



All for One

CODE OF CONDUCT

MACH'S RECHT

All for One Group

Applicable to: All for One Group SE and all affiliated companies within the meaning of Section 15 AktG

Version: 3.0

Valid from: 13.07.2020

Author: Haner, Manfred

Responsible: Maria Caldarelli, Chief Compliance Officer, Executive Director Corporate Legal & Integrity

Adopted by: Management Board of All for One Group SE

Status: 19.05.2025

Other applicable documents:

This document forms part of the Compliance Management System at All for One Group SE. All members of staff can access it on the company intranet (Sharepoint). Revisions will be published on the intranet. Members of staff at affiliated companies who cannot access Sharepoint will be made aware of the document and any revisions to it by other suitable means.

AGG conformity:

If only one gender form is used in the document for reasons of simplification, any other gender form is expressly meant.



MACH'S RECHT

**Dear colleagues,
To be and remain number 1, to exploit market
opportunities and to grow - that is our goal.
It is important to us to achieve this goal, but not at any
cost.**

The reputation that the All for One Group enjoys in the market is largely determined by the way we interact with each other and how we present ourselves - both internally and externally. We want to be perceived as a responsible and trustworthy group of companies. Customers and business partners can trust that every employee acts ethically, reliably and honestly. The reputation of our company, but also of each individual, depends on this.

We have therefore drawn up the following Code of Conduct together with colleagues from various departments. It supplements the corporate values communicated last year.

Our corporate culture is based on personal responsibility and mutual trust. This should not be restricted by the Code of Conduct, but rather emphasized. Therefore, the following still applies: do it - and "MACH'S RECHT" - do it right!

Yours

Michael Zitz and Stefan Land

CONTENTS

INDEX

01	INTRODUCTION	6
02	PRINCIPLES OF OUR BEHAVIOR	6
	LAW-ABIDING BEHAVIOR.....	6
	RESPONSIBILITY FOR THE REPUTATION OF THE ALL FOR ONE GROUP	6
	MUTUAL RESPECT, FAIRNESS AND INTEGRITY	6
03	CONDUCT TOWARDS BUSINESS PARTNERS AND THIRD PARTIES	7
	BUSINESS RELATIONSHIPS WITH CUSTOMERS	7
	BUSINESS RELATIONSHIPS WITH COMPETITORS	7
	BUSINESS RELATIONSHIPS WITH SUPPLIERS.....	7
	BUSINESS RELATIONSHIPS WITH THIRD PARTIES	7
	SPONSORING AND DONATIONS	7
04	AVOIDING CONFLICTS OF INTEREST	8
05	ACCEPTING BENEFITS, BRIBERY, CORRUPTION	8
	ACCEPTANCE OF BENEFITS	8
	CONTRIBUTION FROM THIRD PARTIES.....	8
	INVITATION OF THIRD PARTIES TO BUSINESS MEALS AND ENTERTAINMENT EVENTS	9
	CONTRIBUTION TO THIRD PARTIES.....	9
	INVITATIONS TO THIRD PARTIES FOR BUSINESS LUNCHEES AND ENTERTAINMENT EVENTS.....	9

BENEFITS TO PUBLIC OFFICIALS10

06 DEALING WITH INFORMATION 10

INTERNAL HANDLING OF INFORMATION10

EXTERNAL HANDLING OF INFORMATION10

DEALING WITH INFORMATION FROM OUR BUSINESS PARTNERS10

07 INSIDER KNOWLEDGE 11

08 DATA PROTECTION 11

09 RISK MANAGEMENT, FINANCE AND TAXES 11

10 SOCIAL PROGRESS, HEALTH, OCCUPATIONAL SAFETY AND SUSTAINABILITY 12

11 NOTICES IN CONNECTION WITH THIS CODE OF CONDUCT 12

12 PENALTIES 12



INTRODUCTION

This Code of Conduct was adopted by the Management Board of All for One Group SE and is part of All for One Group's compliance management system. It is binding for all employees of the Group. Management Board members, managing directors and executives lead by example when it comes to compliance and implementation.

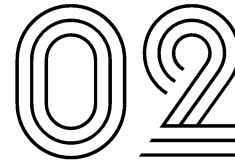
Every line manager ensures that the employees in their area are aware of and comply with the Code of Conduct.

The first point of contact for the Code of Conduct is the direct line manager. In addition, the Management Board has appointed a Compliance Officer for the Group.



ETHICAL VALUES ARE
THE BENCHMARK FOR OUR
ACTIONS.

MICHAEL ZITZ



PRINCIPLES OF OUR BEHAVIOR

LAW-ABIDING BEHAVIOR

In our actions, we always observe the law and our guidelines and policies.

If our actions do not fall within these guidelines, we act as we expect others to act. Ethical values are the benchmark for our actions.

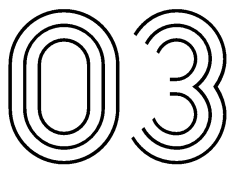
RESPONSIBILITY FOR THE REPUTATION OF THE ALL FOR ONE GROUP

The company is a reflection of its employees. As ambassadors of the All for One Group, all employees make a significant contribution to the company's public reputation. Individual violations of the law can cause great damage to the company's reputation.

MUTUAL RESPECT, FAIRNESS AND INTEGRITY

The All for One Group is characterized by the diversity of its employees. This diversity is an enrichment, as it leads to a broad spectrum of views and approaches to solutions. We protect the personal dignity of each individual. The All for One Group therefore condemns discrimination or harassment of any kind. We have the courage to stand up for each other and for third parties.

Violations on the grounds of race or ethnic origin, gender, religion or belief, disability, age or sexual identity are reported to the AGG Officer (AGG=General Equal Treatment Act); discrimination and harassment on other grounds are reported to the line manager or the Compliance Officer. Details can be found in point 11 of this Code of Conduct.



CONDUCT TOWARDS BUSINESS PARTNERS AND THIRD PARTIES

BUSINESS RELATIONSHIPS WITH CUSTOMERS

The All for One Group cultivates long-term customer relationships that are characterized by intensive and open cooperation. We see ourselves not only as a supplier, but also as a service-oriented partner that advises its customers honestly and professionally before each contract is concluded. Agreements with customers must be complete and unambiguous, and subsequent amendments and additions must be documented transparently. We refrain from any action that could call into question the integrity of All for One Group companies.

BUSINESS RELATIONSHIPS WITH COMPETITORS

The All for One Group complies with the rules of fair competition. Free competition promotes efficiency and innovation. We do not participate in price fixing or other prohibited agreements on market behavior with competitors. Nor do we attempt to gain unfair competitive advantages. Agreements restricting competition in tenders can be sanctioned with fines and imprisonment in accordance with the Criminal Code.

BUSINESS RELATIONSHIPS WITH SUPPLIERS

We select our suppliers carefully and maintain fair business relationships with them. We observe the legal requirements for free competition. We expect our business partners to observe and respect the principles set out in our Code of Conduct. Our suppliers are often also our customers. We do not use this to our advantage, but keep these relationships strictly separate. Purchasing is based on the applicable laws of the country in which the All for One Group operates.

Private relationships with a supplier must not lead to preferential treatment of this business partner. This applies in particular if the employee can directly or indirectly influence the official commissioning of the business partner. If such a case exists, the responsible manager must be informed so that the business decision can be reviewed and approved as part of the internal approval process in accordance with the "dual control principle".

WE REFRAIN FROM ANY ACTION
THAT COULD CALL INTO
QUESTION THE
INTEGRITY OF THE ALL FOR ONE
GROUP.



BUSINESS RELATIONSHIPS WITH THIRD PARTIES

We only use the services of civil servants and employees in the public sector in connection with an activity if the service to be performed is directly related to a transaction sought by both parties. The services must be agreed in writing with the competent authority and made transparent.

SPONSORING AND DONATIONS

We retain the option of engaging in sponsorship activities. In contrast to donations, a service is expected in return. All sponsorship measures serve advertising purposes and are managed transparently. The sponsoring partners must provide demonstrable consideration for the company. Sponsorship services may not be provided in connection with the business activities of an All for One Group company and must be submitted to the Compliance Officer for approval in advance.

We promote science, culture, sport, social projects and the environment within the scope of our possibilities and in compliance with the law and internal guidelines through donations in cash and in kind as well as services. Donations are made exclusively for altruistic purposes. In no case does the All for One Group hope to benefit from this.





AVOIDING CONFLICTS OF INTEREST

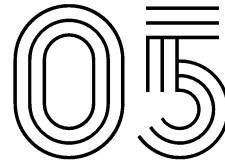
The companies in the All for One Group expect loyalty from their employees.

All employees must avoid situations in which their personal or financial interests conflict with those of the respective All for One Group companies. In particular, it is therefore prohibited to acquire a financial interest in competitors, suppliers or customers or to enter into business relationships with them in a private capacity if this could lead to a conflict of interest. The interests of the All for One Group must not be impaired by conflict situations.

Such conflicts of interest can arise in many situations. For example, personal relationships must not lead to preferential treatment of a business partner. Employees should not personally gain direct and/or indirect advantages from their position in the All for One Group through access to confidential information. All employees have a duty to promote the legitimate interests of All for One Group as far as possible. Any competitive situation with the company must be avoided.

Any actual or potential conflict of interest must be reported to and reviewed by the line manager or the Compliance Officer.

Any activity that is made available to a third party outside the main employment relationship is a secondary activity. It is irrelevant whether the activity is remunerated or unremunerated, self-employed or employed. For the protection of the company, no activity may be carried out that violates the interests of the All for One Group. This applies in particular if the secondary employment is in direct competition with the company.



ACCEPTING BENEFITS, BRIBERY, CORRUPTION

No employee may accept or grant benefits - in any form whatsoever - that could reasonably be expected to influence business decisions or transactions of the All for One Group. All transactions in this context must be documented by those responsible and disclosed to the line manager and the responsible accounting department. Gifts and other benefits may be subject

WE CONDUCT OUR
BUSINESS ACTIVITIES
IN ACCORDANCE WITH THE
RULES, FREE FROM
INFLUENCE BY ACCEPTING AD-
VANTAGES, BRIBERY
OR CORRUPTION.



to income tax. Care must therefore be taken to ensure that they are managed in accordance with local tax legislation.

ACCEPTANCE OF BENEFITS

All for One Group employees conduct their business activities in accordance with the rules, free from influence by accepting benefits, bribery or corruption. Apart from their salary and the additional remuneration approved by management, employees do not receive any money, profit or other advantage from the business conducted for the All for One Group.

CONTRIBUTION FROM THIRD PARTIES

All for One Group employees, their family members and life partners as well as other persons close to them do not accept gifts in kind, payments, loans, non-cash gifts (e.g. vacation trips or other benefits) or other benefits from customers, suppliers, competitors or partners of All for One Group companies if these exceed a value of EUR 40.00 (reference value in the European

Union). If there is any doubt about the amount of the benefit, the Compliance Officer must be consulted in order to make a proper assessment.

Under no circumstances may the contribution be accepted if it negatively affects the interests of the All for One Group or is made during a negotiation and/or bidding process. It is irrelevant whether it comes directly or indirectly from a party involved.

An exceptional case generally exists if it is a benefit that is not related to work at an All for One Group company.

Gifts of a recognizably higher value may also be accepted as an exception if they cannot be refused in view of the business relationship. In this case, the gift must be reported to the Compliance Officer as soon as possible. The Compliance Officer will then decide on how to proceed.

In principle, any appearance of dishonesty must be avoided.

INVITATION OF THIRD PARTIES TO BUSINESS MEALS AND ENTERTAINMENT EVENTS

Participation in business meals and entertainment events is to be carried out with the necessary and appropriate restraint. Each employee must always check whether his or her participation in the event is in line with standard business practice. Indicative features of this are that the host is present, participation is not repeated frequently and the travel or accommodation costs are not borne by the inviting business partner. In cases of doubt, the Compliance Officer should be consulted. In all cases, the line manager must be informed.

Employees only accept invitations from current and potential customers, suppliers, competitors or partners of All for One Group companies if participation in the business meal or entertainment event serves to initiate or improve business relationships and thus the interests of All for One Group. The business decision to be made must not be influenced by this and must not violate laws or ethical principles. The business practices of the respective country must always be observed.

If the invitation is also extended to family members, life partners or other persons close to the employee, the employee must ensure that participation does not take place at the expense of the inviting customer, supplier, competitor or partner.

CONTRIBUTION TO THIRD PARTIES

All for One Group employees do not offer current or potential customers, suppliers, competitors or partners of All for One Group companies any promotional gifts, presents, gratuities or other benefits that exceed a value of EUR 40.00 (reference value in the European Union).

Under no circumstances may the contribution be offered if it negatively affects the interests of the All for One Group or is made during a negotiation and/or bidding process. It is irrelevant whether it is offered directly or indirectly to a party involved. The

gift must not unduly influence any business decision to be made and must not violate the law or ethical principles.

Gifts of a higher value may also be exchanged in exceptional cases, provided this is in line with local customs and the hospitality of the country. In principle, any appearance of dishonesty must be avoided.

INVITATIONS TO THIRD PARTIES FOR BUSINESS LUNCHES AND ENTERTAINMENT EVENTS

All for One Group employees only offer invitations to business meals and entertainment events if these serve to initiate or improve business relationships and thus the interests of the All

**EMPLOYEES MUST
AVOID SITUATIONS IN WHICH
THEIR PERSONAL OR FINANCIAL
INTERESTS COME INTO CONFLICT
WITH THOSE OF THE ALL FOR
ONE GROUP.**

for One Group. The invitation must be appropriate and consistent with standard business practice and must not unduly influence any business decision to be made or violate any laws or ethical principles. Invitations for relatives, life partners or other related



parties of employees of customers, suppliers, competitors or partners of All for One Group companies must be avoided. In cases of doubt, the Compliance Officer must be consulted.

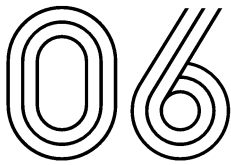
Under no circumstances will travel or accommodation costs for third parties be covered by the All for One Group.

Invitations to entertainment events are issued by Marketing.

Invitations to business meals and entertainment events can also lead to tax consequences for the invitee - they must therefore be documented in the interests of the All for One Group, but also in the interests of the invitee, and disclosed to the supervisor and the responsible accounting department.

BENEFITS TO PUBLIC OFFICIALS

Civil servants, public sector employees, politicians and other representatives of public institutions may under no circumstances receive gifts, donations, benefits or invitations that could call their independence into question. Invitations must always be made subject to the approval of the employer.



DEALING WITH INFORMATION

INTERNAL HANDLING OF INFORMATION

The All for One Group employees are obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to the departments concerned, unless in exceptional cases, in particular due to confidentiality obligations, there are overriding interests. Relevant knowledge may not be unlawfully withheld, falsified or selectively passed on.

EXTERNAL HANDLING OF INFORMATION

Much of the business information and data of All for One Group companies is confidential or legally protected, meaning that there is a duty of confidentiality towards third parties. The duty of confidentiality relates in particular to intellectual property. This includes trade secrets, trademarks and copyrights, but also business and marketing plans, drafts, business papers, salary data and all other unpublished financial reports and data.

Communication with media representatives and analysts is only carried out by employees expressly authorized to do so. Inquiries must be forwarded to these employees. All statements in the media (including social media such as Facebook and X) about All for One Group companies, customers, partners and competitors are subject to the obligation of fairness and loyalty to the employer.

EMPLOYEES MUST AVOID SITUATIONS IN WHICH THEIR PERSONAL OR FINANCIAL INTERESTS COME INTO CONFLICT WITH THOSE OF THE ALL FOR ONE GROUP.

Dishonest reporting to outside organizations (lawyers, tax advisors, etc.) or persons is strictly prohibited. All annual financial statements and annual reports, business papers and business books of All for One Group companies must accurately reflect business events and transactions and comply with legal requirements as well as the accounting policies and internal accounting procedures of All for One Group companies. Further details can be found in the All for One Group's IFRS accounting policy.

DEALING WITH INFORMATION FROM OUR BUSINESS PARTNERS

All information and business secrets disclosed and collected through our business activities must be protected. The unreserved trust placed in us by customers and business partners in this respect forms the basis of our successful work. Nothing can



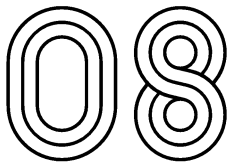
jeopardize this trust.



INSIDER KNOWLEDGE

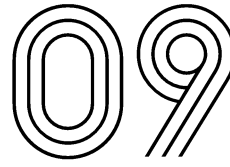
For us as a listed company, the strictly confidential treatment of any insider information is fundamental. Using insider information, all employees are prohibited from acquiring or selling insider securities such as shares in All for One Group SE for their own account or for the account of another person. It is also prohibited to disclose or make available insider information to another person without authorization, or to recommend the purchase or sale of insider securities on the basis of insider information, or to induce another person to do so in any other way.

Further details can be found in the guideline on insider information.



DATA PROTECTION

As an IT service provider, we process a large amount of data (including personal data) in order to fulfill our tasks and obligations towards our customers, contractual partners, service providers, authorities and other third parties. This also includes data that requires a high level of protection and must be specially protected against unauthorized access by third parties. The security of data processing therefore plays a key role in the fulfillment of our tasks. We are also committed to handling data carefully as part of our social responsibility. Further details on this can be found in the data protection management system applicable to the All for One Group.

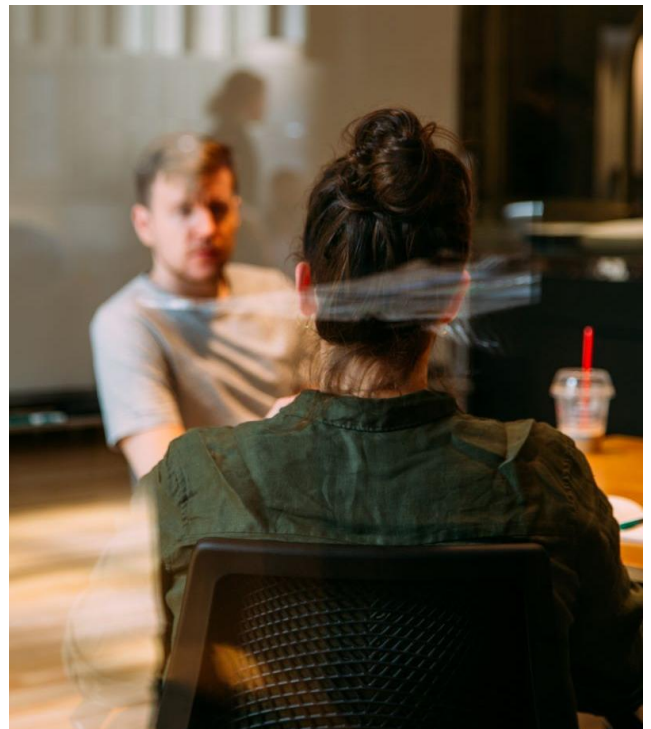


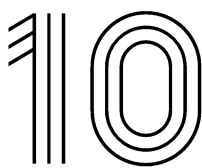
RISK MANAGEMENT, FINANCE AND TAXES

Effective risk management plays an important role in all areas of our business activities. In this way, we ensure that risks are identified and minimized in good time.

The All for One Group is committed to transparent financial reporting. Independent auditors are commissioned on a regular basis. Every employee is also required to conduct business transactions conscientiously and accurately. Further details can be found in the All for One Group's IFRS Group guidelines.

We are expressly committed to fulfilling all tax obligations. We engage in responsible tax planning that complies with the law and takes our legal obligations into account. Further details on this can be found in the All for One Group's Tax Compliance Management Policy.





SOCIAL PROGRESS, HEALTH, OCCUPATIONAL SAFETY AND SUSTAINABILITY

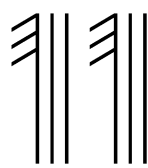
We are committed to responsible, sustainable and transparent corporate governance that respects human rights and internationally recognized core labor standards. In particular, we reject all forms of forced and child labor and ensure health protection and appropriate remuneration that at least meets the respective national legal standards.

Compliance with standards alone is not enough for us - we want to be a driver of economic development and social progress. With our business model and the associated digitalization, we enable the efficient use of resources for us and our customers. In this way, we ensure sustainability along the entire value chain.

We also set a good example when it comes to the conscientious use of energy: our data centers obtain green electricity from plants with the latest environmental standards in order to avoid CO2 emissions with a positive impact on the climate. As a certified IT company, our green electricity certificates of origin comply with the criteria catalog of recognized testing institutes.

The physical and mental health and safety of employees in their workplace is an extraordinary concern that everyone works together to improve on an ongoing basis. All for One Group companies and every employee share responsibility for creating safe and healthy working conditions. Any irregularities must be reported to the occupational safety officer. In addition to their role model function, our managers must ensure the health and safety of their employees in their areas of responsibility.

The principles outlined are the foundation of our human rights strategy, which aims to ensure respect for human rights and environmental concerns both in our own business operations and along our global supply chains. A detailed description of All for One Group's human rights strategy can be found in the associated policy statement.



NOTICES IN CONNECTION WITH THIS CODE OF CONDUCT

If there are concrete indications that a certain behavior may violate this Code of Conduct, the matter must be submitted immediately to the supervisor for clarification.

This can also be done in a confidential manner by informing the Compliance Officer or the Compliance Department (by telephone: +49 (0)711/ 78807 403, by e-mail to compliance@all-for-one.com and by name or anonymously via <https://all-for-one.integrityline.org/>).

The Compliance Officer must be informed immediately of any suspicion of unlawful conduct, in particular a criminal offense. Employees who have provided information under this Code of Conduct in good faith will not suffer any disadvantages.

If employees have any questions or suggestions regarding the Code of Conduct, they can contact their manager or the All for One Group Compliance Officer. The name of the Compliance Officer is published on the intranet.



PENALTIES

Any employee who does not comply with the rules must expect appropriate consequences, which may range from criminal prosecution to termination of employment and claims for damages. Express reference is made to the criminal liability of corruption and competition agreements under the Criminal Code.

MACH'S RECHT

All for One Group