

SYNTAX

Code of Conduct

Business Success and Values in Balance

This code underlines the cornerstones of our corporate culture and defines standards of conduct for all employees.

Ethical standards are the foundation of Syntax' business practices all over the world - for us they are just as important as economic success.



Syntax as a Business Partner

Integrity

Syntax acts strictly in accordance with the applicable guidelines and laws. In addition, our principles are grounded firmly in fairness, respect for different cultures, social responsibility, environmental protection, and the well-being of our employees. These principles form the basis for trust (both internally and in cooperation with external partners and customers), for teamwork, innovation, as well as customer centricity and the long-term success of the company.

All Syntax employees act at all times in the interest of the company and for the business success of our customers and partners. Syntax demands and promotes teamwork and constructive cooperation in order to successfully implement projects in the interests of our customers, thereby achieving optimal results.

Compliance

Syntax relies on the greatest possible transparency and unrestricted compliant behavior of its employees. The company prohibits and discourages any form of bribery and any other

unethical, fraudulent, or corrupt behavior towards customers, competitors, or business partners. Our employees are obliged to strictly refuse any kind of inappropriate benefit (*see also "Gifts"*).

Gifts

Our employees are not permitted to accept inappropriate gifts. This does not apply to gifts of low value. Monetary gifts and donations of monetary value (e.g., in the form of vouchers) are generally not authorized. Visits to restaurants or invitations to events must have a plausible, business-relevant intention and not influence business relationships.

Data Protection

Data entrusted to us by customers and business partners as well as our own is of the greatest value - and is accordingly treated with the utmost care and caution. Syntax always acts in accordance with the EU General Data Protection Regulation (GDPR) and the applicable rules in other countries and regions. Confidential and company data, information and documents are only used by employees for the



purpose associated with their respective role - this also applies to the post-employment relationship period.

Import / Export

Syntax consistently adheres to applicable trade restrictions and embargoes. In addition, we have established processes with the help of which employees in import and export related areas (purchasing, sales, supply chain, research and development) are always up to date with the current guidelines.

SYNTAX at the Workplace

Diversity

We encourage a diverse environment as an important factor for promoting respect, tolerance and understanding. Syntax does not tolerate discrimination of any kind based on ethnicity, skin color, origin, religion, gender, disability, age, nationality, sexual orientation, or physical limitations. All forms of violence or (sexual) harassment at work fundamentally contradict our identity and will be severely punished.

This applies on the company premises as well as on business trips or business events. In addition, Syntax takes firm action against bullying and any hostile, intimidating or degrading behavior. Our respectful environment not only has a positive effect on human interaction, but also on our business activities: Thanks to constructive diversity, we are constantly expanding our horizons and creating the best conditions for innovative ideas.

Health, Safety and Data Protection

The health and safety of our employees is our top priority. Special processes ensure that occupational

health and safety laws are complied with at all times and the risk of injury is minimized. Utmost care is also taken in regarding sensitive or confidential data relating to our employees. Personal information is protected under the highest GDPR standards. Syntax has [ISO 27001](#) and ISAE 3402 information security certifications as well as a TISAX certification according to the industry-specific standard VDA-ISA of the automotive industry.

Conflicts of Interest

In all situations, our employees act confidently and with unlimited loyalty to Syntax and its business partners. They avoid situations in which their personal interests could conflict with those of the company. This means that employees do not accept inappropriate gifts from competitors, customers, or suppliers (*see also "Gifts"*). Nor will they engage in self-employed activity that competes with Syntax or use confidential information for personal gain.

Misconduct

If there is evidence of misconduct by employees,



Syntax immediately initiates disciplinary measures. This includes: actions contrary to company guidelines (including the Code of Conduct), (sexual, psychological, physical) harassment (*see also "Diversity"*). Syntax also takes strict action against instances of misappropriation of intellectual

Syntax at the Workplace

property and / or misuse of our company systems for their intended purposes.

Corporate IT

Syntax has defined high security standards for the company's own IT systems and has attained the appropriate certifications (see also "*Health, Safety and Privacy*"). Employees only use the systems within the framework of these guidelines. If necessary, Syntax carries out unannounced checks on the equipment provided as well as on systems and networks ensuring IT security, a functioning infrastructure and thus reliable business processes.

Syntax continuously updates its security requirements, policies, and related procedures. Even the development and implementation of software, hardware, services, or other equipment for employees follows the highest IT security standards and forms the basis for future security measures.





Syntax in Public

Law Abiding

Syntax and its employees act in accordance with the applicable laws at all times. Compliance with legal and internal regulations (e.g., accounting standards) has top priority, especially in sensitive areas such as storing and using confidential company information. If employees are legally obliged to pass on confidential information to government agencies, for example as part of investigations, this is only done to the extent that is absolutely necessary and stipulated.

Corruption Prevention

Syntax's business relationships with federal, state and local government agencies comply with anti-corruption laws. The company strictly ensures that rules for the procurement of products and services as well as requirements for public tenders are duly observed.

Political Neutrality

Syntax does not endorse political activities or campaigns for political parties, candidates, officials, etc. This also extends to donations.

Antitrust and Competition Law

Syntax always acts in accordance with all existing trading guidelines and prevents unfair business activities thereby supporting a free, competitive market. Employees are prohibited from disclosing confidential information to third parties, for example regarding ongoing customer inquiries, product prices, pricing strategies or product development.



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