



ModuleWorks

Get There Faster.

Code of Conduct

ModuleWorks GmbH

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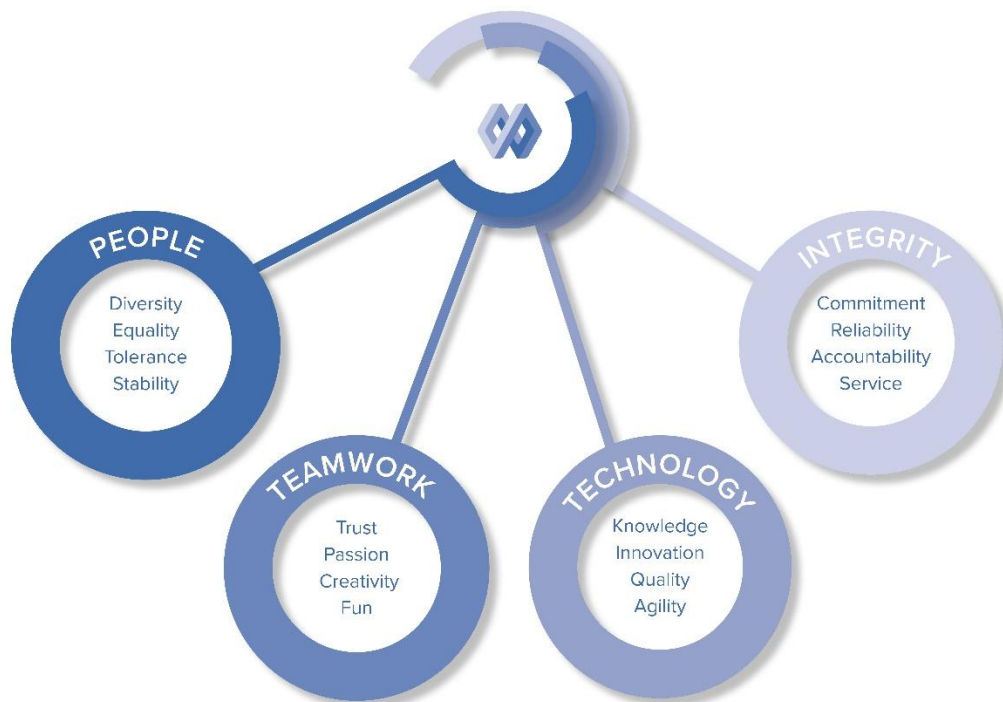
Henricistrasse 50. 52072 Aachen, Germany

The Guiding Principles of ModuleWorks GmbH

Introduction

The companies of ModuleWorks GmbH are active in the five core areas of Digital Manufacturing, Digital Factory, CAM Automation, Additive & Process Technologies, and Research. ModuleWorks GmbH is a leading provider of software technology for engineering applications and has been successfully operating on the market with its associated companies for around 20 years.

As a large employer in the field of technology, ModuleWorks GmbH is aware of its social and ethical responsibility. With this Code of Conduct, we adhere to the fundamental values that guide us.



We expect our employees to respect these values and to put the principles set out here into practice in their daily work. We also expect our suppliers to comply with the standards set out here.



Yavuz Murtezaoglu
Managing Director



David Plater
Technical Director



Marco Ellerbrock
Operations Director



Miguel Johann
Product Director



Gürsel Demircali
Chief Strategy and Transformation Officer



Respect for Human Rights

ModuleWorks GmbH is expressly committed to the protection of human rights in its sphere of influence. We undertake not to participate in human rights violations in any form, either directly or indirectly. We also expect our suppliers to treat all people respectfully and fairly and that human rights are respected within their sphere of influence.

Respect for Freedom of Association and the Right to Collective Bargaining

ModuleWorks GmbH respects the right of employees to freedom of association and collective bargaining.

Employees are free to establish an employee representation or to become a member of an employee representation. An employee must not suffer any disadvantages as a result of membership of a trade union. Employees or their respective organisations can also negotiate and conclude company agreements or collective agreements at the appropriate level. We also expect our suppliers to respect their employees' right to freedom of association and collective bargaining.

Maintaining Fair Working Conditions

ModuleWorks GmbH pays attention to fair working conditions for all employees in all associated companies. This includes compliance with the respective national regulations on working hours as well as the right to appropriate remuneration, which is at least based on the respective statutory minimum wages. Likewise, all salaries, benefits and nationally prescribed social benefits agreed in the employment contract are paid. In addition, ModuleWorks GmbH supports the further education and training of its employees. We also expect our suppliers to offer their employees fair working conditions and to pay them appropriately.

Elimination of All Forms of Forced Labour, Child Labour and Human Trafficking

ModuleWorks GmbH is committed to prohibiting any form of forced labour. This includes all types of work or services that are forced by a person under threat of punishment or that a person does not voluntarily provide. ModuleWorks GmbH assumes that its suppliers do not allow any form of forced labour in their company. ModuleWorks GmbH is committed to the prohibition of any form of child labour. When employing minors, ModuleWorks GmbH observes the minimum age for admission to employment in compliance with national regulations. ModuleWorks GmbH is committed to prohibiting any form of human trafficking. ModuleWorks GmbH demands that its suppliers do not tolerate any kind of child labour or human trafficking in their company.

We expect that our suppliers do not allow young employees to carry out dangerous work, that they comply with national regulations on the employment of minors and that they do not hinder the education of children by employing them.

Elimination of All Forms of Discrimination in Employment

ModuleWorks GmbH rejects any form of discrimination in the working environment. In doing so, we respect the privacy of our employees. We are committed to promoting equal opportunities and diversity and are committed to ensuring that all employment decisions (e.g. recruitment, promotion, education and training) are made solely on the basis of the person's skills and qualifications. Aspects such as race, ethnic origin, religion or belief, gender, sexual orientation, age, nationality, disabilities, social origin, personal relationships or trade union membership must not influence employment decisions. ModuleWorks GmbH rejects any form of sexual harassment of employees and takes action against it with all legal means. We also expect our suppliers to promote equal opportunities and diversity, as well as to prevent discrimination in employment decisions and sexual harassment.

Observance of Health and Safety at Work

ModuleWorks GmbH complies with the applicable national legislation on health protection and occupational safety. One of our central concerns is to offer our employees a healthy and safe working environment. We are committed to keeping the risks to which employees are exposed as low as possible by taking appropriate measures to prevent health impairments and accidents. The employees' working conditions are designed to meet their needs and are subject to a continuous improvement process. All applicable legal framework conditions for health protection, occupational ergonomics and occupational safety are observed. Our suppliers are also required to comply with the applicable national legislation on health and safety at work. Our suppliers must actively take measures to prevent work-related accidents, illnesses and deaths to ensure a healthy and safe working environment for employees.

Respect for Environmental Protection

ModuleWorks GmbH attaches great importance to environmental protection, which is why we use precautionary measures to ensure environmental risks and negative effects on the environment are kept as low as possible. These include, in particular:

- The reduction of energy consumption and greenhouse gas emissions
- Keeping the air clean and thus increasing air quality
- The management of natural resources
- The prevention of waste
- The preservation of water quality and the economical use of water
- Responsible chemical management.

We ensure compliance with the applicable national environmental laws, regulations and standards in all associated companies. Furthermore, we support the use of modern, efficient and environmentally friendly technologies. We also expect our suppliers to protect the environment and comply with applicable national environmental laws, regulations and standards. Suppliers must ensure that their activities do not cause avoidable environmental damage.

Combating All Forms of Corruption

ModuleWorks GmbH rejects all forms of corruption, including bribery and extortion. Decision-making processes must not be influenced in any way by undue benefits (cash, benefits in kind, pleasure trips, etc.). Conflicts of interest must be avoided. If there is a personal interest or a conflict of interest, this must be disclosed. The disclosure does not result in any disadvantages for the person concerned. We also expect our suppliers to take action against all forms of corruption and not to engage in unfair competition. Our suppliers may not bribe or extort others or accept bribes. In addition, suppliers may not enter into price agreements with competitors or similar agreements.

Protection of Intellectual Property and Prevention of Placing Counterfeit Parts on the Market

ModuleWorks GmbH protects the intellectual property of customers and employees through appropriate technical and organizational measures. Internal regulations prevent counterfeit parts from being put into circulation. Suppliers must also ensure these regulations.

Compliance with the Requirements of Data Protection and Information Security

ModuleWorks GmbH ensures that the processing of personal data complies with the valid requirements and regulations of data protection. Furthermore, ModuleWorks GmbH ensures that the requirements of information security for the processing of information of its customers, suppliers and employees are met.

Cybersecurity and Cyber Resilience

The company is committed to developing, delivering, and maintaining products and services with a high level of cybersecurity and in compliance with applicable legal and regulatory requirements, including the European Union Cyber Resilience Act where relevant.

Cybersecurity must be considered throughout the full lifecycle of products and services, including planning, design, development, testing, release, maintenance, and end-of-support activities.

The company follows security-by-design and security-by-default principles and works to reduce cybersecurity risks, prevent incidents, and protect the confidentiality, integrity, and availability of data, systems, and connected products.

Known vulnerabilities and security incidents must be handled promptly, escalated through the appropriate internal channels, and addressed in accordance with company procedures for vulnerability management, remediation, and regulatory reporting.

Employees, managers, and relevant contractors are expected to support secure development and operational practices, report security concerns without delay, and cooperate with internal controls, audits, investigations, and corrective actions related to cybersecurity compliance.

The company also expects appropriate cybersecurity standards from relevant suppliers, partners, and third parties that contribute to products, software components, or services delivered to customers.

General Requirements

This Code of Conduct lists the minimum standards that all companies of ModuleWorks GmbH recognize and whose compliance is expected by all suppliers of ModuleWorks GmbH. We see the definition and implementation of this Code of Conduct as part of our socially and ecologically responsible corporate governance and as an opportunity for us to support the sustainable development of society in the long term. As a result, it is important to us to continuously improve the implementation of the standards defined here in our daily work.

All companies of ModuleWorks GmbH and their suppliers are aware of their corporate responsibility and comply with all legal requirements for corporate accounting. The traceability of all asset-relevant transactions and business transactions is ensured by the factually correct and chronological assignment of the records.

It is assumed that all activities comply with national laws, rules and regulations as well as customs and export regulations. In this context, we observe in particular the international legal requirements and restrictions on export control and export restriction of security-relevant services and goods. This applies to the employees of ModuleWorks GmbH as well as to all suppliers and their sub-suppliers. When suppliers use subcontractors, they are responsible for ensuring that all subcontractors also meet these requirements. The supplier must communicate these standards in an appropriate form to its sub-suppliers and ensure compliance with the standards.

Compliance with the Code of Conduct of ModuleWorks GmbH

ModuleWorks GmbH reserves the right to check compliance with the standards defined here in a suitable form, for example by means of audits, and to adapt them if necessary. In the event of violations of laws and the standards set out herein, we will take appropriate action, including taking steps in accordance with the employment law or terminating business relationships.

If you have any questions about sustainability and the Code of Conduct, you can contact the Corporate Social Responsibility Officer(s) at any time at csr@moduleworks.com or consult the information page at www.moduleworks.com.

Complaint procedures and complaints regarding possible violations of laws or the Code of Conduct should be marked as "Personal/Confidential" and submitted in person and by appointment at the office of the CSR officer at ModuleWorks GmbH, Henricistrasse 50, 52072 Aachen or by post to:

Personal/Confidential
CSR Officer
ModuleWorks GmbH
Henricistrasse 50
D-52072 Aachen

The anonymity and confidentiality of the persons who submit complaints are guaranteed in all circumstances. The person is protected from retaliation or reprisals.