

CODE OF CONDUCT

Cash InfraPro is a globally active engineering and consulting company, from suppliers independent, and sets, with highly specialized teams, ambitious demands on the quality of its work. Our professional competence and due care, confidentiality, and professional behavior, extends to compliance with principles such as law-abidingness, sustainability, and fairness, for which we stand with our company. We established respective measures to implement our standards and we are setting a good example.

The Code of Conduct of Cash InfraPro was developed with the aim of serving as an "ethical and legal guideline". Its standards are based on legal and social policies and on our company values. These are the guidelines for the behavior of our employees in our worldwide business and within our business relationships. All Cash InfraPro employees must adhere to these principles and implement them accordingly in their actions. As a result, we expect as well from our business partners and customers to respect these principles and behave loyally towards them.

01 BASICS

All business activities of Cash InfraPro are conducted on the basis of compliance with applicable laws. This applies to all our investments, activities, contracts, and other processes that are in any way connected with our business.

For this reason, we strictly adhere to the relevant laws and applicable standards. This applies to the payment of taxes, compliance with tax and customs law, compliance with competition law, antitrust and public procurement law, and environmental law. We consistently adhere to the prohibition of corruption and money laundering.

We fulfill associated declaration and reporting obligation carefully and in a timely manner. We apply for all necessary public permits and provide required documents of evidence if appropriate and we have a solid insurance coverage for our company issues. We respect the rights of third parties.

We stand up for these principles as Cash InfraPro and we disseminate our principles by training and educating our employees and, if this is applicable, we inform our business partners and customers about the need to comply with of such principles.

The framework of values of Cash InfraPro is fundamental for our work. Our values are reflected in a clear and straightforward direction in our work, visible and measurable results in optimization of work processes, in a context of a collegial approach and collaboration to achieve a positive, service-oriented delivery of results of our work. With the aim of developing and advancing our business area in the best possible way, and with the background to modernize the cash business in an honest manner, we are looking to achieve the greatest benefit for our customers.

In the bidding process of public or private contracts, we practice as a fair and free competitor.

According to German principles, and as a suppliers independent engineering and consulting company, we advocate a separation of planning/ design and implementation when building

or converting cash centers for National Central Banks, Commercial Banks, or build up cash infrastructure in cash-in-transit (CiT) and logistics companies, banks or retailers.

Cash InfraPro respects the UN Global Compact in the field of human rights, labor standards, environment and climate and the prevention of corruption. We expect from our business partners to follow accordingly.

The Managing Director of Cash InfraPro expects from all employees and in particular managers to adhere to the principles established by Cash InfraPro. All employees and managers are advised to report possible violations. The Chief Compliance Office can be contacted at any time for this purpose.

02 BUSINESS PARTNERS

Our business partners are selected with care. We expect them to act with integrity. We do not enter into business relationships with companies that clearly violate laws or international conventions, that may be involved in money laundering or terrorist financing or that do not make reasonable efforts to eliminate abuses and violations of the law. We act with strong restraint in cases of suspicion.

We insist on compliance with human and labor rights and advocate equal rights. We do not accept discrimination, child labor, forced labor or torture. We demand the same from our business partners.

Decisions concerning our business and our contracts may only be made on the basis of enforceable, performance and quality-related criteria. Business decisions as a result of personal advantage or relationships are strictly prohibited. We do no lobbying.

To avoid corruption and bribery, we have established agreements and control measures within our teams. Mechanisms such as approvals or signature regulations have been established. A transparent presentation of relationships and functions within the company, and further control mechanism like a four-eyes principle for better control but as well for re-insurance, is agreed and installed.

03 CONFLICTS OF INTEREST

All employees are obliged to keep their private interests strictly separate from the interests of Cash InfraPro. This applies in particular to transactions with related parties or for companies in which related parties work.

If personal relationships exist, the business relationship may only be entered into with the approval of the Managing Director of Cash InfraPro after respective inspection of not violating the compliance. A secondary employment is generally subject of an approval.

04 HUMAN RIGHTS AND LABOR STANDARDS

We do not tolerate any discrimination against the background of ethnic origin, religion, age, disability, or sexual identity. This applies in particular for colleagues and employees, but as well with respect to all of our business partners.

The Diversity Charter deserves our respect. Fair working conditions, appropriate remuneration and the payment of social benefits that at least comply with national or local statutory regulations and labor laws are guaranteed from site of Cash InfraPro. The International Labor Standards of the ILO provides us with further orientation. We respect the United Nations (UN) Universal Declaration of Human Rights, and UK Modern Slavery Act. Our company is committed to create a working environment that is free from physical, sexual, mental, and verbal abuse, threats, or any other form of abuse.

We strive to provide high-quality services. That is why we train our employees so that they are motivated to provide this service in a good working environment. We promote respectful and appreciative interaction with one another. We are in constant dialog with our employees and support regular meetings and open discussions within the teams. We encourage and challenge our employees with regard to their skills and abilities and we are open for their personal needs. We support them through individual training and with the opportunities for individually strengthening their development. We challenge our employees and encourage them for openly making further suggestions regarding innovative ideas.

05 PROTECTION OF WORK

We respect the health and safety of our employees and comply with applicable laws, rules, and regulations regarding workplace safety, which must be considered. We equip our employees with the best possible and required equipment (digital media, personal protective equipment, transportation, etc.) and we give information on safety measures. This applies to work in-house, on the way to and from the customer, on the site of the customer during the execution of the project and related to the country and depending on the respective safety situation of a country. The guidelines from the Ministry of Foreign Affairs and public health authorities, provide us with guidance regarding the protection our employees.

We handle work equipment and working area property with care, and we show responsibility, protect it from loss, theft, damage, and misuse. The same applies for the handling of the property of our customers, business partners and third parties.

We do not use internet access for illegal actions, recordings, copies, or downloads. The private use of the Cash InfraPro e-mail is generally not allowed. We protect IT systems when we use company internet for private purposes against trojan, viruses and further threats. We do not download programs from the internet without proof of trusted source, or upload or download files or attachments via web-mailers.

06 PROTECTION OF THE ENVIRONMENT AND SUSTAINABILITY

The protection of the environment and our livelihoods guides us in all of our decisions and work related to engineering and consulting and our training activities, but as well regarding our work environment. Our service considers the impact on the economy and the society.

Our employees are advised to use the public transport on the way to their work and back, that is reimbursed by Cash InfraPro. We logistically optimized the availability of our business location by train in best possible way. Regarding this, we want to promote travelling that is as CO2-neutral as possible. We are using a Co-Working area to be most effective and environmentally friendly with our daily work. In this way, we avoid empty conference rooms and offices that are temporarily not must be occupied and we just book the rooms and offices according to our need. We allow home office as well, where it is appropriate.

We try to be as environmentally friendly as it is manageable and comfortable for our employees when we are business traveling.

Related to the protection of environment and regarding sustainability, we are aiming to support a lean and green approach. In addition to our on-site visits in projects and trainings, we support web-based meetings and online learning formats to avoid travelling when it is not really applicable.

We expect to avoid unnecessary travelling and we support action that leads to a reduction in material consumption. We pay attention to our on-site offerings and create such meetings as optimized as possible to be most effective. We achieve this with a most effective preparation in advance of such meetings.

The strive to save resources is in our view. Project documents are not printed out without request or need.

Regarding further sustainability targets, we have chosen a highly modern co-working facility that complies with several environmental requirements to avoid waste and energy consumption and that supports resource savings. These savings comply to water, energy, waste, circular economy, etc.

07 DATA PROTECTION AND PROTECTION OF INFORMATION

As internationally working company, the use of modern information and technology is important. Modern technology for communication is an integral part of our daily work. All employees that are obliged to provide personal data in business transactions must handle such processes sensitively and comply with international and national law, such as the GDPR in the European Union. Personal data may only be used, processed, transferred, collected, or stored in accordance with applicable data protection laws. This applies to the data of employees and as well for the data of customers, suppliers, competitors, advertisers, and other people. In particular, the processing of the data will only be provided if the subject of data has given a consent. Data collection must be legally necessary or permitted for any other reasons. Technical and organizational measures are assessed annually for effectiveness, and if necessary be adjusted.

08 DIGITAL SECURITY AND WORKING ENVIRONMENT SECURITY

We understand the importance of protection of sensitive data against unauthorized access. We are committed to implement robust measures to ensure data security throughout our operations.

Through several key measures, Cash InfraPro ensures that all related information and sensitive data are protected with the highest level of security against unauthorized access.

We enforce strict access controls by implementing role-based access permissions granting individuals only the necessary privileges to perform their specific tasks. We employ strong encryption mechanisms for data at rest and in transit, utilizing and updating passwords and industry standard encryption algorithm to protect data integrity and confidentiality. We regularly conduct security audits and assessments to identify and address any vulnerabilities in our systems and processes.

We implement user training programs to foster a culture of security awareness and responsible data handling among our employees. We constantly monitor our infrastructure for any suspicious activities, promptly investigating and mitigating any potential security incidents.

All our employees are instructed to install software updates on digital equipment on a regular basis and as soon as it is made available by the provider. Backups are carried out on a separate offline security token on a regular basis.

Our premises in the co-working area is not accessible to people without authorization. Our employees have an automatic entry authorization by a personalized card. External parties do not have access without legitimate reason and not without a member of Cash InfraPro for supervision.

Any other documents in hard copy related to the company or customers, remaining in the legal office under the registered company address of Cash InfraPro, Oberer Steinberg 35, 63225 Langen (Germany). Unauthorized persons have no entry. The premises is equipped with camera surveillance. Persons that have a reason to enter the office will not be in the premises without an employee for supervision.

09 PROPRIETARY RIGHTS OF THIRD PARTIES / OWN PROPRIETARY RIGHTS

The intellectual property forms an essential basis of success in business. Its protection as well as the protection of know-hows is an essential obligation of all employees. We highly respect the intellectual property of our business partners, customers and as well of third parties. All employees are obliged to keep business information and other, non-public information confidential (obligation of confidentiality). Such information are secrets that are provided to them in the context of their operational work, entrusted or otherwise known to them. The obligation also exists after the end of the employment. Such obligation continues and must be confirmed by all departing employees.

10 RESPONSIBILITIES IN THE SUPPLY CHAIN

Cash InfraPro is committed to act as an ecologically and socially responsible company. Its management established corresponding principles in its corporate culture and requires from all employees to comply accordingly. Cash InfraPro expects the same behavior from business partners and suppliers. We continuously optimize our services with respect to an holistically oriented and sustainable approach. We expect this as well from our business partners. This code of conduct describes minimum requirements that must be adhered to ensure that our company standards and demands that we set on ourselves, are met. The obligation to respect these principles, we demand as well from our business partners. Therefore, we carefully observe relationship in advance accordingly before we engage and connect in a relation.

11 COMMUNICATION AND TRAINING

All employees are regularly informed via defined meetings or with other communication instruments about current topics related to this Code of Conduct.

At recurring intervals, areas that are subject of development will be discussed and employees will be trained accordingly. The relevant training shall be carried out on regular basis and in a standardized manner. We are supporting a dialogue about compliance issues on regular basis, and we openly address possible risks.

We communicate in a coordinated and aligned way with external parties and in a sensitive manner against public authorities. Furthermore, we interact sensitively and outline personal views as such, but we are not making statements in social media, except where it is aligned with the company (LinkedIn). We stick to cooperate communication and cooperate design.

12 INTERNAL CONTROL MEASURES

Cash InfraPro maintains an internal control system. We have installed an “Ethics, Risks and Compliance Management” (ERC).

We installed a Chief Compliance Officer who maintains and supports the ERC. Our Chief Compliance Officer obtained certification by an independent, external company. The Chief Compliance Officer has an unrestricted right to inform and audit, unless statutory or conflict with internally agreed regulations stand against. We review our policies and standards annually critical of their applicability and topicality and adjust if appropriate.

EFFECTIVENESS

This Code of Conduct is binding for all Cash InfraPro members and employees.

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