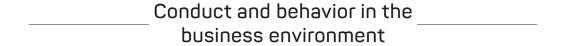




Introduction

Our Code of Conduct is a guideline for the entire company JAM Software GmbH and therefore applies equally to each of us, whether management, executives, employees, temporary staff or trainees. It represents the demand on ourselves to live up to the values and principles listed therein and signals responsible behavior towards our business partners, customers and our employees.

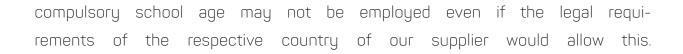


We always act with fairness and frankness towards our customers and business partners. We capture the wishes, needs and expectations of our customers and business partners in order to ensure a target-oriented implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners on a basis of trust.

Human and	
 employee rights	

We strictly reject any kind of child or forced labor without exception and we also expect this from our business partners. Children of



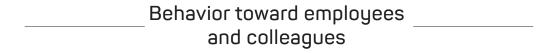




We treat all personal data of our customers, business partners and employees with the utmost care and only collect or process personal data if this is absolutely necessary or legally required for the fulfillment of the respective work task. In doing so, we proceed in a GDPR-compliant manner. The basic criteria "availability, confidentiality, authenticity, auditability and integrity" are always guaranteed by our IT security guidelines.

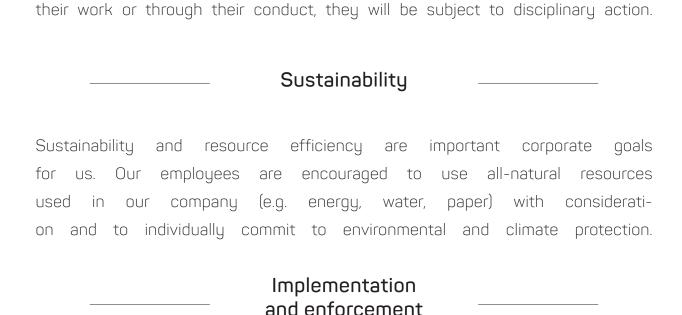
Anticorruption	
and integrity	

No financial contributions, in particular donations and sponsoring measures, are made by us to political parties in Germany or abroad, to organizations affiliated with or similar to political parties, to individual elected officials or to candidates for political office. We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties. Collusion and kickbacks as well as corruption and antitrust violations are not endorsed by us. All employees, regardless of their role in the company, are called upon to actively participate in its implementation.



Any form of discrimination is strictly prohibited. This applies regardless of nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability, religion or belief. Promotions and new hires are always made free of discrimination. It is self-evident for us to comply with applicable laws and regulations at all times. We set great value on the careful and responsible handling of the working materials used and on the confidential treatment of the company's intellectual property. We continuously question existing solutions and develop new ideas for the benefit of our customers. To achieve this, we encourage constructive cooperation among our employees. Their interests and demands on us are crucial for our work and further development. We can only be successful through consistent teamwork. If employees violate existing guidelines, rules or regulations in the course of

Jamsoftware



This Code of Conduct illustrates the requirements for our behavior and that of our employees, for both internal and external relationships. We expect all employees to follow these principles, to comply with all laws and rules, and not to abuse the trust placed in us by our customers and business partners. In addition, we also assume social, ethical and ecological responsibility within our day-to-day business activities. By signing the Code, the company JAM Software GmbH commits to make all necessary efforts to live up to the principles and values described in it.

Yours faithfully,

Joachim Marder

Managing Director at JAM Software GmbH