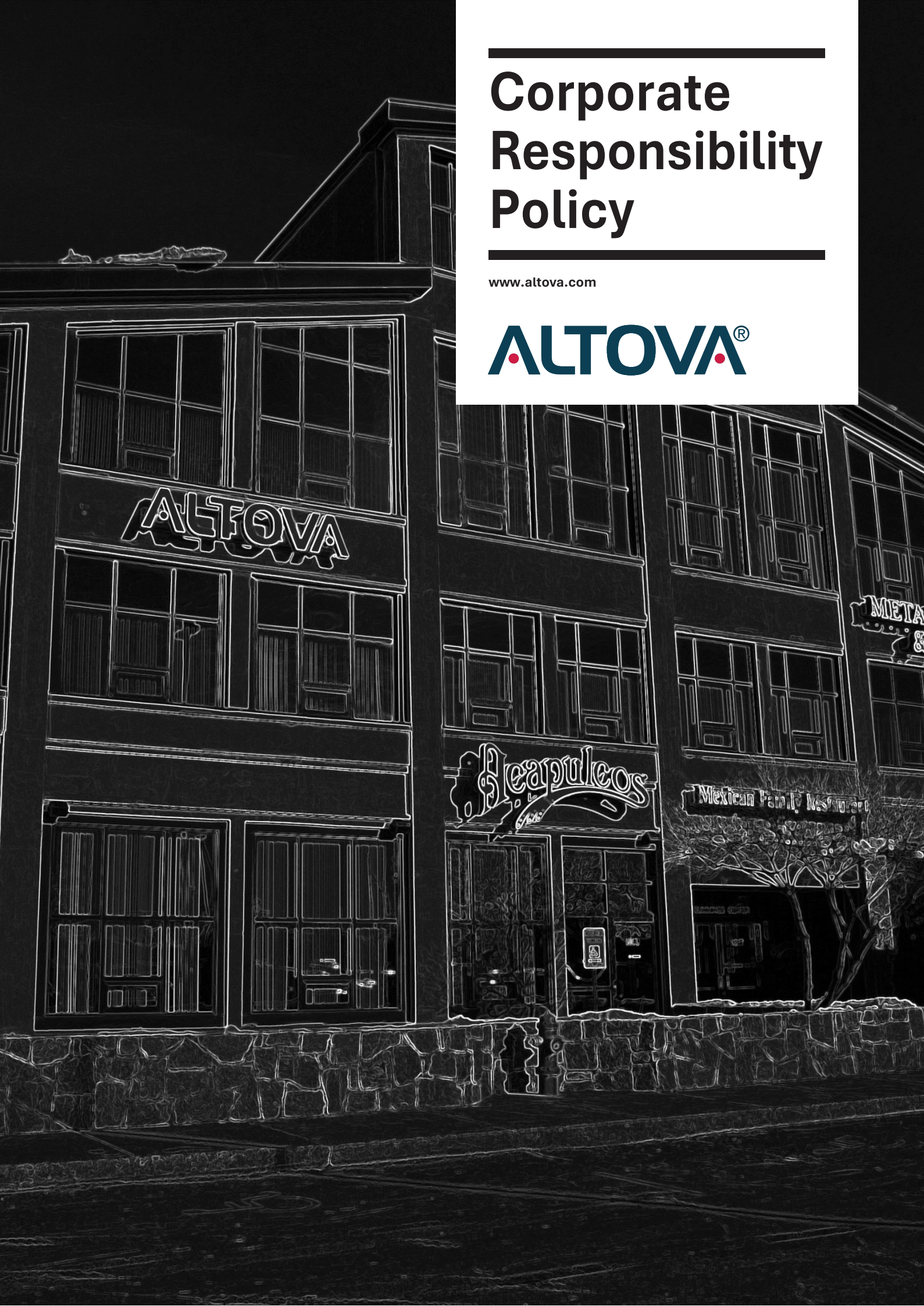

Corporate Responsibility Policy

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ALTOVA[®]



01 Object and Scope

This Corporate Responsibility Policy (hereinafter referred to as "policy") applies to all companies of the ALTOVA Group, including Altova GmbH and Altova, Inc. It supplements other existing guidelines and policies of the Altova Group (such as the Code of Conduct of the Altova Group and the groupwide applicable guidelines on the protection of personal data) and if required serves as a starting point and reference document for possible division-specific supplements.

This policy defines sustainability objectives and obligations and describes our understanding of responsibility towards people and the environment. Every company of the Altova Group shall be required to comply with the statutory regulations of the jurisdiction in which it operates. As the parent company of the Altova Group, Altova GmbH supports the ten principles of the United Nations Global Compact on human rights, labor standards, the environment, and the fight against corruption, as well as the Sustainable Development Goals (hereinafter referred to as "SDGs") of the United Nations. References to the SDGs are listed below in the corresponding sections.

Description of the Altova Group

Altova Group has a big responsibility to society and the environment. We are convinced that we can only be successful over the long term when we take this responsibility into consideration in all our actions. The protection of people and the environment, as well as sustainable management, are very important in our business activities. For our products this means that they must be safe, efficient, and environmentally compatible. We think in terms of generations and not in calendar quarters, which is why economic sustainability has always been paramount for us. Ultimately, we attach huge importance to conducting our business activities with integrity.

We treat our staff with respect and we are committed to fair competition in all markets in which we operate. In its long history, the Altova Group has successfully grown through responsible, future-oriented action. Already thinking about tomorrow today will therefore also continue to be one of our guiding principles.

02 Responsibility for Health, Safety, and the Environment

Energy Consumption and Greenhouse Gases

We plan and act at all times to meet our responsibility towards society and the environment. We continuously strive to lower our impacts on the environment, and in particular to reduce CO2 and other harmful emissions, through conscious behavior. Optimal energy efficiency and emission reduction is taken into consideration at all levels of the company, including optimizations in our work processes.

Environmental and energy management in our subsidiaries is based on the applicable standards, corporate policies, and the national environmental and energy regulations. This is checked on a regular basis, thus giving us the opportunity to continually identify the need for improvement and adopt corresponding measures.

Pollution and Water Consumption

We implement procedures to minimize and – where possible – avoid environmental pollution. Water is a valuable resource. We aim to optimize and reduce our water consumption also within the Altova Group.

Materials, Chemicals and Waste

We are committed to minimizing the amount of waste within the Altova group. Within the Altova Group we ensure through suitable measures that the applicable material compliance rules are observed.

Product Use and End of Useful Life of Product

As a group, we are committed to responsible and respectful treatment of the environment and natural resources. This applies in particular to the development and use of new products and technologies. The reduction of all kinds of emissions protects both the environment and staff.

Targeted upgrades or retrofitting, as well as the reconditioning of essential components in our facilities, improve their versatility, open up new applications and enable a sustainable extension of their life.

Occupational Safety and Health Protection

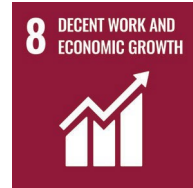
The Altova Group pledges itself to avoid damage to people, property and the environment in all its business activities. At all times we aim to create a safe and healthy work environment for our employees. Occupational safety and ergonomic workplaces ensure a healthy and satisfactory work environment and play an increasingly important role in our everyday work life. With qualified safety personnel and a health and safety management system, which is based on the requirements of the applicable standards, local legislation, risk assessments and defined processes and procedures, we ensure within the Altova Group that the risks for human well-being and the environment are minimized in all our companies.



03 Social Responsibility

Working Conditions, Career Management and Training and Education

Our employees are key to our corporate success through the passion with which they engage in their daily work. Our aim is to promote a trusting cooperation for the benefit of our employees and the company and to create the necessary conditions so that our employees also remain highly motivated and loyal to the company for years to come. We attach huge importance to personal appreciation, fairness and a broad range of development opportunities and promote the development and recruitment of specialists and managers from within the company. With social benefits exceeding the legal minimum requirements we ensure that the group continues to be an attractive employer in the future.



Social Dialogue

We respect and promote the right to social dialogue between company and employees. Our aim is to preserve our longevity and trustworthiness in the active exchange of information and ideas and interaction with our staff and their representatives. We also maintain a close and active working relationship with our customers and business partners, which is characterized by trust and fairness. We focus on the long-term orientation of the group, and not on the short-term success.

Diversity, Discrimination and Harassment

Cooperation within the Altova Group, but also with third parties, should always take place on a basis of decency, mutual respect, fairness, and trust. Open communication is to be undertaken at all times. Personal insults, discrimination or sexual harassment between employees are not tolerated. Due consideration is to be paid to protecting each employee's private life.

The selection and promotion of employees is to be based on their suitability for the proposed activity, regardless of race, age, gender, nationality, religion, sexual orientation or invalidity or disability. We actively promote a diverse and fair working environment.



Corruption and Anticompetitive Practices

The Altova Group is committed to fair and open competition in world markets. Anti-competitive price or market-sharing agreements with competitors or the abuse of a dominant market position are not allowed. Every employee shall adhere to the respective legal regulations in the framework in which they act. In the course of business or when dealing with authorities, no employee may procure, whether directly or indirectly, improper advantages for business partners, their employees or officials. Nor may an employee solicit or accept any improper advantages from business partners. An advantage is improper if its nature or extent is likely to influence the recipient's actions and decisions. It also includes the support of the worldwide measures to combat money laundering. Employees are to observe the necessary precautions. As a group of companies, we have an internal control system, which covers corruption-related risks, as well as training measures, in order to monitor adherence with compliance requirements and prevent possible compliance breaches.

Responsible Information Management

Every employee shall be obliged to treat as confidential commercial information about the Altova Group of companies or its business partners that has not been placed in the public domain, to take precautions against unintentional disclosure and only to use information in as much as it is in the interest of the business. Employees are forbidden to procure third parties' business secrets illegally. Effective measures are to be taken to ensure data security when exchanging information by electronic means.

Protection of Personal Data

We attach huge importance to the protection of personal data – be it the data of our employees, customers or other third parties. We created a data privacy policies throughout the group and naturally go beyond this when required by law.

04 Sustainable Management

Responsible Corporate Management

The Altova Group takes care to not only ensure that our products and services focus on quality, efficiency, economy, and durability, but we also pay close attention to the manner in which the Altova Group acts and manages. We focus on the long-term success and success of all parts of the Altova Group.



Sustainable Procurement

We also expect our suppliers and subcontractors to adhere to our social and sustainability principles. With a corresponding Code of Conduct for Suppliers we require our suppliers to observe our guidelines in this regard.

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Within the framework of regular evaluation of the management system this policy is checked with regard to experiences, changing circumstances for official or corporate responsibility and changes to the activities in the subsidiaries and is updated if required.