
Banking for
a better future.

Tomorrow GmbH
Neuer Pferdemarkt 23
20359 Hamburg

hello@tomorrow.one
www.tomorrow.one

Manifesto of Tomorrow GmbH

Management

Michael Schweikart
Inas Nureldin
Jakob Berndt

Commercial register

Hamburg Local Court
Registration number HRB 146816
VAT no. DE 313132852

Bank details

GLS Gemeinschaftsbank eG
IBAN: DE 80 4306 0967 2070 2341 00
BIC: GENODEM1GLS

Umweltbank AG
IBAN: DE73 7603 5000 0002 4570 24
BIC: UMWED7NXXX

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A guide to our Manifesto

Our Manifesto outlines the principles that govern our behavior as employees and founders of Tomorrow and provides guidance on key areas of business operations to avoid undesirable outcomes; it therefore also serves as our Code of Conduct. In line with our values, it describes what is important to us as a company when interacting and collaborating with our teams, partners, and other external parties.

It helps us navigate through decisions and situations where responsible conduct and ethical decision-making are critically important. Only by fully complying with our Code of Conduct and all laws and regulations can we achieve our aspiration to be a category leader within the sustainable Fintech industry, be respected and trusted by our partners, investors, employees, and all other stakeholders.

Please read this document carefully. We expect behavior to be responsible, ethical, and with integrity. Adherence to the Code of Conduct, laws, regulations, and other internal policies and procedures are mandatory for all employees.

Tomorrow follows a zero-tolerance principle for violating the provisions of this code, laws, and regulations. We conduct thorough investigations into potential misconduct, and proven misconduct or violations will result in disciplinary actions under employment law.

We trust all employees to make the right decisions by applying common sense and judgment while behaving according to Tomorrow's Code of Conduct, values, and purpose. When something does not feel right, and you do not find the guidance you seek in this document, you should seek clarification from your lead or contact the Compliance Officer listed in Annex 1.

All employees are required to bring the Tomorrow's Code of Conduct to life by demonstrating the highest level of ethical behavior at all times and report misconduct directly to the Compliance function or People & Culture or anonymously through the Whistleblowing service (see link in Annex 1).

This Code of Conduct may be shared with Tomorrow's material outsourcing partners and providers, and we strongly encourage them to adopt clear commitments on ethical business like those in our Code.

What is correct behavior?

At Tomorrow, we are in constant relationships with various people, organizations, and representatives of a wide range of interests. Our corporate image depends on how our employees conduct themselves in everyday business. There is no alternative to personal integrity and sound judgment. When faced with a difficult situation, you should ask yourself the following questions:

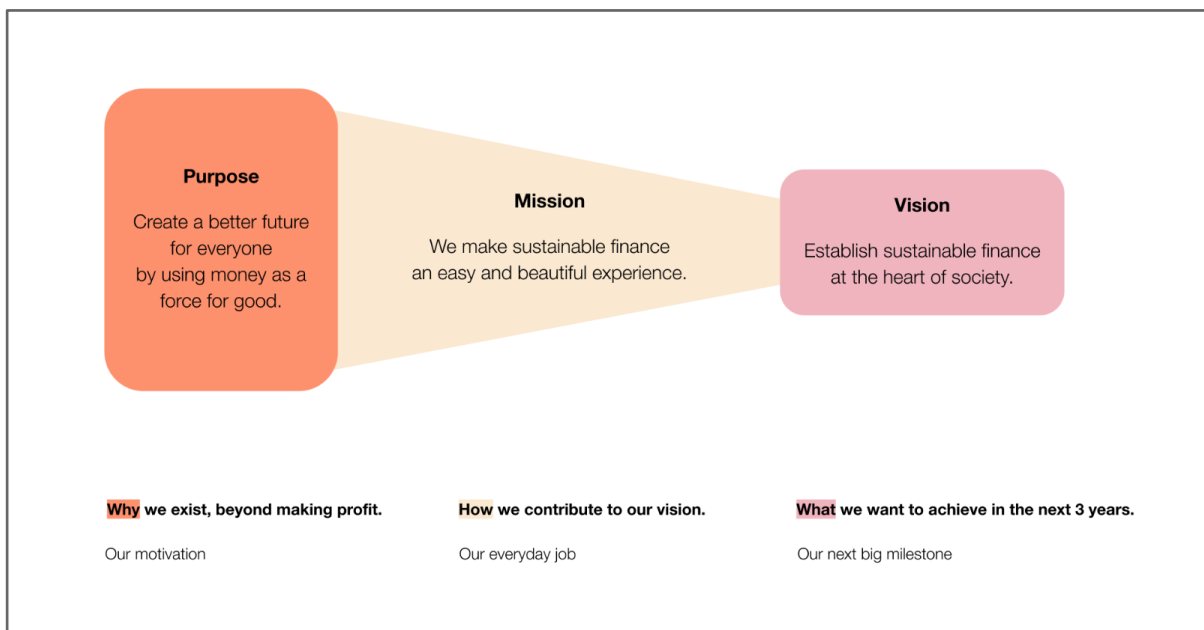
- Is my action or decision legal, ethical and consistent with our values?
- Does my action or decision comply with this Code and our other internal requirements?
- Do I take my action or make my decision free of personal interests?
- Am I aware of all potential risks that I need to know about in order to make my action or decision?
- Does my action or decision stand up to public scrutiny? How would it appear in a newspaper story?
- Does my action or decision protect Tomorrow's reputation as a corporation with high ethical standards?

If you can answer "yes" to all questions, then the action or decision is most likely correct and consistent with the guidelines below. Otherwise please seek guidance from your lead or of the Compliance officer.

Our commitment to our purpose and values

Creating positive impact with finance is at the heart of our business, it is the reason why Tomorrow was founded and the motivation behind everything we are doing as a team and business - beyond making profit. We manifested this motif in a powerful purpose statement:

Create a better future for everyone by using money as a force for good.



In our fast changing and competitive business environment, it is crucial to stay true to our identity and what matters to us at Tomorrow. Our five values help us do this. They remind us of what Tomorrow stands for and serve as a yardstick for our conduct with each other and our stakeholders. In the following you can find a detailed description of our values and how they guide our interactions and decisions.

A better Tomorrow for everyone

We aim to shape our common future in a positive way. We are part of the solution to the social, ecological and economic challenges we face as a global society.

We dare to think big

We strive for great impact and want to grow by scale. By constantly learning and staying adventurous, we aim to change the world.

Transparency is Queen (and King)

By sharing vital information internally and in public, we hold ourselves accountable for our actions. Thus, we ensure fairness and fidelity to our mission.

Let's do this together

We shape Tomorrow as a team. By supporting each other and by being honest and empathic we will

reach our ambitious goals.

Welcome to our Community

We engage with our users and further stakeholders at eye level and invite them to actively participate. Their needs help us to guide our actions.

Everything that happens in the company should directly or indirectly promote our purpose and all actions should be aligned with it. The values define the way we act, make decisions, give feedback and work together.

Our commitment to sustainability

Sustainability is the basis of our business activities. We want to be part of the solution to the social, environmental and economic challenges we face as a global society. We wish for a tomorrow where no human being has to fear a violation of their basic rights and where access to clean water, sanitation, safe housing and medical care is the standard. A tomorrow in which natural resources are used responsibly and nature and animals are valued. A tomorrow in which fair business practices are not the exception, but the rule. A tomorrow in which technology relieves us of all tedious tasks and enables us to learn new things and pursue meaningful activities. In short, a tomorrow in which we would all like to live together. To ensure this mission we are a Certified B-Corporation and have an independent Impact Council as part of our governance. We enable our customers and other stakeholders with our real time impact reporting and a comprehensive yearly sustainability report to review our sustainability performance and to actively be part of our mission.

A transparent and sustainable value chain is a crucial part of this strategy. To ensure this, it is important to establish ground rules that must not be violated under any circumstances and that apply to our entire value chain. We always make sure to choose the most sustainable option available and try to find local suppliers and partners. The following points are therefore the absolute basis for us and in order to act responsibly and create a better tomorrow for all and we expect our suppliers to ensure the same within their supply chain.

- We value and respect the United Nations Universal Declaration of Human Rights. Tomorrow actively and politically calls for action to ensure that human rights apply to all people, regardless of who they are or where they live.
- We stand for an era of new work and work with purpose. Having a safe and enjoyable workplace is the absolute basis for this. We therefore oppose all forms of forced labor and child labor as defined by the ILO Core Labor Standards. All employees started working at Tomorrow by their own free will and are here because they enjoy working for a better tomorrow. We believe in the great power that unfolds in a community and therefore it is a matter of course for us that all employees can exercise their right to freedom of association and collective bargaining. We believe it is important that not only Tomorrow's employees but all employees of companies are allowed to exercise collective bargaining.
- It is therefore clear to us that at minimum we comply with applicable law and labor standards. Tomorrow pays its employees an industry competitive salary and stands against excessive remunerations and bonuses. Further, we want to create opportunities for individual further training (through tailored, needs-based further training programs), we do not participate in any kind of discrimination and promote flexible working time models and the compatibility of career and family. Please find more information in the People & Culture Policy (listed in Annex 1)
- In order to ensure that all employee matters are heard, we also created an employee seat in our supervisory board.
- Fighting climate change is at the core of our vision and mission. We work in a resource-saving and climate-neutral way - this means not only a paperless office, the use of green electricity and climate friendly transportation, for example, but also that we are taking responsibility for the

emissions we generate by offsetting our ecological footprint.

- We trust our users and are responsible for providing them with reliable quality. Their needs help us to guide our actions. Open dialogue keeps us connected and helps us to address customer needs and make our product better and better.
- We operate responsibly, for the long term, and prefer to promote the common good locally in our region - A long-term partnership with our business partners, society and all stakeholders is essential to us.
- We want to create long-term added value for society as a whole; any kind of tax avoidance is therefore unacceptable to us. We believe taxes are important for every social system. Taxes provide the state with necessary funds to support our society with essential services and help to reduce social and economic inequality. Tomorrow is therefore a big fan of supporting our society by paying taxes.
- We believe that educated consumers are the foundation to achieve a competitive, sustainable economy. Comprehensive sustainability reporting, at least in accordance with the core principles of the Global Reporting Initiative, is the basis for us to achieve this goal. To ensure this we publicly report our core sustainability and financial performance on a yearly basis.
- It is important to us that everyone understands why and for whom we are working. That's why we consider to regularly integrate the crowd into our fundings and disclose our ultimate beneficial owners. We expect the same from our partners.

Our commitment to compliant business operations

Tomorrow expects all employees to act in accordance with this Code of Conduct and make judgments based on the principle of integrity. Compliance with the laws and regulations of the jurisdictions in which Tomorrow does business is, therefore, an integral part of the corporate responsibility and core values.

Every individual is responsible in the context of the tasks assigned to them for complying with legal, regulatory and internal regulations. The management board, supervisory board, and employees of Tomorrow shall assume their roles and the associated responsibility with the greatest possible degree of professionalism, competency, and care at all times, both internally and in relation to third parties.

In both their professional and private lives, employees shall not engage in activities that could harm third parties or Tomorrow. To ensure integrity, Tomorrow uses internal policies and procedures which can be found in the officially announced notices or in the internal data storage service.

The following sections provide information on key areas of our business operations and outline the responsibilities we all have as employees. You will find guidance on the core principles that should govern how we do business:

Gifts & benefits

We offer and accept gifts & benefits transparently and only for legitimate business purposes!

Gifts and other benefits are permitted if they are customary and ethical. Tomorrow's employees shall not demand, accept or grant any gifts or benefits above the approved limits (max. 40 Euro) connected with their role in the company, including invitations that do not fall within the usual professional cooperation. Accepting and giving gifts and other benefits is prohibited in particular if it appears likely to influence pending business decisions or violates a law, regulation or directive.

All employees must follow the Tomorrow manifestos principles to avoid even the appearance of misconduct.

→ When in doubt, consult the Compliance Officer listed in Annex 1 of the policy.

Fraud, bribery & corruption

We never tolerate fraud, bribery & corruption!

Employees are conscious of our responsibility towards customers, partners, and colleagues that Tomorrow's actions always aim for the highest standards. All employees must comply with the laws, regulations, internal guidelines, and procedures applicable to their field of activity.

Tomorrow opposes any form of competitive manipulation through corruption, bribery and money laundering and supports and attaches great importance to avoiding such activities. We must also avoid building business relationships with third parties that contribute to illegal or illicit acts. We therefore maintain transparency in our dealings with our customers, suppliers and authorities and comply with international anti-corruption standards, such as those set out in the UN Global Compact, as well as applicable anti-corruption and bribery laws.

For employees this means to immediately reject any bribes and never offer any bribes to anyone under any circumstances; recognize and take steps to stop any potential bribery or corruption or the appearance of bribery or corruption involving Tomorrow or any of our partners; strictly follow this policy whenever considering making a charitable donation or any other form of corporate giving.

How to recognize potential corruption:

- Unusually high fees and commissions
 - Disproportionate gifts, entertainment and hospitality
 - Disproportionate requests to keep relationships confidential
 - Accompanying letters and oral agreements that go around written contracts
- Report suspected fraud or other violations of laws and internal policies, standards and procedures immediately to our Compliance Officer (listed in Annex 1 of the policy).

Fairness & conflicts of interest

When performing our job, we operate fairly and never put our own interest above Tomorrow's!

We operate as fair partners and competitors. We demonstrate this through professional, respectful, and ethical behavior, as this is a prerequisite for us to remain true to our mission and succeed in an increasingly globalized and competitive environment. Hence all employees are expected to role model fairness and ethical conduct in all their interactions.

However, there are several everyday situations in which conflicts of interest may arise between stakeholders and Tomorrow. We will take all necessary measures to avoid or resolve conflicts of interest between internal and external stakeholders and Tomorrow. We are required by law to make business decisions in the best interest of the company and independent of any collusion or agreement with competitors. Tomorrow and its employees will refrain from any conduct that violates antitrust laws. There may be situations where we have to balance interests; on those occasions, we make all our decisions independently and reasonably, considering all critical aspects.

We expect our employees to act ethically when dealing with conflicts of interest. Our employees should inform their supervisors of relationships with individuals or companies with whom Tomorrow does business that could lead to conflicts of interest - such as family relationships, partnerships, business activities or investments.

Money laundering, financing of terrorism and economic sanctions

We never launder money or finance terrorism!

Tomorrow is committed to preventing and combating money laundering and terrorist financing. Hence we only perform business transactions with fully identified customers and partners.

- Always comply with the regulations on money laundering, terrorist financing, financial

sanctions and embargoes.

- Always retain accurate and complete records and documents of all your business activities.
- If you notice such activity, in all cases, report them immediately to our **Compliance Officer** and or consult our partner Solarisbank and their anti financial crime unit (listed in Annex 1 of the policy).

Confidential information & insider information

We act according to legal standards regarding confidential information and insider trading!

Business transactions at Tomorrow lead to information that is not public knowledge, e.g., information obtained in confidence, including internal information and documents of Tomorrow or our partners, are considered insider information when not publicly known. Special rules of conduct apply to such information, and misuse is punishable by law. In this respect, Tomorrow strictly follows the German law (GeschGehG).

To maintain the trust of our shareholders and investors, it is crucial that all employees comply with the legal prohibitions on insider trading. This information may only be used for the intended commercial purpose and exclusively distributed with the necessary authorization. Tomorrow will follow up on any suspicious behavior involving improper use of insider information, and violations will result in disciplinary actions.

If employees obtain some sort of insider information about a publicly traded company, it is crucial that this information is disclosed to the compliance officer without delay. In order to avoid any doubt, this company will be put on our "Sperrliste", therefore no employee is allowed to invest in any shares or financial instruments which are listed [here](#).

- Confidential information may only be distributed for the purpose of fulfilling business purposes and should only be shared on a "need to know" basis.
 - Confidential information must not be sent via email to any personal email address.
 - Confidential information must not be used for one's own benefit.
 - Confidential information must not be made available to other partners.
- If you notice such activity, take steps to report them immediately.

Data protection and data security

We protect all information and data of our customers, partners and fellow employees!

Employees must not disclose information - unless it is already known to the public - for their personal

gain or for the benefit of third parties. This includes technical data, financial data, operational data, customer information or any other information relating to our firm's business and its operational activities and future plans.

Employees must comply with relevant laws and company regulations with respect to personal data, particularly that of customers, applicants, employees and shareholders. Personal data and (to the extent equivalent by law) legal entities may only be collected, processed and used in accordance with the respective requirements.

Personal data may only be collected, processed, or used if necessary for clearly defined, legitimate purposes agreed at the company level. We aim to ensure a high standard of data quality and technical protection against unauthorized access by third parties. To protect the data and information provided to us by our partners and customers, we must all ensure compliance with data protection laws, our policies, and any contractual obligations in collecting, using, retrieving, and disclosing such data.

You can find our current Data Protection Policy in Annex 1.

Our commitment to correct workplace behavior

Tomorrow expects all employees to act in accordance with our workplace policies. These principles should provide employees, partners and others with a guideline for correct behavior and should set expectations within the workplace.

Supporting diversity, inclusion & belonging

We are committed to fostering a respectful, equitable, and inclusive work environment!

In keeping with our value of "A better Tomorrow for everyone," we are committed to creating a great and positive impact for everyone, regardless of:

- ethnic origin or nationality
- social background
- age
- religious affiliation or world view
- sexual orientation
- the gender or the gender identity
- physical and mental abilities

At Tomorrow, we celebrate the variety of life paths and all dimensions of diversity. We believe that diversity and differences make us stronger. We know that there is still a long way to go and that anti-discrimination policies alone are not enough. While absolute equality on a global scale is still a distant goal, every step we take at Tomorrow brings us closer to that very goal.

We therefore want to hold ourselves accountable and make decisions that take into account and (if necessary) prioritize the belonging, empowerment, inclusion and individuality of all our stakeholders.

Preventing Discrimination

We never tolerate discrimination!

Everyone has the right to work in a professional atmosphere that is free from discriminatory practices and promotes equal treatment regarding employment opportunities, recruitment, hiring, compensation, benefits, work assignments, access to training, work advancement, discipline and termination or retirement. Violations of this policy will under no circumstances be tolerated.

Therefore, we at Tomorrow absolutely prohibit discrimination based on gender, sexual orientation, gender identification, ethnicity, color, national origin, immigration status, age, marital status, pregnancy, childbirth or related medical conditions, physical or mental disability, medical condition, socio-economic situation, political opinion, union affiliation, creed, religious belief or any other classification protected under applicable law.

→ If you suffer or witness any type of discrimination, please report it to People & Culture.

Preventing Harassment

We never tolerate harassment!

At Tomorrow, we are committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including verbal, sexual or physical harassment.

We have a zero-tolerance policy for any form of harassment in the workplace. We treat all incidents seriously and promptly investigate all allegations of verbal, physical or sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

→ If you suffer or witness any type of harassment, please report it to People & Culture.

Ensuring a safe workplace

Tomorrow cares about its employee's health and safety!

At Tomorrow, we do not compromise on our employees' health and safety. We conduct business in a sustainable, safe, and healthy manner. This includes providing safe working environments and complying with all local health and safety laws and regulations in the places where we do business.

All employees receive an introduction to our Feelgood Program when joining Tomorrow. During the introduction, all employees are shown the optimal working posture and how to set up the technical setup so that there are no physical impairments.

→ If you suffer from or witness any type of insecure or unhealthy work conditions, please report it to Office & Feelgood Management.

Communication & Feedback

Tomorrow makes sure that everyone feels welcomed, supported and appreciated!

Mindset principles are supposed to guide our conversations by making sure that everyone feels welcomed, encouraged, supported and appreciated. The following principles should guide our employees in everything they are doing:

- We communicate with empathy and open-mindedness.
- We are transparent about the intention of our communication.
- We communicate with authenticity and honesty.
- We see and respect the individual behind the workmate.
- Every opinion counts.
- We make sure to have spaces for controversial discussions.
- We find and communicate our focus.

- We create a safe and appreciative communication climate.
- We stick to communication in English.

Information principles ensure transparency, accountability and efficiency in our work. Making sure that there are no information asymmetries will be beneficial for everyone. Therefore, employees should act in accordance to the following principles:

- We share relevant information with all stakeholders.
- We communicate our goals in a transparent manner.
- We are honest about our own resources.
- We provide context for requests.
- We elaborate our vision and roadmap.
- We outline clear responsibilities.
- We set out clear project plans (e.g. start and due dates, steps, processes, people involved etc).

Besides the mindset and information principles, it is also important to ensure and prioritise psychological safety so that we can learn and grow together. In our definition this means taking care of each other. Consequently, every employee should following these principles:

- We make sure to have regular informal check-ins and take the time to give feedback.
- We provide direct, non-violent feedback.
- We show appreciation for questions, ideas and feedback.
- We create explicit room for arguing / constructive feedback.

→ If you have problems or suggestions, address them directly in your team or contact People & Culture.

Annex 1

Helpful links to further information

The information on the policies listed below can be obtained via our internal Tomorrow network, the officially announced notices or in the internal data storage service. For external stakeholders, please contact our People & Culture team to obtain the documents and information.

Policies:

- Find People & Culture Policy [here](#).
- Find Data Protection Policies [here](#).

Contact persons:

- Find the person responsible for People & Culture in Personio.
- Find the Compliance Officer in Personio.
- Find the Office & Feelgood Manager in Personio.

Whistleblowing mailbox:

- The whistleblowing service is reachable under the link [here](#).