



CODE OF CONDUCT

Welcome to the code of conduct of DTS IT AG

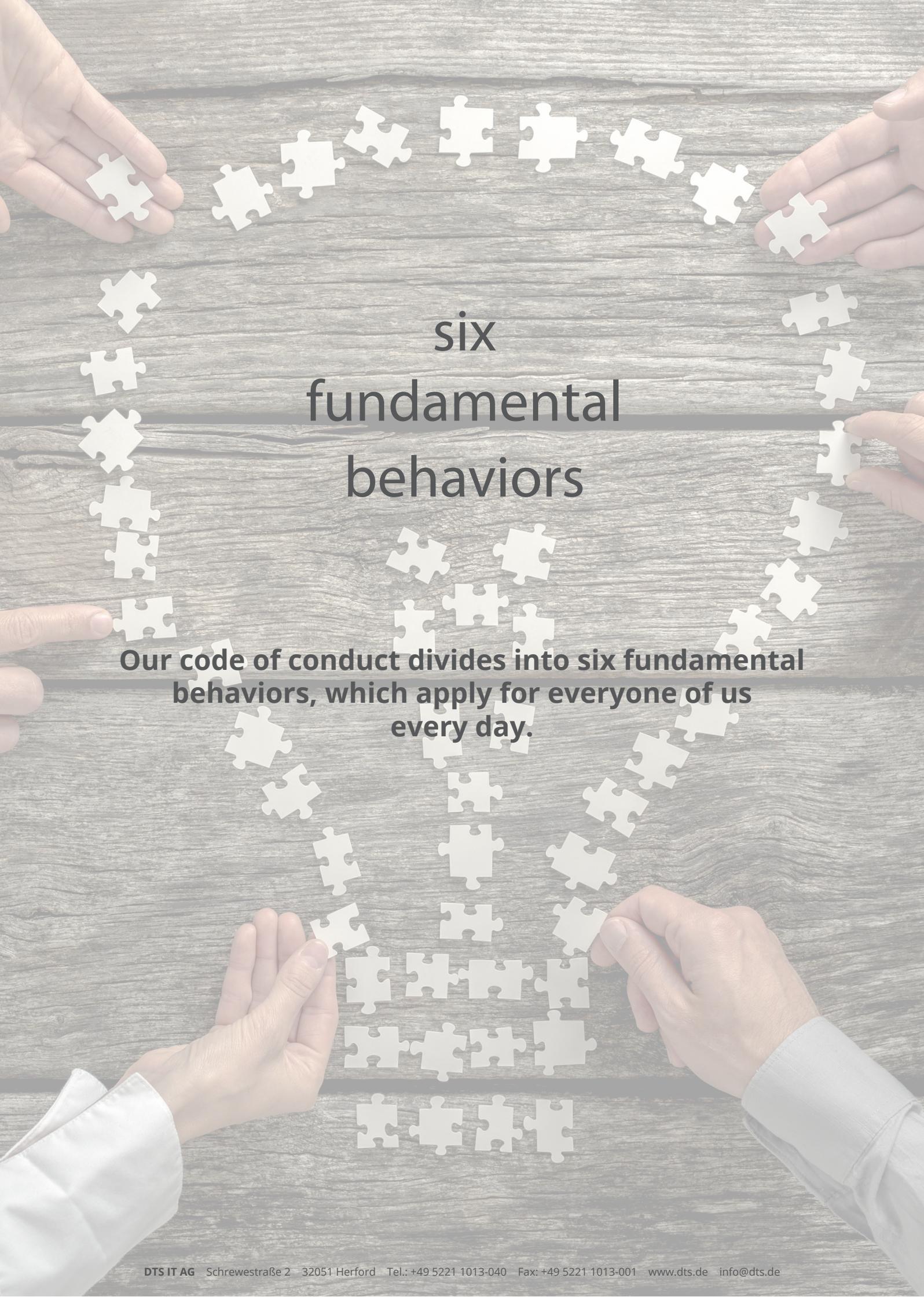


DTS IT („DTS“) is committed to an innovative corporate culture and at the same time is aware of its social responsibility, especially with regard to sustainability, the economy and the environment. This sense of responsibility is vital for creating credibility and trust between management and staff and with business partners, suppliers, customers and the public.

Accordingly, our code of conduct should be seen as an essential part of our corporate culture. It is intended to increase awareness of rights and principles. Our conduct is guided by national laws and internal guidelines as well as internationally recognised standards.

Integrity, reliability, compliance with the law and mutual respect are values that we prize highly and we expect our affiliated bodies as well as our employees to do the same.

Ulrich Möller
Member of the Board of DTS IT



six
fundamental
behaviors

Our code of conduct divides into six fundamental behaviors, which apply for everyone of us every day.

01

Basic principles and scope of the code

DTS complies with the laws and regulations of the countries in which it operates and requires its business partners to do so as well. Compliance with regulations is for us a fundamental principle of business.

By observing regulations, every employee will be acting in the company's interest and helping to avoid reputational damage, fines or claims for damages, which could lead to serious harm being caused to our relationships with customers, suppliers, consumers and other partners.



Due to the nature of our business, data protection and IT security regulations are of particular importance, especially in the data centre and security areas of the business. Under GDPR, fines of up to 4% of annual group turnover can be applied for infringement, which would threaten our viability as a business. This code of conduct is therefore intended to enforce compliance with GDPR as well.

We also take care to ensure that the companies affiliated with us (§§ 15 ff AktG) also comply with these regulations. In addition, we expect our subcontractors too to respect these regulations and all applicable laws.

02

Processing of data, information and intellectual property

The protection of customers', suppliers' and employees' data and other information is of particular importance for us, especially in an era of increasing digitalisation. The way we collect and process data complies with legal requirements and takes into account fundamental principles such as data economy and restriction of purpose.

DTS serves a large number of customers in the IT security and cloud/data centre sector and is valued by business partners as a security specialist. In order to live up to this reputation, a general awareness of security is required among all staff. Damage to the company's image in this area could have a considerable negative impact on our reputation and results.

To limit the risk of loss, unauthorised access to or modification of data and the risk of technical or human error, every employee must comply with IT security principles and adhere to any specifications, agreements and confidentiality policies agreed with the customer. Also to be complied with are the special security standards laid down by ISO 27001 (ITC guidelines, IT security guidelines and other policies).

In summary, suitable technical and organisational measures, including security and privacy controls, ensure an appropriate level of protection. The internationally recognised formula of Confidentiality, Integrity, Availability (CIA) applies, supplemented by the resilience of systems and services. The confidentiality, integrity and availability of data and information must always be maintained.

At the slightest suspicion of threats or technical vulnerability, we take immediate and transparent action in accordance with standards and internal regulations.

We respect the intellectual property of business partners and third parties. In the same way, all our employees are responsible for increasing and protecting our own know-how and IP rights, as these represent a crucial competitive advantage and must be safeguarded accordingly. This is done in particular by means of technical and organisational measures and of process and contract design.

Our own data and information should therefore be handled as carefully as our customers. All employees must protect confidential information and business documents from being read or misused by third parties and other unauthorised persons. We expect our sensitive data to be handled by business partners and third parties in the same way.

Both internal and external reporting and communication on our commercial transactions are based on the corporate values of honesty and integrity. This applies to investors, employees, business partners and the public. Reports, records and other documents must be prepared in compliance with regulations, standards and requirements governing completeness and accuracy.

Insider trading rules under capital market law must be observed.

03

Integrity and fair competition

DTS bases its day-to-day business on generally accepted ethical values and principles, in particular integrity, compliance with the law and respect. We promote transparency, integrity and responsible management.

We reject all forms of corruption and bribery. Neither active nor passive means for gaining unfair advantage are permitted. Infringements of this principle pose a considerable risk for both the company and its staff. They jeopardise profitability and are sanctioned accordingly. Conflicts of interest and the mixing of corporate and private interests, whether of employees or close relatives, are to be avoided. In case of doubt, the first priority is transparency. Donations and other forms of social engagement are made in the name of the company.

We face global competition and comply with all anti-trust regulations. Anti-trust infringements are incompatible with our claim to be technological innovators abiding by the principles of fair competition.

DTS complies with anti-money laundering regulations. We investigate unusual financial transactions and, where necessary, alert the authorities.

04

Behaviour towards staff



„We thrive on ideas. Every employee is part of our success.“

Regardless of background, ethnicity or nationality. We believe that diversity encourages constructive exchange, creativity and interdisciplinary working, which benefit our customers as much as ourselves. Against this background, freedom of thought, opinion, religion and equal rights are guaranteed.

1. Non-discrimination

Employment decisions, including hiring and promotion, remuneration, training, dismissal and termination, are made without discrimination.

2. Remuneration

Remuneration is at or above the level specified in the applicable legislation.

3. Working time

DTS complies with applicable laws, rules and regulations regarding working hours and requires the same of its suppliers and service partners.

4. Health and safety

Maintaining the health and safety of our staff is a top priority. Operational procedures are designed accordingly. To prevent accidents and personal injury, we provide safe and healthy working conditions that meet applicable legal requirements as a minimum. Each employee is responsible for contributing to health and safety at work and for complying with occupational health and safety requirements. Managers will provide appropriate instruction and assist employees in meeting their responsibilities in this regard.

05

Sustainability, economic stability and progress

Sustainability, environmental protection and the conservation of resources (both ours and the planet's) are important corporate goals for us. In order to minimise our impact on the environment and the climate, we and our suppliers and partners act in environmentally responsible ways at all our locations and wherever else we work.

DTS and its suppliers and partners comply with environmental protection regulations and standards and use natural resources responsibly. Every employee is called upon to make a contribution individually. We intend to decarbonise¹ by 2050, especially with regards to our energy usage. We operate an energy management system in accordance with the international energy management standard ISO 50001. The aim is to continuously improve energy efficiency and our overall energy-related performance.

We are always interested in improving economic efficiency in a sustainable way. Economic development should meet today's needs without compromising those of future generations. As consistent economic efficiency and sustainable growth are of great importance to us and our staff, economic sustainability plays an important role in our corporate culture. For this reason, we continuously strive to apply and optimise procedures in our operational processes and the technologies we use.

Against this background, all employees are expected to work efficiently during working hours and to make optimal use of the available resources.



06

Implementation and monitoring, references and contact persons

This code of conduct is an integral part of our corporate culture and lived values. Every employee is responsible for group-wide and uniform compliance with these principles.

If you have any questions about the code or suspect it may be being infringed, you can contact your manager, the executive board or HR at any time. DTS has a non-hierarchical corporate structure. Your first point of contact is your team or branch manager. Management is also always available. On the executive board, Herr Möller is responsible for compliance.

Questions and concerns in connection with this code of conduct are taken seriously by the above-mentioned offices and treated confidentially. This applies in particular to cases of suspicion of infringement, and also to our business partners, from whom we also expect compliant behaviour as a matter of course.

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¹Reducing the turnover of carbon through the conversion of economic practices.