We clearly prohibit deliberately untrue, malicious or otherwise abusive reports – for example, untrue personal attacks against certain individuals – and these may result in disciplinary action. If employees feel that they are disadvantaged due to a report or that a report is untrue and malicious, they can contact the compliance officer in confidence.

The compliance officer can be reached at compliance@ppi.de.

The PPI corporate group



The PPI corporate group has been working successfully as a consulting and software company for financial institutions, insurances and financial service providers for over 40 years. As a steadily growing, family owned joint-stock company, we combine expert knowledge

with technological proficiency to implement projects with competence and simplicity. With our standard product portfolio we occupy a leading market position in the European payments sector. About 800 employees are entirely focussed on our customers' success.

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