



Code of Conduct

Mimacom AG | Mimacom Management AG | Flowable AG | Flowable Licences AG
Mimacom Deutschland GmbH | Flowable Deutschland GmbH | Flowable Mimacom Services Deutschland GmbH
Mimacom Ibérica s.l. | Flowable Services Spain s.l.
Mimacom USA Inc. | Flowable USA Inc.
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1 Purpose

This Code of Conduct defines the minimum standards of business conduct and business practices with which the Mimacom Flowable Group expects everyone who represents our Group, including our employees, external contractors, temporary staff, the management and the board of directors to comply (**Teams**). Our Teams take on a critical role in defining, protecting and fostering our most valuable asset—the trust that our customers, partners, suppliers, shareholders and fellow colleagues (**Stakeholders**) place in Mimacom Flowable Group. The foundation of this trust lies in the personal conduct and capability of our Teams and their continuous desire to jointly create value for our Stakeholders.

This Code of Conduct together with the applicable laws and our internal policies - together Code - represent the minimum standards of conduct for all worldwide Teams. Complying with the Code governs over the desire to grow and make profit in any respect.

The Code of Conduct promotes:

- an appreciative, respectful and fair working environment
- the proper handling of conflicts of interest
- the accountability of team members for their behaviour and performance
- the adherence to local governmental laws, rules, and regulations
- internal reporting and resolution of violations
- the protection of Stakeholder and Mimacom Flowable Group assets
- proactive, full, fair, accurate, timely, and understandable written and verbal communication, reports, and documents

The Code of Conduct is reviewed annually to ensure it is up to date. Any changes will be communicated to the Teams in an adequate form. Teams are required to confirm that they have read and understood this Code of Conduct as well as any changes to it from time to time.

For any questions with regards to the Code, Teams are encouraged to contact their direct line manager or the **Legal Department**.

2 Values

We have a hungry mind. We are passionate about creating outstanding, robust, customizable software solutions based on leading-edge technologies. We are driven by our desire to find and create solutions, as well as to ensure their continuous improvement. We are proud of our accomplishments and transform our knowledge into new applications. We grow as a team by sharing our skills, knowledge and abilities with each other.

We are agile. We are always open to new things and perceive change as an opportunity. We are bold and not afraid of making mistakes; instead, we use them as a chance to learn and grow. Our customers are

perceived as a part of our team, and their challenges give us the opportunity to develop new digital solutions which bring progress to society and business enterprises in equal measure.

We go the extra-mile. We work alongside our customers to achieve ambitious goals – each team member makes significant contributions and is crucial to the shared success of the team. All of us are active on the field of play; there are no commentators or spectators within our team. When things must get done, we are all in pulling in the same direction to achieve our goals.

We offer freedom with responsibility. We trust our Teams, their ideas and their judgement. We act in the interest of the company, our customers and colleagues, ensuring that our individual actions are consistent with the team objectives. We protect our Teams from bullying and sexual harassment in the workplace. The inalienable individuality of each one of us is always respected. We discuss challenges and conflicts in order to find shared solutions. Our organizational structure is flat, giving Teams the freedom to make independent decisions whenever possible. We act conscientiously and raise our hand when we need help. We work in strong distributed teams and have faith in the concerted efforts of our able and intelligent specialists.

We count on people, not titles. We are committed to gender equality. Human resources decisions are made exclusively based on objective criteria and have nothing to do with a person's gender. Each one of us makes a valuable and unique contribution to reaching our targets. Diversity, different ethnicities, skills and opinions make us stronger as a team. We are open, approachable and behave respectfully toward each other. We have great faith in the personal creativity and proactivity of each team member as they seek to shape our company and their own development for the better. We do not exist in a bubble; instead we offer our team members constant and realistic opportunities to grow.

3 Privacy and Confidentiality

Privacy. We are transparent in the handling of personal data and, in particular, the data of our Stakeholders (**Data**). When handling Data, we respect and protect its privacy and security aspects at all times. Limiting access to and use of Data is key. Our Teams' responsibilities regarding the collection, use and access to Data are governed by our internal policies and applicable data protection laws. Therefore, Teams are required to follow all company, country-specific, local and third party policies related to the handling of Data and its protection as issued by Mimacom Flowable Group and communicated to the Teams.

Confidentiality. Any non-public information or knowledge about Mimacom Flowable Group as well as our Stakeholders is considered confidential information, the disclosure of which outside the Mimacom Flowable Group might be damaging to our interests. It may come into possession of Teams in written, spoken or electronic form. Teams are required to ensure adherence to our internal policies when dealing with confidential information. At times, a particular project or negotiation may require Teams to disclose confidential information to a third party. Disclosure of that information should be on a "need-to-know"-basis in accordance with our internal policies and processes and only under a non-disclosure agreement.

Teams must ensure to conduct the appropriate due diligence and have the appropriate agreement in place before disclosing information.

The Teams' duty regarding privacy and confidentiality lasts beyond their employment.

4 Safeguarding Mimacom Flowable Group Assets

- a) **Assets** Company assets include:
 - Tangible assets, such as facilities, money, equipment, and information technology systems;
 - Intangible assets, such as Mimacom Flowable Group intellectual property, patents, trade secrets, invention disclosures, trademarks, copyrights, business, technical and Stakeholder data, computer programs, and business know-how and processes.

- b) **Care** All assets provided by Mimacom Flowable Group must be treated responsibly and with appropriate care. Electronic assets (including laptops, hardware, software and other media) are to be appropriately utilized. Mimacom Flowable Group's assets must be protected from misuse, abuse, destruction, inappropriate disclosure and misappropriation. Our internal policies describe the conduct and care for such assets in detail.

- c) **Use** Mimacom Flowable Group's assets may be used only for Mimacom Flowable Group's business purposes and such other purposes that are specifically approved by the Mimacom Flowable Group management. Without express prior written permission, Teams must not transfer title, remove, dispose of, or destroy anything of value belonging to Mimacom Flowable Group, including physical items, electronic information, and intellectual property. We expect Teams to act responsibly and use good judgment to conserve and safeguard our resources and assets. We have separate internal policies regarding the use of our company assets in place which Teams must adhere to.

- d) **Mimacom Flowable Group Intellectual Property** One of Mimacom Flowable Group's most valuable assets is the intellectual property pertaining to our products and services. Therefore, we take all necessary steps to protect and safeguard the integrity of our intellectual property rights. Teams must have all contracts reviewed and approved by the Sales, Finance, and Legal Teams in accordance with applicable internal processes and policies. We expect every team member to know and comply with these internal processes and policies.

- e) **Third Party Software** We respect the intellectual property rights of third parties. Only approved and properly licensed software is to be used on company systems, and its use is subject to the applicable software owner's license agreements. Conversely, Teams should not uninstall software that has been installed by IT without IT approval.

5 Security Trainings

Mimacom Flowable Teams are expected to complete regular security trainings as instructed and mandated by our Group from time to time. The importance of these trainings cannot be stressed enough. By completing these trainings, we refresh and improve our knowledge and awareness around the topic of cyber security and therewith foster the principles laid out in this Code of Conduct. Trainings must be completed within the defined timeframe.

6 Financial Integrity

- a) **Transparent Payments and Contributions** We are transparent when interacting with Stakeholders and do not influence their decision with improper payments and other contributions. When Teams are faced with a situation in which competing loyalties could cause them to pursue a personal benefit for themselves, their friends, or their family at the expense of Mimacom Flowable Group or its Stakeholders, they may be faced with a conflict of interest. Teams should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict of interest.
- b) **Gifts** Accepting gifts, entertainment, and other business courtesies from a third party can easily create the appearance of a conflict of interest, especially if the value of the item is significant. Generally, acceptance of inexpensive non-cash gifts is permissible (i.e. with a value below CHF 100). In addition, infrequent and moderate business meals and entertainment with Stakeholders and infrequent invitations to attend local events and celebratory meals can be appropriate aspects of many Mimacom Flowable Group business relationships, provided that they aren't excessive and don't create the appearance of impropriety.
- c) **Disclosure** If a conflict of interest is inevitable, then this must immediately be reported to the direct line manager in order to ensure an adequate handling of the given situation.
- d) **Accurate Financial Records** Accurate and reliable financial and business records are of critical importance. Teams must not engage in any actions that could result in conveying false or inaccurate financial information to Mimacom Flowable Group or our Stakeholders. Teams must ensure that all submissions made to Mimacom Flowable Group (for example, orders, sales reporting, special bid requests, resellers involved, rebates, and reimbursement requests) are complete and accurate.
- e) **Anti-Money Laundering, Counter-Terrorist Financing and Economic Sanctions** We are committed to conducting business in a way, so we comply with anti-money laundering, financial crime, and antiterrorism laws as well as all applicable economic and trade sanctions in all countries where we operate. We take the time to know our suppliers and other business partners and the reputations they have, by performing appropriate due diligence and screenings in accordance with internal processes and policies. Teams are required to be proactive when it comes to spotting financial transactions that might signal a problem, and report concerns if they see or suspect an activity or transaction that is

outside of normal process (for example a payment to countries not related to the transaction or cash payments).

7 Mutual Respect and Inclusivity

Key components of success are a diverse, productive work environment that is free from unlawful discrimination or harassment. As part of our commitment to having a respectful and inclusive work environment, Mimacom Flowable Group prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual - on the basis of race, colour, religion, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law.

As an international company, we are committed to attracting and retaining a highly qualified, diverse, and dedicated work force. Working at Mimacom Flowable Group is based solely upon individual merit and qualifications directly related to professional competence.

8 Environmental Protection, Health and Safety

Mimacom Flowable Group is committed to protecting people and the environment and is constantly working to improve procedures and processes to minimize environmental impact and health risks. The Mimacom Flowable Group will ensure that all Teams understand how to work safely while performing their activities. If, despite all precautionary measures, damage to people or the environment should nevertheless occur, every team member has a duty to report this immediately to the direct line manager so that appropriate countermeasures can be taken.

9 Social Media

Teams are aware that communications made on social media platforms are in the public domain, may be permanent and accessible to a much broader audience than probably intended. Teams will not post disparaging, defamatory or otherwise damaging statements about the Mimacom Flowable Group or any Stakeholder, or which could adversely affect the Group's reputation. Any information shared by Teams on social media will respect the privacy rights of the Stakeholders and preserve the confidentiality and security requirements of the Mimacom Flowable Group.

10 Reporting Concerns

Mimacom Flowable Group is committed to creating an open and trustworthy environment where Teams at all levels are encouraged to report breaches or suspected breaches of the Code without fear of retaliation. If a team member believes they have been bullied, harassed, or discriminated against by another team member or by a Stakeholder we strongly encourage them to immediately report the incident. Similarly,

supervisors and managers who learn of any such incident should immediately report this to the **P&O Department and/or Legal & Compliance Department**.

Reports are made to the direct line manager, the **P&O Department**, the **Legal & Compliance Department** or on the **Whistleblower Platform**. Serious matters can be reported on our **Whistleblower Platform** anonymously or confidentially if Teams have reasonable suspicion of such matters. Through this platform, Teams can submit information about serious issues such as reprehensible matters or actions that are unethical, illegal or in violation of internal policies. We take all reported concerns seriously will address them in a fair, honest and timely manner without any fear of retaliation.

Notwithstanding the foregoing, Teams are obliged to immediately report any breaches or suspected breaches of confidentiality or intellectual property rights to their direct line manager or the Legal Department.

All reported breaches or suspected breaches will promptly and thoroughly be investigated, and appropriate action will be taken.

11 Disciplinary Procedures

We do not tolerate breaches of the Code. These actions can harm our company, reputation and fellow colleagues. Team members who violate the Code may be disciplined to match the nature and circumstances of the violation, up to and including suspension or termination of contract, if appropriate. If an act violates the applicable law, it may also result in fines or a criminal prosecution. All violations are documented in the record of the team member.

12 Respect the Laws

Mimacom Flowable Group takes its responsibilities to comply with laws and regulations seriously and each team member is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, our team members are trusted to understand the major laws and regulations that apply to their work.

This Code of Conduct addresses certain fundamental legal requirements such as:

- Maintenance of an appropriate work environment
- Antitrust / Competition Laws
- Anti-Money Laundering Laws
- Protection of intellectual property and confidential information
- Conflicts of interest
- Financial reporting and external communications

□ Sales practices

We understand that this Code of Conduct is not exhaustive, and since we operate in a number of countries, we must be mindful of the laws where we do business. Absence of guidance in this Code of Conduct about a particular legal requirement should not be interpreted to mean that a particular act is acceptable or permissible.