



Purple Bird Technology

Code of Conduct

Version 1.0

March 3rd, 2025



CODE OF CONDUCT

"At Purple Bird Technology GmbH, professional conduct is embedded in our core value, Ethics First. We work with individuals who are advancing their careers and firms that are growing their business. Any unprofessional action can damage the level of trust we work so hard to achieve. Likewise, we want to ensure we are continually in compliance with government regulations. Our reputation depends upon both. Our commitment to professionalism and ethics is detailed in our Code of Business Conduct and Ethics. I encourage you to familiarize yourself with the policies in this document."

Managing Director, Thomas Maier

MISSION STATEMENT:

- Adhere to a philosophy of Ethics First in everything we do.
- Create a work environment where employees can thrive and innovate.
- Be a socially responsible corporate citizen

This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees of the company. All of employees must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should be provided to and followed by the Company's management, including consultants. If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. Those who violate the standards in this Code will be subject to disciplinary action, up to and including termination.

1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. Management and employees must respect and obey the laws. The Company holds information and training sessions to promote compliance with laws, rules and regulations, including insider trading laws for employees.

2. CONFLICTS OF INTEREST AND RELATED-PARTY TRANSACTIONS

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the company. A conflict situation can arise when an employee or management takes actions or has interests that may make it difficult to perform company work objectively and effectively. Conflicts of interest may also arise when an employee or management or their family members, receive improper personal benefits as a result of their connection with in the company.

Conflicts of interest are prohibited as a matter of company policy. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with the management. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor.



3. CORPORATE OPPORTUNITIES

Employees, are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position without the consent of the management. No employee may use corporate property, information, or position for improper personal gain, and no employee may compete with the company directly or indirectly. Employees and the management owe a duty to the company to advance its legitimate interests when the opportunity to do so arises.

4. COMPETITION AND FAIR DEALING

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with the company's clients, competitors, candidates and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice

5. ENTERTAINMENT AND GIFTS (see the anti-corruption guideline by PPT)

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with clients. No gift or entertainment should ever be offered, given, provided or accepted in connection with the company's business by any company management, employee, family member of the management or employee unless it meets all of the following requirements: • It is not a cash (or cash equivalent) gift • it is consistent with customary business practices • it is not excessive in value • it cannot be construed as a bribe or payoff or intended to improperly influence a decision, and • it does not violate any laws or regulations. Please discuss with your supervisor any gifts or proposed gifts if you are not certain whether they are appropriate, and consult your local gift policy. In addition, ensure that you are familiar with the company's anti-corruption policies. Gifts to public officials are generally prohibited and should never be provided without consulting a supervisor in advance.

6. DISCRIMINATION AND HARASSMENT

The diversity of the company's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples include comments based on racial or ethnic characteristics and unwelcome sexual advances. Compliance with this non-discrimination and non-harassment policy is essential to upholding the Company's valuable reputation.

7. WORKPLACE HEALTH AND SAFETY

The Company strives to provide each employee with a safe and healthful work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and



reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are prohibited. Employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.

8. RECORD KEEPING

The company requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported.

All of the company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the company's transactions and must conform both to applicable legal requirements and to the company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to internal e-mails and formal reports.

9. PUBLIC DISCLOSURE

It is the company's policy that the information presented in the company's public communication, be full, fair, accurate, timely and under standable. All employees and management who are involved in the company's disclosure process are responsible for acting in furtherance of this policy. In particular, these individuals are required to maintain familiarity with the disclosure requirements applicable to the company and are prohibited from knowingly misrepresenting or omitting (or causing others to misrepresent or omit) material facts about the company to others, whether within or outside the company.

10. CONFIDENTIALITY

Employees must maintain the confidentiality of confidential information entrusted to them by the company or its clients or candidates, except when disclosure is authorized by the management or required by laws or regulations. Confidential information includes all material nonpublic information that might be of use to competitors, harmful to the company or its clients or candidates, or that may impact the price of the company's securities or those of another company, if disclosed. It also includes information that suppliers and clients have entrusted to us. The obligation to preserve confidential information continues even after employment ends.

Your confidentiality obligations to the company do not prohibit you from reporting potential violations of the law. You may communicate, cooperate or file a complaint concerning potential violations of any law or regulation with any governmental or law enforcement agency and may make disclosures to any governmental entity that are protected under legal whistleblower provisions.



11. ENVIRONMENTAL RESPONSIBILITY

The Company is committed to conducting its business in an environmentally responsible manner. Accordingly, all employees of the company are required to comply with all applicable environmental laws and regulations and to conduct business in a manner that protects the environment, conserves resources and ensures sustainable development.

12. MONITORING AND REPORTING OF ILLEGAL OR UNETHICAL BEHAVIOR

The management is expected to monitor any conduct that violates any applicable law or any provision of this code. Employees are encouraged to talk to supervisors about observed or suspected illegal or unethical behavior or violations of this code and when in doubt about the best course of action in a particular situation. It is the policy of the company not to allow retaliation for good faith reports of misconduct by others made by employees, agents or representatives. You are expected to cooperate in internal investigations of misconduct

13. COMPLIANCE PROCEDURES

The company takes all matters pertaining to this code seriously and will actively enforce the requirements set forth in this code to the extent permitted by applicable law. Those who violate the standards in this code may be subject to disciplinary action up to and including termination. We must all work to ensure that the policies and procedures of this code are upheld. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Always ask first, act later. If you are unsure what to do in any situation, seek guidance before you act.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have.