

Code of Conduct

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1. Introduction

The auxalia WESTCAM Group combines the strengths of three leading technology providers with almost four decades of expertise: **auxalia**, a specialist in digital solutions for the construction industry, **WESTCAM**, an expert in product design, manufacturing and quality assurance, and **ICN**, a provider of mechanical engineering and construction software. Together, they offer a comprehensive portfolio of software, services and hardware along the entire life cycle of projects and products.

With headquarters in Hamburg, Mils/Tyrol and 's-Hertogenbosch and a team of around 180 experts, the Group has a strong presence in Germany, Austria, Switzerland, the Netherlands, Italy, the Czech Republic and Slovakia. It stands for innovation, sustainability and personal customer service. By pooling its expertise, the auxalia WESTCAM Group creates integrated digital platform solutions that are up to the challenges of the future.

The guidelines are based on national and international standards and conventions, such as the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labor Organization (ILO).

2. Area of application

We expect all employees as well as our suppliers and business partners, i.e. everyone who supplies the auxalia WESTCAM Group with goods, services and information, to act responsibly and to commit themselves to the following basic principles and the validity of the following regulations for a common code of conduct. This expectation also applies to all other people working in the company and to subcontractors.

A breach of this Code of Conduct may ultimately be reason and cause for the company to terminate the business relationship. This agreement comes into force upon signing.

3. Social responsibility

The obligation to comply with the law and all applicable laws arises from our corporate responsibility. As a supplier and business partner, we expect you to comply with the following basic principles:

3.1 Human rights

You respect the globally applicable regulations for the protection of human rights as fundamental and universally applicable requirements. This includes that you as a supplier do not use forced labor or child labor.

3.2 Equal opportunities and non-discrimination

They do not discriminate against anyone on the basis of ethnic, national or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation, political views, insofar as these are based on democratic principles and tolerance towards those with different opinions, or other legally protected characteristics, insofar as this does not conflict with mandatory law.

3.3 Fair pay and working hours

You ensure that your employees receive appropriate remuneration that at least corresponds to the legally valid and guaranteed minimum. If there are no legal or collectively agreed regulations, the remuneration is based on the industry-specific, local, collectively agreed remuneration and benefits that ensure a reasonable standard of living for the employees and their families. Working hours must comply with the applicable laws or industry standards.

3.4 Complaints mechanisms / whistleblower reporting office

The auxalia WESTCAM Group has set up a publicly accessible whistleblower reporting office at www.auxalia.com / www.icn.nl / www.WESTCAM-group.com in accordance with the Whistleblower Protection Act. As a supplier, business partner and customer of the auxalia WESTCAM Group, you should pass on the information on the complaints procedure to your employees in an appropriate manner. The complaints procedure is accessible while maintaining the confidentiality of identity and effective protection against discrimination. Where no notice is given, the supplier and business partner itself is responsible for establishing an effective grievance mechanism at company level for individuals and communities that may be affected by adverse impacts.

3.5 Full cooperation and no reprisals

We take allegations of misconduct seriously and investigate all reports of possible violations of the law or auxalia WESTCAM Group policies. We are all required to participate in good faith in investigations. Good faith participation means that when asked for information during an investigation, we participate fully and honestly and do nothing to jeopardize an investigation, such as deleting, concealing or withholding evidence or improperly discussing the investigation with others. In addition, we do not discourage anyone from raising concerns or participating in an investigation.

We will not tolerate retaliation against anyone who makes a report of a possible violation of the law, this Code of Conduct or other Company policy. We also do not tolerate retaliation against anyone for practicing the law, participating in an investigation or encouraging others to report in good faith. Retaliation includes actions intended to punish someone for making a report or participating in an investigation, or to discourage them from making a report or participating in an investigation. These actions may include disciplinary action, demotion or termination, or more subtle actions such as giving poor work assignments or excluding an employee from meetings or events.

3.6 Health, occupational health and safety

We are committed to ensuring a safe and healthy working environment for all employees. Protection of life, health and well-being is our top priority. We comply with all legal and internal regulations on occupational health and safety. All employees are responsible for recognizing and avoiding risks in the workplace and actively contributing to a safe working environment. Managers ensure that employees receive regular training and are informed about hazards. For us, health protection includes not only physical safety but also measures to promote mental health, for example through ergonomic workstations, preventative measures and health-promoting programs. A safe and healthy working environment is a shared goal and an expression of our responsibility to one another.

4. Ecological responsibility

Protecting the environment and conserving natural resources is particularly important to us. With our management system in the area of environment and energy, we want to make a contribution to environmental and climate protection. As a supplier and business partner, we expect you to comply with the following basic principles in particular:

4.1 Compliance with legal requirements

They assume responsibility with regard to environmental protection and comply with all legal requirements concerning the environment and sustainability.

4.2 Increase energy and resource efficiency

You use natural resources sparingly and minimize the environmental impact of your production processes and products. You also make your contribution to reducing energy consumption and CO₂ emissions.

4.3 Reducing raw materials/resources and dealing with waste

The use and consumption of resources, including water and energy, during production and the generation of waste of any kind must be reduced or avoided. This is done either directly at the point of generation or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials. They take a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste.

5. Ethical business conduct

The auxalia WESTCAM Group stands for fair, open and transparent behavior in the business environment. As a supplier and business partner, we always expect you to act with integrity and comply with the following basic principles.

5.1 Avoidance of conflicts of interest

They decide solely on the basis of company-related interests or criteria and are not influenced by personal interests or relationships.

5.2 Prohibition of corruption

You reject any kind of corruption. You shall ensure that your employees, subcontractors, agents or other persons connected with the business activity do not offer, promise or grant any bribes, kickbacks, improper donations or other payments or advantages to third parties. This also applies to the acceptance of such unjustified benefits.

5.3 Fair competition

The standards of fair business activity, fair advertising and fair competition must be complied with. They comply with applicable antitrust laws. In particular, they shall not enter into any anti-competitive agreements with competitors, suppliers or customers and shall not abuse any dominant market position.

5.4 Intellectual property

Intellectual property rights must be respected. Technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

5.5 Integrity and money laundering

The highest standards of integrity must be applied to all business activities. You ensure that the applicable legal provisions against money laundering are not violated and always work with business partners whose integrity you have verified.

6. Confidential data and business secrets

Confidential data and business secrets must be protected. As a supplier and business partner, you shall comply with all applicable laws for the protection of personal data of employees, customers, suppliers and other persons involved. You shall not disclose any information about the auxalia WESTCAM Group's trade and business secrets without prior written consent.

7. Approval of these guidelines by auxalia WESTCAM Group Management

This policy is communicated to and supported by all auxalia WESTCAM Group employees. This Code of Conduct was approved by management on April 23, 2024 (initial version auxalia incl. ICN) and on June 16, 2025 (update for auxalia WESTCAM Group):



Andreas Hofherr, CEO



Markus Ebster, CEO

8. Acknowledgement and consent

We hereby confirm that we have received, read and understood the Code of Conduct for Suppliers and Business Partners of the auxalia WESTCAM Group. By signing this document, the supplier and business partner undertakes to act responsibly and to adhere to the principles/requirements listed. The supplier and business partner undertakes to communicate the content of this code to employees, agents and subcontractors in a comprehensible manner and to take all necessary precautions to implement the requirements.

Place, date:

Company name:

Contact person:

Function:

E-Mail:

Phone:

Signature / company stamp: