Passion
for data

Code of Conduct

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We make the world better with data

Passion for data

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1. Preface by the Managing Directors

Dear Woodmark team,
dear partners and clients,

Woodmark has dedicated itself to the mission of inspiring people with its passion for data & innovation and to work with them to create added value for society and the environment.

The following Code of Conduct sets out the global and overarching standards of behaviour and principles that are supported and lived by all Woodmark employees. By signing the framework agreement for external project support, all contracting parties, including freelancers, agree to comply with the Code of Conduct. They are included when Woodmark is mentioned in the following.

When selecting our partner companies (e.g. software), supplying companies (e.g. electricity, IT, telco) and other service providers (e.g. lawyers, tax consultants), we ensure that their Code of Conduct and business practices are as consistent as possible with our principles.

We therefore ask you to read this Code of Conduct carefully, as it is not only important to Woodmark, but also our contracting parties and clients, as a framework for cooperation.

The Code of Conduct includes rules of behaviour in the areas of leadership and social interaction, dealing with third parties, bribery and corruption, handling business secrets and sensitive data. Business activities in a global context as well as human rights, labour and social standards and responsibility towards nature are also included.

Vincent Fourmi and
Jens Schnettler
Managing Directors

Version as of October 2026

2. Vision and values

Our vision is ‘We make the world better with data’, which is based on our corporate culture and the following values. They express what Woodmark stands for and guide us in our daily work.

Openness

We embrace diversity and always look at the world from the perspective of our counterparts. We are open to change, different opinions, new ideas, technologies and services. Diversity strengthens further development, growth and creativity. Our transparent communication helps us to learn from and support each other.

Trust

Trust is the foundation of everything we do and is built internally and externally on partnership-based behaviour and respectful interaction with each other. We organise our employee management accordingly and see each other as a team and share our knowledge.

Caring

We care for our employees, society and the environment. We stand up for each other and take care of each other. We take responsibility for our own actions and for our team, make our working environment CO2 neutral and use resources sparingly. We treat our clients, business contacts and the environment with great respect.

Respect

Our cooperation is based on mutual respect in our daily dealings with each other. This applies both internally and in our dealings with business partners and clients. We recognise achievement, treat each other as equals and are respectful and honest with each other. We see mistakes as learning potential and give constructive feedback.

3. Our responsibility for employees and business contacts

3.1. Data protection

Woodmark respects the right of every individual to informational self-determination and attaches the highest importance to data protection. The collection and processing of personal data of our clients, interested parties, business contacts and employees is carried out in accordance with the applicable data protection regulations, in particular the General Data Protection Regulation (GDPR). Woodmark Consulting GmbH is responsible for the collection, processing and use of personal data within the meaning of Art. 4 No. 7 GDPR. In accordance with the requirements of the GDPR, Woodmark has appointed a person responsible for operational data protection. This person coordinates mandatory data protection training and is available for queries at any time.

When processing personal data, Woodmark complies with the provisions of data protection legislation and takes the utmost care and confidentiality. We are committed to secrecy and to respecting the rights of the data subjects, i.e. we only pass on personal data to third parties with their consent. If Woodmark has a contractual relationship with clients or business contacts, the collection, processing and use of personal data is governed by the contract. On our website, visitors consent to the storage of their data by means of a double opt-in procedure.

3.2. Trade secrets, sensitive data and intellectual property

Woodmark respects the rights of third parties to their intellectual property. We recognise that our services affect valuable assets of our clients, which are the basis of their success. Among other things, we gain insight into confidential expertise, ideas, concepts planning and prototypes or test parts, as well as other business secrets. The associated trust of our clients is an essential business basis for Woodmark. The same applies to internal information such as new service and service approaches, business ideas or business documents.

It is therefore of the utmost importance to us to protect all this information from unauthorised access and to use it exclusively for business purposes. We stipulate corresponding regulations in contracts with our business contacts. Here too, the strictest confidentiality must be maintained, confidential information and data must be stored carefully and not passed on to unauthorised persons. Our business contacts also ensure confidentiality with their service providers.

3.3. IT security

Electronic data processing systems are indispensable. Tampering with these systems or malfunctions of these systems can have serious consequences, such as loss of data, theft of personal data or infringement of copyrights. Woodmark has taken appropriate measures and issued rules to ensure the confidentiality, integrity and availability of electronically stored information. Our business contacts are also obliged to take all necessary measures to prevent any internal or external misuse and threats to sensitive information. We are ISO27001 certified and fulfil the TISAX requirements.

3.4. Protection of assets and property

Behaviour that damages assets is not tolerated at Woodmark. Our employees are aware of the earmarked nature of Woodmark's assets and property and act accordingly. We expect our business contacts to prohibit any form of fraud or property-damaging offenses, regardless of whether they harm the assets of Woodmark or third parties. This specifically refers to offences such as fraud, breach of trust, theft, embezzlement, tax evasion and money laundering.

Company property must be protected from damage, misuse, unnecessary wear and loss during use. Theft and wilful damage will be prosecuted under criminal law. The property of the Woodmark team and others is to be respected in the same way.

4. Our corporate responsibility

4.1. Principles against bribery and corruption

Woodmark rejects any form of bribery and corruptibility and expects its business contacts to comply with the applicable anti-corruption laws and regulations in Germany and abroad. The prohibition on accepting or granting advantages covers not only direct benefits in the form of payments, but also other favours. All payments from and to business contacts, clients and suppliers are made within the framework of official contracts and supplier/partner programmes. This includes invitations and gifts if these exceed the scope of customary and appropriate behaviour. We ask our business contacts to observe this and to refrain from giving gifts or invitations to our employees.

Under no circumstances do we tolerate payments or other favours to any individual, company, or public official for the purpose of influencing the decision-making processes of the beneficiary or a third party.

This applies to us and our business contacts regardless of whether or not this violates applicable laws and regulations. We and our business contacts only make donations in connection with advertising measures, donations and sponsoring within the legally permissible and customary framework.

Likewise, we and our business contacts never offer or accept illegal payments. This includes, but is not limited to, bribes, kickbacks or other benefits for the realisation of business or in connection with the business relationship with Woodmark. Corrupt behaviour must be reported immediately to the Woodmark Management Board.

All our employees' employment contracts prohibit the acceptance of any benefits from third parties. They must inform the Woodmark Management Board immediately of any offers of such benefits.

Christmas gifts received and meal invitations up to the following limits are exempt from this regulation.

- Gifts from business contacts may be accepted in individual cases up to a value of 50 euros per calendar year may be accepted. Gifts exceeding this value must be reported to the Executive Board.

- Invitations from business contacts to a meal or social event (e.g. tickets) may be accepted up to a maximum value of 50 euros and no more than twice per calendar year. Invitations that exceed this value or frequency must be reported to the Woodmark Managing Directors.

In both cases, the Executive Board reserves the right to review this in the event of suspicion.

4.2. Conflicts of interest

A conflict of interest arises when personal interests or relationships conflict with business interests. This could be the case when selecting employees or business contacts. By disclosing personal interests and the selection process (applicant processes, external supplier selection, etc.), as well as the decisive monitoring of the process by other team members under the dual control principle, overreaching is ruled out.

We value and respect the individual

5. Our social and market-based responsibility

5.1. Social interaction and leadership

Woodmark's values form the cornerstone of our corporate culture and employee management. They create a positive working atmosphere and a respectful, cooperative partnership - both within our team and with our clients and business contacts. With a wide range of tasks, plenty of room for manoeuvre and individual development opportunities, we offer our employees long-term prospects with us.

We value and respect the individual. As people and employees, we are all equal at Woodmark. This means there is no differentiation - not even between hierarchical levels. For example, every Woodmarker can use the company's car park (including e-charging stations) and the gym free of charge on a first-come, first-served basis. The same offer is available to all employees in the area of mobility, such as the JobRad scheme. The only differences are in the responsibilities we take on. Depending on the level of responsibility, there are differences in salary, company car and decision-making authority.

These core values and basic attitudes are exemplified by our managers. They are based on a shared understanding of leadership that was developed together as a team. Their behaviour is characterised by care and openness. They give all employees the benefit of the doubt, grant them freedom and try to harmonise their tasks with their passion. Their own behaviour towards others is full of respect and they also encourage their employees to treat each other and others with respect.

We are firmly opposed to any form of discrimination, marginalisation or disrespectful behaviour and do not tolerate bullying or harassment. Reports on these topics are carefully scrutinised and the necessary measures are taken to create a respectful and trusting environment.

Escalation via confidants
In addition to the actual manager, an independent confidant is integrated into the company to act as a point of contact and coach if a team member has a sensitive personal concern that they cannot or do not wish to communicate via the existing management team. This confidant is obliged to maintain confidentiality and only gives the management with consolidated and generic feedback that cannot be traced back to individuals.

The list of confidential counsellors can be found on the intranet under HR - Diversity, Equity and Inclusion for the team.

Social interaction
The consulting business includes our employees working on different projects at different clients and locations. This makes it even more important from the company's point of view to create sufficient platforms where all or at least the majority of employees have the opportunity to socialise with team members in person. Our regular team days, team events, Christmas or New Year celebrations, sporting activities or joint online events and other leisure activities have been successfully established for years and have always proved their worth for this purpose.

5.2. Fair competition

Woodmark's primary goal is to build sustainable, long-term relationships with our business contacts. Accordingly, we do not aim to maximise profits in the short term, but to achieve sustainable added value, which we realise within the scope of our customer orders.

Woodmark conducts its business honestly and transparently, is committed to fair and undistorted competition and expects the same from its business contacts. Together, we ensure that our business practices comply with applicable competition and antitrust laws. We refrain from entering into agreements with competing companies, distributors, suppliers, dealers and contractors that could lead to a restriction or prevention of competition. This applies in particular to agreements with competitors on pricing, offers, capacities, terms and conditions or market shares and technologies. We strongly condemn the division of clients or sales territories between competitors, anti-competitive boycotts and the unlawful exchange of competitively sensitive information with competitors.

5.3. Enticement of employees

As a matter of principle, Woodmark does not recruit employees from companies with which it has an active business partnership and maintains a corresponding ‘blacklist’. This list is made available to the executive bodies in the recruiting process, i.e. internal and external recruiting resources.

The trust of our clients, partners and stakeholders is essential for Woodmark's continued growth

5.4. Accounting and reporting standards

For the further growth of Woodmark the trust of our business contacts, clients and companies is indispensable for Woodmark's continued growth. Woodmark respects the legal requirements for proper accounting and financial reporting.

We and likewise our business contacts manage our business transactions, assets and liabilities in accordance with legal requirements and document them in the prescribed manner. Any form of balance sheet manipulation is prohibited.

The central accounting department at Woodmark ensures that we comply with the deadlines for submission and reporting to health insurance funds, insurance companies, the employers' liability insurance association, the municipalities, the tax office and, if applicable, other authorities and that the information provided has been prepared to the best of our knowledge and belief. Any jeopardising of submission and reporting deadlines must be reported to the Woodmark Management Board at an early stage in order to initiate possible countermeasures or to inform the authorities in good time.

Regarding project accounting, our employees ensure that we and our client and business contacts have accurate electronic records of working hours, timely submission of travel expenses and documentation of all services and other expenses.

5.5. Allocation of donations and decisions on sponsoring

We see ourselves as an active member of society and are involved in various ways. Our donations are never in connection with a business transaction.

As part of its social responsibility and community engagement, the Woodmark regularly supports social and charitable institutions, organizations, and aid programs, including workshops for the visually impaired, children's homes, SOS Children's Villages, and Aktion Deutschland Hilft.

The Woodmark supports only those organizations and initiatives whose activities are consistent with applicable laws and the values of the Woodmark. As a matter of principle, the Woodmark does not make political donations.

6. Our social responsibility

6.1. Economic activity in a global context

We treat all people with respect and fairness and demand the same from our business contacts. Our responsibility to society includes an active commitment to sustainable development in accordance with the ten principles of the United Nation Global Compact. We are committed to the United Nations Universal Declaration of Human Rights and the core labour standards of the International Labour Organization (ILO). Woodmark and its business contacts and suppliers ensure that they are not complicit in human rights abuses.

6.2. Human rights

Equal treatment and anti-discrimination:
Woodmark values and embraces diversity. We promote respectful interaction with one another as well as openness, respect, trust and care for all people.

Woodmark rejects discrimination on racial grounds, social or ethnic origin, nationality, gender, gender identity, gender expression, marital status, religion, disability, age, sexual identity or ideology or political views, insofar as the latter are based on democratic principles and tolerance, or other legally protected grounds.

Woodmark offers all employees the same equal opportunities. In this respect Woodmark is committed to complying with the 'General Equal Treatment Act (AGG)'. The AGG is a German federal law that aims to 'prevent and eliminate discrimination'. To realise this goal, the persons protected by the law have legal claims against employers and private individuals if they violate the legal prohibition of discrimination against them.

We support the Diversity Charter and have signed it. We provide our team and our business contacts with a working environment that is free from any form of discrimination, and we expect them to follow these values too.

Principles regarding human trafficking:
If there is any suspicion of human trafficking, this must be reported immediately to the of Woodmark immediately. The Executive Board will investigate this suspicion personally.

Freedom of association and collective bargaining:
Woodmark does not restrict the freedom of association of any of its employees. As there is no official employee representation at Woodmark and as Woodmark is not covered by a collective agreement, there are currently no official bodies that have an impact on working time.

Forced and compulsory labour:
Woodmark does not tolerate any form of forced labour. We also expect this attitude from our business contacts. No team member at Woodmark is in a relationship of personal dependency. The employment contracts are generally agreed with a 3-month notice period. It is crucial that the tasks we assign to employees correspond to their professional experience or support the direction in which they want to develop.

Prohibition of child labour:
Any form of child labour is strictly prohibited. Woodmark and its business contacts comply with the provisions of the Convention concerning the Minimum Age for Admission to Employment (Convention 138 of the International Labour Organisation) and the Convention concerning the Prohibition and Immediate Action on the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organisation) as well as the requirements of national laws. Woodmark employees and our business contacts must be at least 15 years of age. If a national child labour law requires stricter standards, these will apply.

We also do not tolerate the use of forced or compulsory labour, i.e. the performance of work against the will of the person performing the work, or under duress or threat of punishment. This prohibition also excludes modern forms of slavery and human trafficking.

6.3. Labour and social standards

Minimum wage:
Woodmark and its business contacts ensure that all employees are paid no less than the legal minimum wage. Compliance with the minimum wage is ensured by including the current minimum wage as a reference value in the payroll table when preparing the monthly payroll run. The minimum wage check is performed when new employees are created in the payroll table.

Compliance with working time legislation:
Our 'Working Time and Working Time Recording' policy ensures that we comply with all requirements of the Working Hours Act. In addition, monthly analyses of all recorded hours are prepared to check compliance with the Working Hours Act.

Health and safety at the workplace:
Woodmark respects its employees' right to a safe and healthy working environment. Our hygiene policy is continually reviewed and adapted to meet current regulations, including those relating to the pandemic.

Our business partners respect and comply with applicable occupational health and safety standards and laws. We prevent workplace accidents, occupational illnesses and work-related health risks through regular training and inspections, as well as safety and health measures.

6.4. Fair working conditions

Our employees are the key to our success. Woodmark and its business contacts create an environment where people work with enthusiasm. We adhere to the rules for fair working conditions in accordance with legal regulations, including those for appropriate remuneration, social benefits, working hours, and privacy protection. All employees must adhere to legal working hours and rest periods. This compliance is reviewed and monitored monthly by the CFO through the system. Necessary measures in case of non-compliance are defined by HR managers with their employees.

6.5. Quality assurance

Woodmark operates in the consulting environment according to the highest quality standards and in compliance with legal requirements as well as technical regulations. We always adhere to the approval requirements for the design, testing, use, and disposal of products. We expect the same from our business partners. Woodmark's quality management system is certified to ISO 9001.

6.6. Sustainability and environmental protection

„We make the world better with data“:
With our expertise and innovative strength, we also support our clients in achieving their goals for the protection of human health, natural resources, and the environment – particularly climate protection.

Woodmark is equally aware of its ecological responsibility and its duty towards future generations. We adhere to applicable environmental protection laws and regulations, including those concerning water and air quality as well as the handling of chemicals. We actively use environmental practices such as waste reduction, recycling, and energy-saving measures. We expect the same from our business contacts and suppliers. Our responsible management of natural resources includes using them purposefully and sparingly. The use of renewable resources is a priority for us, such as the use of renewable energies and the reduction of greenhouse gas emissions.

To achieve our sustainability goals and meet our environmental responsibilities, an internal environmental concept has been developed. This serves as a guideline for our daily actions. It contains guidance and tips for CO2 reduction in the areas of energy, mobility, and consumption. They are reflected, among other things, in the travel policy and hold our clients, suppliers, and business contacts accountable as part of our eco-system.

Woodmark maintains its own environmental team that regularly develops improvement suggestions and new ideas for active climate protection and informs the Woodmark team about them.

Responsible for ecological sustainability at Woodmark is the CFO.

Woodmark maintains its own environmental team that regularly develops improvement proposals and new ideas for active climate protection.

7. Implementation of the Code of Conduct

7.1. Compliance and Control

All employees are informed about the Code of Conduct. At least once every two years, the team is required to complete a training session, including a comprehension test. Participation is documented in our internal Information Security Management System (ISMS).

The provisions of this code of conduct are mandatory for our business contacts and form an integral part of the business relationship with Woodmark. Our business contacts acknowledge the standards set forth in this code of conduct and commit to adhering to them. For this purpose, our business contacts communicate the provisions of this code of conduct to their employees working for Woodmark and ensure their compliance.

Woodmark reserves the right to review compliance with the provisions of this code of conduct for business contacts, with prior notice and in accordance with the applicable law, in an appropriate manner. In the review, confidentiality obligations of business contacts towards third parties must be appropriately considered. Woodmark will treat the information obtained during the review as confidential.

7.2. Compliance in the value chain

Our business contacts are familiar with the business practices of their own business contacts. They commit to adhering to the standards set forth in this code of conduct or comparable values at companies working for Woodmark, as well as other third parties working for Woodmark.

Retaliation against employees who in good faith report actual or suspected misconduct is not tolerated by Woodmark and our business contacts. Rather, we urge our employees and business contacts to promptly and confidentially inform the board and compliance officers of any actual or suspected misconduct that could lead to a compliance violation.

7.3. Violations of the code of conduct by business contacts

The consistency and development of relationships with our business contacts depend significantly on the mutual commitment to the standards set forth in this Code of Conduct. In the event of a violation of this Code of Conduct by one of our business contacts, Woodmark reserves the right to take appropriate measures. This includes the demand for the immediate rectification of violations of legal regulations or contractual agreements and the assertion of claims for damages. In particularly severe cases, Woodmark reserves the right to extraordinary termination.

7.4. Reporting of violations

Our business contacts are required to report actual or suspected violations of this code of conduct. For this purpose, the following contacts and reporting channels are available to directly reach the compliance officers at Woodmark:

Woodmark Consulting GmbH
Compliance
Werner-von-Siemens-Ring 7
85630 Grasbrunn
Phone: +49 89 46 26 97-0
E-Mail: compliance@woodmark.de

The letter can of course be sent anonymously.

Violations of EU law by Woodmark
The Woodmark promotes an open and trustworthy speak-up culture. In accordance with the German Whistleblower Protection Act (HinSchG) and EU Directive 2019/1937, whistleblowers are provided with the opportunity to confidentially contact the Group's Ombudsperson. Reports may concern violations of applicable laws or of the Woodmark's internal policies and standards and may be submitted either anonymously or together with personal contact details for potential follow-up inquiries.

The link to the corresponding form can be found in the footer at woodmark.de

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