

SYZYGY Group
Code of Conduct

As of July 2026

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Introduction

SYZYGY AG and its affiliated companies – collectively referred to as the SYZYGY Group (hereinafter also ‘we’) – are committed to acting ethically in all aspects of their business activities and to upholding the highest standards of honesty and integrity. Long-term corporate success is only possible if all legal requirements are met and ethical and moral principles are consistently upheld. This creates a strong foundation of trust – both in the company and in our day-to-day interactions. The Code of Conduct provides an overview of the SYZYGY Group’s behavioural requirements and values.

Board members, managing directors and teamleads play a central role in implementing and ensuring compliance with the Code of Conduct. They not only serve as role models through their own behaviour, but also actively communicate the importance of compliance to their staff.

Breaches of the Code of Conduct can have far-reaching consequences – both for the individual and for the company as a whole. It is therefore of the utmost importance to us to foster a strong awareness of the need to adhere to these principles.

For the sake of readability, the generic masculine form is used in this document. All references to persons apply equally to all genders. The chosen language is used solely for the sake of linguistic simplicity and does not imply any judgement.

1 Subject and purpose

The Code of Conduct sets out our fundamental behavioural requirements and ethical standards. It lays the foundation for responsible conduct within the entire SYZYGY Group and in our dealings with third parties. The aim of the Code of Conduct is to ensure that members of the board, managing directors, teamleads and all staff – including both our permanent employees and our freelancers – as well as our suppliers, internalise our company’s shared values and integrate them into their day-to-day actions.

2 Scope of application within the corporate group

The Code of Conduct is binding on all companies within the SYZYGY Group.

3 Individual-related scope of application

The Code of Conduct applies internationally to all employees, freelancers, employees REMOTE, freelancers REMOTE, teamleads and executive bodies of the SYZYGY Group. We also expect our suppliers to comply with the principles of conduct set out in the Code of Conduct. The requirements for suppliers are also set out in clause 23 and in a separate Code of Conduct for them.

4 Compliance with Laws, Regulations and Guidelines

As an internationally active company, we respect and comply with all national laws and regulations, as well as all applicable laws with international scope.

We observe all applicable trade controls, import and export regulations, economic sanctions and embargoes. We are aware of our tax and customs obligations and act in accordance with all relevant national and international legal provisions.

In all our activities relating to the acquisition, development or other use of land, forests and water bodies that form the basis of people's livelihoods, we respect and protect their human rights. Unlawful forced evictions and the unlawful deprivation of land, forests and water bodies are strictly prohibited.

In addition to our own guidelines, we are committed to complying with the guidelines of WPP plc, the majority shareholder of SYZYGY AG.

At the start of our employment, we all undergo compulsory compliance and ethics training, which we refresh at regular intervals.

5 Human Rights

We uphold human rights without reservation and do not tolerate any form of modern slavery, forced labour, child labour, discrimination or unequal treatment – neither within the Group nor amongst our business partners and suppliers. We continuously raise our employees' awareness of human rights issues.

In particular, we are committed to complying with the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic,

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Social and Cultural Rights, the European Convention on Human Rights, the Charter of Fundamental Rights of the European Union, the conventions and recommendations of the International Labour Organisation (ILO), including the ILO's core labour standards, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, UNICEF's Principles on Children's Rights and Business, the ten principles of the United Nations Global Compact (UNGC), and the Modern Slavery Act.

We fully respect and protect the rights of minorities and indigenous peoples.

6 Respect for social values and the protection of minorities

It is prohibited to knowingly produce work whose content is contrary to public decency, is discriminatory or harmful to young people, or contains hate speech. When designing and implementing our projects, we always take social impacts into account and ensure that minorities and vulnerable groups are protected and given due consideration.

7 Employees and the working environment

Our employees are at the heart of the SYZYGY Group's business activities and are crucial to our success. We strive to provide a safe, healthy and inspiring working environment characterised by mutual respect and openness. No form of discrimination, harassment, bullying or offensive behaviour will be tolerated.

Diversity, Equity and Inclusion (DEI)

The uniqueness and diversity of our employees are key drivers of creativity, innovation and our long-term success. We are firmly committed to the principles of diversity, equity and inclusion.

As a signatory to the 'Diversity Charter', we are committed to creating a working environment that is free from prejudice. All employees and applicants are treated with the same respect and are given the same opportunities – regardless of gender, gender identity, nationality, ethnic or social background, religion, beliefs, age, physical or mental disability, sexual orientation or family circumstances.

- **Equal opportunities:** We promote fair processes in the recruitment, selection, training and promotion of staff. Decisions are based exclusively on objective criteria such as qualifications, competence and performance. We are actively working to minimise unconscious bias in our HR processes and to sustainably increase the proportion of under-represented groups at all levels of the organisation – particularly in leadership roles.
- **Equal participation (inclusion):** We design our workplaces, digital tools and flexible working models so that all employees – particularly those with disabilities or chronic illnesses – can participate in working life on an equal footing and without barriers.
- **Equal pay:** We are committed to the principle of equal pay for equal or equivalent work and categorically rule out gender-based or discriminatory pay gaps.

Corporate culture and working conditions

Open communication and a positive culture of learning from mistakes are integral parts of our identity. Employees can express their opinions, concerns and criticism freely and without fear of reprisal. The SYZYG Group pursues a strict zero-tolerance policy towards retaliation for the expression of legitimate concerns.

We offer structured career paths, personalised development plans and a wide range of training opportunities to strengthen professional and personal skills.

Ensuring a safe and healthy working environment is our top priority. We minimise risks and accidents through preventive health and safety measures. We place great emphasis on ergonomic workplace design to prevent health problems. Employees receive regular training; details are set out in our Health and Safety Policy.

We strictly adhere to the applicable national working time laws. We offer fair remuneration and social benefits in accordance with local laws. To improve the work-life balance, we promote flexible working arrangements such as working from home, part-time work and trust-based working hours. All employment relationships are based on written, comprehensible contracts.

We respect employees' right to freedom of association, the right to form and join trade unions, the right to collective bargaining autonomy, the right to strike and the right to collective bargaining.

We do not tolerate the use, possession or distribution of illegal drugs in our workplaces. We are prohibited from carrying out our duties whilst under the influence of drugs or alcohol.

8 Financial responsibility and compliance with tax obligations

The SYZYGY Group is obliged to report truthfully to employees, customers, business partners, the public and the regulatory authorities. We are aware of our responsibility to maintain complete, accurate and truthful business documents and records, and to fulfil our obligation to provide transparent financial reporting. We comply with local and international accounting standards.

We are committed to the full fulfilment of our tax obligations. We declare and pay our taxes and duties in full compliance with the legal requirements of the countries in which we operate. We do not tolerate tax evasion and do not assist in any way with tax evasion – neither through our own activities nor through cooperation with third parties.

9 Fraud and Corruption

The SYZYGY Group pursues a consistent zero-tolerance policy towards fraud, bribery and corruption and is committed to conducting only lawful and ethical business.

We comply with the German Act on Combating International Bribery, the UK Bribery Act, the US Foreign Corrupt Practices Act and all other relevant anti-corruption laws.

It is prohibited to offer, grant, demand or accept bribes or improper advantages. We avoid any actions that could give even the mere appearance of corruption.

Gifts (including presents and hospitality) are only permitted within socially acceptable and reasonable limits, provided this is not restricted by contractual agreements with customers or partners. The precise procedures are set out in a Group-wide policy.

10 Conflicts of interest

Our personal and family interests must not conflict with the business interests of the SYZYGY Group. Conflicts of interest may arise, for example, from secondary employment, the awarding of private contracts to related parties, or financial holdings in competitors, customers or suppliers.

If there is a possibility of such a conflict, we are obliged to disclose this immediately and in writing to the relevant manager or the Compliance Department so that appropriate protective measures can be taken jointly.

11 Money laundering and terrorist financing

Money laundering and terrorist financing are strictly prohibited within our company, and all necessary measures are taken to prevent them.

12 Insider trading

We do not tolerate insider dealing or market manipulation. All inside information (e.g. planned mergers, unpublished financial results or significant legal disputes) is treated as strictly confidential. It is prohibited to use such information for personal gain or for the benefit of third parties, to carry out securities transactions or to pass on buy or sell recommendations to third parties.

13 Fair Competition

The SYZYGY Group is committed to free and undistorted competition. We strictly adhere to the applicable antitrust and competition laws. Any anti-competitive collusion, informal agreements on prices, market sharing, capacity or competition-related strategies with competitors is prohibited.

14 Information Security

The protection of confidential information within the context of our business relationships with customers, partners, employees and shareholders is our top priority. We implement Group-wide recognised security standards and policies to ensure the confidentiality, availability and integrity of information at all times.

15 Data Protection

The SYZYGY Group is aware of its data protection obligations. We process personal data in accordance with applicable data protection laws. We take appropriate technical and organisational measures (TOMs) to guarantee the security of processing. We safeguard the rights of the individuals whose data is processed. The Data Protection Officer provides ongoing advice to the company and monitors compliance with regulations. Further information on this can be found in our Data Protection Policy and on our SYZYGY website.

16 Data Security

Ensuring data security plays a crucial role in building trust in our company. We therefore treat the careful handling of company data, as well as the data of our business partners, customers, shareholders and employees, as a top priority. We protect this data from loss, destruction, misuse, unauthorised access and other threats through appropriate measures.

17 Intellectual Property

We respect the intellectual property of third parties and protect our own. The use of copyright-protected works, trade marks or patents may only take place within the framework of statutory and contractual provisions. We are prohibited from using protected documents or confidential information from former employers without their express authorisation in the course of our work for the SYZYGY Group.

18 Company Property

We are responsible for the protection and proper use of company property. The use of company property for private purposes is strictly prohibited.

19 Environment and Climate

Protecting the environment and the climate is of great importance to the SYZYGY Group. We are mindful of our environmental responsibility and implement targeted measures to reduce negative environmental impacts. The SYZYGY Group is committed to acting in accordance with the Paris Agreement. We promote sustainable behaviour in our day-to-day work to reduce CO₂ emissions generated by the business. Further details can be found in the SYZYGY Group Environmental Policy.

20 Communication and the Media

Before publishing any company-related content, we consult closely with our line manager in advance. We only issue public statements, give interviews or make contributions on behalf of the SYZYGY Group if we have been expressly authorised to do so.

In our private online activities and on social media channels that relate to our company or could be associated with it, we always maintain the confidentiality of internal company information. We ensure that our posts do not contain racist, discriminatory or otherwise ethically questionable content and that the reputation of the SYZYGY Group is not damaged.

21 Artificial Intelligence

We utilise the vast innovative potential of artificial intelligence efficiently, securely and responsibly. In accordance with the European Union's Artificial Intelligence Act (EU AI Act), we deploy AI applications in such a way that security, transparency and the protection of fundamental rights and data protection laws are always upheld.

We use AI tools for business purposes exclusively within the scope of approved applications and our internal AI guidelines. When using generative AI, we ensure that we do not input any confidential customer data or personal data into public, unauthorised AI models.

We label AI-generated content transparently in accordance with legal requirements. Before using or sharing such content, we always check it carefully for accuracy, bias and potential copyright infringements.

22 Business partners

The SYZYGY Group works exclusively with business partners who share the same values and ethical standards as the SYZYGY Group and act responsibly in their business activities.

23 Suppliers

The SYZYGY Group expects its suppliers to comply with the principles of the Code of Conduct within their own organisations and supply chains.

Suppliers who employ private or public security personnel for protection purposes are obliged to put in place adequate controls to prevent cruel, inhuman or degrading treatment of people.

The requirements for suppliers are also set out in a separate Code of Conduct for them.

All suppliers are required to sign the SYZYGY Group's Code of Conduct for Suppliers or to provide evidence of equivalent guidelines. This is a prerequisite for working with us and applies equally to their own supply chains.

24 Non-compliance with the Code of Conduct

Breaches of this Code of Conduct undermine trust in our company and may result in serious consequences. Possible consequences include, amongst others:

- Warnings under employment law or termination of the employment contract
- Civil liability claims and claims for damages
- Criminal prosecution and sanctions
- Fines for the company and those responsible
- Lasting damage to the reputation of the SYZYGY Group

25 Duty to report breaches

We share responsibility for the integrity of our company. If breaches of the law or of this Code of Conduct are observed or suspected, these must be reported immediately. Reports can be made to line managers, the Human Resources department, the Compliance department or via the whistleblowing system set up for this purpose.

26 Whistleblowing system

The Right-to-Speak hotline is available to all employees, freelancers, customers, suppliers and other third parties for reporting risks and breaches along our supply chains and within the SYZYGY Group.

This reporting procedure is handled via a secure platform provided by an independent third-party provider. Reports can be submitted either by disclosing one's identity or completely anonymously. All reports are treated as strictly confidential and processed in accordance with the need-to-know principle.

Protection against reprisals (no-retaliation guarantee):

In accordance with the Whistleblower Protection Act (HinSchG), we guarantee that whistleblowers who submit a report in good faith will not be subjected to any form of discrimination, retaliatory measures or reprisals. Any form of discrimination will be treated as a serious breach of compliance.

External reporting channels:

Irrespective of our internal system, our employees are legally free to report matters to the official external reporting bodies of the Federal Government (e.g. the Federal Office of Justice). However, we encourage them to use our internal channels as a first port of call to enable a swift and direct investigation.

27 Points of contact for enquiries

Teamleads and the SYZYGY Group's Compliance Officer are available at any time to answer any questions regarding the interpretation, content or practical implementation of this Code of Conduct.