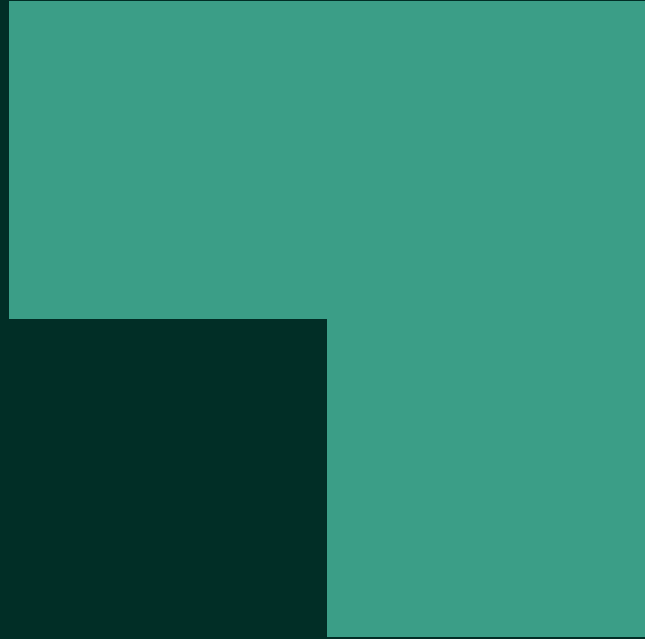# SimCorp

Sustainability Policy

February 16, 2023

Sustainability Policy

1. Introduction

The Sustainability Policy outlines our overarching sustainability scope, ambition, commitment, monitoring and reporting, grievance mechanism, and governance.

As a corporation, SimCorp's role in society is to run a profitable business and generate economic value for all its stakeholders, including tax and GDP contribution. We are committed to acting responsibly in fulfilling this role, by contributing to sustainability while creating strong financial results. Acting responsibly and contributing positively to all our stakeholders have always been core to our DNA as a company. Guided by our company purpose – 'Enabling a prosperous life in a livable world' - the main drivers for SimCorp's sustainability activities are business-related. We believe that our sustainability profile and initiatives will strengthen our attractiveness as an employer and benefit our relationship with all our stakeholders; clients, employees, shareholders, suppliers/partners, and society alike.

At SimCorp, we are committed to the 10 Principles of the UN Global Compact, and we align our work to maximize our positive impact on the UN Sustainable Development Goals. Moreover, we are committed to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This Policy outlines SimCorp's approach to sustainability, and its purpose is to guide us in pursuing our agenda and efforts across the areas covered below.

2. Scope and ambition

The SimCorp Sustainability Policy applies to all employees, both full- and part-time. The global Policy applies to all markets and functional units and is viewed as a guiding principle for our company culture together with our Guidelines for Good Business Behavior and our Diversity, Equity, and Inclusion Policy. Local considerations may apply, but the global Policy must be observed.

2.1 Ambition
It is SimCorp's ambition to take sustainability beyond compliance. We take on the responsibility to embed sustainability across all our business, as everything and everybody count. It is a journey, which starts with a commitment to go beyond what we are required to do. To succeed with this ambition, we have established a governance structure to ensure transparency and accountability for the targets we set.

3. Environment

Climate change and the transition to a low-carbon economy, as set forth by the 2015 Paris Agreement, are among the defining challenges and opportunities of our time and constitute key sustainability impact drivers for SimCorp. We commit to complying with all applicable statutory environmental regulations and requirements where we operate and to reducing our negative environmental impact, primarily comprised of energy consumption related to the use of our offerings, internal IT and software operations, office buildings, and travel activity. We will measure, monitor, and manage our environmental impact and strive for continual improvement by reporting on our goals and progress on an ongoing basis.

4. Social

4.1 Human rights and labor rights
At SimCorp, we are committed to respecting human rights, and we work to prevent any kind of modern slavery or child labor in our business and our supply chain. We support the rights set forth in the International Bill of Human Rights and the core Conventions of the International Labor Organization (ILO), as well as the Principles of the UN Global Compact.

We will ensure our own workforce a safe and healthy environment, in which all internationally recognized human and labor rights are respected. We strive to extend this commitment to our entire supply chain by only contracting suppliers that

adhere to all internationally recognized human rights. The implementation of due diligence mechanisms, such as the careful selection and assessment of suppliers, will help us achieve this goal.

SimCorp's Statement on Modern Slavery Act is published on the company website.

Further, SimCorp respects the rights of our employees to associate freely and engage in collective bargaining if they so choose. The safety and well-being of our employees are paramount for us at SimCorp, and we regard the continual development of our employees' competences and their social, mental, and physical well-being and safety to be of high importance.

4.2 Diversity, equity, and inclusion
At SimCorp, we are dedicated to increasing diversity, equity, and inclusion across our organization. Following our core values, national legislation and the international frameworks listed above, we commit to ensuring an inclusive organization with equal opportunity for all, treating all people with respect and working against discrimination in all its forms, which respects individual characteristics such as gender, age, sexual orientation, nationality, religious, and political beliefs.

Further guidance can be found in our Diversity, Equity and Inclusion Policy.

5. Business conduct and anti-corruption

Respect for business ethics and the rule of law are preconditions for a fair and sound business environment. At SimCorp, we have a zero-tolerance policy on corruption and bribery in any form, and we are committed to conducting our business responsibly, both in our own organization and in our dealings with external partners.

Internally, our Guidelines for Good Business Behavior provide a framework to guide and support employees in acting according to SimCorp´s values and core business principles. Externally, our corporate anti-bribery rules and guidelines are included in our Code of Conduct for Suppliers, which serves as a framework to guide our suppliers to act responsibly and in alignment with SimCorp's values.

6. Data privacy and security

SimCorp's core activity is the development of digital software that enables financial organizations to manage different types of financial data. Hence, responsible and secure handling of our client's data has always been part of SimCorp's DNA. It is of great importance to SimCorp that all our departments, employees, and partners have a focus on data ethics, and ensure that these practices are embedded across the organization.

Security and internal control measures to avoid errors and breaches in connection with our data processing and our development of software are fundamental to our business operation. In this respect, we have taken several measures to ensure a high level of security that range from monitoring our technical infrastructure and successful due diligence of our third-party service providers to having a disaster recovery plan in place and establishing procedures and solutions that enable a quick restoration of critical business services. Additionally, all our employees are required to undergo mandatory GDPR compliance and IT security courses as part of our online learning content. SimCorp's Information Security Policy has been put in place to ensure the accessibility, performance, confidentiality, and integrity of the IT infrastructure and applications and is applicable to all SimCorp employees.

Further guidance can be found in our Data Ethics Policy.

7. Monitoring and reporting

At SimCorp, we set ambitious targets for our sustainability ambitions and monitor progress to ensure we continuously improve our performance. Progress on specific environmental, social, and governance metrics are documented in an annual ESG report, which forms part of our annual Sustainability Report. To ensure transparency, SimCorp's reporting standards are based on current national and international guidelines.

Our latest Sustainability Report is published on SimCorp's corporate website.

8. Stakehlder engagement

Engaging with our stakeholders helps us understand what matters most to them and provides valuable insight into sustainability risks and opportunities for us and our clients. We engage with our main stakeholder groups through surveys and interviews to ensure that their views are addressed.

9. Grievance mechanism

While this policy outlines that SimCorp is committed to acting responsibly in fulfilling its role in society, SimCorp's has a Whistleblower Policy, which clearly outlines procedures to be taken, for internal or external parties to report any potential misconduct without fear of retaliation, whether they are employees, suppliers, or other business partners.

10. Governance

The Sustainability Policy is updated and reviewed on a continuous basis and approved by our Board of Directors. The Policy should be read together with SimCorp's package of corporate policies and guidelines.

Responsibility for monitoring compliance with this Policy is anchored within SimCorp's Sustainability Committee.

This policy is adopted in Copenhagen
on February 16, 2023.

Board of Directors

Peter Schütze	Morten Hübbe	Simon Jeffreys
Adam Warby	Joan A. Binstock	Susan Standiford
Charlotte S. Klausen	Sven Rinke	Neil Cook

SimCorp

About SimCorp

SimCorp offers industry-leading, integrated investment management solutions.

Our platform and ecosystem, comprising partners, services, and third-party connectivity empowers us to provide 40% of the world's top 100 financial companies with the efficiency and flexibility needed to succeed.

With over 25 offices around the world, and more than 2,200 employees, we are a truly global, collaborative team that connects every continent and industry seamlessly.

For more information, see www.simcorp.com