

Table of Contents

1	Preamble	2
2	Introduction - FIS/ASP Guidelines	2
3	Principles of Social Responsibility (Corporate Social Responsibility).....	3
4	FIS/ASP Code of Conduct	4
4.1	Human Rights	4
4.2	Working Practices	5
4.3	Environment and Sustainability	5
4.4	Fair Operational and Business Practices.....	6
4.5	Customer Concerns	6
4.6	Integration and Development of Society.....	7
4.7	Monitoring and Review of the Code.....	7
4.8	Report of Possible Misconduct	7

Ausgedruckt unterliegt das Dokument nicht dem Änderungsdienst

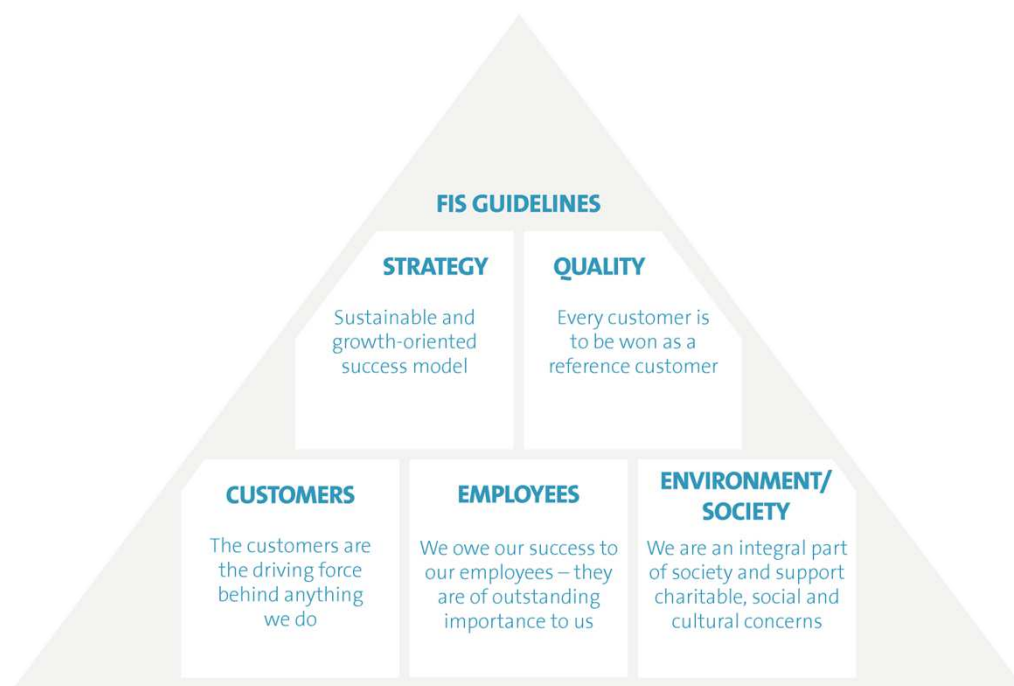
1 Preamble

This directive applies to all employees of the FIS Informationssysteme und Consulting GmbH, Grafenrheinfeld, and FIS-ASP Application Service Providing und IT-Outsourcing GmbH, Grafenrheinfeld, companies and their branch offices. Here, FIS/ASP stands for the FIS GmbH and FIS-ASP GmbH companies.

This Code applies to all employees of FIS Informationssysteme und Consulting GmbH and FIS-ASP Application Service Providing und IT-Outsourcing GmbH. For the only reason of readability, we do not differentiate between the genders. None of the descriptions or corporate roles is gender-specific; they shall equally apply to any person.

2 Introduction - FIS/ASP Guidelines

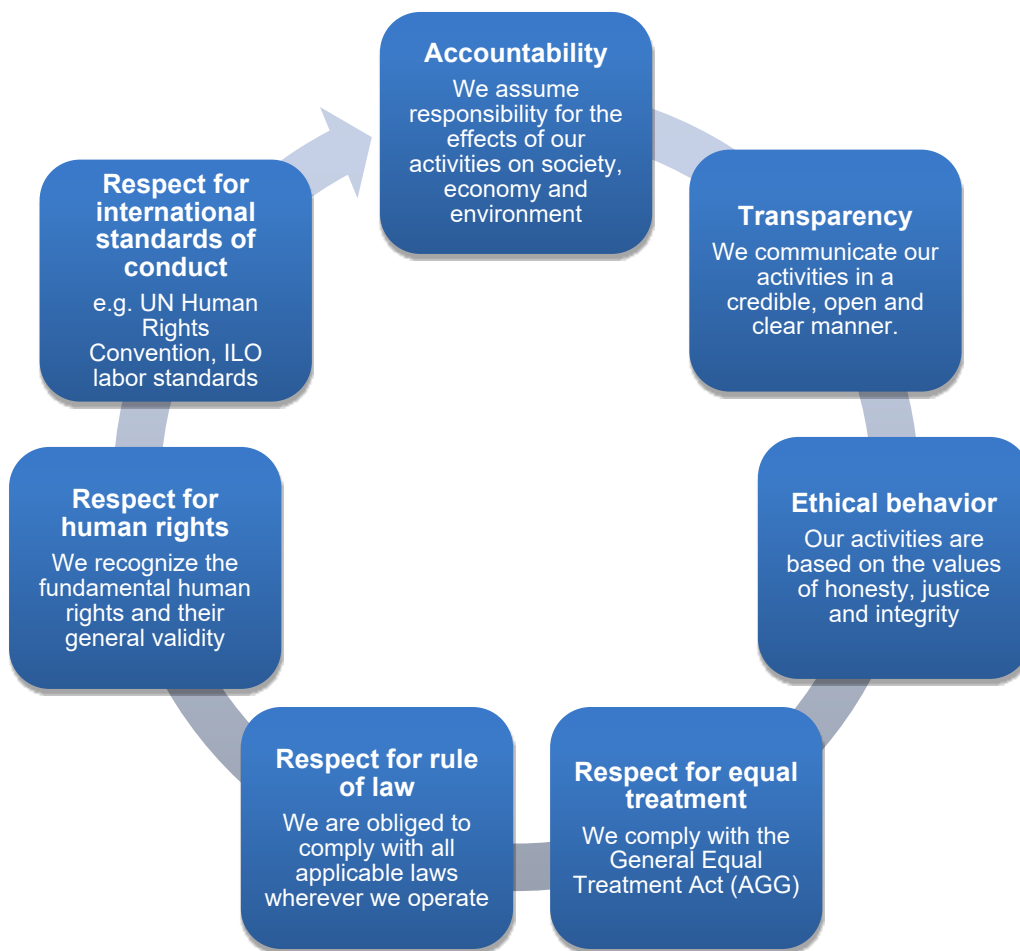
FIS/ASP have formulated and defined guidelines in a discussion with their employees. These include an obligation to fulfil requirements and the commitment to continual improvement. The guidelines are based on a fundamental understanding of social responsibility according to which FIS/ASP intend to act together with every employee.



3 Principles of Social Responsibility (Corporate Social Responsibility)

As globally acting companies, FIS/ASP are dedicated to sustainable business operations in the interest of the company, our employees and society as well as to the compliance and consideration of social and ethical standards. The respect of these generally accepted principles is the basis and prerequisite for a credible dealing with social responsibility. Our employees act accordingly. We expect our business partners to comply with similar principles and implement appropriate processes in their companies and affiliated companies which support the compliance with these regulations.

Social responsibility is founded on the following principles in accordance with the principles of the UN (United Nations) Global Compact:



Ausgedruckt unterliegt das Dokument nicht dem Änderungsdienst

4 FIS/ASP Code of Conduct

A Code of Conduct was defined on the basis of the FIS/ASP guidelines and the principles for social responsibility. It includes the activity fields specified below and describes the joint measures we take to fulfill our responsibility. That is what we also expect from our business partners.

4.1 Human Rights

The respect for human rights is the basis of all measures and activities. We ensure the respect for human rights and, wherever possible, we also take measures to support and protect these rights.

Due diligence

We have the responsibility to ensure with due diligence that the effects of our activities do not violate human rights. This also refers to the activities of other organizations or partners we maintain relations with. We want to contribute to a lasting improvement of the situation.

We are aware that we will be regarded as accomplices if we abet other actors in illegal activities disregarding international standards of conduct or if we fail to take action against them. Due diligence helps avoid the danger of such conflict and dilemma situations or at least reduce it in a company's own sphere of influence.

Discrimination and vulnerable groups

We prevent any kind of discrimination and disadvantage and actively guarantee equal opportunities. We actively support the respect and validity of civil and political individual rights (e.g. freedom of opinion and speech, freedom of peaceful assembly and association, protection against interference with private life, freedom of religion).

Fundamental principles and rights at work

The International Labor Organization (IL) has identified fundamental human rights in the working environment. These include the freedom of association, the abolition of any kind of forced or compulsory labor, the effective abolition of child labor and the abolition of discrimination in employment and occupation. We respect and observe these fundamental human rights. Our AGG (General Equal Treatment Act) guideline for executives provides instructions on the course of action in case of complaints.

4.2 Working Practices

Our working practices influence the respect of the rule of law and the prevailing corporate sense of justice. Socially responsible working practices are deemed essential for social justice, stability and peace.

Employment and employment relationships

One of our constant tasks is to ensure that rights and obligations are complied with in the employment relationships, which also applies to our vendors. In Germany, the compliance with labor law is one of the statutory obligations of the employer. Our social responsibility also includes our activities abroad.

Social dialog

An effective social dialog should contribute to enabling a deep understanding between the organization and the employees and to reducing conflicts, e.g. through regular team, department and staff meetings.

Occupational health and safety

We respect and support occupational health and safety. This includes, for instance, the prevention of health damages that may be triggered by working conditions as well as the adjustment of the professional environment to physiological and psychological needs and requirements. We pursue active health promotion through various measures (health days, cooperations with health centers, ergonomics passport for all employees, etc.) and support our corporate safety through access controls, regular occupational medicine site inspections, maintenance of technical equipment and the provision of defibrillators.

4.3 Environment and Sustainability

We are aware of our own responsibility for the environment. Environmental impacts are diligently identified. Basically, it is our aim to reduce, mitigate or avoid environmental impacts, to sustainably consume natural resources and to recognize and respect ecological limits. Therefore, we make sure that we use the most energy-efficient working materials possible.

Avoidance of environmental pollution

We identify and take appropriate measures to avoid environmental pollution due to pollutant emissions to the atmosphere, discharges into water, noise and waste and dangerous chemicals. We use energy and water efficiently, non-renewable resources are increasingly being replaced by renewable ones using, for instance, waste heat from our data centers for heating office spaces. Our thin-film photovoltaic plants set a sign for climate protection. Since the latest extension of the plants, we have had an area of more than 3,000 square meters that are occupied with thin-film photovoltaic modules. In addition, we purchase our green electricity from regional electricity providers.

We pursue a sustainable company policy and are dedicated to the region. We protect the environment, promote sustainability and show social commitment by various measures and actions. FIS has been certified as a climate-neutral company since 2022 and FIS-ASP since 2024 (through compensation with climate protection certificates).



4.4 Fair Operational and Business Practices

Fair operational and business practices refer to how we form our relationships with other organizations.

Fight against corruption

We fight any form of corruption as corruption undermines moral reputation, renders us liable to prosecution or sanctioning and affects our functionality.

Fair competition

We support fair and free competition and object to anti-competitive conduct. We support the principles of social responsibility through exemplary behavior across our own value chain.

In most countries, there are laws fostering and ensuring competition. We observe antitrust and competition laws wherever we do business.

We respect the right of property and take measures to protect and support property rights including both material and intellectual property.

4.5 Customer Concerns

When selling our products and services, we assume responsibility towards our buyers and users.

Fair advertising, sales and contract practices as well as factual, unbiased and non-misleading information

We guarantee fairness when initiating and processing contracts. This includes, in particular, the provision and transfer of correct information as well as a non-misleading and non-distorting transfer of information.

Complaints management

Even after the purchase of a product or the provision of a service, we are available for the customers (e.g. through our 24/7 support) and our complaints management deals with possible customer concerns.

Protection and confidentiality of customer data

We protect our customers' right to privacy by strictly handling data protection and data security as well as by the conscious use of data. Our information security management is effective and integrative and includes the data protection and IT security disciplines.

4.6 Integration and Development of Society

It is our aim to include society in our activities in order to make a positive contribution to its development. We maintain partnerships with local interest groups to avoid or solve problems. We see ourselves as part of society. We support culture, sports and education as a contribution to social cohesion.

Creation of jobs and professional qualification

We want to fight unemployment and support the development of society through the creation of jobs, professional qualification and capacity building. Our training courses support the spread of expertise and skills. In doing so, we make a contribution to wealth and income.

4.7 Monitoring and Review of the Code

We make sure that our guidelines are regularly monitored and reviewed. Our DIN EN ISO 9001 certification confirms that we demonstrably use a document control system which ensures the time-based monitoring and review of relevant documents.

We trust that our vendors will always respect our Code of Conduct. A violation of the abovementioned principles and requirements can be considered a major impairment of the contractual relationship. In case of suspicion of non-compliance of individual principles and requirements of the Code of Conduct, we reserve the right to demand information on the actual situation and the immediate elimination of a violation once it has been identified.

4.8 Report of Possible Misconduct

A whistleblower system has been established at FIS. Only those who receive valuable information can take proactive and early action against grievances, minimize risks, protect their own reputation and secure internal and external trust.

We do not tolerate any attempt to prevent the whistleblower from reporting possible violations and expect the same from our business partners. There shall be no reprisals, i.e. retaliation, discrimination or disciplinary measures, against whistleblowers, who made a report in good faith.

Various low-threshold reporting channels have been set up for submitting reports.

- By mail: Every whistleblower, whether internal or external, is able to send anonymous reports to the companies by mail. After receipt by the administration, letters are distributed internally for the attention of the Compliance Manager.

- By phone: Any whistleblower can make reports by telephone. In order to ensure anonymity, the report should be received by persons of trust (= Compliance Managers).
Phone: +49 9723 99 81-0 (reception; please ask to be connected to the Compliance Manager)
- E-mail: Each whistleblower is free to mail their report. Anonymity is then subsequently established by the receiving person (person of trust/Compliance Manager). Please send the e-mail to compliance@fis-gmbh.de (FIS) or asp_compliance@fis-asp.de (FIS-ASP).
- Personal: Every whistleblower is free to seek personal discussion. Anonymity is then subsequently established by the receiving person (person of trust/Compliance Manager).
- External reporting office: If an internally reported violation has not been remedied, the reporting person should remain free to contact an external reporting office. The legislator provides external reporting channels. Here, the legislator recommends that these persons preferably report the violation to an internal reporting office if they do not fear reprisals for any such reporting and if it is possible to effectively take internal action against this violation.