

SMF CODE OF CONDUCT

CODE OF CONDUCT AND PERSONAL COMMITMENT

15.12.2025

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Foreword

We create the digital edge for our customers

That is our mission at SMF and we do everything we can to fulfill it. Our goal is a sustainable and responsible corporate policy - in the long term.

To do this, we need uniform principles, which we have set out in the following SMF Code of Conduct. In addition to complying with the law, there are a few other points that may seem obvious to you. The purpose of this code is to reinforce them.

We want to set a good example in our daily interactions and in our work with our customers, service providers and business partners. To this end, we are committed to taking a close look at the impact of our activities on employees, society and the environment and intervening to manage any inconsistencies. The Code of Conduct helps us every day to work in the right way to achieve our goals.

This Code of Conduct is aimed at all of us: employees, managers and members of SMF GmbH management. The rules set out here are binding and it is the responsibility of each individual to comply with them and thus set a good example to others.

We call on our customers, service providers and business partners to support us in complying with the measures and implementing the principles - for better, shared cooperation and a sustainable future.



from left to right: Henrike Simbach, Engelbert Turczyk, Wieland Feuerstein and Tristan Prokopp

signed
SMF Management

1. General principles

Our four guiding values, which describe who we are and what we stand for, form the basis of our daily activities at SMF. We are guided by them because they have brought us to where we are today.

Passion for technology: We love what we do. Our passion for technology drives us to develop high-quality solutions. We want to create long-term added value and ensure that our customers can rely on us.

Family togetherness: We treat each other with trust. We celebrate successes and overcome hurdles together. We support each other and stick together, because we are a team.



Shared responsibility: We want to achieve our corporate goals in harmony with the environment and society. We accept the ideas and wishes of our counterparts openly and respectfully. We think outside the box and actively share our knowledge.

Success through diversity: Our work is characterized by tolerance, respect and fairness. We are a community of different individuals in which everyone is accepted for who they are. This diversity is our strength, because everyone makes a unique contribution to the company's success.

At SMF, we make sure that our corporate policy is sustainable and responsible in the long term. For us, development is sustainable if it is geared towards current needs and at the same time ensures that the needs of future generations are not restricted. We act in accordance with the principles of the UN Global Compact.

Our corporate goal is to secure our long-term existence and financial independence. In doing so, we assume responsibility towards the people working in the company, customers and other stakeholders as well as the public and the environment.

We feel obliged to take a close look at the impact of our activities on employees, society and the environment and to intervene in the event of inconsistencies.

2. Respect and esteem

2.1 Recognition of human rights

We recognize the United Nations Universal Declaration of Human Rights and ensure that the company is not involved in human rights violations. It goes without saying that we reject inhumane behavior. It is also a matter of course for us that the Basic Law, the constitution of the Federal Republic of Germany, forms the basis for our coexistence.

2.2 No child labor and forced labor

We do not tolerate child labor, forced labor or other involuntary labor in accordance with Conventions C 138 and C 182 of the International Labor Organization (ILO).

2.3 Compliance with the minimum wage law

We undertake to comply with the respective national minimum wage law in its respective version.

2.4 Tolerance and equal opportunities

Our work is characterized by tolerance, respect and fairness. This means that we never accept demeaning, condescending, insulting or otherwise disrespectful words and actions. Everyone is treated with respect and dignity. We do not tolerate abuse or discrimination of any kind.

We are a community of diverse individuals in which everyone is accepted for who they are. This diversity is our strength, because each and every one of us makes a unique contribution to the company's success

2.5 Trust and appreciation

Trust, appreciation and respect are prerequisites for constructive and honest openness within the company and are key elements in our dealings with one another. It is important that managers exemplify our values and represent the company's development. They treat their employees with care to ensure their health by respecting their work-life balance.

2.6 Dealing with Artificial Intelligence (AI)

Within the company, we see generative AI as a supportive tool that can relieve us in our respective areas of expertise as needed. AI is expressly intended as an aid and not as a substitute for our own expertise, responsibility, or judgment.

Our communication remains open, respectful, and personal. We transparently identify the use of AI for support, particularly in communication. Direct exchange is a central component of our collaboration and our corporate culture. SMF builds on the intelligence, experience, and expertise of its employees. AI can complement these strengths, but it does not replace them.

2.7 Freedom of association and the right to collective bargaining

We respect the right of its employees to freedom of association and collective bargaining within the framework of the applicable laws and the conventions of the ILO.

3. Safe and good working conditions

3.1 Occupational health and safety in the workplace

SMF ensures occupational health and safety for its employees in compliance with the applicable laws and regulations. Our employees are given free access to drinking water and sanitary facilities.

In addition, suitable fire protection, lighting and ventilation are provided. If necessary, employees are provided with personal protective equipment free of charge. They are then trained in the correct use of the protective equipment and in the general safety regulations.

3.2 Transparency of working hours and remuneration

All contracts for the recruitment of new employees comply with the applicable laws. Employees receive employment contracts in which the working hours and remuneration are specified.

Working hours shall be in accordance with the applicable laws. All remuneration is paid without delay and in accordance with the applicable laws. In addition to the fixed salary components, monetary incentives, such as variable salary components, are offered to employees in the relevant operating divisions.

3.3 Work-life balance

We embrace the digital world and promote forward-looking working models. These include independent working in flexitime, the option to work from home and flexible models for parental leave. We focus in particular on the compatibility of family and work. We support compatibility through a healthy work-life balance based on individual part-time models, flexible working hours, working as close to customers' homes as possible and special leave days

4. Minimizing environmental impact

4.1 Protecting the environment

We recognize that our business activities have an impact on the environment. We therefore ensure that we treat the environment responsibly and work continuously and in a solution-oriented manner to reduce environmental pollution, increase energy efficiency and promote climate protection.

To this end, we develop and implement a specific environmental policy and comply with all applicable laws and regulations for the protection of the environment as part of our business activities. Our principles are set out in our SMF Environmental Policy and Sustainable Procurement Policy.

4.2 Handling hazardous substances

We maintain high health and safety standards in all our activities and are well prepared to take appropriate action in the event of an emergency.

When handling chemicals and other substances that are classified as hazardous if they are released into the environment, their safe handling, movement, storage, reuse or disposal is ensured.

4.3 Reduction of resource use, waste and emissions

Continuously improving the efficiency of resource use is an important part of operational management. Waste of any kind and all emissions into the air, water or soil are minimized, identified and monitored.

We all ensure that we protect natural resources wherever possible and reduce our environmental impact by reducing and recycling waste. In addition to economic considerations, each individual also takes ecological and social criteria into account when working with customers, service providers and business partners.

5. Application of high ethical and moral business standards

5.1 Transparent business relationships

We maintain a trusting and professional relationship with our customers and business partners that does not tolerate any improper benefits through corruption, bribery, fraud or extortion. We will neither offer nor accept gifts, payments or other benefits that could tempt a person to act contrary to their duties. We also do not accept cash.

At SMF, we have a high level of business ethics, which is why we only strive for mutually beneficial business relationships

5.2 Avoidance of conflicts of interest

Our personal relationships and interests will never interfere with or even influence our business decisions and activities. To this end, we also avoid situations that could give the impression of such interference.

5.3 Donations

Our donations are made in consultation with SMF management and are communicated transparently.

5.4 Fair competition

They act in accordance with the principles of the market economy and fair competition. This means that any market-relevant agreements with competitors are prohibited. Furthermore, we have no interest in exerting political influence on political parties or authorities. We are expressly committed to complying with the statutory regulations on insider trading, money laundering activities and the protection of third party and own intellectual property.

6. Dealing with information

6.1 Creation and exchange of information

All types of documentation and reports are written truthfully and correctly. This applies to both internal and external information.

6.2 Confidentiality and secrecy

Employees undertake to maintain confidentiality when processing personal data by signing a separate "Confidentiality undertaking in accordance with the GDPR".

All employees of SMF GmbH are obliged to maintain confidentiality regarding company and business secrets and other internal matters. The confidentiality obligation shall continue to apply after termination of the employment relationship.

6.3 Information protection and cyber security

We comply with all applicable policies, requirements and guidelines on information protection and cyber security and have implemented appropriate controls for the exchange of confidential information. Confidential information is not shared on social media or public platforms

6.4 Handling of personal data

We take the protection of the personal data of our employees, customers, service providers and other business contacts very seriously and adhere strictly to the rules of data protection laws.

We always treat all data that we collect and process for the purpose of our business activities with the utmost care and in the strictest confidence. We have drawn up our own privacy policy for this purpose.

7. General information

7.1 Compliance with the Code of Conduct

The SMF Code of Conduct applies to both SMF GmbH and its subordinate companies. It is binding for all employees, executives and management and also covers the activities carried out in other companies.

7.2 Responsibilities

The management of SMF is responsible for the publication and implementation of the Code of Conduct. It takes the necessary steps to implement the principles and guidelines contained in the Code of Conduct by means of suitable measures and undertakes to regularly monitor compliance with the Code.

In addition, each individual is required to report actual and imminent violations of these principles to their own manager or via the SMF compliance procedure. Such reports are always treated in strict confidence and have no negative consequences for the reporter

7.3 Publication

The Code is generally available on the company website www.smf.de. We are all obliged to inform ourselves regularly about the internal rules and to comply with them.

This document is continuously monitored and amended as necessary. The contact persons for all questions are the management in the person of Wieland Feuerstein, Tristan Prokopp, Henrike Simbach and Engelbert Turczyk.

Dortmund, 15.12.2026