

“The OpenStorage Code of Conduct is binding for all employees. We require that all OpenStorage AG managers exemplify and communicate the principle of integrity which the rules are intended to convey, and take responsibility for ensuring its compliance.”“

Gerd Henneveld · Board of directors of OpenStorage AG

*We use “employee” in the following as a neutral term for men and women.

Conduct towards business partners and third parties

A clear line must always be drawn between the normal scope of a business relationship and private interests when dealing with business partners (customers, suppliers, service providers etc.) and representatives of governmental agencies. OpenStorage places the highest demands on the avoidance and combating of corruption of all kinds and complies without reservation with applicable anti-corruption laws. It is never permissible for employees to offer, grant, promote or accept money in connection with business activities. All business transactions must always be fully and impeccably documented in accordance with the legal requirements (e.g. retention obligations under tax and commercial law for annual financial statements, booking receipts, business letters).

Conflicts of interest

OpenStorage expects its employees to be loyal to the company and its business partners. All employees must avoid situations where their personal or financial interests come into conflict with the interests of the company or its business partners.

Offering and granting of gifts and other advantages

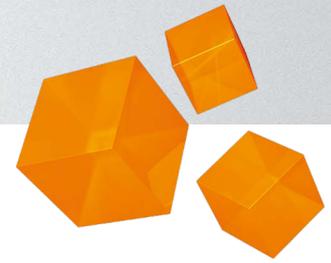
Donations of any kind by employees to business partners, their employees or other third parties in exchange for preferential treatment are not permitted. Remuneration and reimbursements (e.g. discounts) to contracting partners may only be paid on a contractual basis and into the business partners’ business accounts. Courtesy gifts corresponding to customary business practices within a particular scope must always be designed in such a way that the recipient does not need to conceal them and that he is not forced into a position of binding dependence. Invitations to business partners or their employees (e.g. in connection with hospitality and events) may only be issued if they do not exceed the scope customary in business.

Requesting or accepting gifts or other advantages

No employee may use his position or role in the company to request, accept or procure personal advantages. The acceptance of low-value occasional gifts is permitted. The acceptance of gifts going beyond this and other advantages for oneself or related persons requires that the employee’s superior be informed and approves the request.

Competitors

Agreements with competitors which adversely affect fair competition are prohibited. This includes e.g. price agreements, the division of customers or sales areas between competitors, anti-competitive boycotts and other unfair competitive methods.



Conduct towards the company

Company property

Each employee shall ensure that the property of OpenStorage AG and the entrusted property of our customers and business partners is protected from loss, theft or misuse. The private use of company property, including labour services, equipment, buildings and other economic goods is prohibited, unless it is permitted by separate agreements. Company equipment and items also may not be removed from company premises without the explicit permission of the responsible bodies within the company. Intellectual property is also a valuable good, which we protect from unauthorised use and disclosure. This includes trade secrets, confidential information, copyrights, trademarks and logos as well as customer lists, business opportunities and product specifications. This protection applies regardless of whether the intellectual property is owned by OpenStorage AG, affiliated companies or business partners. Each employee shall respect valid third-party property rights and shall refrain from unauthorised use. No employee may procure or use trade secrets belonging to a business partner or other third parties without authorisation.

Data protection

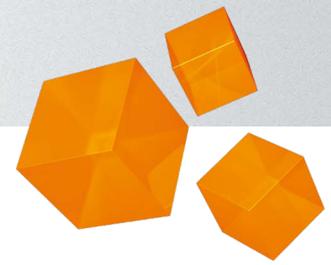
We only collect, process and use personal data if this is required for set, clear and legal purposes. We at OpenStorage take all measures necessary to protect data which the company receives from employees, business partners and customers. The use of data must be transparent for the data subjects, and their rights to information and rectification, and if necessary to objection, blocking and erasure, must be safeguarded.

Confidentiality

Employees shall protect all operating and trade secrets from access by unauthorised persons - this applies both during the term and after the termination of the employment relationship. This includes both internal company secrets and also any information relating to our customers and their business secrets. Internal and external information is always subject to protection through absolute secrecy. This only excludes information which is already publicly accessible or accessible to third parties, or which is required by official bodies. In the event of conflicts of interest within the company, we seek to avoid negative external impacts. We maintain absolute secrecy in relation to third parties and seek an internal solution. The company's interests and trusting business relationships to customers may not be adversely affected under any circumstances.

Communication with the media and online

The disclosure of company data and information to the media shall occur exclusively via the board of directors as well as the marketing communication department. This includes financial data, information on accidents and crises, mergers and takeovers or personnel changes in the management structure. Regardless of whether the statements could be interpreted as positive or negative for OpenStorage, approval must be sought from the marketing communication department for individual employees to express their opinion on the company to the media. The company's online presence is likewise managed by the marketing communication department. This applies particularly to communication on social media.



Conduct towards employees

Conduct with each other - prohibition on discrimination

No employee may be discriminated against, i.e. adversely affected without objective reason, on the basis of race, sex, age, nationality, ethnic identity, skin colour, political opinion, sexual orientation, religious convictions, social background, bodily constitution or other personal characteristics. We urge all employees to contribute to an atmosphere of respectful togetherness excluding any kind of personal harassment, including in particular workplace bullying, unwanted sexual advances, unwanted bodily contact, improper propositions or a workplace environment plagued by offensive jokes, comments or humiliations.

Handling internal knowledge

Employees must communicate openly with each other and exchange information amongst themselves. Knowledge relevant to activities may not be illegally withheld, falsified or selectively disclosed. Information must be disclosed accurately and completely to other departments - assuming that there are no priority interests (e.g. confidentiality).

Introduction of the Code of Conduct

The Code of Conduct is published in its current version in the OpenStorage intranet. Each manager is responsible for ensuring that his employees know and follow the content of the Code of Conduct. Each employee may approach his superior with questions or uncertainties regarding proper conduct. The board of directors is generally responsible for compliance with the Code of Conduct.