

RHEINMETALL 4iG DIGITAL SERVICES LLC.

CODE OF ETHICS AND BUSINESS CONDUCT

DEFINITIONS

Concept	Explanation of term
4iG Group	4iG Plc and its directly or indirectly controlled subsidiaries.
Rheinmetall Group	Rheinmetall AG and its directly or indirectly controlled subsidiaries.
Group Compliance / Compliance	The compliance function of the 4iG Group and Rheinmetall 4iG Digital Services LLC.
Compliance Officer	Within the Compliance function, the person responsible for compliance activities and, with regard to this Code, for the investigation of whistleblowing.
Ethics Committee	The body defined in the Code of Conduct of the Ethics Committee, which is responsible for ensuring that the Company operates in accordance with the law and its ethical commitment. The detailed rules of procedure of the Ethics Committee shall be laid down in a separate set of rules.
R4 / Company	Rheinmetall 4iG Digital Services LLC.

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1. MANAGEMENT MESSAGE

Dear Colleague!

The business operations and success of Rheinmetall 4iG Digital Services LLC. (hereinafter referred to as "**Company**", "**our Company**", "**we**" or "**Rheinmetall 4iG Digital Services LLC.**") are based on ambitious goals, outstanding performance and fair business conduct under all circumstances, in addition to compliance with laws, internal regulations and professional and ethical rules.

The purpose of this Code of Ethics and Business Conduct (the "**Code**") is to set out a framework for the conduct of our employees and officers, based on our values and vision, in order to establish and maintain a strong ethical foundation for our Company.

Our corporate responsibility does not stop at the boundaries of lawful conduct. On the one hand, social responsibility is an integral part of our operations, and our Company is therefore consciously committed to transmitting core values to the community and to enriching society through its activities. We are convinced that this is the only way to successfully face the challenges of a competitive market environment in the long term and the only way to maintain the trust of our employees, customers, shareholders, business partners and other stakeholders and to safeguard the reputation of the Group.

On the other hand, we are committed to conducting our business - including development, sales, service delivery, marketing and communications - in a way that complies with the highest ethical standards, regulations and best practices of the IT industry.

We are committed to protecting the environment and reducing unnecessary use of resources. At all times, we strive to organise our activities in a way that does not place a greater burden on the environment than is necessary.

We have a zero-tolerance policy towards, among others, those who violate the rules on corruption, the prohibition of cartels, respect for human rights and dignity, equal treatment, health and safety, data protection, data security and the environment. Unethical or inappropriate behaviour, or even the appearance of such behaviour, may adversely affect the reputation of our Company, call into question the values that the Group stands for and thus undermine confidence in the Group.

Our activities face a number of ethical challenges, legal and regulatory requirements and other societal demands. The purpose of this Code is to set out provisions covering the key areas of ethical conduct. However, the Code does not provide guidance on all possible situations and problems that may arise. Therefore, all our employees and officers must always act responsibly and with prudent judgement.

We believe that ethical commitment must be expressed not only in words but also in deeds. We therefore encourage all our senior executives to set an example of ethical behaviour to all employees of our Company. Because senior executives have a key role to play in establishing, eva-

luating and monitoring the ethical climate under the Code, they are required to be thoroughly familiar with the provisions of the Code and the principles it sets out, and to communicate and enforce them appropriately in their instructions, decisions and day-to-day activities.

Finally, ethical conduct necessarily includes the enforcement of our Company's ethical values and standards by our employees. We are therefore committed to holding violators of the standards of conduct and ethics set out in the Code and the internal rules implementing it accountable, remedying the situation and restoring ethical functioning.

We count on all stakeholders to join the Group's efforts and actively contribute to the achievement of our goals!

2. GUIDELINES FOR THE CODE

The purpose of the Code is to set out the principles, basic standards and expected business behaviour that are essential for creating an ethical culture and operations that comply with the law and internal ethics.

It helps to identify situations in the course of work that may lead to a breach of ethical standards. The Code also provides guidance on what to do if there are questions about ethical behaviour or if ethical misconduct is detected. A number of practical examples (expected and avoided behaviour) in the Code support easy understanding.

The Code is intended to provide general guidance on expected business conduct, so if you need more information on specific areas, please refer to the detailed company policies.

Where the Code sets out requirements that are more stringent than the standards or customs in a particular country or area, the provisions of the Code should be applied within the local legal framework.

2.1 COMPLIANCE

Compliance means not only adhering to the law and company policies, but also to voluntary, soft law standards within the company. Compliance is thus a broader concept and is seen as a core responsibility of all employees to protect the integrity and reputation of the Company.

In the day-to-day operations of our Company, compliance and ethical issues may arise which this Code is intended to provide guidance on how to address. These principles and requirements are also intended to guide our employees and officers in making certain decisions.

We operate a Compliance organisation to support issues and challenges related to Compliance, with professional support from the 4iG Group Compliance organisation to avoid day-to-day operational risks.

2.2 APPLICABLE LAWS AND REGULATIONS

Our company and our partners are active in international markets, and therefore the legislation of the countries where our operations and those of our partners operate may be applicable. Where local legislation or partner requirements differ from those set out in this Code and our policies, the stricter requirements will apply.

If employees perceive that local requirements would prevent them from complying with the Code or any of our other policies, they are required to consult with their senior executive, the 4iG Group Legal and Regulatory Director and the Compliance Officer, or report such circumstances to the Ethics and Compliance Line.

2.3 SCOPE OF THE CODE

The rules set out in the Code apply to all employees of **Rheinmetall 4iG Digital Services LLC**, including senior executives.

2.4 ETHICS ORGANISATION

In order to monitor compliance with the provisions of this Code and to promote and maintain ethical conduct, our company operates a separate Ethics Organization consisting of the Ethics Committee and the Compliance Officer. The Ethics Committee operates independently of our Company's work organisation. In addition to the Ethics Committee, a Compliance Officer operates at Group level.

Our employees can ask the Compliance Officer questions, even in private, if they have any ethical or moral questions concerning their personal conduct at work.

2.5 ETHICS PROCEDURE

We believe it is important for everyone to report anything that they see that is unsafe, unethical, potentially harmful, not in accordance with the law or company standards. **Any violation of the Code is a serious breach of the rules and may result in termination of employment.**

All incidents of non-compliance will be evaluated by our Company and, if the conditions for non-compliance are met, will be investigated by the Ethics Committee in accordance with the applicable Code of Conduct. Violations of the Code and of the law may result in employment, civil or criminal liability, depending on the circumstances of the case. The Group Ethics Committee is entitled to initiate sanctions against both employees and contractors.

To facilitate reporting, we operate an Ethics and Compliance Line, through which anyone can report any potentially unlawful or non-compliant behaviour.



ETHICS PROCEDURE

The Ethics and Compliance Line is a secure and accessible channel through which whistleblowers can obtain advice and raise ethical concerns.



The Ethics and Compliance Line is available:

by email: compliance@r4ds.hu
online: <https://r4ds.hu/hu/compliance/report-compliance>
by mail: 1037 Budapest, Montevideo u. 8. ("R4 Compliance")

In addition to the above Ethics and Compliance Line, the 4iG Group also operates a parallel stand-alone whistleblowing system, whereby it receives reports about our company's activities. The report is made to 4iG Plc. Group Compliance function Ethics and Compliance Line, using one of the following channels:



4iG Plc. Ethics and Compliance Line is available:

by e-mail: compliance@4ig.hu
online: <https://www.4ig.hu/etika-compliance-bejelentes>
by mail: 1013 Budapest, Krisztina krt. 39. ("4iG Plc. Group Compliance")

Knowledge of and compliance with the Code, our corporate standards and policies are mandatory for all employees, but they cannot provide guidance for all decision-making situations. If you are faced with a challenging ethical decision situation, answer the questions below to determine the steps you need to take:

- Is the situation or conduct being experienced lawful?
- Is it ethically acceptable? Why does this situation bother me? Do I really not know what to do, or am I reluctant to do what I think is the right thing to do?
- Is it consistent with our company values? Who else might be affected by my decision? What are the possible consequences of my decision for my immediate supervisor and colleagues, for my owners and customers, for suppliers and for the Company as a whole?
- Can I justify my decision, if necessary?
- Would you and your colleagues be comfortable if it appeared in the media?
- Would it be the right decision in the eyes of your superiors or the management of 4iG Plc?

If you still have doubts, you should seek advice through the Ethics and Compliance Line, which is completely confidential and can be used to **make an anonymous report**. Reports should always be made in a truthful manner.

2.6 THE KEY RESPONSIBILITY OF SENIOR EXECUTIVES / ROLE MODEL

As R4's senior executives represent our Company to all stakeholders, they have a special role to play as role models for employees, business partners, public authorities and the general public.

Therefore, under this Code, it is the responsibility of the senior executives of our Company to:

- To act with the highest possible integrity in their business relationships;
- Lead by example in ethical conduct and compliance;
- To communicate the Code to their colleagues, to ensure that their colleagues understand it and that all their actions reflect respect for ethical standards;
- Senior executives provide opportunities to demonstrate and discuss ethical behaviour and create an open working environment that encourages employees to raise questions and concerns and, if unethical behaviour is observed, to report it to the Compliance Officer or to the Ethics and Compliance Line;
- Ensure that employees who raise concerns or questions are not subject to any form of retaliation;
- Report compliance issues requiring investigation to the Compliance Officer without delay.

The senior executive may also seek the assistance of the Compliance Officer in the event of a query.

2.7 ZERO TOLERANCE FOR RETALIATION

Our company will make every effort to ensure that complaints received and the identity of the reporting person remain confidential. Nevertheless, the identity of the whistleblower may be inferred from the circumstances.

We will not tolerate any retaliation against a bona fide whistleblower who raises compliance risks or concerns. If a whistleblower feels that he or she has been retaliated against for making a whistleblowing report, either by the whistleblower or by a third party, he or she must report it to the Ethics and Compliance Line. The Compliance Officer and the Ethics Committee will investigate all such complaints and take appropriate action to hold them accountable. Our company will therefore apply the legal sanctions applicable under the rules governing the employment relationship to anyone responsible for retaliation against the person who reports it.

2.8 OUR CORE VALUES

Responsibility	We are responsible for the consequences of our actions and take into account the needs and expectations of our stakeholders: employees, owners, business partners, suppliers, customers, competitors, public officials, civil society organisations.
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Courage	The courage to stand up for ideas and opinions, to receive and give feedback, to challenge the status quo is a value that drives our company forward every day.
Respect	We respect everyone's rights and interests in human dignity, self-determination and privacy. We keep in mind the golden rule that " <i>strive to treat others as you would like to be treated</i> ".
Diversity	As part of the 4iG Group, employees come from different cultures and backgrounds. We therefore expect an unbiased attitude towards each other and to promote this diversity.
Honesty	We believe that honesty is the foundation of mutual trust, and that it is the foundation of our reputation and ethics.
Loyalty	We are loyal to the organisation and to our colleagues who work together under these ethical standards.
Integrity	Adherence to the highest ethical standards, constructive dialogue with all stakeholders, including in competitive situations. We aim to achieve our goals in a fair and responsible manner, in full respect of the legal environment, professional ethics and the contracts we conclude.
Quality	In all circumstances, we strive to develop excellence and expertise and to continuously deepen trust by providing products and services of reliable quality. We are committed to honouring our agreements and will make every reasonable effort to deliver on our promises and commitments in letter and spirit.
Integrity and transparency	We comply with legal requirements, including industry and organisational standards that apply to our business. Our ethical standards go beyond legal compliance and combine standards of good governance and good practice. We are committed to ensuring that transparency is at the heart of our operations, business communications and contracts, so that all stakeholders have the opportunity to make independent and informed decisions.

3. PRINCIPLES OF ETHICAL EMPLOYMENT

3.1 HUMAN RIGHTS

We are committed to respecting the human rights of all stakeholders and expect our employees to do the same.

Our company aims not only to respect human rights, but also to actively promote them in our own value chain and to make a positive impact at the societal level. We support the protection of human rights and condemn all forms of human rights violations. We pay particular attention to

our employees, suppliers, and vulnerable groups such as women, nationalities, ethnic, religious and linguistic minorities, children, people with disabilities and their families.

Conduct to be followed

- ✓ Always respect human rights and take appropriate steps to prevent human rights violations.
- ✓ Ensure that human rights are mainstreamed in business operations, including in business development, development projects, the selection of business partners and suppliers or subcontractors, and public relations matters.
- ✓ Expect your company's business partners to respect human rights.
- ✓ Report any human rights violations that occur in the course of operations or in the conduct of the company's business.

Conduct to be avoided

- ✗ Never turn a blind eye when a plan, action or conduct may adversely affect the enjoyment of human rights.
- ✗ Never regard respect for human rights solely as a public duty.

3.2 EQUALITY AND EQUAL TREATMENT

Our company recognises the value of diversity. Employees of the 4iG and Rheinmetall Groups (of which our Company is a part) worldwide belong to different cultures and come from different backgrounds with whom our Company works. We therefore expect an unbiased attitude towards each other and the promotion of this diversity.

That is why we aim to provide equal opportunities for all. As a matter of principle, we do not tolerate any discrimination against applicants or employees; all applicants and employees must be treated on a basis of protected equal treatment.

Discrimination may be made on the basis of race, ethnic origin, colour, religion, political belief, descent, sex, sexual orientation, age, gender identity, nationality, marital status, pregnancy, childbirth, genetic characteristics, medical conditions, membership of an employee representative body, other protected status or characteristic.

3.3 PROHIBITION OF DISCRIMINATION

Our company expects all employees to refrain from any conduct (whether an action, condition, omission, instruction or practice) that discriminates (directly or indirectly), harasses, ostracises, unlawfully segregates or retaliates.

- **Direct discrimination** is any conduct that results in others being treated less favourably than others because of an actual or perceived protected characteristic.
- **Indirect discrimination** is any conduct that appears to create a level playing field, but which places persons with a protected characteristic at a substantially greater disadvantage than others.

A further form of discrimination that is not permitted is segregation, whereby a measure is taken to separate certain persons from others in a comparable situation on the basis of a protected characteristic in any way, for example by designating their place of work or rest area.

Conduct to be followed

- ✓ Provide opportunities for all, regardless of individual or group characteristics unrelated to ability, merit, performance, qualifications or business considerations.
- ✓ Decisions on recruitment, appraisal, development, reward, remuneration and termination of employment, and decisions on the selection of business partners are based solely on professional competence, merit, performance and business considerations.
- ✓ Be open and respectful of cultural diversity, and support foreigners in adapting to local conditions.
- ✓ Be aware of local legal requirements and cultural factors that may affect your work.

Conduct to be avoided

- ✗ Never discriminate against any person on the basis of marital status, gender, age, ethnic or racial origin or nationality, colour, political opinion, religion or sexual orientation, disability, membership of an employee representative body, etc.
- ✗ Do not discriminate even if not prohibited by law or local custom.

3.4 HUMAN DIGNITY, MUTUAL RESPECT

Our company is committed to creating a working environment based on mutual trust, where everyone is valued and their human dignity is respected. We have a relationship of trust between our company and its employees and business partners, where we give and expect the same respect. Everyone within the Company and its wider community is entitled to courtesy and respect.

We will not tolerate harassment or any other degrading, humiliating, offensive or intimidating behaviour.

We expect colleagues to treat each other with mutual respect and to settle disputes in a manner consistent with the rules and customs of professional conduct and community interaction. The use of profanity or derogatory or abusive language is considered verbal aggression that is not consistent with the standards of professional communication.

Our company considers harassment, sexual harassment, defamation and libel to be particularly serious violations of human dignity.

Conduct to be followed

- ✓ Always respect and protect the dignity of others.
- ✓ Base your work, business and community relationships on openness, trust, mutual respect and support.
- ✓ Make efforts to create and maintain an appropriate and cooperative workplace climate, including in business and community relationships.
- ✓ Respect the community's rules of courtesy, as long as they do not violate our company's ethical standards.
- ✓ If you are upset by someone's behaviour or expression, bring it to their attention, explaining why you find it upsetting and ask them to stop.

Conduct to be avoided

- ✗ Do not intimidate or humiliate others with your actions or words.
- ✗ Never behave in a condescending, abusive or hostile manner.
- ✗ Never use jokes or comments that are inappropriate, racial, ethnic, religious, disability-related, age-related or sexual.
- ✗ Do not distribute or share offensive, violent or degrading material or images.
- ✗ Do not harass anyone with sexual advances, ask for sexual favours, make sexual comments or gestures, or engage in any other sexually offensive behaviour.
- ✗ Never make untrue statements or spread malicious or degrading rumours about others, or share offensive or discriminatory information in any way.

3.5 HEALTH AND ENVIRONMENTAL PROTECTION

We are committed to preventing personal injury, environmental damage and hazards, and to reducing the health, safety and environmental risks arising from the Company's activities. **Health and safety is our highest priority.** As part of this, we ensure compliance with the occupational health and safety legislation that applies to us and ensure compliance with these requirements. Workplaces are designed in accordance with the legislation and generally recognised safety and

occupational health rules to ensure that work is carried out without accidents and with low levels of stress.

To ensure compliance with occupational health and safety requirements, all executives in our company are responsible and obliged to be familiar with the safety regulations that apply to them and to provide their employees with the appropriate training.

We are constantly improving our working environment to ensure that we operate with the lowest possible environmental impact and the least possible risk to health and safety. We cooperate with the relevant local authorities to ensure compliance with international, European and national environmental standards.

In line with this commitment, our Company:

- Complies with the relevant technological regulations in all its activities;
- Promotes health and nature-focused recreational and sports programmes for employees;
- in the design of its working environment, the focus on people and the environment, the use of recycled materials, the introduction of technologies and procedures to reduce waste emissions are a priority;
- is committed to ensuring the safety of people and company property on its premises, including the protection of employees, technology, physical assets, information about the company's operations and its reputation from security threats.

We promote zero tolerance for drug and alcohol abuse.

The use of drugs or working under the influence of alcohol, drugs or other mind-altering substances is prohibited in the workplace.

Conduct to be followed

- ✓ Respect people's right to life and to the best health available.
- ✓ Always consider occupational safety and physical safety when making decisions.
- ✓ Always comply with health, environmental and safety regulations at the workplace and attend training courses.
- ✓ Suspend immediately any activity that is no longer safe or dangerous and report it immediately to your supervisor.

Conduct to be avoided

- ✗ Do not harm people's health or the environment.
- ✗ The budget should not be more important than safety at work!
- ✗ Never work under the influence of alcohol, drugs (legal or illegal) or any other mind-altering or mind-restricting drugs (whether prescribed or otherwise).
- ✗ Do not ignore work safety and security regulations, including smoking restrictions and rules on prohibited articles.

- ✓ Immediately inform your supervisor of any accident, injury, unsafe or unhealthy conditions, incidents that have occurred, are expected to occur or are about to occur, or releases of substances harmful to the environment.
- ✓ When making purchases, give preference to equipment and services produced in a less environmentally damaging way, where the offers are identical.
- ✓ Use recycled materials wherever possible and strive to use electricity, water and other resources wisely.
- ✓ Make the most economical use of vehicles.
- ✗ In the course of their work, all employees shall refrain from unnecessary and wasteful use of energy and production of waste that is harmful to the environment.

3.6 DECENT WORKING CONDITIONS

Human resources are the most valuable asset for our company. We are committed to the development of our employees, to ensuring a good work-life balance and to respecting employees' working time in all workplace and employment-related communications. Our core values also include fair and lawful employment and respect for fundamental labour principles, including the right of employees to form and join a trade union and to elect a works council.

We do not tolerate any form of forced labour, child labour or trafficking in human beings, or other forms of unethical employment, such as withholding wages, denial of sick leave or daily rest, abuse of alternative forms of employment, destruction of workers' identity documents (e.g. passports, identity cards, driving licences).

We are committed to implementing a fair employment and remuneration policy in accordance with the relevant legislation. We also pay particular attention to supporting workers with special needs.

Conduct to be followed

- ✓ Be aware of and report any signs of forced or child labour, human trafficking or unethical employment practices.
- ✓ Ensure that suppliers, contractors, intermediaries, agents and others who perform work for our company are fully aware of the expectation that they will not engage in unethical employment

Conduct to be avoided

- ✗ Never engage in child or forced labour, even if it is accepted local practice.
- ✗ Do not contract or do business with a party that uses or is suspected of using child, forced, bonded or slave labour..

practices in the course of their work for our company.

- ✖ Never allow or turn a blind eye to forced or child labour, slavery, servitude or human trafficking anywhere in the value chain.
- ✖ Do not violate the rights to remuneration for work, religious and assembly freedom, rest, leisure and regular paid leave.

4. PRINCIPLES OF ETHICAL BUSINESS CONDUCT

It is of paramount importance for our company that our business decisions are based on objective criteria such as quality, reliability and compliance. It is important to us that we always act transparently, impartially and with due professional detachment towards our clients, regardless of the nature of the business relationship. To this end, it is important for us to enforce the criteria set out in this chapter in our business relationships.

4.1 SUSTAINABLE DEVELOPMENT

Our company acts in an economically, socially and environmentally conscious and responsible manner by applying a sustainable development approach. Our sustainability efforts aim not only to create economic value by maximising profit and shareholder value, but also to take responsibility for creating social value. While creating innovative products and services, at both the economic and social levels.

As part of sustainable development, we proactively manage risks and opportunities that affect long-term economic, environmental and social issues. In doing so, we actively seek and exploit business opportunities that contribute to the achievement of the *UN Sustainable Development Goals* (SDGs).

Conduct to be followed

- ✓ Always apply a sustainable development perspective when making strategic decisions.
- ✓ If you see best practice on sustainable development, bring it to the attention of the relevant area of the 4iG Group.

Conduct to avoid

- ✖ Do not consider sustainability solely as a reputational issue.

4.2 FAIR TRADE AND COMPETITION

We are committed to fair market conduct, conducting our activities in accordance with fair competition standards and in compliance with the letter and spirit of applicable laws. Respecting competition and market regulations is not only a legal obligation, but also a pillar of business culture. We consider it important that our company acts in compliance with both EU and national competition rules.

Accordingly, we strictly reject any corporate behaviour or business agreements that:

- Violate the prohibition of unfair competition (e.g. by calling for a boycott),
- violate the prohibition of unfair influence on business decisions (e.g. by misleading business partners in business communications),
- constitutes an agreement or concerted practice that restricts economic competition,
- constitutes an abuse of a dominant position.

With regard to **agreements** or concerted practices **that restrict competition**, any collusion **with competitors** (i.e. other undertakings at the same economic level operating in the same market) is strictly prohibited, in particular:

- fixing selling or purchase prices and other commercial terms;
- limiting or controlling production, sales, technical development, investments;
- the allocation or sharing of markets, territories, customers, products or barriers to entry;
- agreeing purchasing or sales quotas, entering into purchasing cooperation agreements with purchasing commitments;
- sharing information of strategic importance with competitors.

If you attend an event, meeting, conference or are a member of an association where you meet with representatives of a competitor, do not share commercially sensitive information relevant to competition law (e.g., prices charged, pricing methods, costs incurred, future commercial policy, market position, non-public corporate goals, market expansion potential).

In addition to the above, agreements between undertakings at **different economic levels** which would restrict the establishment of commercial terms (e.g. sales, price fixing) with third parties are prohibited.

This may include in particular:

- the fixing of fixed or minimum resale prices;
- non-compete or restrictive clauses lasting for 5 years or more;
- restrictions on the buyer's production, purchase, sale or resale after termination of the contract.

We constantly analyse our potential market position based on publicly available information to regularly assess it to make sure we are in the right market position. If, on the basis of such a market analysis, we conclude that we have a strong market position in a particular market, we will take additional measures to prevent the exploitation or abuse of that strong position. We do

not abuse our market position and are committed to creating a level playing field for all our business partners.

We will also act in accordance with the requirement of fair competition in public procurement or tendering procedures. This fairness requires that persons acting on our behalf do not attempt to influence the ongoing procedures in any way. However, in such a procedure, the Company may unknowingly obtain another bidder's bid or any selection information before the processes are completed. In such a case, it is necessary to notify the tenderer of the case through a Compliance Officer.

Employees are also expected not to engage in discussions with any official or public official who has an interest in a procurement in which our Company is involved.

Conduct to be followed

- ✓ If you receive a message from a competitor that is contrary to fair trading and competition, you should immediately inform your supervisor, the Group Legal and Regulatory Director and the Compliance Officer, with an immediate disassociation.
- ✓ Use only publicly available or legally accessible information and sources to evaluate business, customer, supplier and technology trends, and collect information only in a lawful manner.
- ✓ Ensure that there is a legal and legitimate basis for any such discussions with competitors.
- ✓ Discuss only general, competition-neutral issues with competitors and share only information that is public or available from public sources (e.g. information published by senior executives in the press).
- ✓ Ask questions through the Ethics and Compliance Line if you have any doubts about the conduct to be followed.

Conduct to be avoided

- ✗ Never spread false, malicious or damaging information, rumours, opinions about competitors or their products and services. In no way tarnish the reputation of competitors.
- ✗ Never share pricing, future business or market plans, customer and other confidential business information with competitors.
- ✗ Never agree to allocate markets, territories or customer groups.
- ✗ Never use conditions, technical content or requirements that favour only one or a limited number of pre-selected potential partners in a tendering process.
- ✗ Do not fix a reseller margin or sanction distributor pricing (for example, deviating from the recommended price).

Conduct to be followed

- ✓ Only attend meetings where the agenda is known in advance and the agenda indicates that only competition-neutral issues will be discussed.
- ✓ Set only recommended or maximum resale prices and do not impose contractual or actual sanctions for non-compliance.

Conduct to be avoided

- ✗ Never agree with competitors on the geographic allocation of markets or on the allocation of actual or potential customers.
- ✗ Never agree with a competitor to foreclose a third party.

4.3 SANCTION POLICY, COMPLIANCE WITH EXPORT AND IMPORT REGULATIONS

Our company will follow all financial and economic restrictive measures that appear in the international (e.g. European Union, United Nations, United States) and local regulatory environment. These restrictive measures may include sanctions, import or export bans against certain countries, territories or persons.

We exercise due diligence when entering into contracts with third parties and are committed to screening all our suppliers to identify any indications of compliance risks. Your business partners may have specific restrictions or mandatory reporting requirements for certain products under applicable import and export control laws. In this case, you will need to obtain any licenses or permits that may be required for the use, supply, import, export or re-export of these partners' products, software, technology or services.

Our company is strictly prohibited from supporting illegal foreign economic boycotts resulting from contracting, providing information, or taking action.

Violations of trade regulations and restrictions can result in severe consequences, including seizure of goods or funds, substantial fines, loss of export privileges, void contractual agreements, and even imprisonment.

Conduct to be followed

- ✓ Familiarise yourself with the international trade regulations in your area.
- ✓ Immediately contact your supervisor, the 4iG Group Legal and Regulatory Director and the Compliance Officer, or contact the Ethics and Compliance Line, if you believe that sanctions may have

Conduct to avoid

- ✗ Do not enter into any business relationship with a sanctioned country, person, group or organisation without due diligence.
- ✗ Do not import or export prohibited goods.

Conduct to be followed

been imposed on a country, person, entity or group with which you do business or may affect any proposed transaction.

- ✓ Contact the 4iG Group Legal and Regulatory Director and the Compliance Officer, or the Ethics and Compliance Line, if you have any concerns about the legality of a transaction.
- ✓ Make sure you have all the necessary markings, documentation, permits and approvals.
- ✓ Check whether your business partners may be affected by any international trade restrictions ("Know your partner").

Conduct to avoid

- ✗ Never bring restricted goods into a country without declaring them.

4.4 CORRUPTION AND BRIBERY

Our company does not tolerate any form of corruption or acts that suggest corruption (including bribery, kickbacks given to officials, redistribution, extortion, abuse of power for personal gain, influence peddling, undue advantages and gifts with the intention to influence), whether in the competitive (private) sector or in the public or municipal sector. We will do so even if this puts our Company at a competitive disadvantage or deprives it of a business opportunity because of the reporting of such activity.

Important! For the purposes of this Code, corruption and acts suggestive of corruption include not only corruption offences in the criminal sense, but also all acts that are carried out by offering, giving, giving, asking for, accepting, etc., any undue advantage in violation of applicable law and that influence someone to act or refrain from acting in any way in relation to the performance of his or her duties.

We strictly prohibit our employees and persons acting in our name or on our behalf from offering, giving, soliciting, accepting or receiving any unlawful advantage (e.g. cash, personal benefits), particularly if it is for the purpose of exerting undue influence on any official or providing (or even the appearance of providing) an unlawful business advantage. This prohibition covers so-called "*acceleration payments*" (i.e. small sums of money or benefits in kind to officials in order to simplify or speed up administrative procedures or official acts.)

We are also committed to a zero tolerance approach to corruption and bribery in our social philanthropy, charity and sponsorship activities.

It is the shared responsibility of all our employees to develop and maintain a corporate culture that encourages everyone to take action when they encounter corruption, bribery, fraud, extortion, other similar illegal or corrupt activities, or suspected signs of such activities, and not to fear retaliation for doing so. To this end, we have anti-corruption and anti-fraud processes in place to reduce the risk of fraud and identify prohibited conduct. Employees, partners or others can report fraud and corruption by using the Ethics and Compliance line at compliance.4ig.com.

We also exercise due diligence when selecting our partners. We take steps to verify the (potential) partner's reputation, actual ownership, professional knowledge and experience, financial standing and credibility, and compliance with domestic and applicable foreign laws before and during the cooperation.

Conduct to be followed

- ✓ Familiarise yourself with anti-corruption rules and avoid transactions and circumstances that may give even the appearance of impropriety.
- ✓ Comply with anti-corruption rules and related procedures.
- ✓ Ensure that all business partners of the company, including any consultants, suppliers, subcontractors or other collaborators, understand that corruption is not acceptable.
- ✓ Ensure that procurement procedures, including, but not limited to, competitive bidding, are transparent and allow for fair and impartial competition.
- ✓ Immediately report to the Ethics and Compliance Line (compliance@r4ds.hu) if you become aware of or see evidence of corrupt activity within the company or the value chain.

Conduct to be avoided

- ✗ Never directly or indirectly offer, employ, authorise, promise, pay, solicit or accept any unauthorised or improper payment (whether in cash, bad faith expense claims or otherwise), gift or improper favour to obtain preferential treatment, influence the outcome of business negotiations or obtain business advantage or breach of duty.
- ✗ Do not try to persuade any official (foreign or domestic), public official or any private person to act illegally.
- ✗ Do not make or authorise any improper or unlawful payments to such persons.
- ✗ Do not claim or give the impression that you are able to influence anyone unlawfully.
- ✗ Never allow agents, consultants, representatives or other outside parties acting on behalf of the company to act in a questionable manner or to bribe anyone.

4.5 BENEFITS, GIFTS AND BUSINESS INVITATIONS

Business gratuities as inducements are widely used either as an expression of goodwill or to strengthen a bona fide working relationship between business partners. However, such a benefit (which may be a gift, an invitation to an event or hospitality) can only be given or accepted if it is not given with the purpose or appearance of unfairly influencing decision-making.

An important element in the fight against corruption is the creation and application of transparent rules on benefits, including gifts, entertainment and hospitality. To this end, we have adopted a detailed Gift Policy, which sets out the procedures for giving and receiving certain gifts.

Conduct to be followed

- ✓ Familiarise yourself with and comply with the rules and internal regulations on gifts and business entertainment and avoid transactions and circumstances that could give the appearance of impropriety.
- ✓ Report to your supervisor if you or anyone in your line of business receives a gift or hospitality covered by this Code. The supervisor will decide whether the gift should be retained, donated to charity or returned to the donor.
- ✓ Exercise extreme caution when giving gifts or hospitality to officials or public officials, regardless of value
- ✓ If you have doubts or questions about gifts, please contact the Ethics and Compliance Line.

Conduct to be avoided

- ✗ Never give any opportunity to influence your business decisions with gifts or hospitality, and avoid even the appearance that you have been or could be subject to such influence.
- ✗ Do not solicit or encourage an existing or potential business partner to give you any item or do you any favours, no matter how small the value, especially if you are in a position to decide or influence the relationship, proof of performance, authorization of payment, sale price or discount for that partner.
- ✗ Never offer, give, solicit or accept any gift or entertainment that could be construed as undue influence, bribery, kickback, redistribution, or violation of law or regulation (for example, that the invitee could not otherwise afford or return); cash or its equivalent; gifts or entertainment that are solicited or offered in exchange for favours; or personal services.

4.6 FRAUD

Our company is committed to combating fraud and will not tolerate fraudulent practices. In order to protect our core values, assets and reputation, it is everyone's personal responsibility to act in

good faith and in compliance with applicable rules and regulations, being vigilant for signs of fraud.

Thus, attention should be paid to any circumstance where there is a possibility that someone is misrepresenting facts or concealing the truth. The purpose of such conduct is usually to gain an advantage, which in turn causes harm to the deceived party. This may also include conduct where the parties give the impression that a business activity or business relationship is taking place between them, when in fact it is not.

Conduct to be followed

- ✓ Always act in accordance with fraud prevention laws, policies and procedures.
- ✓ Be alert to all signs, events and transactions that may indicate fraud involving the Company.
- ✓ Always document events and transactions in a factual manner.
- ✓ Ensure that business procedures, including procurement, performance confirmation and invoice acceptance processes, are transparent and allow for fair and impartial competition.
- ✓ If you observe signs of fraudulent activity or are aware of such activity, report it immediately to the Compliance Officer or the Ethics and Compliance Line.

Conduct to be avoided

- ✗ Never falsify or copy any data, certificates or supporting documents and never accept any suspicious document.
- ✗ Do not engage in any transaction that you believe may constitute or lead to fraud.
- ✗ Never circumvent regulations, procedures and controls just to perform your duties more easily and quickly.

4.7 MONEY LAUNDERING

Although our company is not subject to the Prevention and Suppression of Money Laundering and Terrorist Financing Act, we are committed to complying with the rules prohibiting money laundering to the fullest extent.

Money laundering is the process of concealing or legalising illegally obtained assets, where these illegally obtained assets are used in the course of legitimate business activities while concealing their illicit origin or nature.

We never condone, enable or support money laundering, i.e:

- We will never engage in a criminal or terrorist financing business;

- We do not engage in or facilitate the commission of criminal or terrorist activities, or engage in any form of money laundering;
- We take reasonable and appropriate measures to identify and assess the integrity of our business partners.

If you observe any suspicious activity that may indicate money laundering, please report it to the Compliance Officer or use the Ethics and Compliance Line.

Conduct to follow

- ✓ Report any money laundering concerns, suspicious transactions or events to your supervisor or use the Ethics and Compliance Line.
- ✓ Exercise due diligence with respect to funds, goods and assets transferred to the Company.
- ✓ Be cautious about making payments or claims for payments that are not normal or customary business practice.

Conduct to avoid

- ✗ Never deal with persons suspected of being involved in the commission of a crime, or with funds derived from a crime, until the suspicions have been investigated and found to be unfounded.
- ✗ Never share your suspicions of money laundering with business partners.
- ✗ Never warn anyone you know is under investigation. Do not falsify, conceal, destroy or erase evidence.
- ✗ Never obtain, use or retain money or property suspected to be the proceeds of a crime.
- ✗ Never conceal the origin or nature of criminal property.
- ✗ Never be a party to an agreement involving property or proceeds of crime.

4.8 INSIDER DEALING AND MARKET MANIPULATION

Insider trading is the unlawful use of non-public information that is likely to have a significant effect on the stock exchange or market price of a share or other security.

Employees and senior executives must not gain personal advantage for themselves or others by using inside information of the company, nor must they disclose or unauthorisedly communicate such information.

We prohibit insider trading, market manipulation and unauthorised disclosure of inside information as a general principle.

Conduct to be followed

Conduct to be avoided

- ✓ If you are unsure about the insider nature of information, please contact the Compliance Officer or the Group Legal and Regulatory Director.
- ✓ Be careful and protect inside information even from accidental disclosure.
- ✓ Report if you believe that someone is involved in insider trading or unlawful market manipulation.
- ✗ Do not buy or sell financial instruments if you have inside information about them and do not instruct a third party to do so.
- ✗ Never share inside information with unauthorized persons, including relatives, within the 4iG Group, the Rheinmetall Group or outside the 4iG Group and the Rheinmetall Group without prior approval.
- ✗ Never spread market rumours or false information for the purpose of influencing the exchange rate of funds.
- ✗ Never leak inside information or give tips to others based on inside information.
- ✗ Never use inside information to trade securities, and never suggest that anyone else do so.

4.9 FACTUAL RECORDS AND INTEGRITY OF BUSINESS PROCESSES

Records and reports are an essential element of corporate operations and should be prepared in a truthful and comprehensive manner. Our company maintains and prepares member company records and reports honestly, accurately and objectively. This is essential for good decision making, to protect our credibility and reputation, and to comply with the law.

Our Company shall record and execute its financial transactions in accordance with the requirements of proper accounting and shall always make them available for inspection by the competent internal or external bodies.

We strictly prohibit the creation of fictitious documents and the alteration of documents so that they do not reflect or conceal the true business circumstances.

Conduct to be followed

- ✓ Find out what information should be recorded and properly handled and what information should not.

Conduct to be avoided

- ✗ Never mislead, conceal or falsify any information by misrepresenting, concealing or falsifying any information to the decision-makers of our Company, the 4iG Group or the Rheinmetall Group.

- ✓ Prepare all reports, assessments and proposals honestly and in their entirety.
- ✓ Ensure that decisions are properly justified.
- ✓ Ensure that all transactions are properly authorised, accurately and fully recorded.
- ✓ Ensure that all parties involved have appropriate access rights and settings in company systems.
- ✓ Manage, control, and authorize expenditures in accordance with and accurately in accordance with policies.
- ✗ Never intentionally record or include false or misleading information in any system, report, document, record or cost accounting.
- ✗ Never falsify any statement, report or record.
- ✗ Do not try to persuade others to do anything that might jeopardise the completeness and integrity of records and reports.
- ✗ Never conceal, alter, destroy, or otherwise tamper with any company information or property relating to a pending or threatened audit, legal proceeding, government or regulatory investigation.
- ✗ Do not sell, transfer, or dispose of company property without proper documentation and authorization.
- ✗ Never enter into contractual obligations on behalf of R4, the 4iG Group or the Rheinmetall Group without proper authorisation.
- ✗ Do not remove or destroy documents or records before the expiry of the specified retention period without prior approval.

5. PRINCIPLES OF ETHICAL WORK CONDUCT

Both the Rheinmetall Group and the 4iG Group are responsible for protecting shareholder investments and ensuring a long-term return on investment that is competitive with other leading companies in the industry. To this end, our Company avoids conflicts of interest. We protect the interests, material assets, business secrets and intellectual property of our company, the Rheinmetall Group and the 4iG Group and ensure appropriate protection of personal data and data security.

5.1 AVOIDING CONFLICTS OF INTEREST

We respect the privacy rights of our employees and do not keep track of what they do outside working hours. However, there is a relationship of trust between our Company and its employees and other partners, where a conflict of interest may arise where an employee's private affairs may not be compatible with the interests of our Company.

We consider this to be:

- a personal and organisational conflict of interest, for example where an employee has a subordinate relationship with a relative;
- a business, investment or shareholding conflict of interest, for example, where an employee has a business, investment or shareholding interest in a business partner company;
- the establishment of a further employment relationship, for example, where the employee wishes to establish a further employment relationship or other employment relationship with a competing undertaking.

Employees are therefore obliged to avoid any situation which creates or appears to create a conflict of interest between the employee and our Company during the period of their employment. Accordingly, we expect our employees to act in accordance with our Conflict of Interest Policy and, in case of doubt, to seek advice from the Compliance Officer.

Conduct to be followed

- ✓ Inform your supervisor of any outside work you do and outside services you provide, and of your relationships with competitors, customers, suppliers or contractors, and seek written approval for these.
- ✓ Notify your supervisor if you are not employed in a particular job because of a non-competition or confidentiality obligation.
- ✓ You should seek written approval for any outside board position before accepting it.
- ✓ Notify your supervisor if you intend to invest in a competitor, customer, supplier or contracted partner and ask for written approval - except for transactions involving publicly traded shares.
- ✓ Notify your supervisor if any of your relationships may create an actual or apparent conflict of interest.
- ✓ Contact the Ethics and Compliance Line if you have any doubts or questions.

Conduct to avoid

- ✗ Do not supervise or have influence over the employment or other contractual relationships of your own relative or someone closely associated with you.
- ✗ Never work for or provide services to a company that you must deal with in the course of your work for the Company.
- ✗ Never acquire an interest in the company of a supplier, contractor, customer or client if you are involved in any way in the selection or evaluation, negotiation or transaction with that company. This also applies if you are controlled by a person with such responsibilities.

5.2 PROTECTING CORPORATE ASSETS

Our company has resources and assets of significant value. Employees have a duty to protect and use these resources and assets appropriately and reasonably. Company resources and assets are used by employees solely for the benefit of the company.

Our employees, suppliers, contractors and business partners must assume responsibility for the integrity, proper, economical, responsible and efficient use of the assets of R4, the Rheinmetall Group and the 4iG Group. All employees and authorized persons may only use the funds, material assets and resources of our Company for lawful and approved business purposes. We attach importance to avoiding waste and preventing misuse of assets.

Portable and home-use business equipment issued to employees (e.g., portable computers and cell phones, work vehicle, fuel card, business debit card) are Company property and must be used with appropriate care.

Conduct to be followed

- ✓ Immediately report any misuse, theft or waste of R4, Rheinmetall Group and 4iG Group property and funds.
- ✓ In planning and carrying out the various activities, always strive for economical and thrifty solutions that conserve the resources of the member company in the long term.

Conduct to be avoided

- ✗ Never use company property and facilities for private purposes unless expressly authorised to do so by the senior executive exercising the authority of the employer in accordance with the applicable rules.
- ✗ Do not carry out personal activities during working hours.

5.3 PROTECTION OF BUSINESS SECRETS AND INFORMATION

Employees are obliged to treat as business secrets and to safeguard any information which they become aware of in the course of their work and which relates to our Company, the 4iG Group, the Rheinmetall Group member companies and business partners. They may not use this information for their own or any other person's benefit, nor may they disclose it to others. This obligation shall survive termination of employment.

We expect our employees to keep as business secrets any information they have access to in the course of their work, for example, information relating to commercial relationships, transactions, operations, financial situation, investments, or solutions, knowledge or ideas they have gathered.

It is of the utmost importance for our company to ensure the protection of confidentiality, in particular with regard to the legislation on the protection of classified information. Where our Company is granted access to such data in the context of legal proceedings, it is obliged to ensure

appropriate protection of classified data. The 4iG Group Security Director is responsible for the security and protection of the handling of classified data.

Conduct to be followed

- ✓ Exercise due care in both external and internal communications.
- ✓ Comply with confidentiality and other relevant policies, use warning signs to classify and protect confidential information. Limit access to business information on a need-to-know basis.
- ✓ Ensure that all employees and external parties with access to confidential information, including potential business partners, have a signed confidentiality agreement or ensure that they are legally bound by an appropriate obligation of confidentiality.

Conduct to be avoided

- ✗ Do not make any statement unless you are the person authorised to disclose the information.
- ✗ Do not request or access confidential information from any source, especially regarding business partners and competitors, and do not attempt to obtain restricted information.
- ✗ Do not disclose or make available to third parties confidential business information of customers, suppliers, business partners.
- ✗ Do not disclose or use confidential information belonging to third parties.

5.4 DATA PROTECTION AND DATA SECURITY

Our company respects people's right to privacy and confidentiality of their personal data. Under applicable law, we are responsible for protecting personal data and for ensuring that the processing of personal data complies with legal requirements.

As the electronic exchange of information is an integral part of our business communication today, it is the responsibility of all our employees to protect data and information from unauthorised access and to keep it confidential within the company.

Accordingly, we expect our employees to undergo training to enhance their awareness of information security and to respect the "need-to-know" principle, i.e. only those employees with the appropriate authorisation to access our systems.

The equipment provided for work (computer, printer, scanner, photocopier, etc.) must be used only for the purpose necessary for the work and must not be used by unauthorised employees to install or run software(s) other than the Company's software.

In order to ensure adequate security, within the limits of privacy and data protection legislation, we reserve the right to access the devices and the data stored on them in order to meet maintenance, business and legal requirements.

Conduct to be followed

- ✓ Process personal data in a transparent manner and use it only for fair and lawful purposes (lawfulness, fairness and transparency).
- ✓ Collect and process only personal data that are necessary and appropriate for the performance of your work and tasks (purpose limitation).
- ✓ Limit the collection of personal data for a particular purpose so that only the processing of data that is necessary, appropriate and proportionate for the purpose of the activity is carried out (data minimisation).
- ✓ Process personal data for as long as it is necessary to achieve the purpose for which it is processed (limited storage).
- ✓ Collect and process such data using only specified procedures, store it in a manner that protects it from unauthorized access, report promptly any damage, misuse or other problems affecting the information infrastructure, any element of the information infrastructure or electronically stored data owned by our Company (integrity and confidentiality).
- ✓ Keep personal data accurate and, where necessary, up to date, identify, manage and correct errors and omissions in electronically stored data at the earliest possible stage of the relevant process (accuracy).

Conduct to be avoided

- ✗ Do not leave personal data unattended, unsupervised (e.g. laptop in a parked car).
- ✗ Never attempt to access personal data to which you are not entitled.
- ✗ Never disclose personal data either within or outside the 4iG Group before you are satisfied that you are acting correctly and lawfully.
- ✗ Do not misuse personal information.
- ✗ Do not keep personal data for longer than is necessary for the legitimate purposes for which they are processed (the deletion periods for each processing activity are set out in the internal rules governing data or document management).
- ✗ Never use a company electronic system for unauthorised purposes or to transmit data without authorisation.

- ✗ Never use an unauthorised device (e.g. unsecured proprietary devices) to store company information.

5.5 PROTECTION OF INTELLECTUAL PROPERTY

For our company - the 4iG Group and the Rheinmetall Group -, intellectual property is one of the most valuable assets, as it is essential for maintaining a competitive advantage. Intellectual property includes, for example, inventions, know-how, patents, trademarks, industrial designs, copyrights, domain names, scientific and technical knowledge and all other intellectual property rights. The protection of these rights ensures that unauthorised use can be prevented and that a fee can be charged for their use.

In this spirit, we respect the work of others and take care not to infringe the intellectual property rights of others, and we expect others to do the same.

We expect our employees to protect the intellectual property of the Company and the 4iG Group and Rheinmetall Group and not to rent or make it available to others. Intellectual property created or acquired using our Company's resources becomes the property of the Company and is not considered private or personal property.

Conduct to be followed

- ✓ In contracts with business partners, clearly state who the owner of the intellectual property is.
- ✓ In the case of complex projects involving multiple IPR holders, consult a lawyer to draft confidentiality agreements.
- ✓ Ensure that employment contracts, licences, sales contracts and technology transfer agreements include terms and conditions to ensure adequate protection of intellectual property.
- ✓ Where appropriate, indicate if the material is protected by copyright and, unless otherwise agreed or required by law, the name of the author and the year of publication.
- ✓ Ensure that the development or sale of new or modified products and services does not infringe the intellectual property rights of others.

Conduct to be avoided

- ✗ Do not copy a product or service.
- ✗ Do not download or install software without proper authorisation (licence).
- ✗ Do not use copyrighted material or third-party trademarks or logos in the production of material without the express permission of the intellectual property right holders.

6. BUSINESS RELATIONS AND RESPONSIBLE COMMUNICATION

We are committed to extending the spirit and practice of responsible and sustainable business practices to the entire value chain. We strive to build trust-based business relationships and communicate responsibly with all stakeholders.

6.1 QUALITY REQUIREMENTS

Our company always strives to ensure that the services it provides, the products it sells, the development and supply of its own products meet the highest quality standards. Our Company carries out all its activities in accordance with the relevant legal and regulatory requirements and its own strict internal quality standards. Employees are required to carry out their duties at all times in accordance with an unwavering commitment to quality and compliance with the law, and to report any quality objections or concerns that arise through the appropriate channels.

6.2 BUSINESS PARTNERSHIPS

An honest and fair approach with customers, suppliers, subcontractors and other business partners is the basis for successful and lasting business relationships. Accordingly, we listen to the needs of our customers, suppliers and business partners. We continuously monitor, evaluate and improve our products, services, technology solutions and business processes to provide quality, safety and innovative solutions to our customers and clients in all areas of the value chain.

Our relationships with customers, clients, suppliers and other business partners are based on mutual trust and respect. We are committed to meeting all our contractual obligations.

Employees must bear in mind that any communication from them may not only be interpreted in relation to our Company, the 4iG Group and the Rheinmetall Group as a whole, but may also be used in the event of a dispute or investigation by a public authority. Communications must always be accurate and appropriate and must not be misleading in any form.

Conduct to be followed

- ✓ Observe the strictest standards of conduct in oral and written communication.
- ✓ Provide true, up-to-date, correct, accurate and understandable information about the Company's activities, products and services.
- ✓ Provide factual and accurate information in all communications.
- ✓ Keep all business-related information confidential if disclosure is not permitted.

Conduct to be avoided

- ✗ Never provide false or misleading information.
- ✗ Do not make implicit opinions or personal views on any business matter.
- ✗ Do not joke about confidential information or serious matters.
- ✗ Never deliberately distort information or make incorrect interpretations for the sake of a moment.

- ✓ Be careful in your communications and avoid misleading language.

6.3 POLITICAL ACTIVITY

Our company does not seek to be directly involved in political activities, does not formulate political goals and strictly complies with the legal requirements for corporate political involvement and political contributions.

However, we encourage our employees to participate in politics by exercising their right to vote, we recognise the right of our employees to engage in politics and we do not prohibit them from engaging in political activity. However, employees are not allowed to engage in political activities on behalf of the Company, the 4iG Group or the Rheinmetall Group, on their own behalf, with their own resources or during their working hours.

Conduct to be followed

- ✓ Please be aware that your own political statements are not those of R4, the 4iG Group or the Rheinmetall Group and may not even appear to be those of R4, the 4iG Group or the Rheinmetall Group.
- ✓ You are not speaking on behalf of the Company, so please make it clear that your political views and activities are personal and have nothing to do with R4.
- ✓ Inform your superior if any conflict of interest arises in connection with your political activities.

Conduct to be avoided

- ✗ Never use the name, brand name or corporate identity of R4, the 4iG Group, the Rheinmetall Group or any other member company in your political activities.
- ✗ You should never give the impression that R4, the 4iG Group or the Rheinmetall Group are committed to any political party or movement.
- ✗ Never use your working time or R4 resources to support political activities.
- ✗ Do not engage in political activities at work (e.g. campaigning, fundraising, etc.).
- ✗ Do not use your job at R4 to influence others or to support a politician, political party or movement.

6.4 GOVERNMENT RELATIONS

Our company will conduct its business in good faith and honestly, in accordance with applicable laws and regulations, using only permissible methods.

We strive to develop good and transparent relations with government and EU officials and other external stakeholders, including representatives and members of national and international professional organisations.

We lobby in accordance with local laws and regulations in the countries where we operate. In some countries, specific legislation restricts the value and nature of gifts and hospitality that may be accepted by officials or public officials, and particular attention should be paid to this (further details are set out in our adopted internal rules on gifts).

Conduct to be followed

- ✓ Be aware of and always comply with legal and regulatory requirements.
- ✓ Cooperate openly but prudently with officials or public officials.
- ✓ Notify and seek advice from your supervisor and the Compliance Officer before providing information in the context of any non-routine official procedure.

Conduct to be avoided

- ✗ Never violate legal requirements relating to taxation.
- ✗ Never mislead the person or authority conducting the proceedings in criminal or other official proceedings.
- ✗ Do not in any way prevent authorized law enforcement or supervisory officials from gathering information, data, evidence or statements.
- ✗ Never conceal, alter or destroy documents, data or records that are the subject of a proceeding.
- ✗ Under no circumstances should you prevent another employee from providing accurate information.

6.5 ASSUMING SOCIAL RESPONSIBILITY

We are committed to ensuring that you are part of, support and develop the community and environment in which you work.

We report on our donation and sponsorship activities regularly, openly and transparently. Accordingly, we only cooperate with companies that operate in a regulated and transparent manner, in line with the principles applied in business practice, and only participate in such companies.

We expect all sponsored and supported individuals and organisations to act in accordance with our ethical values and principles. We reserve the right to terminate or withdraw a grant if the recipient acts in a manner contrary to our values.

Conduct to be followed

Conduct to be avoided

- ✓ Seek to create partnerships that support social innovation and social entrepreneurship.
- ✓ Please remember that all corporate sponsorship and donation activities must be in accordance with the principles and standards of our Company's policies.
- ✗ Do not give grants or donations to any natural person or organisation that violates the principle of zero tolerance towards corruption and cartel agreements, human rights, health and safety at work, or seriously or repeatedly violates the ethical values of the Company.
- ✗ Do not sponsor or donate to any individual or organization that discriminates in any way or identifies its name or activities with discriminatory practices.
- ✗ Do not sponsor events or individuals who disproportionately damage the environment or have a negative impact on society and do not have effective measures in place to mitigate the impacts of their activities.

6.6 PUBLIC ANNOUNCEMENTS, SOCIAL MEDIA AND PRESS RELATIONS

We aim to publish regular, complete, comprehensive and reliable information about our activities and ambitions through all media. The Company's senior executives and a designated person within the 4iG Group are authorised to make statements on behalf of R4. We strive to develop positive and high quality professional relationships with the media. We maintain open, transparent and balanced two-way communication with external stakeholders.

Any communication to the media on our behalf is considered a public communication, which requires caution and a thorough knowledge of legal and media issues and, accordingly, is only permitted with the approval of the 4iG Group Director of Corporate Relations and Communications and the 4iG Group Legal and Regulatory Director.

The 4iG Group Corporate Relations and Communications Directorate coordinates our Company's social media activities.

Our company welcomes the fact that its employees are connected to our company in both their professional and private lives and contribute to the positive image and diversity of our company by responsibly naming their employer in public.

However, we remind our employees to exercise the necessary caution on social media to ensure that the Company's reputation is not tarnished. To this end, employees should not appear on social media on behalf of the Company, make untrue statements about their activities, evaluate Company matters on the basis of criteria that cannot be objectively verified, or use IT tools in violation of our policies.

Conduct to be followed

- ✓ Before providing any information, even informally, to media representatives on company matters, you should inform the 4iG Group Corporate Relations and Communications Directorate and seek their advice and approval.
- ✓ Ensure that any information that constitutes a public communication, such as a presentation at a professional forum, is approved by the 4iG Group Corporate Relations and Communications Director and the 4iG Group Legal and Regulatory Director.
- ✓ Ensure that all information provided is true, correct, complete and accurate.
- ✓ Act responsibly on social media.
- ✓ Always adhere to our company's ethical standards and be aware that your statements may be interpreted as communications from our company, i.e. they may affect the overall image of our company.

Conduct to be avoided

- ✗ Do not disclose information concerning corporate matters without proper authorisation.
- ✗ Never provide misleading or untrue information.
- ✗ Never publish any misleading, aggressive, offensive, abusive, exclusionary, harmful or in any way unethical advertisement, opinion or publicity.