

Code of Conduct

CoachHub is committed to respectful, honest and ethical conduct and providing high quality services exceeding customer requirements. This commitment is fundamental to the philosophy of CoachHub. The commitment includes upholding legal and ethical standards in all of CoachHub's (business) activities. Abiding by the applicable laws is a cornerstone to legal and ethical business activities. CoachHub further puts strong emphasis on ecological and social responsibility. In this respect CoachHub expects the same standard from employees, business partners or suppliers.

This Code of Conduct is based on the Principles of the UN Global Compact, the Business Social Compliance Initiative (BSCI) and the international environmental standard ISO 14001.

Version history

Date	Version	Comments	Reviewer	Approved by
2021-03-25	1.0	Initial version of the document	Dennis Jansen, Chief Legal Officer	Dennis Jansen, Chief Legal Officer
2022-02-16	1.1	General review	Dennis Jansen, Chief Legal Officer	Dennis Jansen, Chief Legal Officer
2024-06-27	1.2	General review, AML	Angela Shirley, Senior Legal Counsel	Dennis Jansen, Chief Legal Officer

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1. Scope

This Code of Conduct is an essential part of all employment and business relationships that exist in relation to CoachHub as an employer and to the provisioning of our service. It applies to all internal contracts and to all the direct and indirect business partners of CoachHub. Just as we commit ourselves, our business partners are obliged to abide by the principles of this Code of Conduct.

2. Legal requirements

CoachHub abides by national and international laws, regulations and ordinances. Compliance is brought to action in the actual spirit of the standards we hold ourselves and our business partners accountable to.

a) Competition

CoachHub complies with national and international competition laws. German and EU competition law prohibits agreements between two or more independent businesses which affect trade within Germany / EU Member States and have the object or effect of restricting competition. As part of this, CoachHub refrains from any anti-competitive agreements including price fixing (between competitors or between suppliers and distributors), illegal market sharing between competitors; sharing commercially sensitive information, i.e. anything that you would regard as a “trade secret” (between competitors or between suppliers and distributors).

b) Anti-Corruption

Bribery and corruption are prohibited by national and international laws. CoachHub has a zero tolerance policy for bribery and corruption. CoachHub and CoachHub's business partners conduct in a manner that does not give rise to any unlawful or unethical personal dependencies or obligations. Business partners guarantee an anti-bribery and anti-corruption policy with which compliance is mandatory. In the event of the suspicion of corrupt conduct, this must be reported to CoachHub Management. CoachHub's related policies, i.e. the Anti-Bribery and Anti-Corruption Policy, apply.

c) Prevention of Money Laundering

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. CoachHub complies with our legal obligations to prevent money laundering and does not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets. We expect no less from everyone we work with.

d) Data Protection

CoachHub complies with national and international data protection laws. CoachHub handles any personal data in accordance with relevant data protection laws and follows the need-to-process principle. CoachHub's related policies, i.e. the CoachHub Group Data Protection and Non-Disclosure Agreement, apply.

e) Third Party Intellectual Property

CoachHub has the responsibility to protect confidential and proprietary information disclosed by customers and business partners and to use such information only in accordance with CoachHub's contractual commitments or as otherwise authorized by the third party. Confidential and proprietary information of a third party includes, but is not limited to, inventions, software, trade secrets, trademarks, name, logos, copyrighted material, pricing, product information, business plans and employee information. In addition, CoachHub uses third-party hardware systems and software programs under licensing agreements that may restrict use and duplication. CoachHub does not infringe upon a third party's intellectual property or violate the terms of a license agreement with a third party.

f) Economic Sanctions

CoachHub is committed to complying with all applicable economic sanctions and related regulations. Employees responsible for conducting due diligence on a third party, must carefully screen for and report any indication that conducting business with the individual or entity may violate any applicable economic sanctions or trade laws.

3. Conflicts of Interest

All employees are required to refrain from any action or interest that conflicts with, or may reasonably be expected to conflict with, CoachHub's interests. A "conflict of interest" exists whenever an individual's private interest interferes or conflicts in any way (or even appear to interfere or conflict) with the interests of CoachHub.

A conflict may arise when an employee takes actions or has personal interests that may make it difficult to perform his or her work for CoachHub objectively and effectively.

A conflict of interest may for example arise if an employee conducts business on behalf of CoachHub with a member of his / her family. Moreover, a conflict of interest may arise if an employee conducts business on behalf of CoachHub with an entity in which the employee or a family member has an interest, including if the employee or a family member works for an entity that conducts business with CoachHub or is a competitor of CoachHub, or if the employee or a family member receives a financial or personal benefit from an entity that is a vendor or client of CoachHub.

Because conflicts of interest may not always be clear-cut, all employees are encouraged to raise questions about particular situations to CoachHub's Legal Department and seek advice as to whether an activity presents a conflict of interest.

4. Prevention of Discrimination

CoachHub is an equal opportunity employer. All qualified applicants will receive consideration for employment and employees will be treated refraining from any active or passive discrimination, exclusion or preference based on racial or ethnic origin, nationality, sex (including pregnancy), sexual orientation, age, physical or mental disability, political opinions, religious or philosophical beliefs, trade union membership, or any other characteristic protected by applicable laws, regulations and ordinances.

5. Etiquette, social grace and inner-corporate conduct

All employees at CoachHub and CoachHub's business partners are treated with respect and dignity. No employee may be subjected to mental, verbal or physical coercion or harassment by employers or co-workers. Disciplinary measures may only be taken according to current national and international laws .

6. Health and safety

Health and safety standards at the workplace of CoachHub's employees and at our Business Partners workplace will be maintained. Employees are to be informed regularly regarding current workplace health and safety regulations and safety measures. In the spirit of our Company's mission, CoachHub offers programs on mental and physical well-being to CoachHub employees.

7. Environmental protection

We consider the protection of nature and the environment as one of our greatest responsibilities. CoachHub and our business partners abide by environmental laws and local standards such as waste management and recycling. Ongoing efforts are to be made to prevent and mitigate environmental burdens. We pay particular attention to the protection and the preservation of natural resources. We promote and give preference to environmentally and socially responsible products.

8. Contractual employment conditions / working hours

CoachHub as well as CoachHub's business partners guarantee the written documentation of the conditions of employees' occupation (e.g. commencement and end of the employment relationship, working hours, salary and bonuses). Employment terms must comply with the strictest requirements in force at any given time under current laws.

While CoachHub relies on trust-based working time, managers are obliged to guarantee that employees do not (voluntarily or on orders) exceed the agreed working hours to an extent that impairs their personal life.

9. Remuneration

CoachHub and CoachHub's business partners guarantee that salaries are at least equal to the respective statutory minimum salary. The salary paid must be sufficient to cover the basic needs of the employees. CoachHub guarantees and expects from business partners paying a living wage, namely to interns and to employees with high variable remuneration components.

The circumvention of social security regulations is prohibited.

10. Anti-Slavery

CoachHub pursues a zero-tolerance approach with regard to modern slavery. In this respect CoachHub strives to prevent human trafficking, servitude, forced and compulsory labour or slavery in CoachHub's business and in collaboration with all of CoachHub's business partners. CoachHub further adheres to all employment laws including minimum wages (cf. clause 9), employment and working conditions, freedom of association, health and safety and expects all of CoachHub's business partners to comply with the set out requirements as well.

11. Right of association and right to collective bargaining

Employees do not face any workplace related discriminatory treatment which is directed against the freedom of association. Employees are guaranteed their right to organize in associations of their own choice to promote and protect the interests of the employees, and to join, work for or leave such associations.

12. Management systems

CoachHub and CoachHub's business partners introduce a management system in order to implement, comply with and examine the principles laid down in this Code of Conduct. The management system contains responsibilities, procedures and suitable documentation. Implementation and ongoing improvement of the principles laid down in this Code of Conduct are examined and documented regularly.

13. Communication, Monitoring and Measures

This Code of Conduct is made accessible to CoachHub's and CoachHub's Business Partners' employees. CoachHub is entitled to monitor Business Partners' Compliance to the principles laid down in this Code of Conduct. If non-compliance is detected, appropriate remedial measures are to be taken immediately; including the termination of the business relationships where necessary.

14. Complaints procedure

Complaints and notices of violations of this code of conduct can be filed at any time via CoachHub HR Team – including in an anonymous form to the following email address: confidential@coachhub.com. CoachHub and all business partners guarantee that they will abstain from any retaliation or other disadvantageous measures or disciplinary measures against the person filing the complaint directly or indirectly.

15. High Quality Service

Good quality management is an essential corporate objective and therefore a part of the tasks of every employee and service provider. It is generally agreed that effective implementation of the quality management system can only be ensured with the support of all. In order to ensure successful implementation of the quality management system, the company and the employee/service provider agree on the full support of all employee and service providers. CoachHub makes quality objectives known to the employee and service providers. Employees and service providers shall inform the company of all QM objectives of which they become aware in the course of his/her activities as well as information relevant to QM that

becomes known to him/her in the course of his/her activities, so that CoachHub can continuously improve its quality.