

entegra
Code of Conduct

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1 Foreword

Dear colleagues,

Dear business partners,

Corporate responsibility and integrity are integral parts of entegra's company culture. Mutual respect and trust shape our relationships, both within our team and with our business partners. We do not tolerate any violations of the law, nor do we condone harassment or discrimination.

This entegra Code of Conduct outlines a set of behaviors to guide our actions and provides a framework for making difficult decisions. Every one of us at entegra is committed to upholding the principles set forth in this Code.

We place great value on entrepreneurial freedom and trust our team members to handle this freedom responsibly. Openly addressing problematic issues is explicitly encouraged. It is everyone's responsibility to be open to discussions about company practices, the work environment, their own behavior, or the behavior of others.

Thank you for your contribution to fostering a culture of compliance at entegra.



Uwe Appel



Wolfgang Eyrich

Note: In the interests of better readability, the simultaneous use of the masculine/feminine language forms has been avoided.

2 Our North Star – Guidance for the entire team

With our deep and broad expertise, we tackle digital stagnation, superficial knowledge, and fake innovation—challenges that hinder us from fully realizing the benefits of digital technologies. We are committed to our core values, which permeate every aspect of our daily work:

- **Innovation:** Innovation is part of our DNA. We thrive on solving complex problems and view it as our duty, as innovators, to find better solutions that support people economically and the planet ecologically.
- **Sustainability:** Our actions are grounded in a responsible approach to the environment, people, knowledge, and products. We develop sustainable software that stays up to date through refactoring. This includes AI and ML technology and the consideration of future business requirements.
- **Excellence:** For us, “good” is never good enough. Our goal is to exceed expectations. We strive for excellence in our people, products, and business operations. We believe that openness and a willingness to continuously learn form the foundation of outstanding performance.
- **Collaboration:** We work across teams, aiming to integrate diverse knowledge and expertise into the user experience. Collaboration starts within the entegra team and extends to project work with clients. We not only work closely with the leading minds of our customers, but also with the best from neighboring industries. We try to involve as many users as possible.
- **Enjoyment at work:** For many of us, work is a calling. Enjoying what we do is essential for a fulfilling life. Our goal is for every team member to look forward to coming to work each morning.
- **Digital Thinking 4.0** Digital transformation requires a new mindset—Digital Thinking. The I3.0 era left many of our clients disappointed. To overcome the current stagnation and digital paradox, we need to rethink entire processes, from the end to the beginning, and build normalized data models based on a Single Source of Truth (SSOT). This involves eliminating silo thinking and addressing uncontrolled, excessive redundancy.
- **Reliability** We operate in a VUCA world (Volatility, Uncertainty, Complexity, Ambiguity). This means that plans and contracts alone are insufficient for successful collaboration. Honesty and deep trust among team members, partners, and clients are indispensable. Taking responsibility for goals and results, and fostering a constructive culture around mistakes, is fundamental to modern, effective work.
- **Efficiency:** We aim to design and deliver solutions that achieve promised outcomes (rather than just output) within a defined time frame, using minimal resources. Effectiveness is the foundation of efficiency.
- **Fairness:** Fairness toward customers, partners, colleagues, and competitors defines our way of doing business. We recognize and respect individual boundaries and never exploit weaknesses. We stand against corruption in all forms.
- **Tolerance and mindfulness** There is your truth, my truth, and the reality. Acknowledging this, we respect every idea and way of being or thinking. We never judge others for their thoughts or beliefs—they are who they are. Being open-minded and eager to learn from others is integral to maintaining excellence.
- **Respect:** We respect laws, rules, and cultures—both local and international. This includes adherence to international standards such as the prohibition of child labor, exploitation, and sustainability guidelines.

Our goals are ambitious:

- Digitize the world
- Build the Power Metaverse
- Achieve relevance in our industry
- Retain existing customers
- Acquire new customers

3 Guidelines for team members and their work

At entegra, we uphold the highest standards of integrity, professionalism, and ethical conduct in all aspects of our business. As a software engineering company, our success is measured not only by the quality of our products and services but also by the trust we earn from and extend to our customers and partners. To maintain our reputation as a trusted industry partner, all team members are expected to adhere to the following guidelines.

By following these guidelines, we demonstrate our commitment to the values and principles that define entegra as a responsible and respected member of the software engineering industry.

Workplace safety, health protection, and environmental responsibility

- We prioritize the health, safety, and well-being of ourselves and others in the workplace.
- We comply with applicable national health and safety laws.
- Providing a safe and healthy work environment for our team members is a central concern.
- We are committed to minimizing risks to team members by implementing measures to prevent health issues and accidents.
- Our working conditions are designed to meet individual needs and are subject to a continuous improvement process. All legal requirements regarding health protection, workplace ergonomics, and safety are observed.

Integrity and honesty

- We conduct all business activities with honesty, integrity, and transparency.
- We avoid conflicts of interest and promptly disclose potential conflicts.
- We do not engage in any form of bribery, corruption, or unethical behavior.
- We do not tolerate bribery or corruption! Benefits in the form of invitations or gifts are only permitted if they serve a legitimate business purpose and do not represent consideration for an unlawful advantage. They must not have an unreasonably high value and must not disproportionately exceed the limits of normal business practice or the normal standard of living of the recipient.

Communication and collaboration

- We promote open and honest communication by sharing information and feedback constructively.
- We collaborate effectively with colleagues, customers, and partners to achieve common goals.
- We resolve conflicts and differences professionally and respectfully, seeking win-win solutions whenever possible.

Can-do mindset

- We embrace challenges and approach new tasks with a positive, proactive spirit.
- We take calculated risks and share our insights with the team.
- We do not assign blame for mistakes. In an ever-innovating company, mistakes are part of daily business and initiate process improvements.

Professionalism and respect

- We treat colleagues, customers, partners, and competitors with respect, dignity, and professionalism.
- We promote a culture of inclusivity and diversity.
- We refrain from discrimination, harassment, or any form of disrespectful behavior in the workplace.

Quality and accountability

- We take responsibility for our work.
- We strive for excellence in all tasks and deliverables, maintaining high standards of quality and accuracy.
- We continuously seek opportunities for improvement, innovation, and learning.

Professional development

- We take the initiative in pursuing professional development opportunities to enhance our skills and expertise.
- We stay informed about technological advancements, industry trends, and best practices.
- We support the growth and development of other team members through knowledge sharing and mentoring.

Confidentiality and data security

- We respect the confidentiality of sensitive information belonging to entegra, our customers, and partners.
- We protect company assets and intellectual property, including software code, business and operational secrets, and proprietary information.
- We adhere to data protection regulations and best practices to ensure the security and privacy of all entrusted data.
- When collecting, storing, processing, or transmitting personal data (e.g., names, addresses, phone numbers, birth dates, or health information) of team members, customers, or third parties, we exercise the utmost care and confidentiality while complying with applicable laws and regulations.

Compliance with laws and regulations

- We comply with all applicable laws, regulations, and industry standards that govern our business operations.
- We stay informed about legal and regulatory requirements relevant to our roles and responsibilities.
- We report suspected violations of laws or regulations to the appropriate authorities, management, or designated contacts.

Leadership expectations

Leaders at entegra play a crucial role in upholding our values and fostering a culture of integrity, collaboration, and continuous improvement. Leaders are expected to:

- **We are open to concerns and feedback:** Leaders should create an open and inclusive environment where contributors feel comfortable voicing concerns and providing feedback. They should actively seek input from their team members and demonstrate a willingness to listen and address their concerns in a timely and constructive manner.
- **We take all concerns about unethical behavior seriously** Leaders have a responsibility to ensure that all team members feel safe and supported when reporting instances of unethical behavior or violations of company policies. They should take all reports seriously, conduct thorough investigations and take appropriate action to address misconduct while maintaining the confidentiality of those involved.
- **We set an example of integrity and collaboration:** Leaders are expected to lead by example, embodying the values of integrity, collaboration, and ethical conduct in their actions and decisions. They should demonstrate honesty, fairness, and transparency in all interactions and must actively work to build trust and credibility with their team members and colleagues.
- **We avoid micromanagement** Leaders delegate tasks and responsibilities in a way that empowers and motivates team members. A healthy culture that embraces learning from

mistakes, coupled with clear communication of goals, allows individuals to work independently without feeling overly controlled by their managers.

By meeting these expectations, entegra's leaders play a critical role in fostering a culture of trust, accountability, and high performance. This culture drives our collective success in achieving business goals and fulfilling our mission.

4 Guidelines for dealing with customers, partners and government agencies

When representing entegra in dealings with customers, partners, and government entities, we adhere to the following principles:

- We prioritize clear and honest communication, ensuring all parties are fully informed and aligned.
- We respect the confidentiality of sensitive information shared with us and uphold strict data protection standards.
- Our commitment is characterized by mutual respect and professionalism and promotes long-term relationships based on trust and integrity.
- We adhere to all applicable laws, regulations, and industry standards, demonstrating our dedication to legal and ethical conduct.
- We listen to the needs and concerns of our stakeholders, striving to understand their perspectives and address their priorities effectively.
- We respect and protect the intellectual property of all parties, including customers, partners, and government organizations, ensuring compliance with copyright, patent, and trademark laws.

5 Responsibility towards contributors, society and the environment

As a responsible company, entegra is committed to promoting the well-being of its contributors, contributing to societal betterment, and protecting the environment. We fulfill this responsibility by adhering to the following principles:

Equal treatment

Discrimination based on ethnicity, gender, disability, religion, belief, age, or sexual identity is strictly prohibited at entegra. This applies across all areas, including hiring, promotions, terminations, and daily interactions with colleagues, contributors, business partners, or external stakeholders.

Human rights

- We uphold the human rights, personal rights, and dignity of our employees and all third parties.
- Forced labor, child labor, all forms of modern slavery, human trafficking, and exploitation are strictly forbidden. We enforce strict compliance with relevant laws.
- entegra is dedicated to integrating a comprehensive set of international human rights standards into its business. We expect our employees and business partners to support and contribute to the diverse manifestations of human rights in accordance with international standards. These standards include:
 - The Universal Declaration of Human Rights
 - Core labor standards of the International Labor Organization (ILO)
 - OECD Guidelines for Multinational Enterprises
 - UN Guiding Principles on Business and Human Rights
 - UN Global Compact (“The Ten Principles”)

Social and environmental responsibility

- Each year, we allocate funds for corporate donations, encouraging employees to propose charitable organizations they feel passionate about.
- We implement sustainable practices, minimize waste, conserve resources, and reduce our carbon footprint.

Responsibility to our employees

- We provide a secure, inclusive, and supportive work environment that fosters personal and professional growth for all employees.
- We offer competitive compensation that reflects our commitment to fairness and equitable treatment.

6 Consequences of compliance violations

At entegra, we recognize that our actions have far-reaching implications, and we strive to make decisions that benefit our stakeholders, society, and the planet as a whole.

In cases of violations of laws or the standards outlined here, we take decisive action, including pursuing legal measures or terminating business relationships.

Violations of the Code of Conduct by employees (particularly in cases of intentional or grossly negligent behavior) may result in consequences such as warnings, termination, or third-party claims for damages.

If you have any questions about the Code of Conduct, feel free to contact management at any time.

Reports and complaints regarding potential violations of laws or the Code of Conduct can be submitted via email to hinweisgeber@entegra.de. Alternatively, reports can be made by placing a message in a sealed envelope labeled clearly with "Code of Conduct" in the entegra mailbox located at Hertzstraße 28, or by sending it via postal mail. The anonymity of the reporting individual and the confidentiality of their report will be maintained under all circumstances.