Foreword

Dear colleagues,

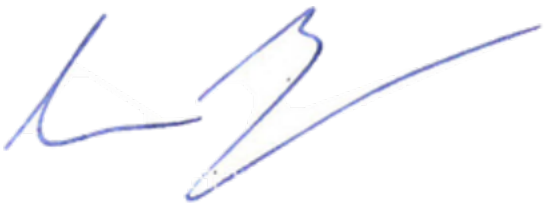
trust is our greatest asset. We build it only when we act with integrity and honesty, strengthening confidence in both ourselves and avodaq as a company. This includes, among other things, treating others as we would like to be treated ourselves, having realistic expectations of others, making sensible and comprehensible decisions, and working in a resource-efficient manner. Of course, we comply with applicable legal requirements.

The following Code of Conduct (CoC) provides the foundation for mutual trust and cooperation at avodaq. It serves as a guide when we make decisions or solve problems in our daily work.

The CoC is comprehensive but not exhaustive; it cannot cover every possible situation. We therefore rely on you to use good judgment and to ask for help when you are unsure.

If you have any questions or if you believe the Code of Conduct has been violated, please talk to your superiors, contact the HR department, or reach out to our designated representatives. You may also report concerns anonymously using the compliance form available on our website. It is important to us that anyone who raises a concern feels safe and that all incidents are handled appropriately.

Acting in accordance with the principles of the Code of Conduct is essential for all of us. It provides the foundation of our collaboration and the key to our shared success.



CEO Andreas Kusch, September 2025

1 General

The Code of Conduct (CoC) is a binding framework establishes by the Management Board of avodaq AG. It is grounded in widely accepted standards of conduct and regulations from both national and international business practices, as well as applicable laws. The CoC is further complemented by internal policies, regulations, and employment agreements. In the event of any conflict, applicable laws shall always take precedence over the CoC.

1.1 Compliance with the Code of Conduct

All employees are required to be familiar with the current version of the CoC and to adhere to its provisions.

Should employees have concerns about the CoC or find themselves unable to agree with its content, they are encouraged to discuss these issues with their direct manager or the HR department. Objections will be given careful consideration, and, where appropriate, actions may be taken to enhance clarity or correct inaccuracies. Regardless of individual agreement, all employees are obliged to comply with the guidelines set forth in the CoC.

Any violation of the CoC may result in appropriate disciplinary measures, which—depending on the severity of the breach—can range from employment-related actions to civil claims for damages, and in severe cases, criminal prosecution.

1.2 Decision-Making

If there is uncertainty about whether a behaviour aligns with the principles of the CoC, the following questions should be considered:

1. Have I taken all relevant concerns into account when making my decision? (Professional test)
2. Do I believe my decision complies with all legal and internal requirements? (Legality test)
3. Would I stand by my decision if my supervisor were to learn about it? (Supervisor Test)
4. Would I support the same decision being made in all comparable situations? (Generalization test)
5. Would I still consider my decision appropriate if my company had to publicly justify it? (Public test)
6. Would I accept my decision if I were personally affected by it? (Consternation test)
7. What would a third party say about my decision? (Second opinion test)

If the answer to any of these questions is "no", it is advisable to pause and reconsider the decision or seek guidance. Seeking good advice can help prevent serious consequences when in doubt.

1.3 Role of Managers

Managers at avodaq AG serve as key role models and their conduct is held to the standards set by the CoC. They act as the primary point of contact for any questions regarding the interpretation of the regulations. In fulfilling their leadership responsibilities, managers are tasked with preventing unacceptable behavior and taking appropriate measures to address any potential breaches within their areas of responsibility.

2 Principles of Cooperation

We are committed to fostering and maintaining an inclusive culture that is welcoming, positive, creative, and enriching—an environment that enables individuals to thrive and strengthens our community. Every person should be treated with respect, fairness, and dignity as a valued member of the team.

2.1 Respectful Cooperation

Trust is the foundation of our success and underpins all cooperative efforts. This naturally leads to situations where the boundaries between professional and private life may not be immediately clear.

These boundaries are unique to each individual. What one person views as acceptable may be perceived by others as uncomfortable, inappropriate, intrusive, overly familiar, disrespectful, embarrassing, too direct, indiscreet, or even harassment. Harassment can manifest in various forms, and a reasonable person would objectively find such actions or behaviors unacceptable.

Often, crossing these boundaries results in conflicts that may prevent effective collaboration or interaction, conflicts that can be avoided through respectful and appropriate behavior.

We expressly prohibit any behavior that excludes individuals or groups based on inherent or perceived characteristics. We acknowledge that some disabilities or illnesses may not be immediately obvious and are committed to removing barriers for all employees.

2.2 Equal Opportunity

We are committed to providing equal opportunities for all. The selection, recruitment, and promotion of employees are based solely on qualifications and skills, ensuring a fair and unbiased process.

2.3 Chats and Social Media

Our communication via email, chat programs, the intranet and the Internet aims to foster collaboration and maintain strong relationships among colleagues and business partners. We use these communication channels appropriately and maintain a suitable frequency.

Our communications must never be used to engage in illegal or political activities, disseminate sexual content, or circulate defamatory messages, including hate speech, abuse, or slander. Any content that is legally objectionable will be reported to the relevant law enforcement authorities immediately.

Detailed guidance on proper communication practices is outlined in our Social Media Guidelines.

2.4 Alcohol and Drugs

Employees are prohibited from being under the influence of alcohol or drugs during working hours, including breaks. This prohibition applies to all company premises, including offices, common areas, parking lots, and underground garages. The following exceptions apply:

- Events hosted by avodaq where alcoholic beverages are offered; responsible consumption is expected in these cases.
- Medically prescribed cannabis medication; employees must inform their manager or the HR department and provide the necessary documentation.

3 Office and Workplace

We are committed to providing a safe and health-promoting workplace for all employees. It is essential that every employee is familiar with and adheres to all safety guidelines. Unsafe conditions, incidents, or accidents must be reported promptly to ensure timely corrective action and to maintain a secure working environment.

3.1 Protecting our Offices

Unauthorized individuals are not permitted access to company offices. If an unknown person is encountered, their purpose should be politely inquired. In the event of an unauthorized individual, the respective branch manager and/or reception must be informed immediately. Persons who are clearly unauthorized should be escorted out of the premises to maintain security.

3.2 Company Ownership

We recognize that employees may occasionally use company resources for personal purposes. Such use is permitted within reasonable limits, provided it does not compromise avodaq's interests or affect the work performance of the employee or their colleagues. Only smartphones, laptops, and small accessories (e.g., chargers, cables, headsets) may be taken off company premises without prior authorization.

Examples of unauthorized use of avodaq property include:

- Borrowing or removing avodaq property from the company premises without permission.
- Setting up a workplace outside avodaq offices using company property.

- Using avodaq property to support third parties, external companies, or organizations.
- Using demonstration or laboratory equipment that is intended as "scrap", waste or for recycling purposes for non-company activities.

3.3 Official Communication Applications

avodaq provides official systems for business communication, including:

- Business phones (both workplace and mobile)
- Cisco Webex
- Microsoft Office 365

These systems are to be used exclusively in accordance with applicable data protection regulations. Exceptions are permitted only if business partners require the use of alternative communication applications, provided that data confidentiality is ensured at all times.

Special care must be taken to avoid careless disclosure of trade secrets. For example, if meetings are recorded, compliance with relevant data protection guidelines is mandatory.

3.4 AI Tools in Use

We support continuous training and skill development in the use of AI tools. However, employees must understand that AI tools are aids—not substitutes for human judgment. While AI can facilitate tasks, analyze data, or automate repetitive processes, the ultimate responsibility for decisions and outcomes remains with the employee.

When using AI tools, protecting personal data and maintaining the confidentiality of company information are top priorities. Employees are required to use AI tools strictly in accordance with applicable data protection regulations. The current AI guidelines issued by avodaq must always be observed.

3.5 Workplace in the Home Office

When an employee voluntarily performs work outside the avodaq offices, this is considered home office work. The home office workspace is primarily a private matter but should approximate the standards of an office workplace. It must allow the employee to perform their duties without restrictions, promote health optimally, and protect against occupational illnesses and accidents.

Confidentiality of data and business communications must be strictly maintained in the home office environment.

4 The Brand avodaq

The brand "avodaq" is an integral part of our corporate identity (CI) and represents one of our most valuable assets. It plays a crucial role in all corporate communications and is protected both in word and image. The brand, including logos, domain names, websites, templates, and stationery, is to be used exclusively for business purposes. The marketing department is responsible for creating and maintaining all appropriate brand materials.

Any use of the brand elements outside the company requires the prior written consent of the Board of Management..

All proprietary work, such as presentations, documentaries, graphics, images, videos, audio recordings, and software, may only be used for business purposes in accordance with the avodaq privacy policy.

4.1 Communication and Marketing Measures

All communication and marketing measures are coordinated and executed exclusively by the marketing department in collaboration with the relevant responsible departments.

No public statements may be made without prior consultation. All external inquiries should be directed to the marketing department.

5 Environmental Protection

As a commercial enterprise, we acknowledge our responsibility for the environmental compatibility and sustainability of our products, locations, and services. We prioritize the use of proven, environmentally friendly, low-impact, advanced, and efficient technologies and products.

All avodaq employees are expected to consider environmental protection in their daily work, using resources and energy responsibly and sparingly. We commit to minimizing waste and pollution in all our operations.

6 Human Rights

Respect for applicable human rights regulations is a fundamental aspect of our corporate responsibility. Every employee is expected to honor the dignity and personal rights of colleagues and all third parties with whom the company conducts business.

6.1 Child and Forced Labour

We categorically reject all forms of child labour, forced labour, and compulsory labour. Our company strictly complies with all applicable national and international laws, regulations, and standards concerning labour practices.

We ensure that workers are protected from tasks that could interfere with their education or endanger their health, as well as their physical, psychological, social, or spiritual development.

7 Data Protection and Information Security

Protecting data and information is a fundamental priority for our company. We are committed to preventing negligent handling or unauthorized disclosure of personal data as well as confidential or sensitive information. The standards for proper conduct in the physical workplace equally apply to online environments.

7.1 Privacy

Data protection is essential to safeguard all personal data, ensuring the right to informational self-determination and preventing data misuse. In all decisions regarding the processing of personal data, we strictly adhere to applicable legal regulations.

It is important that all employees understand our expectations concerning the protection of data, applications, and underlying systems. To this end, appropriate training is regularly required to enhance knowledge and awareness in data protection practices.

7.2 Information

Each employee is responsible for safeguarding the confidentiality, integrity, and availability of information, whether digital or analogue, belonging to avodaq, our employees, customers, suppliers, or other data subjects. We employ appropriate technical and organizational measures to ensure that all information—whether personal or business-related—and the associated business processes within our systems are adequately protected. This policy and its derived regulations ensure our compliance with legal obligations and commitments to customers, suppliers, employees, and other stakeholders.

7.3 Non-Disclosure Agreements & Confidentiality Requirements

In addition to adhering to applicable legal requirements and avodaq's internal security and privacy policies, we must also comply with numerous agreements related to security and privacy imposed by our customers and other third parties. These include non-disclosure agreements and contractual confidentiality obligations.

Before disclosing any data to third parties, employees must obtain consent from the data owner and ensure that only information necessary for fulfilling legitimate business purposes is shared. Unsolicited or unauthorized confidential information of third parties must not be used. If such information is received inadvertently, it must be promptly returned to the owner, deleted, or destroyed.

Employees are also prohibited from using or transmitting confidential, proprietary information from previous employers unless such use is authorized by the previous employer or the rights to the information have been rightfully acquired by avodaq.

7.4 Confidential Information in Business Communication

All business information must be stored exclusively on media and storage locations approved by avodaq. Relevant information received from business partners through other channels, such as files attached to chat histories, must be transferred and securely stored on company media.

8 Conflicts

We respect the personal interests and private lives of our colleagues. However, we place particular importance on avoiding any conflicts of interest—or even the appearance thereof—between private and business interests. Our decisions are made solely based on objective criteria and must not be influenced by personal relationships or benefits. Situations that could create, or appear to create, a conflict between personal gain and avodaq's interests must strictly be avoided.

8.1 What is a Conflict of Interest?

A conflict of interest arises when the personal activities or relationships of employees impair their objectivity in representing the interests of avodaq. Such conflicts can undermine trust, decision-making, and company integrity.

Examples of Potential Conflicts of Interest:

8.1.1 Secondary Activities Outside avodaq

- Avoid engaging in approved secondary activities that conflict with responsibilities at avodaq or impair work performance or working hours.
- Refrain from working on one's own account or performing unpaid work for avodaq customers, competitors, or suppliers.

8.1.2 Personal Relationships

- Situations where family members or friends work within the same reporting hierarchy or hold positions where they influence each other's decision-making.

- Family members or friends employed by competitors, customers, or suppliers in ways that relate to or could interfere with their role at avodaq.
- Engaging in personal business relationships (e.g., lending/borrowing money, renting real estate) with individuals in your reporting line.

8.1.3 Participation in Committees

- Holding functions on supervisory boards or advisory bodies of other companies.
- Participating in private or non-profit organizations where avodaq is, or may be, a customer or business partner.

8.1.4 Investments

- Investing in private companies that are competitors, suppliers or customers of avodaq.
- Having more than a 1% stake in a listed company that is a competitor, supplier, or customer of avodaq.
- Avoid investments in companies related to avodaq's business that could create or appear to create a conflict, including those held by related parties.

Additionally, any work conducted outside of avodaq that may lead to inventions or intellectual property related to avodaq's business is subject to the agreements concerning the assignment of such rights under the employment contract.

9 Gifts and Benefits

Building and maintaining positive relationships with customers, partners, service providers, vendors, and suppliers may involve the provision of meals, gifts, and entertainment, where appropriate. All gifts and benefits must remain within an appropriate and transparent framework. Benefits and gifts should generally be avoided when dealing with recipients employed in the public sector or whose employer is subject to public law.

9.1 Guidelines for Dealing with Grants

- Gifts and benefits should be of low value and not exceed 15 EUR.
- Entertainment and advertising materials provided by avodaq should be used primarily.
- Donations must be sensible and appropriate.
- Consideration must be given to how gifts and benefits may be perceived.
- Projects involving gifts or benefits must be disclosed before purchase or handover.

- Cash or cash equivalents (such as gift cards or vouchers) are prohibited unless they are of low value.
- Engaging third parties to provide gifts in the name of avodaq is prohibited.

9.2 Approval Requirements

Low-value gifts and invitations to employees of private companies do not require prior authorization. Gifts exceeding this threshold must be approved by an authorized signatory.

9.3 Donations

Financial and in-kind donations are generally provided only for science and research, education, charitable causes, sports, and cultural activities. Donations are granted exclusively to recognized non-profit organizations or institutions authorized to receive donations under applicable regulations. All donations and sponsorships require prior verification and approval by the board.

10 Corruption and Bribery

Corruption undermines trust, endangers economic and social development, and damages fair trade. At avodaq, we are committed to conducting business with integrity and would rather forgo business opportunities than engage in bribery. Our employees are strictly prohibited from accepting bribes or anything of equivalent value.

10.1 Legal Framework

Anti-corruption and anti-bribery laws in most countries prohibit giving, paying, or promising any "something of value" (bribes) to:

- Influence any action or decision, secure or retain business, or
- Obtain any improper advantage for the company.

Accordingly, our employees must neither directly nor indirectly promise, offer, give, or approve bribes or valuables intended to improperly influence decisions, retain business, or gain an undue advantage for avodaq. Violations of these laws can result in substantial criminal penalties, including imprisonment.

10.2 Behaviour of our Partners and Suppliers

We require our business partners to comply strictly with our anti-corruption and bribery policies and applicable laws. The use of third parties or intermediaries to facilitate or conceal bribery is strictly forbidden.

11 Financial Management

We strictly adhere to all legal requirements for proper accounting and financial reporting. Transparency, accuracy, and integrity are our foremost priorities.

11.1 Responsible and Accurate Management of avodaq Finances

Every avodaq employee is personally accountable for the company funds they manage or spend. Company funds must be used solely for legitimate business purposes. Employees must seek to obtain fair value for goods and services, ensuring sales always include a reasonable margin; selling below cost is prohibited. Accurate records of all financial transactions must be maintained, including those managed by third parties on behalf of avodaq. Concealing, falsifying, misrepresenting, or altering financial documents or data constitutes a serious violation.

11.2 Expense Reporting Guidelines

Employees must submit business expenses in accordance with the applicable expense policy. All expenses must be accurately categorized, supported by valid receipts, and submitted timely via the designated system (Dynamics 365) within 30 days of incurring the expense. Reimbursement occurs only after supervisor approval. Misrepresenting business transactions or submitting false documentation is strictly prohibited.

11.3 Purchase of Goods and Services

Supplier and service provider selection is based on economic and factual criteria such as creditworthiness, integrity, and delivery capability. Business relationships are authorized by the board or designated signatories. Routine office supplies, catering, and orders up to 750 EUR follow simplified procedures. Detailed quotations must be obtained prior to purchase, and procurement guidelines govern contract conclusion.

11.4 Accounting Requirements

avodaq AG maintains complete and accurate financial records that accurately reflect company transactions and financial position. All employees must submit financial transactions promptly and accurately to accounting and bookkeeping.

11.5 Annual Financial Statements

Information provided for annual financial statements must be complete, accurate, timely, and understandable. There may be instances where information must be provided for avodaq's annual financial statements. In this case, it must be ensured that the information meets the above requirements.

11.6 Funds off the Books or "Parked" Funds

Off-book funds—held or deposited outside official company accounts without proper transparency, approval, documentation, or accounting—are strictly prohibited. Attempts to bypass controls or manipulate records involving off-book funds are serious violations, regardless of fund usage.

11.7 Prescribed Sales Channels

Goods and services from third parties may have restricted distribution channels. Sales personnel must understand and comply with all applicable regulations (see sections 12.4 and 12.5).

11.8 Financial Reporting Responsibilities

Finance department employees have specific obligations to provide accurate, complete, objective, relevant, and comprehensible financial information.

12 Applicable Laws

avodaq is committed to full compliance with all applicable laws and regulations. We exercise our legal rights when necessary to protect the company's interests. In cases where there is reasonable suspicion that current or former employees have committed criminal offenses related to their work at avodaq, we reserve the right to involve judicial authorities.

12.1 Market Competition

Antitrust and competition laws are designed to promote fair market conditions, giving consumers greater choice and better prices. These laws prohibit practices that restrict competition, including agreements between competitors on pricing, terms of sale, or the allocation of customers or markets. They also regulate exclusive arrangements, bundling and tying, predatory pricing, restrictions on reseller discounts, minimum resale pricing, and—in some jurisdictions—price discrimination among resellers.

Violations of competition laws can result in substantial fines, damages, reputational harm, and even government oversight of avodaq's business activities. avodaq is committed to competing fairly in all markets where we operate.

12.2 Copyrights

Employees must always ensure that appropriate permissions are obtained before using third-party copyrighted materials. Unauthorised use—including copying, reproducing, digitising, distributing, broadcasting, modifying, or incorporating such materials into avodaq products, promotional materials,

communications, blogs, or social media—is prohibited unless licensed by the copyright holder. Some exceptions apply, such as for works in the public domain (e.g., most works published before 1923).

This policy applies even if the use is for personal purposes or internal avodaq projects and includes all forms of media: images, text, video, software, and source code (e.g., open-source libraries). Employees must not use avodaq facilities, equipment, or networks to obtain or share unauthorised copies of copyrighted material (such as films, television programs, software, or music via the Internet or peer-to-peer networks). Breaches may result in civil or criminal liability.

12.3 Export Regulations

Employees must comply with all applicable national and international export laws. In general, exports are permitted for most civil and commercial end users worldwide, provided all necessary licenses are obtained. Exceptions apply to embargoed countries, jurisdictions designated as state sponsors of terrorism, and sanctioned entities or organisations, regardless of their location.

12.4 Import Regulations

Employees must also comply with import requirements. Importation on behalf of avodaq is generally allowed in most countries, provided all required customs declarations and licenses are obtained and both local customs rules and avodaq policies are followed. Exceptions include imports of personal belongings and shipments to embargoed countries or state sponsors of terrorism.

12.5 Anti-Money Laundering Laws

avodaq is committed to supporting global efforts to combat money laundering and the financing of terrorism. Employees must strictly adhere to all applicable anti-money laundering (AML) and counter-terrorism financing (CTF) policies and procedures.

Where required, customer due diligence must be conducted to ensure that avodaq does not engage in business with individuals or entities listed on German, U.S., or international sanctions lists.

13 Report a Concern

Employees are encouraged to raise concerns through their immediate supervisors, HR representatives, or designated confidants.

If a direct conversation is not feasible or does not lead to resolution, concerns may be submitted by email to coc@avodaq.com or reported anonymously via the compliance contact form on the website.

Employees who report concerns in good faith are protected from retaliation by management. All employees are expected to cooperate fully and provide truthful information. Deliberately submitting false accusations may result in disciplinary action.