

Company Code of Conduct

Code of Conduct for Employees and Executive Management of the auxalia WESTCAM Group

Version 2.0 – April 2026

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1. Introduction

The auxalia WESTCAM Group is a European provider of digital solutions in the fields of construction, product design, manufacturing and quality assurance. As a corporate group comprising auxalia, WESTCAM and ICN, it combines extensive expertise across the entire value chain and represents innovation, quality and sustainable development.

The business activities of the auxalia WESTCAM Group are based on integrity, responsibility and sustainable business practices. These principles form the foundation of all business activities as well as cooperation with employees, customers and business partners.

With this Code of Conduct, the auxalia WESTCAM Group defines binding standards of conduct and establishes a clear framework for lawful, ethical and responsible behaviour within the company.

The provisions are based on applicable legal requirements and internationally recognised standards, in particular the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization.

This Code was last reviewed and updated on: 15 April 2026.

2. Scope of Application

This Code of Conduct applies to all employees and members of the executive management of the auxalia WESTCAM Group.

The auxalia WESTCAM Group is committed to implementing appropriate organisational measures to ensure compliance with this Code. All employees are responsible, within the scope of their respective roles, for adhering to and implementing the principles set out herein.

The executive management has a particular responsibility to act as role models and to actively promote and ensure compliance with this Code.

3. Social Responsibility

3.1 Human Rights and Equal Treatment

The auxalia WESTCAM Group is committed to respecting internationally recognised human rights. Discrimination or unequal treatment based on personal characteristics is not tolerated.

3.2 Working Conditions, Working Hours and Remuneration

The company ensures fair, transparent and legally compliant working conditions. Working hours and remuneration comply with applicable legal requirements and take into account operational as well as individual needs.

3.3 Employee Development and Social Dialogue

The auxalia WESTCAM Group promotes the professional and personal development of its employees through appropriate training and qualification measures. Open communication and constructive social dialogue are key elements of corporate culture.

3.4 Health, Occupational Safety and Security

The protection of life, health and well-being of employees is of the highest priority. The auxalia WESTCAM Group ensures a safe working environment and implements appropriate measures to prevent workplace accidents and health risks.

3.5 Whistleblowing System

The auxalia WESTCAM Group provides an effective and confidential whistleblowing system that enables the reporting of potential violations of legal requirements, internal policies or this Code of Conduct.

Reports can be submitted via the official reporting channel:

<https://auxalia.personiowhistleblowing.com/>

All employees are encouraged to report potential violations in good faith.

3.6 Protection of Whistleblowers and Non-Retaliation

The auxalia WESTCAM Group ensures that individuals who report concerns in good faith or participate in investigations are fully protected.

Any form of retaliation, intimidation, discrimination or adverse treatment against whistleblowers is strictly prohibited. This includes actions intended to prevent, discourage or penalise reporting.

3.7 Cooperation in Investigations

All employees are required to fully cooperate in the clarification of potential violations and to support investigations by providing complete and accurate information.

4. Environmental Responsibility

The auxalia WESTCAM Group is committed to the responsible use of natural resources and to compliance with all applicable environmental regulations.

The company aims to minimise environmental impacts, use resources efficiently and promote sustainable business practices.

5. Ethical Business Conduct

5.1 Corruption and Improper Advantages

The auxalia WESTCAM Group maintains a zero-tolerance policy towards corruption and bribery. It is prohibited to directly or indirectly offer, grant or accept improper advantages.

This includes in particular cash payments, gifts, hospitality, commissions, kickbacks or any other benefits intended to improperly influence business decisions.

5.2 Avoidance of Conflicts of Interest

Business decisions shall be made solely on the basis of objective and factual criteria. Conflicts of interest shall be avoided or disclosed without delay.

5.3 Fair Competition

The auxalia WESTCAM Group is committed to complying with all applicable competition and antitrust laws. Anti-competitive practices, including price-fixing or the exchange of sensitive information, are strictly prohibited.

5.4 Integrity, Fraud and Anti-Money Laundering

Fraud, embezzlement and other forms of financial misconduct are not tolerated. Compliance with all applicable laws regarding the prevention of money laundering is mandatory.

6. Confidential Data and Business Secrets

The auxalia WESTCAM Group is committed to protecting confidential information and personal data. Such data must be processed in accordance with applicable legal requirements and protected against unauthorised access.

Company property and business secrets must be handled with care and may not be used or disclosed without authorisation.

7. Implementation, Monitoring, Audits and Training

The auxalia WESTCAM Group implements appropriate measures to ensure compliance with this Code of Conduct. These include training measures, internal controls and the continuous improvement of relevant processes.

All employees are required to participate in relevant training and contribute to compliance with this Code.

8. Consequences of Violations

Violations of this Code of Conduct are not tolerated and may result in disciplinary measures depending on the nature and severity of the violation. These may include termination of employment.

9. Approval and Acknowledgement

This Code of Conduct has been approved by the management of the auxalia WESTCAM Group and enters into force upon its publication.


The auxalia WESTCAM Group ensures that this policy is made accessible to all employees in an appropriate manner and is actively communicated. It is further ensured that the contents of this Code are understood and implemented in daily business operations.

Compliance with this policy is supported and monitored through appropriate measures, in particular training and internal controls.

15 April 2026



Andreas Hofherr, CEO



Markus Ebster, CEO