

# Acrolinx Code of Conduct

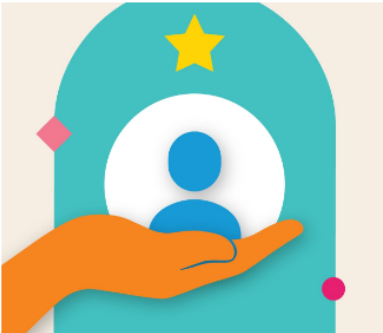
## I) Preamble

At Acrolinx, we believe in the power of building organizational culture on our Company Values. How we act, interact, communicate, and decide every day brings those values to life. This Acrolinx Group (“Acrolinx”) Code of Conduct (the “Code”) shall provide guidance to what is expected of any director, officer, employee or temporary staff of Acrolinx (the “Staff”) as well as any business partner of Acrolinx. It serves as a framework and blueprint for behavior and communication. As such, it becomes an inherent element of the agreements, contracts and engagements made with the stakeholders listed above.

The Acrolinx Compliance Officer is appointed to support and guide all stakeholders to comply with this.

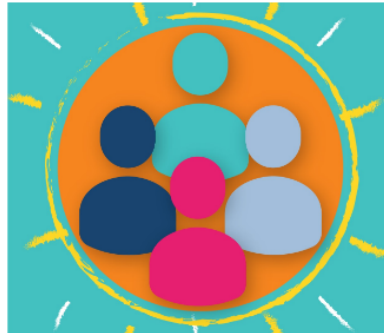
## II) Acrolinx Company Values and Guiding principles

The six Acrolinx Company Values shall guide any action, interaction and behavior of Acrolinx and Staff, in the public and in the marketplace:



### We're committed to our customer.

Our customers are our greatest source of pride, and our collective reason to go to work every day.



### We thrive together.

We're aligned as a team and we work across departments (and oceans) to create impact and value for our customers.



### We're creators.

We have a natural love of making and innovating. We use our strategic vision, curiosity, creativity, and experience to continually improve the value of everything we do.



### We respect and care about everybody.

We're aligned as a team and we respect and care about everybody. We're committed — both in and out of the workplace — to efforts that promote respect, dignity, fairness, and equality.



### We do what we say we'll do.

We focus on keeping and exceeding our commitments, and being fair and honest with the people around us.



### We lead with urgency and agility.

We believe that doing our best means we need to evolve quickly and be flexible when a new challenge arises.

Living up to those Company Values every day is the first and most important principle of this code of conduct.

The following Guiding Principles support how this can be put into practice by all.

- **Commitment** - We are committed to upholding this Code.
- **Honesty, Integrity, and transparency** - We conduct business honestly, transparently and with integrity.
- **Legality** - We abide by the law.
- **Courage** - We speak up and call out unethical behavior.

### III) Commitment

This Code shall apply to all Staff. The Acrolinx Compliance Officer shall give advice and support to all Staff to enable them to comply with the code.

The Executive Leadership Team (“ELT”) and every People Leader have the added responsibility of demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication, of behavioral expectations, modeled from the top and demonstrated by example. To make our Code work, People Leaders must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Leaders will not consider employees’ ethics concerns as threats or challenges to their authority, but rather as an encouraged form of business communication.

### IV) Respect

#### 1) Behavior of Staff

Acrolinx is committed to providing and maintaining a work environment that is safe, healthy, and productive for all staff. The work environment shall be kept free from:

- Any discrimination and/or harassment, regardless if based on gender, gender identity, gender expression, religion, colour, race, ethnicity, sexual orientation, age, physical or mental limitations, genetics, or any other factor;
- Any form of sexual abuse, regardless of form of advancements, assaults or other inappropriate actions or comments, i.e. jokes or slurs;
- Other inappropriate comments, jokes, or slurs, i.e. regarding gender, gender identity, gender expression, religion, colour, race, ethnicity, sexual orientation, age, physical or mental limitations or genetics, that creates, permits, promotes or fosters an intimidating or offensive environment at Acrolinx.

In addition to this, any behavior that negatively reflects on Acrolinx’s reputation or business interests as well as any behavior in or out of the work environment that negatively affects the health and/or performance of Staff at work may lead to disciplinary actions taken against the violating person.

This includes any unfair and/or unethical behavior toward competitors.

#### 2) Property and Intellectual Property

All Staff are obliged to protect and uphold any physical and intellectual property of Acrolinx and of its business partners or other related third parties.

Staff is expected to use any assets only for the benefits of Acrolinx. Violation of any intellectual property is strictly prohibited, particularly in the form of selling intellectual property or insider trading for their or someone else's profit.

The physical property includes any inventory provided by Acrolinx for use at the workspace or at home, i.e. equipment, supplies, facilities and systems.

The intellectual property includes software, templates, publications, inventions and other ideas that were developed or otherwise acquired by Acrolinx. Regarding intellectual property of business partners or other related third parties, Staff shall exercise the necessary care and confidentiality. This shall particularly include the use of their software, i.e. computer programs, databases and related documentation, as well as their trademarks. Staff shall comply with the terms of use, rights and obligations as set out by these business partners or other related third parties.

### **3) Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. As manifested in one of our Company Values "We respect and care about everybody" - Acrolinx is committed to creating a supportive, inclusive, and safe work environment where employees have the opportunity to reach their fullest potential, to the benefit of both our talents and the business.

This begins with respectful, sensitive, and open communication, but also includes interacting in or across teams and the ways in which we deal with conflict or handle friction.

Acrolinx is an equal opportunity employer and is committed to providing a workplace that is free of harassment, intimidation, bias, and unlawful discrimination of any kind. Any employee who feels harassed or discriminated against should report the incident to their People Leader, to the People Team or - if they prefer - through [EthicsPoint](#) our external Whistleblowing Platform. Every case will promptly and thoroughly be investigated and appropriate action will be taken.

### **4) Respect for the External Environment**

We are conscious about the impact our activities have on the environment. Acrolinx's activities do not pollute or have any negative effect on the environment beyond what is considered normal for companies with international activities within the software industry.

We are committed to our Sustainability Agenda and our pursuit of supporting the UN SDGs for climate action and the preservation of a healthy global environment. As part of this commitment, all Staff shall be conscious and sensitive to their own and the business' environmental and climate impacting action.

We should consider and make decisions (big or small) to support climate and environment protection. This can range from turning off the light when leaving the office in the evening, sorting trash, using re-usable containers for take-out lunches, all the way over to choosing public transport on business trips, whenever possible.

## **5) Use of Company Resources**

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use in accordance with applicable Information Security policy is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Acrolinx are trusted to behave responsibly and use good judgment to conserve company resources. People Leaders are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as laptops in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company requested support to nonprofit organizations.

In order to protect the interests of the Acrolinx network and our fellow employees, Acrolinx reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device in compliance with the country-specific laws and regulations. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your People Lead or the IT Team.

## **V) Honesty, Integrity and Transparency**

"We do what we say we'll do" is one of our Company Values.

The success of our business is dependent on the trust and confidence we earn from our employees, customers and partners. We gain credibility by living up to this Company Value every day, and by demonstrating honesty and integrity.

When considering any action, ask yourself: Will this build trust and credibility for Acrolinx? Will it help to create a working environment in which Acrolinx can succeed over the long term? Is the commitment I am making one that I can fulfill? We must be able to answer "yes" to those questions and work to earn and maintain our trust and credibility.

To support our endeavor to create and maintain trust and credibility, and a business built on honesty and integrity, we have developed an [Anti-Bribery, Anti-Corruption Policy](#) to be read and acknowledged by all staff.

## **1) No Conflict of Interests**

We aim to avoid any conflicts between the interests of Acrolinx and any personal or family interest that may influence professional judgment. To achieve that, we avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Acrolinx may conflict with our own personal or family interests, because the course of action that is best for us personally may not also be the best course of action for Acrolinx. We must never use Acrolinx property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Acrolinx.

Below are some areas where conflicts of interest often arise:

- Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Acrolinx.
- Hiring or supervising family members or closely related persons, including partners or spouses, in direct or indirect reporting-line.
- Serving as a board member for an outside commercial company or organization that is a customer, supplier, partner or competitor of Acrolinx.
- Owning or having a substantial interest in a customer, competitor, supplier or contractor.
- Placing company business with a firm owned or controlled by an Acrolinx employee or their family.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Acrolinx employees.

## **2) Accurate Public Disclosures**

All disclosures made in financial reports and public documents must be full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform the ELT and the People Team or, - if they prefer - report a case through [EthicsPoint](#) our external Whistleblowing Platform immediately if they learn that information in any filing or public communication was untrue or misleading at the time it was

made or if subsequent information would affect a similar future filing or public communication.

### **3) Fair Competition**

Acrolinx is dedicated to ethical, fair and vigorous competition. We will sell Acrolinx products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Acrolinx or the sales of its products or services

### **4) Information**

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

We will not disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material non-public information with respect to Acrolinx, its securities, business operations, plans, financial condition, results of operations or any development plan. We must be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material non-public information.

### **5) Media Inquiries**

From time to time, employees may be approached by reporters or other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, all media inquiries should be directed to the CMO.

## **VI) Legality**

Acrolinx's commitment to integrity begins with complying with the laws, rules, and regulations where we do business. Further, each of us must have an understanding of the company policies, procedures, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Acrolinx policy, we should seek advice from the appropriate party. We are responsible for preventing violations of the law and for

speaking up if we see possible violations. Acrolinx and its Staff are committed to upholding and abiding by the letter of the law. This particularly includes:

- German and European and US data protection laws
- Employment laws in the countries in which we employ Staff
- Competition and anti-trust laws

## VII) Courage

People Leaders at Acrolinx have a responsibility to create an open and supportive environment where employees feel comfortable raising questions, particularly about ethics concerns. We all benefit tremendously when employees are empowered to prevent mistakes or wrongdoing.

Acrolinx will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate disciplinary action, up to and including termination of employment. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Employees are encouraged to address such issues with their People Leaders or the People Team.

If for any reason that is not possible or if an employee is not comfortable raising the issue with their People Lead or the People Team, Acrolinx's ELT operates with an open-door policy and employees should not hesitate to contact those individuals.

In support of this principle, Acrolinx has issued a [Whistleblowing Policy](#) and put in place an external Whistleblowing platform, which can be used to report any such case.

Staff shall report - without hesitation - any unethical behavior or suspected case of a breach of this code to

- their supervisor
- the Compliance Officer/Legal Counsel
- [NAVEX EthicsPoint](#)

Any person credibly reporting a possible breach shall have the full support of the entire Leadership Team of Acrolinx. Such reports shall be investigated fairly and confidentially by the Head of Legal/Compliance Officer. All Staff must cooperate with investigations or audits arising from such reports. Upon finalization of the investigation, the ELT will review the case and decide whether disciplinary action shall be taken.

If reasonable and appropriate, it shall arrange for a mediation between the damaged and the injuring party.



Notwithstanding the outcome of the investigation, any person credibly reporting a possible breach in good faith will not and must not be subject to any form of retaliation. Any threat or act of retaliation shall itself be considered a severe violation of this code. Acrolinx will not tolerate retaliation against anyone who has, in good faith, reported a possible violation of this code or refused to participate in activities that violate this code.

## VIII) Remedies; Disciplinary Action

In case any breach of this Code has been determined, the ELT will decide on the disciplinary action that shall be taken. This may include the following:

- Admonition
- Temporary suspension of voluntary benefits
- Written warning
- Reassignment
- Termination based on conduct

## IX) Conclusion

It is impossible to anticipate every possible ethical scenario you might face over the course of your employment with Acrolinx. Because of that, we need to rely on one another's good judgment to uphold the highest standard of integrity for ourselves and our company. If you are unsure about what the right thing to do is in a particular situation, don't be afraid to ask questions of your People Lead, the People Team, or the ELT.

I hereby confirm that I have read, understood and acknowledged the aforementioned terms of the policy.

Date

Name and Signature