



Code of Conduct

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1 We Lead with Our Values

At amasol, we believe that our success is built on the everyday decisions each of us makes. As members of the team, our actions and choices shape not only our own work but also the way amasol is perceived by customers, partners, colleagues and other stakeholders.

This Code of Conduct provides guidance for making responsible, ethical and lawful decisions in our daily work. It reflects amasol's commitment to integrity, transparency, fairness, respect and responsible business conduct.

Management is committed to supporting an environment in which employees can make informed and ethical decisions, raise concerns and seek guidance where necessary.

Everyone working on behalf of amasol is expected to act responsibly, comply with applicable laws and internal requirements and contribute to maintaining the trust placed in amasol by its customers, employees, business partners and other stakeholders.

1.1 Why This Code Matters

This Code provides the basic principles for how we work together, how we conduct business and how we interact with customers, suppliers, partners and other stakeholders.

The Code is intended to help employees:

- comply with applicable laws, regulations and internal requirements;
- make responsible and ethical decisions in their daily work;
- act with integrity, fairness and respect;
- protect amasol's reputation, assets and information;
- understand when and where to seek guidance;
- identify and appropriately address potential misconduct or compliance concerns; and
- contribute to a professional, inclusive and responsible working environment.

This Code does not replace applicable laws, employment agreements or more specific internal policies and procedures. Where specific requirements exist, those requirements must also be followed.

1.2 Decision-Making: How to Make the Right Call

Not every situation can be addressed in detail in a Code of Conduct. Where the correct course of action is unclear, employees should consider questions such as:

- Is the action lawful?
- Is it consistent with amasol's values and internal policies?
- Is it fair, transparent and responsible?
- Would I be comfortable if the decision became known to colleagues, customers or management?
- Could the decision create an inappropriate personal or business advantage?
- Could it negatively affect another person, amasol, a customer or another stakeholder?
- Do I need additional guidance before acting?

Employees are encouraged to seek guidance from their manager, the Legal and Compliance Team, the People Team or another appropriate internal function whenever they are uncertain.

1.3 Role of Managers

Managers have a particular responsibility to lead by example and support the implementation of this Code.

Managers should:

- demonstrate ethical and responsible behaviour;
 - communicate expectations clearly;
 - support employees who raise questions or concerns;
 - avoid retaliation or unfair treatment;
 - address potential misconduct appropriately and promptly;
 - escalate matters through the appropriate internal channels where necessary; and
 - promote a professional, respectful and inclusive working environment.
- Managers must not instruct or encourage employees to disregard applicable laws, internal policies or other binding requirements.

1.4 Speaking Up

We encourage employees to speak up if something does not seem right.

Concerns may relate to a potential violation of this Code, unethical conduct, serious misconduct, legal violations, human-rights concerns, discrimination, harassment, corruption, fraud or other serious compliance concerns.

amasol does not tolerate retaliation, intimidation, discrimination or any other disadvantage against persons who raise concerns on reasonable grounds or participate in a related review or investigation.

Concerns may be raised with a manager, the Legal and Compliance Team or, where the matter falls within its scope, through amasol's designated internal whistleblowing channel.

Reports submitted through the whistleblowing channel are handled confidentially, objectively and in accordance with applicable legal, data-protection and internal requirements.

A reporting person does not need to prove that a violation has occurred. Reports should be based on information or circumstances that provide reasonable grounds for concern.

Reports containing information that is intentionally or grossly negligently false are not protected.

Further information on reportable concerns, reporting channels, confidentiality, protection against retaliation and the handling of reports is provided in amasol's Whistleblowing Policy.

2 People @ amasol

2.1 Diversity, Inclusion and Respect

amasol is committed to a professional, respectful and inclusive working environment in which individuals are treated with dignity and fairness.

We value different perspectives, experiences and backgrounds and support a workplace culture based on mutual respect, collaboration, professionalism and equal opportunity.

Employees are expected to treat colleagues, customers, suppliers, contractors and other business partners respectfully and professionally.

Further principles regarding human rights, workplace conduct, diversity and inclusion are set out in amasol's Human Rights Policy and Workplace and Employee Wellbeing Policy.

2.2 Equal Opportunity and Non-Discrimination

amasol supports equal treatment and equal opportunities throughout the employment lifecycle.

Employment-related decisions should be based on appropriate, objective and work-related criteria such as qualifications, skills, experience, performance and business requirements.

Discrimination on grounds protected by applicable law is not tolerated.

This includes, where protected by applicable law, discrimination based on characteristics such as gender, gender identity, age, disability, religion or belief, sexual orientation, ethnic origin or other protected characteristics.

Employees are expected to contribute to a workplace free from discrimination, unfair treatment and inappropriate bias.

2.3 Health, Safety and Wellbeing

amasol is committed to providing a safe, healthy and legally compliant working environment and to supporting the prevention of workplace accidents and work-related health risks.

Employees are expected to:

- comply with applicable occupational health and safety requirements;
- follow applicable workplace and emergency procedures;
- participate in mandatory health and safety training where required;
- report relevant hazards, accidents or safety concerns;
- use workplace equipment responsibly; and
- contribute to a safe and respectful working environment.

Appropriate occupational health and safety measures may include workplace risk assessments, health and safety training, ergonomic workplace measures, emergency and evacuation procedures, first-aid arrangements and other preventive measures where applicable.

amasol also supports employee wellbeing and a healthy work-life balance through proportionate measures appropriate to its operational environment.

Further details are provided in the Workplace and Employee Wellbeing Policy.

2.4 Anti-Harassment and Respectful Workplace

Harassment, bullying, intimidation, violence, retaliation and other inappropriate, abusive or degrading workplace behaviour are not tolerated.

Harassment may take different forms, including verbal, physical, visual or sexual harassment.

Employees are expected to:

- communicate respectfully;
- avoid offensive, intimidating or degrading behaviour;
- respect personal boundaries;
- contribute to a professional working environment; and
- raise concerns through appropriate channels where necessary.

Concerns relating to harassment or serious misconduct may be reported to a manager, the People Team, the Legal and Compliance Team or through the applicable internal whistleblowing channel, depending on the circumstances.

2.5 Human Rights and Fair Labour

amasol is committed to respecting internationally recognised human rights and fundamental labour standards.

amasol does not tolerate:

- forced or compulsory labour;
- child labour;
- human trafficking;
- modern slavery, servitude or debt bondage;
- discrimination and harassment;
- exploitation or degrading treatment; or
- unsafe or unhealthy working conditions.

amasol supports fair, safe and lawful working conditions, equal treatment, respect for human dignity and compliance with applicable labour and employment laws.

The principles of amasol's Human Rights Policy are informed by internationally recognised standards, including the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the Universal Declaration of Human Rights.

amasol also expects relevant suppliers and service providers to comply with applicable laws and respect fundamental human rights and fair labour standards.

Human-rights and labour-related expectations for suppliers are addressed through amasol's Supplier / Third-Party Code of Conduct and Third-Party Management processes.

Where a material human-rights or labour-related concern involving a supplier is identified, amasol may assess the matter and determine appropriate and proportionate follow-up measures in accordance with applicable Third-Party Management and compliance processes.

3 Responsible Business Conduct

amasol is committed to conducting business honestly, ethically and in compliance with applicable laws and internal requirements.

Employees are expected to act with integrity, avoid inappropriate personal influence and support transparent and fair business practices.

3.1 Conflicts of Interest

Employees are expected to act in the legitimate interests of amasol when performing their professional responsibilities.

A conflict of interest may arise where personal, financial, family or other interests could influence, or appear to influence, an employee's professional judgment.

Potential conflicts may include:

- financial interests in customers, suppliers or competitors;
- personal relationships that may affect business decisions;
- outside employment or business activities;
- gifts, hospitality or other benefits;
- involvement in the selection of a supplier in which the employee or a related person has a personal interest; or

- other circumstances that could compromise objective decision-making.

The existence of a potential conflict does not automatically mean that misconduct has occurred.

Potential conflicts should be disclosed promptly to the relevant manager or the Legal and Compliance Team so that they can be assessed and managed appropriately. Where the manager is involved in the potential conflict, the matter should be disclosed directly to the Legal and Compliance Team.

3.2 Gifts, Hospitality and Other Advantages

Gifts, meals, hospitality and other advantages may be part of legitimate business relationships, but they must never be used to improperly influence business decisions or create an inappropriate sense of obligation.

Employees must not offer, give, request, receive or accept anything of value where this could:

- constitute bribery or corruption;
- improperly influence a business decision;
- reward improper conduct;
- create a conflict of interest;
- violate applicable law or internal policy; or
- reasonably appear inappropriate.

Gifts and hospitality should always be reasonable, proportionate, transparent and connected with a legitimate business purpose.

Cash gifts, personal cash payments and cash-equivalent gifts, including vouchers that can be exchanged for cash, are prohibited.

Where an employee is uncertain whether a gift, invitation or other advantage is appropriate, advice should be sought from the relevant manager or the Legal and Compliance Team before offering or accepting it.

Further requirements are set out in amasol's Anti-Corruption Policy.

3.3 Compliance with Laws and Regulation

amasol conducts its business in accordance with applicable laws and regulations in the jurisdictions in which it operates.

Employees are expected to comply with applicable legal requirements relevant to their responsibilities and to seek guidance where necessary.

3.3.1 Antitrust and Fair Competition

amasol supports fair and open competition and complies with applicable antitrust and competition laws.

Employees must not participate in unlawful agreements or discussions with competitors relating to matters such as:

- price fixing;
- market allocation;
- customer allocation;
- bid rigging;
- restrictions of competition; or
- other unlawful anti-competitive practices.

Information about competitors must only be obtained and used through lawful and ethical means.

3.3.2 Anti-Bribery and Anti-Corruption

amasol does not tolerate bribery or corruption.

Employees must not directly or indirectly offer, promise, give, request or accept an improper advantage in connection with a business decision.

This applies to dealings with both private-sector organisations and public officials.

Further requirements are set out in amasol's Anti-Corruption Policy.

3.3.3 Anti-Money Laundering

amasol supports compliance with applicable anti-money laundering requirements.

Employees involved in relevant financial or commercial processes should remain alert to unusual or suspicious transactions and raise concerns through the appropriate internal channels.

amasol seeks to conduct business with legitimate customers and business partners and does not knowingly participate in transactions intended to conceal the unlawful origin of funds.

3.3.4 Global Trade Compliance

amasol complies with applicable trade, export-control, sanctions and import requirements.

Employees involved in cross-border activities must comply with applicable restrictions relating to products, services, technology, customers, countries and business partners.

Where uncertainty exists, the Legal and Compliance Team should be consulted before proceeding.

3.3.5 Insider Information and Confidential Financial Information

Employees must not misuse confidential or non-public information obtained through their work for personal gain or to provide an improper advantage to another person.

Where applicable securities or insider-trading rules apply, material non-public information must not be used for trading or passed to others for that purpose.

Confidential financial, business or customer information must also be handled in accordance with applicable information-security and confidentiality requirements.

3.3.6 Accurate Recordkeeping and Reporting

Business records must accurately and truthfully reflect the underlying transactions and activities.

Employees must not knowingly:

- falsify records;
- conceal material information;
- create misleading financial or business documentation; or
- provide intentionally inaccurate information.

Records must be maintained in accordance with applicable legal, financial, contractual, documentation and retention requirements.

3.4 Fair Dealing

amasol seeks to deal fairly and professionally with customers, suppliers, competitors, employees and other stakeholders.

Employees must not seek unfair advantage through:

- deception;
- concealment;
- intentional misrepresentation;
- misuse of confidential or privileged information;

- manipulation; or
- other unethical practices.

Business should be won on the basis of legitimate competition, quality, competence, service and customer value.

4 Sustainability and Responsible Business

4.1 Environmental, Social and Governance Principles

amasol recognises that responsible business conduct includes environmental, social and governance considerations.

amasol follows a practical, risk-based and proportionate ESG approach appropriate to the Company's size, business activities and operational environment.

The Company's ESG focus is supported by its ESG Strategy & Roadmap and related internal policies.

Relevant focus areas include:

- emissions and resource-conscious working;
- workers' conditions and employee wellbeing;
- corporate culture;
- information and data security;
- ethical and compliant business conduct;
- human rights;
- responsible supply-chain practices; and
- continuous improvement of relevant ESG measures.

4.2 Environmental Responsibility

amasol supports proportionate and practical environmental measures appropriate to its business model and operational impact.

Relevant measures may include:

- responsible and efficient use of energy and resources;
- avoiding unnecessary consumption;
- reducing avoidable waste;

- digital and paper-conscious working;
- responsible use and lifecycle management of IT equipment;
- reuse, repair, refurbishment or recycling where appropriate;
- environmentally conscious purchasing considerations where practical;
- remote and digital collaboration;
- avoiding unnecessary business travel where feasible;
- consideration of lower-impact travel options where appropriate; and
- improving transparency regarding relevant greenhouse-gas emissions and other environmental impacts.

Further details are provided in amasol's Sustainability Policy, Resource-Conscious Working Principles, Green IT Policy and Sustainable Travel Policy.

4.3 Responsible Use of Technology and Artificial Intelligence

As an IT company, amasol recognises the importance of using technology responsibly, securely and efficiently.

Employees should:

- use IT equipment and digital services for their intended business purpose;
- avoid unnecessary replacement of functioning equipment;
- use available energy-saving settings where appropriate;
- support digital and paperless processes where practical;
- avoid unnecessary duplication or retention of information, subject to legal, contractual, information-security and data-protection requirements; and
- return IT equipment and data-bearing media through the appropriate internal process when no longer required.

Artificial intelligence systems and AI-supported tools must be used responsibly and in accordance with applicable legal, data protection, information security and internal requirements.

When using artificial intelligence, employees are expected to:

- use approved AI tools and configurations in accordance with applicable internal AI requirements;
- protect personal data, confidential information, intellectual property and other protected information;

- review AI-generated content appropriately before relying on or further using it;
- remain responsible for decisions and work results supported by AI;
- consider the risk of inaccurate, inappropriate or discriminatory AI-generated results; and
- ensure appropriate human oversight of AI-supported activities and decisions.

AI must not be used in a manner that unlawfully discriminates against individuals or otherwise circumvents applicable legal or internal requirements.

Further guidance is provided in amasol's Green IT Policy, Asset Management Policy and applicable Artificial Intelligence Policies.

4.4 Sustainable Business Travel

Business travel should be based on a legitimate business need.

Where practical and operationally appropriate, employees are encouraged to:

- consider whether the business purpose can be achieved through virtual collaboration;
- avoid unnecessary travel;
- combine meetings or journeys where appropriate;
- plan travel efficiently; and
- consider suitable travel options with lower environmental impacts.

Environmental considerations must be balanced with operational requirements, customer needs, cost, safety, accessibility and contractual requirements.

Further details are provided in amasol's Sustainable Travel Policy.

4.5 Responsible Supply Chain

amasol expects relevant suppliers, contractors and service providers to conduct business responsibly and in accordance with applicable laws and contractual requirements.

Supplier-related considerations may include, where relevant and proportionate:

- human rights and labour standards;

- anti-corruption;
- ethical business conduct;
- information security;
- data protection;
- environmental considerations; and
- other applicable compliance requirements.

Where applicable, third parties are assessed and managed on a risk-based and proportionate basis through amasol's Third-Party Management and onboarding processes.

Relevant expectations are further defined in the Supplier / Third-Party Code of Conduct.

5 Protecting amasol's Resources

5.1 Protecting Company Assets

amasol's physical, digital and intellectual assets are important to its business and must be used responsibly.

Employees are expected to:

- protect Company assets against loss, theft, damage and misuse;
- use Company equipment for authorised purposes;
- comply with applicable Asset Management and Information Security requirements;
- report lost, damaged or defective equipment;
- protect intellectual property and proprietary information; and
- return Company assets when required.

Company IT equipment, electronic devices and data-bearing media must not be independently disposed of by employees unless expressly authorised.

Further guidance is provided in amasol's Asset Management Policy and Information Security Policy.

5.2 Confidential Information

Confidential information must be protected from unauthorised access, disclosure, alteration, loss or misuse.

Employees must handle confidential information in accordance with its applicable classification and only share it with authorised persons who have a legitimate business need.

Confidential information may include, among other things:

- customer information;
- contractual information;
- pricing and financial information;
- business strategies;
- source code and technical information;
- intellectual property;
- employee information; and
- other information classified as confidential.

Applicable confidentiality obligations continue to apply where required after the end of employment or a business relationship.

5.3 Data Protection and Privacy

amasol processes personal data in accordance with applicable data-protection requirements.

Employees must:

- process personal data only for legitimate and authorised purposes;
- follow applicable data-protection instructions;
- respect data-minimisation and retention requirements;
- protect personal data against unauthorised access and disclosure;
- use approved systems and processes; and
- report suspected personal-data breaches through the applicable incident process.

Detailed requirements are set out in amasol's Data Protection Concept and related data-protection procedures.

5.4 Information Security and Cybersecurity

Information security is a shared responsibility.

Employees must comply with amasol's Information Security Policy and related internal requirements.

This includes, where applicable:

- protecting information according to its classification;
- using approved systems, devices and services;
- complying with access-control requirements;
- protecting authentication credentials;
- reporting suspicious emails, security events and potential incidents;
- following applicable incident-reporting procedures; and
- completing required information-security training.

Operational information-security incidents must be reported through the applicable information-security incident process.

6 Communication and Public Representation

6.1 Speaking on Behalf of amasol

Public statements made on behalf of amasol must be authorised and consistent with the Company's official position.

Employees should not represent personal views as official amasol statements.

Where employees are approached by journalists, media representatives or other external parties for an official statement, the request should be referred to the appropriate authorised internal function.

6.2 Social Media

Employees may use social media for personal or professional purposes in accordance with applicable internal requirements.

When referring to amasol, customers, colleagues or business-related matters, employees must:

- distinguish personal views from official Company statements;
- protect confidential and proprietary information;
- respect data-protection requirements;
- communicate respectfully and professionally;
- avoid discriminatory, abusive or unlawful content; and
- avoid creating or promoting undisclosed conflicts of interest.

7 Responsibilities

Management is responsible for supporting a culture of integrity, compliance, respect and responsible business conduct.

Managers are responsible for leading by example and supporting implementation of this Code within their areas of responsibility.

The Legal and Compliance Team provides guidance on legal, ethical and compliance matters and supports relevant reporting processes.

The People Team supports fair employment practices, workplace-related matters, employee wellbeing and relevant awareness activities.

Information Security supports the implementation and maintenance of applicable information-security requirements.

All employees and other persons within the scope of this Code are expected to:

- comply with applicable laws and internal requirements;
- act with integrity and respect;
- protect Company and customer information;
- complete any required training assigned to them;
- raise relevant concerns;
- cooperate with authorised reviews or investigations; and
- avoid retaliation, obstruction or unauthorised disclosure.

8 Violations of the Code

Potential violations of this Code may be reviewed and, where appropriate, investigated through the relevant internal process.

Confirmed violations may result in appropriate and proportionate corrective or disciplinary measures in accordance with applicable law, employment requirements and internal procedures.

Where the matter concerns a supplier, contractor or other business partner, appropriate and proportionate contractual or Third-Party Management measures may be considered.

Serious matters may also be referred to competent authorities where required or appropriate under applicable law.

9 Relationship to Other Policies

This Code provides the overarching ethical and behavioural framework for responsible business conduct at amasol.

More detailed requirements are addressed in applicable internal policies and procedures, including, where relevant:

- Compliance Policy;
- Anti-Corruption Policy;
- Human Rights Policy;
- Workplace and Employee Wellbeing Policy;
- Whistleblowing Policy;
- Sustainability Policy;
- Resource-Conscious Working Principles;
- Green IT Policy;
- Sustainable Travel Policy;
- Supplier / Third-Party Code of Conduct;
- Third-Party Management Policy;
- Information Security Policy;
- Asset Management Policy;
- Data Protection Concept;
- Artificial Intelligence Policy within the amasol Group;
- Azure-Connected LLM Instances within the amasol Group;
- Risk Management Policy; and

- other applicable internal policies and procedures.

Where a more specific internal policy establishes detailed requirements for a particular subject, that policy must also be followed.

10 Review and Continuous Improvement

amasol periodically reviews this Code and its related compliance framework.

Additional reviews may be considered following:

- changes in applicable laws or regulatory requirements;
- organisational or operational changes;
- changes to relevant internal policies;
- audit or assessment findings;
- material customer requirements;
- identified compliance risks or incidents; or
- other relevant improvement opportunities.

The Code may be updated where necessary to maintain consistency with applicable legal requirements, amasol's internal policies and the Company's operational environment.