
Code of Conduct

Companies and
Employees of the Group

ALTOVA[®]





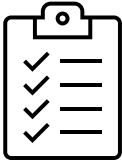
01 Subject Matter and Scope

This Code of Conduct is a guideline that applies to all business activities of the Altova Group and sets clear standards regarding integrity and proper business operations. It is mandatory for all employees (hereinafter referred to as “Employees”) of the Altova Group, which includes Altova GmbH and Altova, Inc. It supplements other existing guidelines and policies of the Group (such as, in particular, the Corporate Responsibility Policy, and the guiding principles on the protection of personal data).

This represents a gender-neutral designation here. It indicates all gender identities.

Employees are encouraged to use their judgment responsibly and prudently and to be guided by honesty, reliability, and integrity. An employee may not misuse their position to gain personal benefit or promote or tolerate conduct that is not in accordance with this Code of Conduct.

However, advisors, representatives, dealers, suppliers, or other persons working for the Altova Group should also be required to comply with this Code of Conduct.



02 Compliance with Applicable Law

Every employee must observe the statutory provisions of the legal system in which they operate.

If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. Should mandatory local laws and/or local regulations be more extensive, the more extensive laws and regulations must be followed, in which case we always strive to comply with the spirit of this Code of Conduct.

If there are any doubts, the employee must seek legal advice.

In the following, this Code of Conduct deals with select aspects and areas that the Altova Group considers to be particularly important.



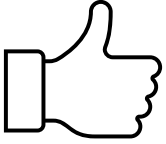
03 Employees

Cooperation shall be characterized by decency, mutual respect, fairness, and trust. Open communication should always be nurtured.

Personal insults or sexual harassment will not be tolerated. The privacy of each employee must be respected within reason.

Employees should be selected and promoted on the basis of their qualifications for the intended job, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, beliefs or other personal characteristics.

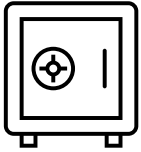
The safety of employees in the workplace must be given the utmost attention.



04 Open and Fair Competition

The Altova Group is committed to fair and open competition in the world's markets. Anticompetitive price agreements

with competitors, market splits and the abuse of a dominant market position are not permitted.



05 Money Laundering

Money laundering describes the process of smuggling illegally earned money or illegally acquired assets into the legal financial and economic cycle. The Altova Group supports worldwide measures to combat money laundering.

Employees must observe the relevant due diligence obligations, in particular when dealing with larger transactions in cash.

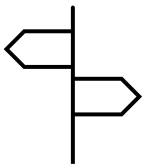


06 Granting and Receiving Undue Advantages

In business dealings or dealings with public authorities in particular, no employee shall promise, offer, grant, demand, accept or provide undue advantages for business partners, their employees, or members of public authorities, either

directly or indirectly.

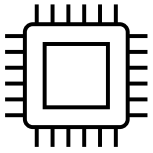
Similarly, an employee may not demand or receive any undue advantages from business partners. An advantage is undue if its nature and size are likely to influence the actions and decisions of the recipient.



07 Conflicts of Interest

Employees should avoid situations in which personal interests conflict with their duties within the Altova Group. If such a conflict of interest arises, the employee must inform their supervisor.

In particular, employees are prohibited from holding an interest in or working for competitors, suppliers or customers. This does not apply to investments in listed companies.

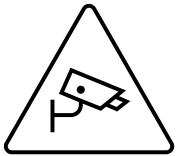


08 Protection of Information & Trade Secrets

Every employee is obliged to treat business information about the Altova Group or business partners that have not been made public as confidential, to take precautions against unintentional disclosure and to use the information only to the extent necessary in the business interest.

Employees are prohibited from illegally obtaining trade secrets of third parties.

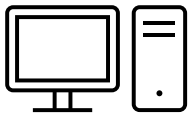
With regard to electronic information exchange, effective measures must be taken to ensure the security of data and the protection of personality rights.



09 Data Privacy

The Altova Group processes, stores, and protects personal data in compliance with the applicable legal regulations. Should these be less stringent than the principles derived

from the Group-wide guidelines on the protection of personal data, the provisions of the guidelines must be followed.

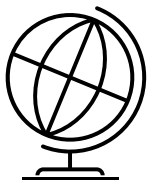


10 Asset Protection

The Altova Group provides its employees with the equipment necessary for the performance of their work, such as buildings, facilities, equipment, and other assets, such as inventories, liquidity, property rights and know-how.

Employees must treat these assets with care and protect them against loss, theft, or damage.

The assets of the Altova Group may only be used for business purposes. Personal use is permitted only with written agreement.



11 Export and Import Control

The Altova Group undertakes to comply with the relevant legal standards for export and import control – in particular licensing requirements and export, import and support bans

– as part of the transfer, export and import of the goods concerned.



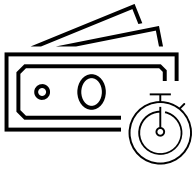
12 Health & Safety Protection

The Altova Group attaches great importance to safety and health at work. Safety, security, health, and environmental protection are integral parts of our operations and as such we approach them with the same level of commitment as we do with any business-related activities.

Altova Group operations are conducted in compliance with applicable health, security, safety and environmental laws and regulations, company standards and best practices. We take all reasonable and practical steps to ensure that we provide a safe,

secure, healthy, and clean working environment.

Every employee is personally responsible for safety, security, health and environmental protection at the workplace to the full extent required by his/her duties to the best of his/her knowledge, ability and experience, while the managers have overall responsibility. We are all encouraged to identify areas for improvements and continuously work towards improved safety and a better environment.



13 Remuneration and Working Hours

Remuneration is based on the applicable laws and, if applicable, existing, binding collective agreements and is supplemented by the relevant national minimum wage laws.

The Altova Group undertakes to comply with the applicable laws and international labor standards with regard to the maximum permissible working hours.



14 Forced and Child Labor, Human Rights, and Discrimination

The Altova Group does not tolerate or practice any child labor in its companies.

Forced labor, modern slave labor or comparable measures that deprive employees of freedom are prohibited. All work must be voluntary, and it must be possible to terminate the employment relationship.

The Altova Group promotes equal opportunities and does not tolerate discrimination. All people are treated equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religion, beliefs, or other personal characteristics.



15 Environment

The Altova Group is committed to responsible and careful handling of the environment and natural resources. We will comply with environmental regulations and standards applicable to our operations

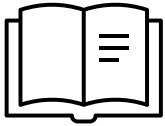
to minimize environmental pollution and to contribute to environmental protection. We also strive to continuously improve our energy efficiency by investing in sustainable technologies.



16 Dealing with Conflict Minerals

The Altova Group is duly diligent in taking measures to avoid the use of conflict minerals¹ in its products in order to

prevent human rights violations, corruption and financing of armed groups or the like.



17 Implementation

The management of Altova Group companies must ensure in an appropriate manner that employees take note of this Code of Conduct and comply with it.

The employee must report a breach of the Code of Conduct to the respective management or the General Counsel of Altova.

The confidentiality of such reports shall be ensured to the extent possible. Retaliatory measures against an employee who has reported a breach of the Code of Conduct in good faith will not be tolerated. In its audits, the Group Legal department ensures compliance with this Code of Conduct and incorporates it into its audit criteria.

Breach of this Code of Conduct by an employee may result in measures under labor law, including termination of employment and other legal measures.

¹The term "conflict minerals" in the present case refers to raw materials or minerals that originate from politically unstable areas of the world and whose mining or trade promote forced labor and other human rights violations, lead to corruption or money laundering or serve to finance armed groups. These typically include the following minerals and raw materials from politically unstable parts of the world: Tin, tantalum, tungsten and gold.

Altova GmbH

Rudolfsplatz 13a/9

A-1010 Wien

AUSTRIA

www.altova.com

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