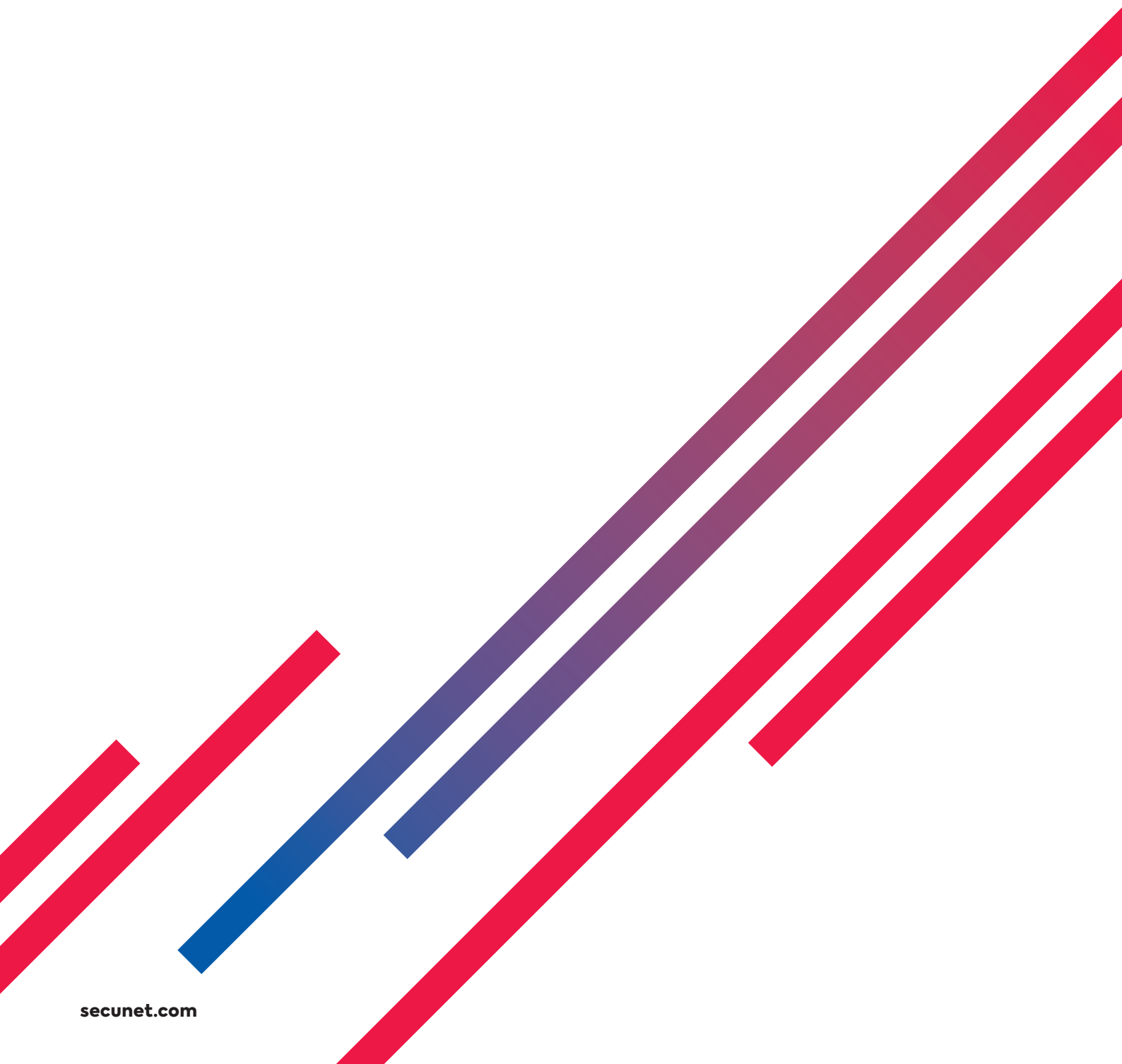


Code of Conduct for Employees

November 2022



For the sake of better legibility, masculine pronouns shall be used throughout the following when referring to persons. All statements apply equally to all genders.

Our commitment to integrity, trust and respect

“Integrity is our industry’s highest asset. Employees, customers and business partners can rely on us. We mean what we say, keep what we promise and take responsibility for it. We live diversity, tolerance and openness and treat everyone with respect. We always act in accordance with legal regulations.

This Code of Conduct serves as a binding guideline for managers and employees and applies to all secunet Group companies in its current version. Internal policies, regulations and contractual agreements supplement the Code of Conduct.

Non-compliance with this Code can lead to considerable damage, not only for secunet but also for employees, business partners and other market participants. Compliance with the Code of Conduct is mandatory. Violations of the Code will not be tolerated and will be sanctioned accordingly.

Please take time to understand our Code of Conduct and adapt your behaviour accordingly. If you have any questions or find something unclear, contact your manager or the Compliance Office.”

Essen, 15.11.2022
The Management Board

Compliance with social standards



Human rights and equal treatment

We are committed to the globally applicable regulations for the protection of human rights (e.g. ILO) as fundamental and universally valid requirements. Of particular importance are the right to equal opportunities and non-discrimination, the avoidance of child and forced labour, the right to freedom of association and collective bargaining, fair pay in accordance with local market conditions and compliance with applicable regulations on working time.

Equality, diversity and a respectful, open and fair interaction with each other are our top priorities. No-one may be treated improperly, preferentially, disadvantaged or excluded on account of his race or ethnic origin, skin colour, nationality, ancestry, religion, ideology, gender, age, sexual identity, physical constitution or appearance. We do not tolerate any form of discrimination. Any form of harassment is prohibited. We hold all employees in the same high regard.

Occupational health and safety

We adhere to the applicable legal and employers' liability insurance requirements for health and safety at work. We actively support the further development and improvement of working conditions and thereby promote the health, safety and satisfaction of our employees.

Responsibility for the environment



Environmental protection

We want to make an active contribution to the conservation of natural resources and protection of the environment. We comply with legal requirements and are committed to the sustainable protection of the environment. We are establishing and applying an appropriate environmental protection management system for controlling the corresponding activities.

Furthermore, we use natural resources sparingly and minimise the environmental impact of our processes and products.

Recommended conduct

- You should perform your tasks in a manner that is compatible with the interests of environmental protection and use resources and energy sensibly and sparingly.
- Ensure that your activities have the least possible negative impact on the environment and that they comply with environmental laws and regulations.

Transparent and sustainable business relationships

Fight against corruption

Our reputation as a company of integrity is crucial. As such, we firmly reject any form of corruption and bribery. We do not offer or accept bribes. Violations constitute a criminal offence and may result in criminal prosecution. So-called “facilitation payments” (also known as “kickbacks”) are not permitted.

We only give or accept gifts if they are of moderate value and are a gesture of courtesy in line with general business practices. As a matter of principle, we reject donations that are intended to improperly influence a decision or an official act. We exercise particular caution when dealing with public officials or government representatives, as we always comply with the often very strict regulations of different countries.

Recommended conduct

- Never allow yourself to be bribed directly or indirectly and never bribe others.
- Never accept an advantage in your business activities and reject any promise of a prospective advantage.
- Check the appropriateness of gifts and invitations by consulting the “Anticorruption Policy”; in case of uncertainty, contact the Compliance Office.
- Observe the regulations on dealing with public officials.
- You are to report violations of the prohibition of corruption to the Compliance Office or via the whistleblower system.



Details are governed by the separate “Anticorruption Policy”.

Dealing with conflicts of interest

secunet trusts that all employees will make their decisions exclusively according to objective criteria and will not allow themselves to be influenced by personal interests and relationships. Private and business interests must be strictly separated.

Recommended conduct

- Be aware that you may have a conflict of interest.
- Make business decisions only in the interest of secunet and not on the basis of personal interests.
- Inform your manager and/or the Compliance Office of any relationships with persons or companies with whom secunet does business that could lead to conflicts of interest – for example, family relationships, partnerships, business partnerships or investments.



Details are governed by the separate “Anticorruption Policy”.

Donations & sponsorship

As a matter of principle, secunet does not make monetary or material donations to political organisations, parties or individual politicians. Insofar as secunet employees make private, politically motivated donations, they must ensure that such private donations are not brought into a connection with secunet.

Expenditures for donations and sponsorship measures are to be made transparently and responsibly.



Details are governed by the “Sponsorship” process and the “Anticorruption Policy”.

Dealings with customers

Customers are the focus of our activities. Their satisfaction is the benchmark for our services. We create benefits for our customers by meeting their requirements with high-quality products, intelligent solutions, speed and absolute reliability. For our customers, we are not just a supplier of goods or services, but a trustworthy partner. We support our customers with our expertise and service to help them achieve sustainable success in their markets.

Quality is an expression of secunet's corporate philosophy. Every employee strives daily to achieve the highest level of quality. This constitutes both the basis for our customers' trust and, at the same time, a contribution to the future of secunet.

Dealings with suppliers and business partners

In its business activities, secunet Group is contractually bound to a large number of suppliers and service providers – often resulting from a long-term and trust-based partnership. Responsible conduct on the part of business partners, suppliers and their employees is thus a prerequisite. secunet only maintains business relationships with partners of integrity who comply with the law. Relationships with business partners must be based solely on objective criteria. This applies above all to the selection of suppliers and business partners.



Details are governed by the separate “Code of Conduct for Suppliers and Business Partners of secunet Group” and the “Consultants and Intermediaries”.

Prohibition of money laundering and violations of sanctions

secunet complies with national and international regulations against money laundering. All secunet employees must notify the Compliance Office of any transactions that could give rise to suspicion of money laundering activities.

Recommended conduct

We comply with national and international sanctions, embargo regulations and other restrictions through foreign trade law.



Details are governed by the separate "Export Policy".

Taxes and business records

secunet complies with all statutory provisions as well as tax laws and regulations to ensure proper accounting and financial reporting. Maintaining accurate accounting records as well as other records is paramount to meeting our business, regulatory and commercial requirements and forms the basis of integrity in our business conduct. Insofar as statutory regulations require the disclosure of records, we comply with this obligation.

Fair market conduct



Compliance with antitrust and competition law

secunet convinces with the quality of its products. We are committed to fair and undistorted competition in both national and international markets. We strictly comply with antitrust and competition law.

Recommended conduct

- Never enter into agreements with competitors that restrict competition.
- Do not abuse any dominant market position.
- Only use permissible means to monitor the competition.
- Conduct that is unfair or results in liability claims is not permitted.
- If in doubt, contact Corporate Compliance or the Legal Department.



Details are governed by the separate "Antitrust Law Policy".

Prohibition of insider dealing

We appreciate the trust that our investors place in us. As a listed public limited company, we are obliged to immediately publish information with significant potential to influence the share price that directly affects our company and is not public knowledge. As a general rule, anyone who has knowledge of inside information may not use or unlawfully disclose it when trading in financial instruments.

The aim of insider trading bans is to protect the integrity of the financial markets and serve to ensure equal information for investors. Violations can result in considerable reputational damage for our company as well as for the acting and responsible persons. For this reason, and not least also because of the severe legal sanctions, it is imperative that we comply with our obligations under capital market law and avoid even any semblance of violations of the insider trading bans.

Recommended conduct

- Do not acquire or sell secunet shares using insider information and do not recommend this to others.
- Do not disclose inside information to any other person unless such information is required for the performance of professional duties.
- In particular, avoid talking or phoning about inside information in public places or while travelling.
- Keep documents related to inside information in a safe place.
- In case of doubt, please contact the Investor Relations department.



Details are governed by the separate "Insider Law Policy".

Protection of information and corporate property



Information security

All employees of secunet are obliged to maintain confidentiality with regard to business and trade secrets, i.e. all confidential information which is relevant to secunet's business operations or in the confidentiality of which secunet has an interest.

By taking all necessary, appropriate and reasonable measures, secunet employees shall ensure that company and business secrets do not fall into the hands of unauthorised persons, either within secunet Group or externally.

Recommended conduct

Company and business secrets (including those of third parties) must be kept secret.



Details are governed by the currently valid "Corporate Guideline on Information Security", the "Security Concept of secunet Security Networks AG" and the various security policies.

Data protection

secunet attaches great importance to the protection of personal data. The right of informational self-determination and compliance with data protection laws are protected accordingly. Violations of data protection may result in fines, penalties, lawsuits or other sanctions against secunet or individual employees.

Recommended conduct

- Process personal data confidentially, lawfully and only for clearly defined purposes.
- Process personal data only if it is protected against loss, alteration and unauthorised use or disclosure by appropriate technical and organisational means.
- In the event of a data protection breach (or a suspected one), contact the Data Protection Officer immediately.
- If you are uncertain about how to handle personal data, please contact the Data Protection Officer.



Details are governed by the “Data Protection Management Concept of secunet Group”.

Protection of corporate property

Corporate property and assets of secunet serve to achieve our Company goals. All employees of secunet Group are obliged to protect corporate property against loss, theft or misuse. Data files, programmes or documents may also not be copied and removed from secunet’s sphere of influence or brought into secunet’s sphere of influence without approval. The intellectual property (IP) of secunet, as well as intellectual property entrusted to us by third parties, must be protected. Intellectual property includes trade secrets, inventions, patents, utility models, trademarks, designs, registered designs, domains and/or software and is therefore one of secunet’s most important intangible assets and secures our competitive position.



Recommended conduct

Handle secunet property and assets entrusted to you carefully and responsibly.

Internal and external communications

Business-relevant information concerning the company, its business activities or its strategies, as well as other matters of the company shall only be disclosed internally or externally by authorised employees.



Details are governed by the separate “Public Relations / Communications Policy”.

Violations and sanctions

Compliance with this Code of Conduct is mandatory. Violations of this can lead to considerable damage and will not be tolerated. Violations will be sanctioned accordingly. Non-compliance can lead to consequences under labour and criminal law.



Implementation and contact persons



The Management Board of secunet is responsible for the implementation, monitoring and further development of appropriate and effective compliance measures within secunet Group.

Every manager is expected to go beyond his own role model function and take all necessary steps to ensure compliance with this Code of Conduct.

If you feel that the Code of Conduct does not provide a concrete answer to a situation, please discuss the matter with your manager or the Compliance Office.

Should employees become aware of violations or suspected violations of this Code of Conduct, they should inform their supervisor(s) and/or the Compliance Office. Information on deficiencies or other circumstances that lead to legal violations can be submitted (anonymously as well) at any time via our electronic whistleblowing system. In the event of concrete indications, investigations are initiated to clarify the facts and appropriate countermeasures are taken.

Compliance Officer

Stephanie Ventz
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BKMS Whistleblowing System

<https://www.secunet.com/en/about-us/company>

secunet – protecting digital infrastructures

secunet is Germany's leading cybersecurity company. In an increasingly connected world, the company's combination of products and consulting assures resilient digital infrastructures and the utmost protection for data, applications and digital identities. secunet specialises in areas with unique security requirements – such as cloud, IIoT, eGovernment and eHealth. With security solutions from secunet, companies can maintain the highest security standards in digitisation projects and advance their digital transformation.

secunet is an IT security partner to the Federal Republic of Germany and a partner of the German Alliance for Cyber Security.

secunet Security Networks AG

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