VECTOR >

Code of Conduct

Vector Informatik GmbH

vector.com

Dear Colleagues,

Each one of you contributes to the success of the Vector story and represents our company. The conduct of everyone[1] has a strong effect on the image of Vector and the impression we make on our customers, business partners and the public. Our business activities are consistently aligned with the requirements of international and domestic law. On the other hand, the values that flow into our principles of conduct also represent a further, significant component of our success. As Vector continues to thrive and grow, it is important that our principles of conduct be codified and defined in a Code of Conduct. This Code of Conduct represents a minimum standard for our conduct and complements legal requirements and company policies already in place.

It is a guideline for our everyday actions and personal responsibility and thereby helps avoid misconduct. That is why we would like to ask you to please take the time to read our Code of Conduct carefully.

Through our compliance with this Code of Conduct, we can make **OUR BRAND, OUR VALUES AND OUR EMPLOYEES STRONG.**

Thank you very much for your cooperation and support!

Dr. Thomas Beck Dr. Matthias Traub

[1] Any gender-specific forms used to facilitate reading are to be understood to mean persons of all genders.

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Our principles of conduct

Preamble

The principles of conduct described hereinafter in this Code of Conduct apply worldwide for all employees of Vector Informatik GmbH and its affiliated undertakings. They are binding upon each of us, regardless of our activity, position or responsibility within Vector.

These principles are based on national and international provisions and conventions, such as the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights as well as the relevant conventions of the International Labour Organization (ILO).

Our work is guided by fairness and respect

Respect for human rights

We accept responsibility for observation of and compliance with internationally recognized human rights and we respect and advocate for such rights.

We reject any discrimination or harassment in the workplace or when hiring new employees and do not tolerate preferential treatment or exclusion, e.g. based on ethnic origin, race, skin color, national origin, gender, age, political opinion, social background, marital status, sexual orientation, religion, physical or mental disability or ideology. We do not tolerate human trafficking, forced labor or child labor in any form. We consistently adhere to the legal minimum age for employment.

Our organization has a respectful employee culture that we live in the form of an ‘open door culture’. We rely on trust and loyalty in combination with respect and recognition to achieve optimal performance.

We maintain an open and constructive dialog with our employees and employee representatives. We respect the freedom of association and the right to form interest groups. We grant our employees the right to represent their interests in accordance with national legislation.

We ensure that we do not hire or use public and private security service providers if they violate human rights.

Rights of local communities

We do not engage in land theft. Our business partners must ensure compliance with the prohibition of unlawful eviction when acquiring, cultivating, or otherwise utilizing land, forests, and waters.

Leadership by example

Through their own conduct, our executive officers provide an example of integrity and honesty for others to follow. We promote open exchange and encourage and cultivate new ideas and the opinions of others. Our senior executives trust employees and acknowledge and recognize their contributions. We also try to recognize and reward the potential of our employees.

Health and occupational safety

For us, the health and safety of our employees is a priority concern. Compliance with legal requirements intended to ensure a safe working environment is a matter of course for us. We provide our employees with information on safety measures and instruct them to act accordingly in the context of their everyday work.

We contribute to the performance and satisfaction of our employees through a variety of preventive and health-promoting measures. We value the ability of our employees to achieve a healthy work-life balance. We strictly comply with all applicable laws regarding working hours and leave.

Wages and social benefits

We pay remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements.

We obey the law and we keep our promises

Our company and each individual employee are responsible for compliance with the law and regulatory requirements. This applies equally to management, senior executives and employees as well as to all others associated with us such as, for example, interns, student employees and temporary personnel. Respecting and complying with the law are therefore a primary obligation for all of us. We expect the same from our business partners.

We avoid conflicts of interest and refuse to tolerate corruption

Conflicts of interest arise when personal interests do not coincide with those of the company. We respect the personal interests and opinions of our employees. For us, it is important to avoid such conflicts, and we

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appreciate the loyalty of our employees towards their company.

Anti-corruption measures

Corruption is prohibited by international and domestic law. As a result, any form of bribery is incompatible with our corporate culture and system of values. We refuse to tolerate corruption. Even the slightest indication of corruption must be avoided. As a result, none of us may take advantage of business relationships for personal gain or for the benefit of others. We comply with the applicable legal provisions for the prevention of money laundering.

Dealings with business partners and third parties

Compliance with anti-trust and unfair com-petition law is mandatory for all of us. We are committed to fair competition and do not allow the exchange of market-related information for the purposes of price fixing, to obtain rebates or to share markets with other competitors. We are upright market participants and promote and defend competition. Any abusive use or violation of laws governing fair and free competition will not be tolerated. We also expect the same commitment from our business partners and third parties. Our dealings with one another and with our business partners and other parties are based on honesty and transparency.

Invitations, gifts and other gratuities

We make every effort to ensure that gifts or invitations are not in any way intended to influence decisions and that gifts and invitations are accepted or given only if in accordance with common business practice and allowed by the relevant provisions of law.

We treat information and property responsibly

Business and trade secrets, confidential information

We comply with all national and international trade regulations, customs, export as well as embargo regulations, to ensure that all applicable national and international sanctions and trade embargoes are observed. If necessary, any required measures shall be taken to avoid sanction violations.

We treat business and trade secrets confidentially. Employees are bound by this obligation even after their employment terminates. We safeguard internal and confidential information. The use of such information is allowed only if in the interest of Vector. This obligation also applies to information of our business partners, suppliers or other parties. We also treat the business and trade secrets of our business partners with respect.

Insider information

Insider information is information that has not yet been made known to the public. We do not act based on such information, use such information for personal gain or make such information available to others.

Data protection

We collect, store and process personal data in accordance with the statutory provisions. Our business processes are designed in such a way that the rights of data subjects are safeguarded in accordance with the relevant data protection regulations and their personal data is protected against unauthorized access. This applies equally to the personal data of employees and business partners. Personal data are processed exclusively for specific, defined and legitimate purposes.

We undertake to treat our customers' internal and confidential information and business secrets confidentially; this also applies to personal data of any kind. This obligation begins with the initiation of the business relationship and continues after its termination. We ensure compliance with applicable laws (e.g. GDPR) and use recognized standards for information security (e.g. TISAX label).

Protection of our know-how

Our knowledge, experience, skills and products incorporate intellectual property and represent important corporate assets. The protection of such intellectual property is crucial for the continued existence and future of our company and its protection is mandatory for each employee of Vector.

Use of artificial intelligence

We ensure compliance with applicable laws and regulations when developing and/or using artificial intelligence. In doing so, we follow an approach that ensures that people remain the pacesetters of development.

Materials and supplies

We treat all materials and supplies properly and carefully and protect them against theft and improper use. The use of materials and supplies for personal use is permissible only if expressly allowed.

With the help of trustworthy and well-chosen business partners, we ensure that the products supplied to Vector do not contain metals extracted from minerals or their derivatives that originate from conflict regions in

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which they directly or indirectly finance or benefit armed groups.

We link our economic performance to our social responsibility

Vector stands for transparent and responsible management at all levels. We consider the expectations of relevant target audiences and stakeholders in our actions. Through our transparent and ethical conduct, we create sustainable added value for Vector, the environment, the marketplace and society.

Marketplace

Vector sees itself as a reliable and fair business partner within the value-added chain. At the same time, Vector would also like to reinforce awareness of sustainable management on the part of its business partners.

Protection of the environment

For Vector, ongoing avoidance and reduction of adverse impacts on the environment is a self-evident responsibility. With the help of established processes in environmental management aligned with ISO 14001, we strive to reduce our environmental footprint. Vector also promotes activities intended to achieve a positive ecological balance. Each of us is also motivated to be aware of our impact on the environment and act accordingly to avoid the possibility of negative influences or at least keep them to an acceptable minimum.

We comply with the relevant legal requirements and contribute to the preservation of air and soil quality.

We are committed to active and sustainable climate protection, for example by purchasing energy from renewable sources. Our aim is to create transparency about our CO_2 emissions and clarity about our CO_2 reduction targets.

We monitor and document our energy consumption and always strive to find cost-effective solutions to improve energy efficiency and minimize energy consumption in the long term.

We use water carefully. Water extraction, particularly in areas suffering from water shortages, is reduced to a minimum.

We use resources efficiently, employ energy-efficient and environmentally friendly technologies and reduce our waste volumes as well as our emissions to air, water and soil.

We handle chemicals and other materials that pose a risk if released into the environment with care to ensure the safe handling, transportation, storage, use, recycling, reuse and disposal of these substances.

Animal welfare & biodiversity

We comply with applicable national regulations for the protection of animal and species diversity.

Society

Vector takes social considerations into account when making entrepreneurial decisions. The company shapes social values through its constructive engagement and attempts to reduce the social risks to the public. As a result, we support selected non-profit institutions and educational projects to awaken technical enthusiasm and curiosity at an early age. We recognize the social involvement of our employees.

We insist that the regulations are complied

All Vector employees are obligated to comply with this Code of Conduct. In the event of any suspicion of failure to comply with the principles of conduct contained in this Code of Conduct, we will investigate the matter, draw the necessary conclusions and take remedial measures to ensure that similar violations do not recur.

In case of knowing or suspecting a violation

If they have any questions regarding the Code of Conduct, for example, as regards the interpretation of any of its provisions, employees may first turn to their superiors. The same will also apply accordingly in the case of doubt as to whether a specific action or activity is consistent with the Code of Conduct of Vector.

We encourage all employees to report – anonymously if desired – any indication of a possible violation of our principles of conduct, the law or company policies. Except insofar as we may be required to make dis-closure by law, we will treat any reports of potential violations confidentially. We will also treat employees who are accused of misconduct fairly. We encourage employees to disclose any misconduct on their part, even in the event misconduct is only suspected.

We understand that it could under certain circumstances be uncomfortable to confide in a superior. As a result, employees can also contact us directly at: compliance@vector.com

We protect any employee from retaliation who reports potential misconduct or provides relevant information.

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