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## Introduction

Our Code of Conduct is binding for all bodies and employees of maincubes Holding & Service GmbH and its direct and indirect subsidiaries (hereinafter "**maincubes**"). It reflects our claim to comply with the law and ethical rules of conduct. It is a requirement for the executive bodies and employees of maincubes and at the same time their promise to the outside world. It demands responsibility from each individual towards the company in the knowledge that the success of maincubes and the reputation it has acquired can be damaged by even a single act of misconduct.

The Code of Conduct thus contains rules of conduct that must be observed. Violations of the Code of Conduct will not be tolerated.

The Code of Conduct of maincubes is dynamic. Binding legal standards can change and behavioural requirements can be concretised through instructions and guidelines.

In addition to the Code of Conduct (I. including Annexes A to D) and the rules for the implementation of and compliance with the Code of Conduct (II.), maincubes, mindful of its responsibility as an entrepreneur, is committed to the social principles and principles laid down in the Social Charter (III.).

### I. **maincubes Code of Conduct**

#### 1. **Prohibition of bribery, corruption and improper business conduct**

maincubes condemns and prohibits any kind of bribery, venality and any other form of improper or corrupt business behaviour. Anyone acting on behalf of maincubes must not offer or grant any unfair advantages to individuals, a group or a company, either directly or indirectly, for example in order to conclude business deals. Even the appearance of bribery, venality, corruption and improper business conduct must be avoided.

#### 2. **Gifts and invitations**

maincubes expects relationships with customers, suppliers and other business partners to be based on a clear commitment to fair dealing and sound business decisions. Gifts and invitations to persons in the non-public sector must always be socially adequate and appropriate (for the public sector, the regulation in point 3. below applies). All gifts, invitations and other benefits received and made must be reported to the management or the Compliance Officer and are kept in a maincubes benefits register. They may neither be sent to private addresses nor be connected with an award, a business transaction or any other business decision of maincubes.

#### 3. **Prohibition of offering gifts, invitations or granting other advantages to civil servants or other persons in the public sector**

maincubes employees are strictly prohibited from offering money, other items or services of value as gifts to public officials or other members of the public service, whether this is done directly or indirectly. This in itself is to avoid the impression of trying to influence decisions and actions of public officials. Most countries around the world have laws that make corruption punishable, including imprisonment, with substantial fines, costly enforcement proceedings and claims for damages. The sanctions are directed both against the organs and employees guilty of corruption and against their employers. No less serious is the viewpoint that corruption and similar prohibited activities can significantly and adversely damage the good reputation of maincubes and the

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reputation of its governing bodies and employees. Even uninvolved employees may find themselves in the position of having to answer in these contexts. The prohibitions on corruption are not limited to dealings with all civil servants and employees of the public service, but also with persons and members of organisations that have been entrusted with sovereign tasks in the broadest sense.

*See also: Explanation Prohibition of offering gifts, invitations or granting other advantages to civil servants or other persons in the public sector (Annex C)*

#### **4. Conflicts of interest**

maincubes expects unrestricted loyalty from its bodies and employees. Decisions must remain uninfluenced by personal interests and non-corporate considerations in order to avoid conflicts of interest.

*See also: Explanation of conflicts of interest (Annex D)*

#### **5. Behaviour towards competitors**

maincubes prohibits agreements and concerted practices that have as their object or effect the restriction of competition. The mere exchange of non-public competition-relevant information between competitors can be illegal.

maincubes does not participate in price agreements or prohibited coordination of market behaviour between competitors. We are committed to fair dealings with our business partners and competitors and do not abuse existing room for manoeuvre. We also do not disseminate false information about our competitors' products and services or attempt to gain competitive advantages in any other unfair way.

#### **6. Donations and sponsorship**

As a responsible member of society, maincubes promotes education, science, culture, social concerns, but also sports and the environment. However, all this only within the framework of legal and economic possibilities. maincubes does not grant donations to gain business advantages. All donations must be in accordance with the applicable legal system and internal guidelines. For all donations, the addressee and the purpose of use must also be documented. Donations as individuals, to private accounts and to persons or organisations that could harm the interests or reputation of maincubes will not be granted.

Sponsoring is also part of maincubes' means as a communication tool. However, all sponsoring activities require appropriate and verifiable communication and marketing services from the sponsoring partner and are handled transparently like donations.

Both donations and sponsoring require the prior approval of the management in all cases.

#### **7. Integrity and loyalty**

Integrity and loyalty means above all honesty, sincerity and openness in everyday work and in business dealings. It is our goal to always carefully check whether our behaviour towards each other and in business dealings is in line with maincubes' expectations and specifications regarding integrity and loyalty. In addition, it is the goal of maincubes to be honest and forthright even when it is difficult for us personally. For example, if we have made a mistake, we want to admit it openly. But openness also means passing on information in full so that others can assess our actions and know where they stand.

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Our goal must also be to act as a reliable partner ourselves in all situations, both internally and externally, and to represent our corporate values in a **self-determined manner**. This means: We are proud of our solutions, which are **safe, efficient** and **customer-oriented**. For this, we act in a **binding, reliable** and **trustworthy manner**. We align our work **flexibly with our** customers' wishes. **Innovative** and **open to** new ideas, we develop offers that are **easy to** implement for our customers. **Sustainability** and social responsibility are very important to us. We treat ourselves as well as our customers and partners with **consideration** and **respect**, and act in a **transparent, team-oriented** and **fair manner**.

## 8. Data protection and confidentiality

maincubes with its undertakings and employees is subject to the legal obligations regarding data protection and has adopted its own principles, which must be consistently observed for every type of data processing within maincubes and in interaction with third parties. The aim is to ensure that personal data is processed with care and to take appropriate preventive measures to prevent any misuse of personal data and commercial information.

We only collect and process data requiring protection with the consent of the data subject if a clear legal norm permits this or if it is necessary to fulfil a contractual obligation. Furthermore, we collect, process and use personal data only to the extent necessary and only for the intended purposes. We respect the comprehensive rights of the persons whose data we collect, process and use.

Confidential information of maincubes, its employees and business partners can cause great damage in the wrong hands, e.g. with the media, with competitors or business partners.

Under certain circumstances, employment with another company or non-profit or similar organisation may create a conflict of interest with your employment with maincubes. If the possibility exists, the other employment would have to be approved by your supervisor or the Compliance Officer before you take it up.

The aim of maincubes is therefore to take special care that sensitive information, whether in paper form, data form or verbally transmitted, is treated confidentially. In case of doubt, it is better to check once more whether information is confidential than once too little.

## 9. Appreciation and fair working conditions

A great motivation for each individual employee is that their own performance is recognised. Everyone can appreciate the special contribution of the individual by recognising him or her for a good result or the individual effort. The knowledge and skills of the employees are maincubes' most important asset. However, it can only be fully developed if maincubes and its employees see themselves as a genuine community in which each employee is willing to share his or her knowledge and experience with colleagues.

Managers support their employees in achieving a work-life balance and in taking advantage of work-life and health offers, thus creating the basis for productive work.

Every employee has a right to be protected against discrimination and harassment. In the event of conflicts, the supervisor, the human resources department or employee representatives must be consulted. We are performance-oriented and consistently strive for the best possible result. We recognise and reward good performance by our employees. In doing so, the individual differences in performance must be taken into account. This is a great obligation for all managers.

The aim of maincubes is thus to comply with labour law and the resulting agreements.

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## 10. Safety, health and environmental protection

maincubes aims to address safety, health and environmental protection as responsibly and methodically as it does the issues of quality, productivity and cost efficiency. maincubes makes sustained efforts to develop and use safe as well as health and environmentally friendly methods and processes. It ensures that its business activities comply with applicable health, safety and environmental standards as well as recognised corporate and best practice standards. All maincubes employees are personally responsible for ensuring safety, health and environmental protection in their workplace to the best of their knowledge, ability and experience.

In this respect, maincubes employees are also encouraged to identify areas where improvements can be made and to continuously strive for a better working environment.

## 11. Consumer Protection/Dealing with Customers

When acquiring and supporting customers, maincubes pays attention to the observance of all legal regulations.

Employees of maincubes only call our customers for advertising purposes within the legally permissible framework. We do not advise our customers to buy products or services that they clearly do not need.

## 12. Money laundering

maincubes takes all necessary measures to prevent money laundering within its sphere of influence. This includes, in particular, the identification of business partners in the compliance onboarding process, as well as their risk-based, event-related and regular review for changes. maincubes does not do business with customers who are involved in money laundering or who do not cooperate with or hinder the identification of the beneficial owner.

## 13. Trade controls

maincubes follows existing trade controls and complies with import and export control regulations and economic embargoes. A review of the customer takes place for the first time in accordance with the compliance onboarding process and subsequently through regular monitoring and comparison of the customer lists with the applicable sanctions lists.

## 14. Compliance with laws and guidelines, social responsibility

We act ethically and comply with laws and guidelines. We act in accordance with the respective national law, our guidelines and policies.

maincubes is part of the democratic and market-economy organised community. We are therefore fully committed to our social responsibility. We bear responsibility for future generations: Social and ecological aspects have high priority for us.

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**Annex A to the Code of Conduct**  
**Prohibition of bribery, corruption and improper business practices**

In most countries, not only corruption of public officials, but also bribery among business people is illegal and subject to criminal prosecution. Bribery in business transactions can result in significant reputational damage for the companies involved, high claims for damages and substantial penalties (including imprisonment). Moreover, bribery in business transactions undermines fair competition in production and trade of goods. maincubes wants to convince customers through the quality of its products and the convincing values of the products, but not through illegal and unfair machinations. It is therefore strictly prohibited for maincubes bodies and employees to accept or offer personal payments in the form of bribes, kickbacks or similar from customers, suppliers or other third parties who have a business relationship with maincubes. This prohibition against offering or accepting personal improper payments also applies in locations where the other prohibited payments may be tacitly tolerated or where applicable law applies different ethical standards to such payments. If a prohibited payment is offered to a maincubes body or employee, he or she should contact the management or the Compliance Officer as soon as possible. This is the only way for maincubes to take appropriate measures to deal with the situation and to ensure fair competition.

For the avoidance of doubt, for the purposes of this clause, prohibited payments shall include any undue advantage, including but not limited to cash, other forms of pecuniary benefit, benefits of a monetary nature or any other benefit of value to the relevant body or employee, their family or relatives.

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## **Annex B to the Code of Conduct**

### **Gifts and invitations**

In working for maincubes, governing bodies and employees come into contact with suppliers, customers and other business partners who play an important role in maincubes' business operations. It is therefore essential that relationships with suppliers, customers and other business partners are based on a clear commitment to acting fairly and making business decisions on a sound basis. Excessive gifts and hospitality can impair the ability to make business decisions free from conflicts of interest. In contrast, low-value gifts and invitations are less likely to be perceived as inappropriate and to trigger conflicts of interest. However, this always presupposes that the locally applicable business customs permit the exchange of such gifts and small invitations in the first place. This must not be assumed under any circumstances in the case of extravagant gifts and invitations. Should the case arise that a legitimate business purpose and local customs do not permit the rejection of a high-value gift, the gift may be accepted but must then be transferred to maincubes and left for further use, such as for exhibition purposes or the like. maincubes may comply with the employee's wish to acquire the gift.

#### What does maincubes mean by gifts and invitations?

The terms gifts and invitations basically cover everything that is of value. A list of possible relevant gifts and invitations would be endless, so the following are only examples for clarification (the reference in each case is the possible personal enrichment):

- Gifts
- Cash, wire transfers, cheques or other cash substitutes, discounts or specially favourable terms of purchase of products or services (except where these benefit all maincubes employees), loans, raffle prizes, means of transport, provision of vehicles for use, use of holiday facilities, gift vouchers, shares, watches, calendars, pens or other promotional items and accessories, etc,
- Invitations
- Business meals, sporting events, theatre visits, hotel accommodation, etc.
- Appropriate (allowed) and inappropriate (rejected) gifts and invitations

maincubes distinguishes between appropriate and inappropriate gifts and invitations.

#### Gifts and invitations, the acceptance of which is usually permitted without or, in individual cases, after prior approval by the management or, if applicable, the Compliance Officer:

The acceptance of gifts and invitations is permitted without approval if they are of low value (orientation size up to EUR 40.00) and can be considered as an expression of local common, moderate business practice. The acceptance of invitations must also be made for a business reason. As a rule, the following low-value promotional items may be considered a sufficiently moderate expression of goodwill, unless local law provides otherwise: Low-value promotional items, i.e. pens with advertising imprints, calendars, baseball caps and the like, bouquets of flowers, fruit gift baskets, simple books or the like, small bundles of production samples, occasional dinner invitations, simple sporting events, theatre visits or other cultural events of similar value (invitations should, however, generally only be accepted if the business partner also participates).

However, the prior approval of the management or the Compliance Officer is required if you receive an invitation whose value recognisably exceeds EUR 100.00 in an individual case. The same applies if you regularly receive invitations from a business partner and the value of all invitations recognisably exceeds the sum of EUR 200.00 per year. Invitations to travel or other events lasting longer than one day or to

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events for which only limited ticket contingents are available (e.g. to European or World Cup football matches) are also subject to approval.

Even if you accept an invitation that is within the permitted range, you should always bear the following in mind:

- Could the gift or invitation possibly affect objectivity or judgement?
- Is there a business reason for the gift or invitation?
- Could the acceptance of a gift or invitation (or the authorisation you give to do so as a supervisor) set an undesirable precedent for other similar cases?
- Would you have to fear negative reactions if the acceptance of the gift or invitation became known to other maincubes employees, the public, your friends or your family?
- Gifts and invitations that you must not accept

In certain cases, the acceptance of gifts or invitations is always inappropriate and should therefore be refused without exception:

- If the gift is cash, cash equivalent or other means exchangeable for cash, e.g. money transfers, cheques, loans, etc. or
- if the gift or invitation itself or its acceptance would be illegal; or
- if the acceptance of a gift or invitation promotes the expectation of "performance and consideration" or it is to be feared that such an impression could be created; or
- if, from the point of view of individual participants, the gift or invitation might be something morally objectionable or might be seen as an expression of a lack of respect for other people, religions and cultures (e.g. applies to events where sex is offered); or
- if the gift or invitation violates company rules of the recipient or the invitee.

How do you behave if you are offered a gift that you are not allowed to accept?

A gift that does not comply with the principles described above must be returned immediately. In addition, you must inform the management or the Compliance Officer of such an event. In certain cases, especially if it is to avoid repetition, it may be useful to write to the provider of the gift explaining the principles that apply at maincubes for accepting gifts.

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The reverse case:

Granting of gifts and invitations

The rules applicable at maincubes for the acceptance of gifts and invitations apply conversely to gifts and invitations that maincubes bodies and employees wish to offer to third parties. Particular restraint must be exercised in the case of suppliers, customers or third parties with an ongoing business relationship with maincubes. For maincubes bodies and employees, this means observing the following principles:

- maincubes officers and employees may not offer gifts that exceed the value and other limits described above; and
- no invitations should be issued whose value exceeds EUR 100.00 in an individual case (depending on local customs, this amount may also have to be set considerably lower). The value limit must also be observed if several invitations to certain persons follow one another and the total value of these invitations reaches the value limit of EUR 200.00 per year. There can only be exceptions to these limits if the prior written consent of the management or the compliance officer has been obtained.

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## **Annex C to the Code of Conduct**

### **Prohibition of offering gifts, invitations or granting other benefits to public officials or other persons in the public sector**

#### General principles of conduct

- It is prohibited for maincubes bodies and employees to offer, provide or promise gifts, other benefits or advantages of any kind whatsoever to civil servants or other members of the public service in the sense described above. This prohibition expressly also applies to the indirect transmission of gifts via third parties, consultants or similar, as well as to family members, relatives, etc.
- maincubes bodies and employees may not invite civil servants or other members of the public service in the sense described above to business meals, trips or other events, and likewise neither directly nor indirectly. Exceptionally and in rare individual cases, it may be permissible to extend a meal invitation or other invitation and to offer a means of transport for use, provided,
  - that this is done in "good faith" and for a business reason consistent with the official activities of the civil servant or other public employee,
  - that the invitation has an appropriate value and
  - that the invitation is only issued after a thorough examination of the measure for its compatibility with applicable law and local customs.

In any case, however, such invitation shall only be permitted if previously approved in writing by the management or the compliance officer.

- As a matter of principle, maincubes bodies and employees do not make any gifts (gifts directly or indirectly and of whatever kind) to politicians, political parties, other political organisations or trade unions and their representatives. Furthermore, they do not extend individual invitations to this group to attend events, travel or business trips, except in those cases and to the extent that this is expressly permitted by applicable law. However, this is only permitted after prior written approval by the management or the Compliance Officer. maincubes makes it a principle to properly document and correctly account for every benefit. These rules are not intended to restrict the commitment of maincubes, its bodies and employees in the cultural, social and scientific fields, insofar as it is based on decisions by the management of maincubes.

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## **Annex D to the Code of Conduct**

### **Conflict of interest**

The danger of a conflict of interest always exists when personal, social, financial or political interests of an employee overlap or collide with company interests. The requirements for correct and ethically impeccable behaviour of the executive bodies and the employees to avoid conflicts of interest are high. A threatened or actual conflict of interest should always be disclosed to the management or the compliance officer.

#### Typical cases of conflicts of interest

- Secondary occupations

Secondary employment in the form of services or consultancy for third parties who have a business relationship or competition with maincubes may trigger a conflict of interest and must therefore be approved by the aforementioned superior. As a rule, approval for secondary employment cannot be granted if the executive body or the employee maintains a business relationship with the third party at the same time as part of the duties he or she performs for maincubes.

- Employment of close relatives

If a close relative works for a customer, competitor or supplier of maincubes, the executive body or the employee should inform the management or the Compliance Officer. The same applies if a relative has a business relationship with you as an officer or employee in the course of your duties for maincubes. The rule is that the governing body or employee should not maintain a business relationship with relatives outside maincubes on behalf of maincubes. It should also be avoided that a close relative is among the employees in the reporting line or is otherwise responsible to the body or employee within maincubes. If the possibility cannot be ruled out that family or other close relationships with an executive body or an employee of maincubes could lead to a conflict of loyalty or interest, the management or the Compliance Officer should be approached about this. maincubes will then work together with the executive body or employee to find a solution appropriate to the situation for those affected in the company.

- Competition

A conflict of interest may also exist if corporate bodies or employees of acquire interests in competitors, customers or suppliers of maincubes. This can occur, for example, if the intended participation is significant and capable of influencing decisions that the executive body or the employee has to make at maincubes. In this case, approval must be obtained from the management or the Compliance Officer prior to the acquisition of the shareholding. As a general rule, however, a shareholding of less than 1% of the share capital in a corporation, for example, is not considered "material" within the meaning of this paragraph. Likewise, shareholdings in stock exchange-oriented companies, investment funds or the like are not "material" if it can be assumed that the direction of the company's interests will not be influenced via your shareholding.

All the rules of conduct described above are, of course, also applicable mutatis mutandis to potential business contacts.

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What should you do in the event of a conflict of interest?

Any open or threatened conflict of interest can be mitigated by disclosing it to management or the compliance officer and authorising the board or employee to act. Should the governing body or employee be unsure whether he or she can personally correctly identify a conflict between interests, or should he or she be unsure of the correct priorities in assessing interests, he or she should conduct the "free-question test" on himself or herself and, if necessary, seek advice from the compliance officer if any of the answers to the following questions are "yes":

- Can my project influence me in any way in the freedom of the decisions I make for the maincubes?
- Could colleagues at maincubes or uninvolved third parties develop the idea that my intention somehow influences my judgement or actions at maincubes?
- Would I object to my project being reported publicly in the media or otherwise coming to the attention of maincubes customers, suppliers, my friends or family?

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## II Implementation of the Code of Conduct

### 1. Compliance

With the rules of conduct described above, maincubes intends to prevent violations of the Code of Conduct of maincubes as far as possible. Should violations nevertheless occur, maincubes will not tolerate this and will quickly take appropriate measures. Employees and officers who violate the Code of Conduct will be held accountable and subject to appropriate sanctions, which may include termination of employment.

All bodies and staff are therefore expected to,

- To avoid breaches of the Code of Conduct
- take action when violations of the Code of Conduct occur,
- inform the Compliance Officer of any violations.

In the event that you are unsure whether you could violate the Code of Conduct in a particular case, contact the Compliance Officer as a preventive measure.

The compliance organisation consists of both centralised and decentralised elements. The central contact person for all compliance issues is the designated compliance officer. Responsibility and authority can thus be delegated simply and clearly. This officer is centrally located and thus independent of other corporate units.

In addition, a further officer will be appointed in each division of maincubes in order to do justice to the respective business models, the respective business requirements and/or cultural or other requirements and values (if necessary also of different countries). Together, the central compliance officer and the respective compliance officers of the divisions will regularly meet in a committee to develop recommendations and guidelines.

### 2. Whistle-blower / Whistle-blower

Bodies, employees and customers may confidentially contact the following in the event of reasonable suspicion of violations of the Code of Conduct, in particular fraud, bribery and corruption, health or safety concerns or other breaches of law

- E-mail: [hinweisgeber@deudat.de](mailto:hinweisgeber@deudat.de) (24x7)
- Telephone hotline: +49 611 950008-40 (Mon-Fri. 08:00 - 17:00)

The report can also be made anonymously under the online portal

- [https://www.deudat.de /compliance](https://www.deudat.de/compliance) (24x7)

Reports will be treated confidentially and followed up by the Data Protection Officer, who will acknowledge receipt within 7 days, make the necessary enquiries and investigations and take the appropriate measures. In this respect, he is not bound by instructions.

Maincubes undertakes to keep the reporting and identity of whistle blowers confidential. Disclosure to management will be made only to the extent necessary. Further disclosure will only

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be made (i) with the consent of the whistle blower, (ii) if required by law, (iii) if there is a risk to life or health, or (iv) to enforce claims and protect the rights and interests of maincubes.

All documents related to whistle blowers and reports will be kept confidential and stored. Both unauthorised disclosure of the identity of the whistle blower, the report or the documents are a violation of the Code of Conduct and may result in disciplinary action.

Whistle blowers who have come forward with a justified suspicion may not suffer any personal disadvantage as a result (e.g. dismissal, non-promotion). Reprisals, discriminatory or negative behaviour by employees and contractual partners towards whistle blowers will not be tolerated by maincubes, is considered a violation of the Code of Conduct and may lead to disciplinary measures.

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### III. maincubes Social Charter

#### 1. **Diversity of nations and promotion of human rights**

maincubes recognises and respects the cultural, social, political and legal diversity of all nations and societies and is strongly committed to upholding and promoting internationally recognised human rights.

#### 2. **Freedom of association**

maincubes recognises the fundamental right to freedom of association and the right to collective bargaining within the framework of national regulations and existing agreements.

#### 3. **Trustful cooperation with employee representatives**

maincubes is also committed to open and trusting cooperation with democratically legitimised employee representatives on the basis of constructive social dialogue and with the aim of achieving a fair balance of interests.

#### 4. **Prohibition of forced labour**

maincubes is strongly committed to the prohibition of any form of forced labour.

#### 5. **Abolition of child labour**

maincubes is committed to the abolition of exploitative child labour.

#### 6. **Equal opportunities and diversity**

maincubes rejects any form of discrimination in the workplace and is expressly committed to promoting equal opportunities and diversity among its employees, taking into account the respective cultural and legal particularities.

#### 7. **Respectful treatment of employees**

maincubes is committed to ensuring that all employees are treated respectfully, without any corporal punishment, mental or physical coercion, abuse or harassment or the threat of such treatment.

#### 8. **Appropriate remuneration, compliance with working hours**

maincubes respects the right to adequate remuneration on a contractual basis, which is oriented towards legally guaranteed minimum wages, and ensures compliance with the regulations on working hours and regular paid holidays.

#### 9. **Promotion of workers**

maincubes supports the qualification of employees, which is also in the interest of the company, in order to ensure a permanently high level of performance and a high-quality service. At the same time, it emphasises and promotes the employees' own responsibility to maintain and improve their employability.

#### 10. **Occupational health and safety**

maincubes considers the health of its employees to be a decisive value factor for the company and therefore strives to ensure the occupational health and safety of its employees.

#### 11. **Environmental protection and sustainability**

maincubes is committed to environmental protection and sustainability in business.

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