

Code of Business Conduct

DATEV eG

Preamble

DATEV's stated aim is to pave the way for the digital business models of its members and the commercial processes of small to medium sized enterprises: as a trustworthy partner and the leading provider of powerful and sustainable solutions. To achieve this objective, we continuously evolve as a company. In the coming years, DATEV also wants to be the leading solution provider for consultancies and is establishing a sustainable position on the SME market, actively shaping digital progress and creating added value through the creation and networking of ecosystems. Our Code of Business Conduct embodies the core value framework of the company; all other internal regulations must align with it.

DATEV is fully committed to operating within the law, without exception. We expect all employees to follow the applicable law and binding internal regulations, as well as the terms of their employment contract, at all times.

In this Code of Business Conduct, the term "employee" refers to all personnel working for DATEV, including the Executive Board, Management, executive employees and other leaders. All employees are personally subject to this Code of Business Conduct and are regularly informed of the binding nature of internal regulations; the intranet is an essential tool in this regard.

DATEV works to ensure that the rules in this Code of Business Conduct are applied throughout its individual associated companies, provided this is reasonable given the size and complexity of the company in question. In the case of associated companies abroad, local national law must also be observed.

DATEV expects all of its business partners to comply with the law. DATEV expects its suppliers in particular to prevent and mitigate environmental and human rights risks in their business activities and work to ensure that the entire supply chain does so.

Art. 1: Realisation of the cooperative mindset and principles of business conduct

1. As a cooperative, DATEV takes a particular approach to supporting the business interests of members and observing their rights. All employees shall conduct themselves in accordance with the mandate set forth under the law and the company statutes. Safeguarding the business secrets of members in line with applicable regulations is an essential element of the business operations of the cooperative.
2. For DATEV and its employees, sustainability is a guiding philosophy for all business conduct. DATEV defines sustainability as the balance between three dimensions: economy, ecology and social responsibility.
3. DATEV is committed to good, responsible corporate governance in line with the Corporate Governance Code for cooperatives of the German Association of Cooperatives and Raiffeisen Credit Unions (DGRV).
4. DATEV recognises the co-determination rights granted by law and works with the respective works councils and similar institutions in a mutually respectful, trustworthy partnership.

Art. 2: Data protection and business security

1. Data protection and business security (including information security) are top priorities and of fundamental importance to DATEV as a professional software developer and IT service provider. DATEV stands for exceptionally high standards in this field. This applies in particular to personal data, and to business data as well. All employees bear a special responsibility in this regard.
2. All employees shall maintain the strict confidentiality of member and client data, in particular job data.
3. DATEV requires all business partners to comply with their data protection and business security obligations.

Art. 3: Finances, company property, obligation to tell the truth

1. The applicable legal regulations and generally applicable standards for bookkeeping and accounting (especially the German Accepted Accounting Principles), and for financial transactions (in particular the

DATEV Code of Business Conduct

four-eye principle) must be observed. All employees shall safeguard the financial foundations of the business by observing the internal regulations governing areas of responsibility and signature control.

2. Transactions with related companies and persons shall follow standard market conditions; the applicable internal regulations shall be observed.
3. DATEV shall take all required measures to prevent money laundering and the financing of terrorism within its spheres of influence. Embargo regulations will be observed.
4. All employees shall handle intangible and tangible property responsibly and avoid damage to property. DATEV assets and company equipment and facilities must only be used for business purposes unless another use has been explicitly permitted.
5. All records and reports on business processes must be complete and true.
6. DATEV is committed to observing tax regulations and expects all employees to follow the applicable tax law and binding internal regulations at all times.
7. DATEV uses an internal control system (ICS), tax compliance management system (TCMS) and active risk management to ensure that internal processes are run properly and to prevent any going concern risks.

Art. 4: Integrity

- Integrity defines the conduct towards businesses and people with whom DATEV has business connections. DATEV carries out transactions with related persons under the same conditions that would apply if the related persons were completely independent of DATEV; the same principle shall apply to the relationship between DATEV and its associated companies. Business is conducted with respect and mutual appreciation, and in line with commercial principles.
- Work is commissioned free of external, unrelated considerations and personal interests. If there is a close personal relationship between business partners and employees who are significant personnel, or if such a relationship develops, the employees must disclose the nature of the relationship to the Chief Compliance Officer before any work is commissioned. Significant personnel are persons who make decisions,

DATEV Code of Business Conduct

conduct negotiations or lead projects. Agreements with business partners must be documented in full in writing.

- Employees shall not offer or accept benefits that are not allowed, regardless of what form they take. Specifically, the internal regulations regarding the giving and receiving of gifts and benefits must be observed. Offering direct or indirect benefits to civil servants or office holders in Germany or abroad is strictly forbidden unless they are allowed under the law or permission has been granted by an administrative authority or supervisory authority.
- If employees come into possession of insider information concerning publicly listed companies and persons with whom DATEV has business connections, they must observe the legal insider trading rules.
- Donations and sponsorships by DATEV must be transparent, documented and checked to ensure they are legally permissible. The Executive Board must approve every donation or sponsorship in each individual case.
- Employees must not induce third parties to commit unlawful acts or knowingly take part in the unlawful actions of third parties.
- The company depends on the full commitment of its employees. Side activities for and involvement in the boards of other companies or institutions must not infringe upon the interests of DATEV and must be disclosed. Becoming licensed as a professional consultant requires the consent of DATEV.

Art. 5: Human rights and sustainability

1. Human rights and sustainability take high priority at DATEV. There is a separate policy statement regarding this.
2. DATEV respects internationally recognised human rights and rejects inhumane practices, such as forced labour or child labour. DATEV does not work with companies and institutions that adhere to or permit such practices. DATEV expects its suppliers to observe applicable international and local social standards as well as our human rights strategy.
3. Diversity, equity and inclusion are the foundations of commercial success and innovation. All employees carry out their work responsibly and as equals. Leaders have a particular responsibility as representatives of the business to ensure equal opportunity and participation and to protect employees from discrimination.

DATEV Code of Business Conduct

4. Discrimination on the basis of race, ethnic origin or social background, gender, religion or world view, disability, age or sexual identity, as well as threats, insults, slurs and physical or psychological abuse are not tolerated and will be punished consistently. We actively take preventative measures and aim to strengthen social justice.
5. We consider the triple bottom line of economic, ecological and social engagement as the basis for sustainable success. Details on this are governed in DATEV's sustainability guidelines.

Art. 6: Product innovation, product safety

1. DATEV products stand for quality. All parties involved shall ensure that our products add value for our clients and never cause harm.
2. DATEV protects its own intellectual property and respects that of others.

Art. 7: Conduct in competition

1. DATEV has impressive software, cloud solutions and expertise, and follows the rules of competition. Employees shall not engage in practices contrary to competition law, nor will they instigate such acts.
2. Employees shall safeguard confidential information, including through third parties. No one at DATEV will give business secrets or other internal information to competitors or other third parties without authorisation, and only within the strict confines of the law. .
3. Working for, holding shares in or operating a competing company would be incompatible with being an employee at DATEV.

Art. 8: Compliance

1. All employees are contractually obliged under their employment contract to comply with this Code of Business Conduct. Leaders are responsible for ensuring that the Code of Business Conduct is observed in their areas of responsibility and have a special obligation to do this. All business partners shall make a sustainable contribution to ensuring that the values of this Code of Business Conduct are incorporated in the supply chain as well.

DATEV Code of Business Conduct

2. DATEV has an IDW PS 980 certified compliance management system.
3. All employees have the right to inform their leadership of potential violations of the law or binding internal regulations within the company, including violations of this Code of Business Conduct. Furthermore, DATEV has a complaint management system. The whistleblower system is available to any person, regardless of whether they have a contractual or business relationship with the company at all, and regardless of the nature of such relationship if it does exist. The system provides those affected with the opportunity, anonymously if desired, to submit information of all kinds and complaints about the conduct of DATEV or direct or indirect suppliers. The Compliance team, which is impartial, independent and obligated to maintain confidentiality, processes the information or complaints received. DATEV shall ensure, as far as possible within its own spheres of influence, that those submitting information or complaints are protected from negative repercussions and punishment in relation to their disclosures.
4. Violations of this Code of Business Conduct identified shall be sanctioned appropriately; the rights of the Works Council will be observed in this case. Violations may also result in criminal charges, external investigations and civil proceedings. DATEV will work with the responsible public authorities in accordance with applicable law.
5. The Chief Compliance Officer monitors compliance with this Code of Business Conduct. In case of doubt concerning the application and interpretation of this Code of Business Conduct, employees can contact their manager or the Compliance team (compliance@datev.de) at any time.