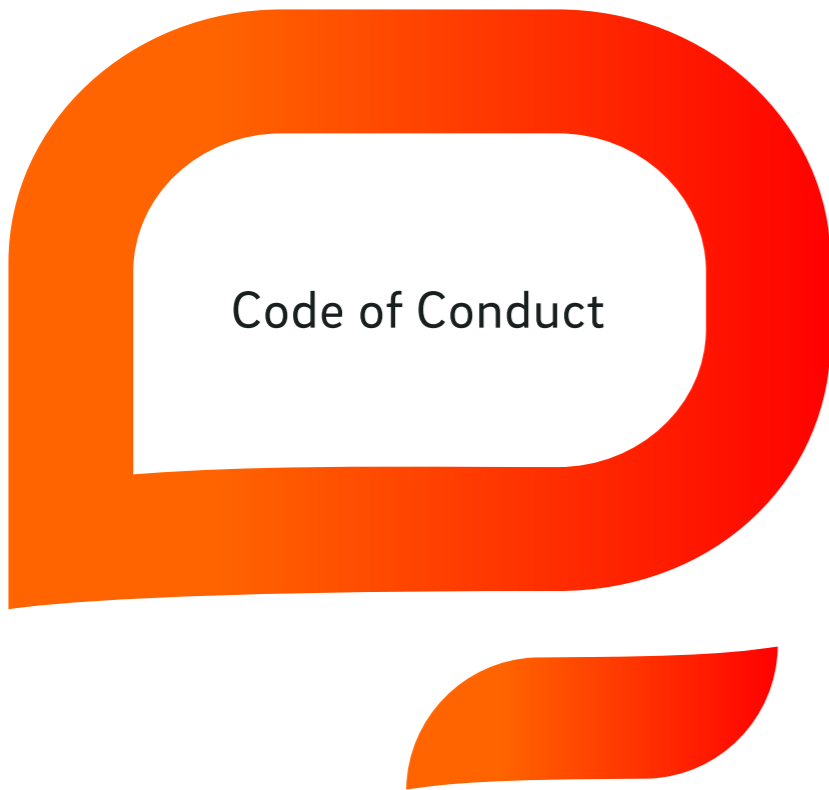


Strong principles and a fair culture

q.beyond AG
Code of Conduct for our Business Practices



Our corporate values are important to us.

Because they form the basis of our company culture.

q.beyond views trustworthiness as the foundation of its success as an appealing business partner and employer. We win this trust through customer focus, reliability, good team spirit and a pragmatic approach. Conduct in accordance with the law is given the highest priority in this regard. It is part of our company culture and should be a matter of course for all employees¹. As a result, we rate impeccable business conduct higher than short-term business success.

We are convinced that true competitive strength does not only come from the products or services we offer as a company. The way we work together internally and with our customers, suppliers and the general public is also a critical factor in our competitive strength.

¹ For improved readability the masculine form of speech is used in the following text.

As a result, we consistently practice our common values, which are the foundation of our corporate culture:

- We address the needs of our customers and offer **fitting solutions** in the clients' interests.
- We **faithfully** honour the agreements we have made together.
- Each q.beyond employee brings his strengths and interests to the team and beyond **to achieve collective goals**. We do this with passion and confidence.
- **It is our policy to take the most direct and straightforward approach** to the outcome, ensuring any damaging consequences are avoided long-term.



Code of Conduct

General information on the Code of Conduct

We all influence q.beyond's reputation by our professional conduct. The Code of Conduct describes how we interact with each other as well as with our business partners, competitors, suppliers and natural resources. We all acknowledge these policies as the basis of our business activities.

The q.beyond Code of Conduct is applicable to every member of the company, regardless of whether they are a Member of the Board, Managing Director, Executive or Employee. In this respect, Management and all Executives have an exemplary function.

Conduct in accordance with our Code of Conduct is an important consideration in the internal employee performance review process. Acting in accordance with the q.beyond Code of Conduct is regarded as acting in the company's interest.

Conduct in business dealings

We conduct ourselves in a fair, responsible and respectful manner.

Our interaction with each other is shaped by respect and fairness. The same applies to our relationships with customers, partners, suppliers, competitors, shareholders and other capital market stakeholders, authorities and other persons and institutions. The relationship should be based on mutual respect and responsible co-operation.

Fair competition

No bribery or corruption

Donations and sponsorship

Contributions

We stand for fair competition and abide by the law.

We want to succeed in a fair way. That is why we are committed to open competition and adhere to the prevailing laws. We do not participate in price-fixing and do not co-ordinate our market strategy with competitors.

We strictly reject unfair methods that could give us an alleged competitive advantage (e.g. competitive espionage, dissemination of false information). We work in close co-operation with the authorities.

We condemn any form of bribery or corruption.

We conduct our business in a lawful manner. We do not tolerate bribery or corruption of our employees or distribution and co-operation partners. We refrain from any form of corrupt behaviour and ensure that we avoid any appearance of influence on or by our business partners. This is particularly true in business dealings with authorities and public institutions and their representatives.

We do not offer our customers and their decision-makers any illicit advantages and do not accept any ourselves. We reject gifts, invitations or benefits from business partners if their value could influence our conduct or could even give this impression. We do not promise or confer any advantages to achieve a desired behaviour or a desired decision.

We are transparent about donations and sponsorship.

We make donations or engage in sponsoring voluntarily and without any expectation of business benefits in return. We only make donations for verifiable scientific, charitable, cultural or political purposes, we only use sponsorship for marketing purposes.

We place the company interest at the forefront.

When making business decisions, we consider q.beyond's interests. Private interests or personal advantages do not influence our decisions. We do not promote personal benefits and avoid the resemblance of any exertion of influence. We promptly inform our managers about gifts and invitations of higher value.

We take all necessary measures to prevent money laundering within our company.



Social responsibility and protecting the environment

Human rights

Equal opportunities and freedom from discrimination

Employee rights and compliance with social standards

Health and safety at work

We take responsibility for society and the environment.

We feel a joint responsibility for the economic, ecological and social needs of future generations. Sustainable economic activity, compliance with social and ecological standards, conservative use of resources and commitment to the interests of society as a whole are fundamental values for us.

By using eco-efficient technologies and adopting a resource-friendly approach, we continuously reduce our energy and water requirements as well as emissions and waste.

In the operation of our data centres in particular, we only use electricity from renewable sources and only deploy hardware systems that meet the latest energy efficiency standards.

We uphold human rights.

We are firmly dedicated to respecting human rights and take responsibility for our value chain. We enforce applicable law and follow the guiding principles of internationally-recognised human rights frameworks and standards, such as those defined by the United Nations, for example. We also ensure that we prevent human rights violations in the course of our business activities. This is particularly true with regard to our suppliers.

We respect employment laws.

We expressly undertake to comply with all labour laws and fundamental conventions of the International Labour Organisation (ILO). We observe the minimum legal standards in terms of the level of remuneration and social benefits. We are committed to a close and trusting collaboration with the Works Council.

We use appropriate education and training measures within the scope of our operational opportunities to enhance our employees' professional skills.

We take the health of our employees very seriously.

We take all necessary precautions to prevent accidents and damage to the health of our employees. Compliance with the regulations on occupational safety and protection of health is ensured.

We don't tolerate any discrimination.

We are committed to equal opportunities. Ethnic origin, skin colour, gender, age, marital status, disability, religion, nationality, sexual orientation or social background, do not play a role at q.beyond. We are committed to ensuring that the dignity of every employee is respected at all times and that his working environment is protected from any physical harm or sexual, psychological or verbal harassment. Any form of bullying and intimidation will not be tolerated.

We are consciously committed to equal opportunities and support our employees within the scope of the corporate opportunities to balance their professional and private interests. This is particularly true for work-life balance.

Information handling

Code of Conduct



Information handling

The Information you entrust to us is protected and treated confidentially.

We understand the high sensitivity of the data entrusted to us by our customers, partners, employees, shareholders and suppliers. Data security is thus of paramount importance to us. Clear rules help us to handle data and information appropriately.



We use all available means to protect data.

We protect company data, personal customer and employee data as well as the customer's machine data with all appropriate means that are available to us, both technically and in an organisational sense. We protect this data from unauthorised access, unauthorised and improper use, loss or premature deletion. All employees of q.beyond AG are jointly responsible for maintaining a consistently high level of data protection.

We regularly train our employees on data protection.

When handling data in the context of Internet of Things, we take into account the legal regulations as well as an allocation of powers of disposal and rights of use for the data.

If necessary, we define the type and scope of the allocation in individual contracts.

We respect the full rights of the individuals whose data we use.

We collect, process and use data requiring protection only with the express consent of the individual concerned and only if a clear legal standard permits this or if it is necessary to fulfil a contractual obligation. We collect, process and use data only to the extent that is necessary and only for the intended purposes. The data are then deleted.

Confidentiality

All information is handled with care and confidentiality.

We are careful not to pass on confidential information to unauthorised third parties, neither in personal conversations nor when using means of communication (e.g. telephone, Internet, social media, etc.). This also applies to former employees after their employment with q.beyond.

Personal statements

No statements are to be made on behalf of the company.

We do not make any statements on behalf of q.beyond about corporate matters to media representatives, at events or in social networks without the express consent of the Corporate Communications Department. In making personal statements on social networks that also concern the company, we respect the rights of other companies and individuals involved. Our conduct on social media always complies with our social media guidelines.

Transparency

We are committed to proper record keeping and transparent financial reporting.

We document and control all essential business processes; we record all accounting-relevant information completely and correctly. We ensure that we do not mislead the interested public. We treat all shareholders and key target groups equally when passing on relevant information. We publish important changes without delay, in accordance with legal regulations.

Insider information

We keep insider information to ourselves.

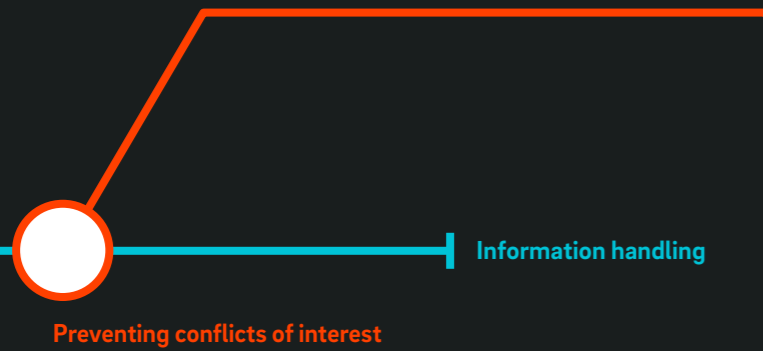
We are aware that unauthorised use of insider information can have a significant impact on the q.beyond share price. As a publicly listed company, we are committed to fair trading in securities and help to prevent any insider trading. We do not use insider information for private securities transactions, do not pass on insider information without authorisation and do not entice others to carry out transactions on the basis of insider information.

Intellectual property

We protect and respect intellectual property.

We protect our intellectual property to the extent required by law and observe existing and legally valid third-party property rights. We refrain from the unauthorised use of intellectual property - in particular of pictures and texts.





Secondary activities

Investments

Company property

Preventing conflicts of interest

We preserve the interests of the company and adhere to the obligations of employment contracts.



q.beyond respects the personal interests and private lives of its employees. That is precisely why we attach great importance to ensuring that q.beyond's employees do not encounter conflicts between their private and corporate interests in the course of their work. We therefore deal openly with conflicts of interest in order to protect employees and the company.

We advise the company of any secondary activities.

A secondary occupation is any activity in which we make our labour available (both paid and unpaid) outside our employment relationship with q.beyond. We only perform dependent or independent secondary activities with the express consent from the employer. We expressly welcome and support voluntary work

We handle company property with care.

Upon express permission, we may also use company property for private purposes. Company property which has been made available to us is treated with care, protected against theft or destruction and we ensure that it remains usable without restriction.

We disclose financial interests in competitors or business partners.

Equity investments and other financial interests in q.beyond competitors or business partners are reported immediately to the q.beyond Executive Board. The Executive Board may prohibit the investment. The only exceptions to this rule are listed equity investments (e.g. shares) which do not involve any direct or indirect commercial influence on a competitor or business partner.

Compliance with the Code of Conduct

Preventing conflicts of interest

Conduct violation

Whistleblowers

Complying with the Code of Conduct

We maintain the compliance principles and do not tolerate any misconduct.

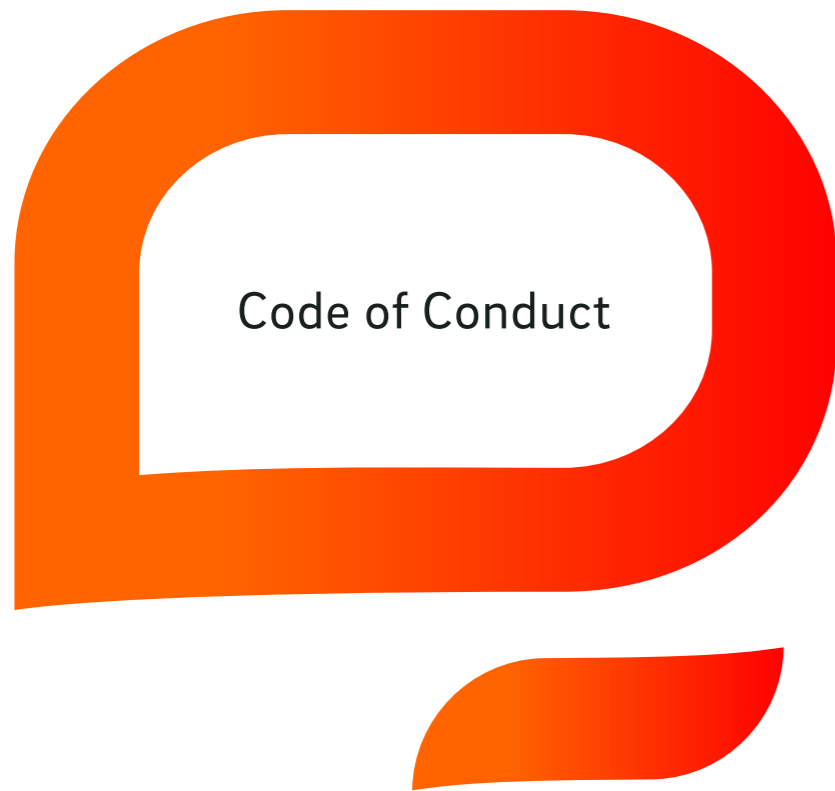
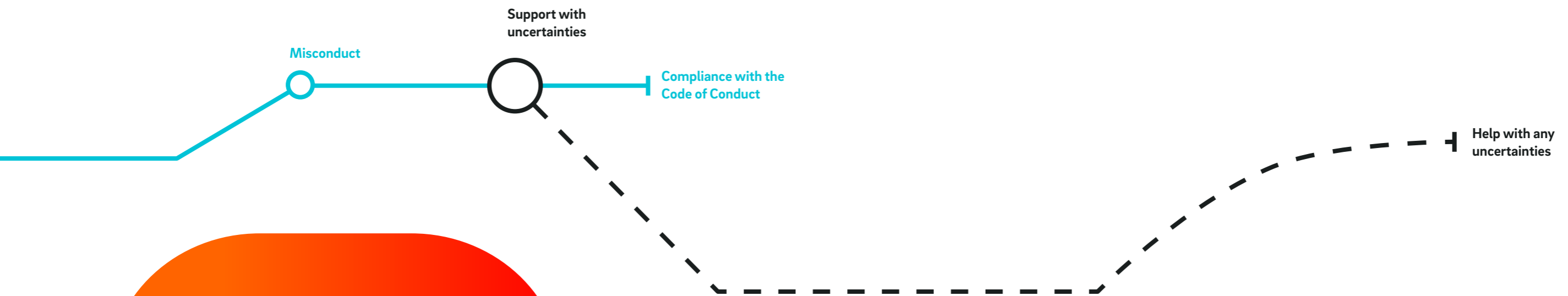
q.beyond AG expects all its employees to adhere to these compliance principles, as they form the basis of our daily collaboration. All employees make themselves familiar with the content of the principles, the managers advise and support them in complying with the guidelines. Misconduct and violations of conduct regulations as well as infringements of legal provisions and guidelines can have serious repercussions both for individuals and for our entire company. We therefore do not tolerate misconduct whatsoever.

We report every violation or specific suspicion.

Every employee is required to report any violation or specific suspicion of a violation of laws, guidelines and internal policies. Employees can report such information in various ways: to the Head of Compliance, directly to the Executive Board or via the electronic whistleblower system SAFE CHANNEL available on the q.beyond homepage. By means of SAFE CHANNEL, q.beyond gives all employees and outsiders the opportunity to report any suspicion of illegal activity. Specially trained individuals, bound to secrecy, follow up every serious and sufficiently specific report.

Whistleblowers are protected.

No disadvantages are incurred by whistleblowers if they have not violated the applicable conduct regulations themselves and provide the information to the best of their knowledge and belief. If the whistleblower himself has contributed to the violation, his report can have a positive effect if it has averted damage to the company. Reports which are only intended to damage the reputation of an employee or third party constitute unacceptable misconduct. All reports can also be submitted anonymously.



We penalise misconduct irrespective of rank or position.

Any culpable and deliberate misconduct in violation of these principles is punished within the framework of the statutory provisions, irrespective of the rank and position of the person in question within the company. This is particularly true in the event of corrupt behaviour and damage to our assets through criminal acts.

Help with any uncertainties

Ignorance does not protect against potential consequences of improper behaviour. We therefore regularly inform and train all employees on the latest developments regarding these standards of conduct. Nonetheless, there will always be questions in our day-to-day work which our Code of Conduct does not adequately answer.

If anything is unclear or you have any queries, you can contact your manager or the Head of Compliance, in confidence. We will work together to find a solution as to how a planned business action and this Code of Conduct can be reconciled.

Should you have any questions on the subject of compliance, do not hesitate to email compliance@qbeyond.de



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