

Code of Conduct for exceet Card Group GmbH

Preamble

Our code of conduct applies to all employees of the exceet Card Group GmbH and its subsidiaries (hereafter referred to as exceet Card Group. It also applies to advisors and persons with functions equivalent to those of an employee, such as contract workers. Over and above the code of conduct, our employees are obliged to follow all laws and legal regulations which are relevant to their employment.

Corporate goals of the exceet Card Group: Quality and Safety

For us at exceet Card Group, quality and the safety of our products and services determine the fundamentals of our corporate philosophy. We aim to fulfil the high quality and safety expectations of our customers, even for products and processes with an increasing complexity and we implement the necessary improvements thoroughly and with a focus on sustainability.

Working conditions

Every employee of the exceet Card Group has to contribute to a safe and healthy environment, meaning that safety regulations and practices must be strictly adhered to.

Observing the legal regulations relating to health and safety at work for the exceet Card Group is taken for granted; forced labour or child labour, as well as any form of exploitation of children or minors, will not be tolerated.

Right of association

The exceet Card Group respects the right of employees to form associations or organisations of their choice in order to support and protect the interests of employees; to join or leave them; and to be active within them. Employees must take care not to negatively impact their employment duties.

Human dignity and human rights

Employees of the exceet Card Group should act in accordance with ethical principles and follow laws and guidelines; the exceet Card Group condemns all unlawful discrimination or oppression of any kind. We require all employees to respect other individuals, to be open and to behave honestly, and to both support and promote individual and cultural diversity, regardless of differences in age, gender, religion, ability, place of origin or sexual orientation. These requirements refer to actions both internally within the company and in all business relationships.

Conflicts of interest

The exceet Card Group trusts that the personal interests of employees do not come into conflict with the interests of the company. Our employees are not allowed to undertake any secondary employment that conflicts with the interests of the exceet Card Group, in particular those where there is an issue of competition.

Corruption and bribery

The exceet Card Group condemns corruption and bribery. Behaviour which results in dishonest business dealings will not be tolerated. This affects both active and passive measures: our employees are not permitted to offer, receive or accept any benefits from business partners if this could harm or be seen to harm an objective and fair business decision. The basic guideline is that any acceptance has not to be kept secret by the recipient and must not impose any obligation on the recipient. If in doubt, approval should be requested from the relevant line manager.

Environmental protection

The exceet Card Group is conscious of the environmental impact of its business and commits to conserving the earth, water, air and ecological diversity. Our employees must take measures to avoid or reduce damage to the environment when carrying out their duties, in line with the principles of a sustainable economy, and should be considerate in their use of natural resources. All relevant laws and guidelines from authorities should be strictly adhered to. Any damage to the environment should be immediately reported to the responsible party within the company.

Company Property

All employees are obliged to treat the property and assets of the company appropriately, sparingly and in all cases responsibly. The unauthorised private use of goods or services of the company is not allowed.

Data Protection

We are conscious of the high sensitivity of the personal data that our customers, employees and suppliers entrust us with, and protect this data in a careful and confidential manner. The security of this data is of overriding importance to the exceet Card Group, having a critical impact on our corporate success and public image. Every single person is responsible for ensuring a high level of security, within the bounds of their duties. We support this by a whole range of technical and organisational measures which aim to ensure the confidentiality of personal data. Internal rules create a uniformly high data protection level in all areas of our activities

We collect and process data which requires protection only with the agreement of the affected party, if a clear legal norm permits it, or if it is required for the fulfilment of a contract. In addition, we collect, process and use personal data only to an extent that is required and only for specific purposes. We respect the comprehensive rights of people whose data we collect, process and use. In this respect, compliance with the GDPR is our minimum standard.

Confidentiality

Alongside the technical and organisational measures to protect data, everyone is obliged to protect the interests of the company. To this end, we do not share information from and about our company with third parties unnecessarily. In particular, in cases of internal incidents of any kind, our employees should inform their line managers (and the person responsible for safety or data protection, if applicable) but should not share any information with external parties without permission.

Personal conversations and telephone calls with colleagues in public (for example, when on public transport) should take the confidentiality of the content into consideration. In addition, we keep our business documents hidden from the eyes of strangers.

Social Media

In relation to the use of email and the internet for private purposes, the terms of the respective employment contract apply to our employees. This includes the use of so-called 'social media' (Facebook, Twitter and comparable platforms). If platforms like these are used during working time for work purposes, the company's interests and external image must be protected, which includes that direct comments about the company should not harm the interests of the company, neither through inappropriate nor unlawful behaviour.

Over and above this, we expect our employees to always consider the interests of the company when using platforms like these outside working time and in private.

Enquiries from companies or institutions, particularly those from the press, which arise from usage of social media platforms should always be directed to the respective marketing manager.

Concluding statement

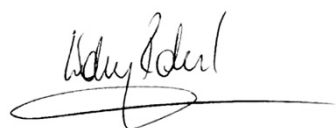
All employees and members of the board of directors and the supervisory board of the exceet Card Group are obligated to follow these guidelines. Breaches of these guidelines will lead to consequences, which in serious cases could lead to warnings or to immediate termination of employment.

Every employee is responsible for reporting a breach or suspected breach of laws, regulations and internal guidelines. Whistleblowers will not suffer any negative consequences for providing information to the best of their knowledge and in good conscience, as long as they have not breached any behavioural rules themselves. In this context, employees should first inform their immediate line manager. The management is responsible for providing support as necessary. If this process is not appropriate, information about misconduct can be communicated by post, telephone, fax or email. The opportunity exists to communicate information anonymously.

A handwritten signature in black ink, appearing to read "Ulrich Reutner".

Ulrich Reutner
CEO

exceet Card Group GmbH

A handwritten signature in black ink, appearing to read "Robert Wolny".

Robert Wolny
COO

exceet Card Group GmbH