



Profile Solutions
Worldwide

Code of Conduct
As of 01.01.2023

Introduction

Exelliq Holding strives to only conduct business in full compliance with all laws and regulations and in accordance with a high level of ethical standards. It is only business conduct that is in full compliance with all laws and regulations and of a high level of ethical standards that will ensure the long-term success of our company and best serve society.

The Code of Conduct constitutes the legal and ethical framework for how all managers and employees of the company (hereinafter referred to as "Employees") should conduct themselves and defines the fundamental rules of conduct within the company and in relation to the company's business partners and the general public. The Code also reflects the underpinning core values pursued by the company, including above all those relating to employment, occupational and product safety as well as environmental protection.

The underpinning principles and values can be summarised as follows:

- All laws and regulations in each jurisdiction are to be strictly observed. There are no exceptions.
- Don't ever compromise your integrity. Never use your position in the company to achieve any benefit for yourself, your family or your friends.
- Do not offer (or accept) gifts or invitations which could suggest that they might influence the recipient's business judgement.
- Do not knowingly mislead anyone. Never try to counterfeit any documents.
- Be fair to your colleagues and treat them with respect. Any form of discrimination on the grounds of race, skin colour, religion, gender or sexual orientation, age and disability is unacceptable.
- Respect our business relationships. Always deal with our customers and suppliers fairly and with respect.
- Health and safety rules and procedures are in place to protect you, your colleagues and others. Always follow them.
- Always respect and protect the environment.
- Always ask if in any doubt. Consult your supervisor, the compliance officer or the HR department should you be in any doubt about a particular matter.

The company has established a Compliance Management System (CMS) for the purpose of ensuring that the company's business and the conduct of its employees are in full compliance with its fundamental principles and values. The Code of Conduct is a fundamental element of this CMS.

The Code of Conduct was issued by the management of Exelliq Holding on 01.04.2022 and came into force with immediate effect.

Nußbach, dated 01.01.2023

Exelliq Holding

Gerold Schley

Herbert Landschützer

Contents

1. Fundamental conduct requirements
2. Antitrust laws

- 3.** Anti-corruption regulations
- 4.** Political contributions, donations and sponsoring
- 5.** Trade control regulations
- 6.** Conflicts of interest
- 7.** Four-eyes principle
- 8.** Handling of assets
- 9.** Confidentiality
- 10.** Data security and protection of personal data
- 11.** Communication
- 12.** Records and financial information
- 13.** Fundamental rules for payments
- 14.** Money laundering
- 15.** Human rights, employment and occupational health and safety

- 16.** Product safety
- 17.** Environmental protection

- 18.** Promoting exemplary business practices among business partners
- 19.** Questions; reporting infringements; sanctions

1. Fundamental conduct requirements

Compliance with laws and regulations: Each manager and worker ("Employee")¹ of Exelliq Holding ("the Company") is responsible for familiarising themselves with and strictly adhering to the laws and regulations of the jurisdiction in which they operate. Irrespective of the sanctions that may be inflicted by law, any employee may also be subject to disciplinary measures for violation of laws and regulations, since a violation of laws and regulations also constitutes a violation of the obligations under the employment contract.

Highest ethical standards: Every employee is also expected to follow the highest ethical standards in internal cooperation and external business pursuits. This not only entails treating all external and internal partners with respect, fairness and sincerity, but also promoting all human rights, good working practices and environmental protection. Supervisors are expected to curb any unacceptable behaviour.

Reputation of the company: The reputation of the company is to a substantial degree shaped by the actions of its employees and the way in which each of its employees presents and conducts themselves. An employee's unlawful or inappropriate conduct can result in the company suffering significant damage. It is therefore expected of each employee that they conduct themselves in a way that upholds and promotes the high reputation of the company.

2. Antitrust laws

General: The company is firmly dedicated to doing business in accordance with the principles of fair competition. This includes strictly complying with antitrust laws and regulations that strive to protect competition from anti-competitive behaviour.

Horizontal agreements: Under no circumstances shall any employee execute agreements with competitors or potential competitors or participate in any collusive conduct with competitors or potential competitors (collectively, "*horizontal* agreements") whose purpose or effect is to prevent or restrain competition. It is therefore strictly prohibited,

- to enter into an agreement with a competitor, to refrain from competition, to limit business with suppliers, to divide up customers, markets, territories or production, or
- to discuss with competitors about prices, production quantities, production capacities, sales, offers, profits, profit margins, costs and other parameters governing or influencing the competitive behaviour of the company with the purpose of provoking parallel behaviour on the part of the competitor.

¹ The term "employee" used herein encompasses both persons of the male gender and persons of the female gender.

Vertical agreements: Many jurisdictions, such as the European Union or the US, although with minor differences, prohibit many types of vertical agreements and arrangements, i.e. agreements and arrangements between suppliers and customers or patent holders and licensees. These include

- limitations on the customer's freedom to determine resale prices,
- limitations on the customer's freedom to determine supply conditions in relation to its business partners (e.g. geographic or customer restrictions),
- certain most-favoured-customer clauses, certain exclusivity agreements
- (e.g. total requirements purchase clauses)
- as well as non-competition agreements.

It often depends on the duration and intensity of the limitations as well as the market position of the companies involved as to whether such limitations are permitted or not. As a consequence, employees are advised to obtain legal advice before entering into such vertical agreements.

Abuse of a dominant market position: To the extent that the company holds a dominant position in a particular market, it is important for employees to be aware that in many jurisdictions, such as the EU or the US (although with minor differences), *abuse* of a dominant position is prohibited. The following conduct, e.g., might constitute such abuse:

- treating customers differently for no good reason (prohibition of discrimination),
- any refusal to supply,
- any selective supply,
- imposing unreasonable purchase or selling prices and conditions,
- bundling for additional supply or service in the absence of any objective reason for doing so.

It depends on the circumstances of the individual case as to how a dominant position is determined as well as the limits within which certain conduct is still permissible. For this reason, employees should obtain legal advice if the company's position may be deemed to be dominant and the relevant conduct occurs in this market.

Corporate mergers and acquisitions: Corporate acquisitions or mergers involving the company are potentially subject to the prior approval of the relevant antitrust authorities. Given that the company is part of the larger Industrie Holding Nimbus group, it is highly likely that prior approval will be required. As a result, the company is not permitted to purchase any business or shares of another company or to engage in any merger with another company unless the legal department of Industrie Holding Nimbus has given its prior consent.

Consequences of non-compliance: Should there be any breach of the antitrust laws, then not only are the relevant agreements rendered null and void, but any breach can also result in significant penalties and claims for damages, which can put the very existence of the company in jeopardy. The company is therefore committed to the principle of "zero tolerance" and to taking disciplinary action (including termination for good cause) against any employee in breach of antitrust laws. Employees should also be mindful that they may be subject to personal injury claims and penalties (including imprisonment in some jurisdictions).

3. Anti-corruption regulations

General: The company strives to ensure that the rules of fair competition are adhered to. Among other things, this includes the company's commitment to competing for business through the quality and price of its products and services, not by granting undue advantages to others.

Granting benefits to public officials: Anti-corruption legislation in most jurisdictions stipulates that no employee shall, directly or indirectly, offer, promise, grant or authorise the granting of any benefit, whether pecuniary or non-pecuniary, to any public official (or to anyone related

to a public official) with a view to influencing any official action or deriving any benefit. To rule out any suspicion, offering, promising, granting or authorising a benefit to the public official is furthermore prohibited if this could even give the *slightest* impression that this was with the intention of influencing an official act or obtaining a benefit.

The term "*public official*" is loosely defined to include:

- any official, employee or representative of a public body and any person who acts in an official capacity for a public body (the term "public body" encompassing all state and local public institutions and associations, as well as all companies and corporations that are publicly owned or controlled, and all supra-national public organisations),
- any employee within a political party and any person occupying a place within a political party, as well as any candidate for political office,
- any person exercising any other public function or duty for any country or public administration.

In practical terms, this specifically covers (but is not limited to) all civil servants and public officials, members of a political party, employees of a state university, judges, customs officials as well as immigration officials.

The term "*benefit*" encompasses all things of any value, including (but not limited to) money or money equivalent benefits (such as cheques, loans, moratoriums, cancellation of debts), personal discounts and price reductions that are not generally granted, gifts, invitations to cultural or sporting events, perks, use of facilities, materials or equipment, beverages, meals, transportation, accommodation, any promise of future employment.

Granting of benefits to other persons which are not public officials: No employee may directly or indirectly offer, promise or grant any benefit to any person (such as customers, suppliers or other business partners, or the respective employees or representatives or other persons associated with the customers, suppliers or other business partners) or authorise the granting of any benefit to encourage or reward that person for carrying out their function inappropriately. The same is applicable if the benefit could be *perceived* as instigating or rewarding an improper exercise of the person's particular function.

The term "*function*" encompasses any function or activity associated with the business, any activity related to the employment of the person concerned, as well as any activity that the person concerned performs for a company or business.

The function is performed "*improperly*" if the person concerned fails to perform it in accordance with the expectations held by a reasonable third party having regard to the requirements of good faith, lack of prejudice or a position of trust that the person concerned may hold.

Money and pecuniary advantages; sexual or immoral benefits: Irrespective of the nominal amount, the offer, promise, granting as well as the authorisation of the granting of money or benefits comparable to money (such as cheques, loans, moratoriums, cancellation of debts) and benefits of a sexual or immoral nature are always prohibited.

Granting benefits with the involvement of third parties: It is prohibited for employees to offer or grant prohibited benefits to any public official or other business partner *indirectly* with the involvement of a third party (such as an agent, consultant or other business partner). It is also prohibited that money or other valuables be given to a third party if there are circumstances *indicating* that the third party might pass the money or valuables (in whole or in part) to an official for the purposes of influencing an official act or obtaining a benefit, or to any other business partner in return for obtaining unfair competition in a commercial transaction.

Representatives of the company: Ensuring that third parties representing the company (such as sales agents, distributors, consultants and similar persons) strictly comply with the relevant anti-corruption rules is important for the company and its reputation. Employees in charge of engaging such representatives therefore have to ensure that the representatives adhere to the company's anti-corruption rules or have implemented and follow comparable rules.

Demanding and accepting benefits: No employee is permitted to exploit their position in order to demand, accept or be promised personal benefits. It is only permissible to accept benefits that are in line with standard business practices and do not jeopardise the reputation of the

company and the absolute integrity of the employee. This exception is essentially related to the acceptance of occasional gifts of symbolic value as well as business meals that are appropriate in terms of their value and frequency (see also Anti-Corruption Policy on the Intranet).

Money and pecuniary benefits must never be accepted.

Benefits not complying with the preceding rules have to be rejected or, if this is not possible, the respective supervisor and the company's compliance officer have to be notified.

If and insofar as local anti-corruption rules are stricter than the general principles outlined above, the employee is required to comply with the stricter rules.

4. Political contributions, donations and sponsoring

Political contributions: Political contributions involve the provision of anything of value to further a political objective. Some examples are local, regional or national events aimed at raising funds for the pursuit of political objectives, the provision of goods or services to a political party or candidates for political office, paying employees to work for a political objective during working hours, or paying expenses for a political campaign.

In many countries, political contributions from companies are prohibited and subject to abuse. This is why any political contribution by or at the expense of the company requires the explicit prior consent of the management.

Exerting pressure of any kind, whether directly or indirectly, on an employee, making a personal political contribution or supporting a political party or a candidate's political affiliation is prohibited.

Donations: Donations refer to voluntary monetary or non-cash contributions without anything in return (i.e. the company does not receive any money or other material values) to third parties for educational, scientific, environmental, cultural or social purposes.

Each donation must be documented in a clear and recognisable manner. It must not be made to secure an unfair competitive advantage for the company or for any other improper purpose. It must not be made to individuals or profit-making organisations. All donations must be approved by at least one member of the management.

Sponsoring: Sponsorship refers to any monetary or in-kind contribution made by the company to an event organised by a third party, for which the company is given the opportunity to display their logo at the event, to promote the company's brands, to be mentioned in the opening or closing remarks, to participate as a speaker in a discussion panel and/or to receive tickets to the event.

Each act of sponsorship must be made pursuant to a sponsorship agreement mentioning the recipient of the contribution, the amount of the contribution, the event for which the contribution is rendered and the reciprocal benefit received by the company. Each act of sponsorship must be approved by at least one member of the management.

5. Trade control regulations

Many jurisdictions where the company operates have adopted trade control laws and regulations restricting or prohibiting the cross-border transfer of goods, services and technology, as well as certain cross-border capital transactions and payments. These restrictions may not only pertain to the export (including re-export) of goods, services or technology to certain countries or to certain persons or companies that are "denied" or "blacklisted", but also to the *import* of goods, services or technology from such countries or from such persons or companies that are "blacklisted".

Any breach of trade control laws and regulations may result in severe penalties for the company (including the risk that the company will, itself, be "blacklisted", which will deter public organisations and many businesses from doing business with the company). It may also result in personal liability and imprisonment.

All employees engaged in the export or import of goods, services or technology, as well as in cross-border capital transactions and payments, are required to familiarise themselves with and strictly adhere to the relevant trade control laws and regulations.

6. Conflicts of interest

Best interests of the company: Every employee has a duty to demonstrate undivided business loyalty to the company and only make business decisions that are in the best interests of the company, as opposed to those based on potential personal gain.

Avoiding conflicts of interest: Each employee has to avoid any conflict of interest and indeed any possible *semblance* of a conflict of interest. If there is any (possible) conflict of interest, the relevant employee has to immediately inform the supervisor and the HR department and is not allowed to make any decision for the company, participate in any decision-making process or influence anyone else in the decision-making process.

Competition with the company: While in employment, no employee shall engage in any activity that gives rise to competition with the company or assist any company (whether as part of employment, through consulting or any other means) that is in direct or indirect competition with the company. Once the employment relationship has been terminated, the employee may only cause competition to the company or support another company competing with the company as long as the employee does not use confidential information of the company, unless the employee is bound by a post-contractual restraint on competition.

Employee's involvement with third parties: Each employee holding or acquiring, whether directly or indirectly, an interest in a customer, supplier of goods, service provider or other *business partner* of the company is required to report this to the relevant HR department and their supervisor in the event that they are directly or indirectly involved in any transactions with the respective customer, supplier of goods, service provider or other business partner or if they are in a position to influence decisions of the customer, supplier of goods, service provider or other business partner as a result of their interest. Any employee who directly or indirectly has an interest in a *competitor* must also notify the relevant HR department and supervisor if that interest enables the employee to exercise any influence over the management of the competitor. It can be assumed as a general rule that a stake of more than 5% in the total capital of the competitor gives the employee this opportunity to wield influence on the management.

Involvement of related persons in third parties: The rules outlined above regarding the holding or acquisition of an employee's interest in a customer, supplier, service provider, other business partner or competitor are applicable *mutatis mutandis* where a person closely related to the employee (this includes, but is not limited to, the employee's spouse, brothers or sisters, children, parents) holds or acquires such an interest.

7. Four-eyes principle

Internal four-eyes principle: As a general rule, all contracts (be they written, electronic or otherwise) and all declarations and determinations which establish or may establish obligations or liabilities of the company or whereby the company waives rights, shall be subject to the approval of at least two employees who have the necessary authorisation ("four-eyes principle").

Right to represent the company in its external relations: The four-eyes principle also applies if the declaration or statement of only *one* employee to a third party would be legally binding on the company. This means: while a contract requires the signature of only one employee to be binding on the company (because the employee holds the right of sole representation in external relations), the company's internal policy requires the signature or consent of a second employee who has the required authorisation. Avoiding differences as far as possible between the right to externally represent the company and the internal four-eyes principle, employees should only be given the right to represent the company jointly as a matter of principle, unless there are valid and well-documented reasons to grant the right to represent the company solely.

Documentation: Approval by at least two employees must be well documented. This can either take place on the relevant document itself (such as a personal signature on a written document) or - especially where e-mails are concerned - by other suitable means (such as

printing out the relevant e-mail as well as signing and archiving the printout, or establishing a suitable electronic process to ensure that the transaction has been approved in an audit-proof manner by two employees with sufficient authorisation).

Exceptions: By way of exception to the four-eyes principle, the signature of only one employee is sufficient in the following transactions:

- internal ordering of materials or semi-finished goods,
- internal ordering of services,
- authorisation to lend tools or other items of equipment.

The management is entitled to define further exceptions to the four-eyes principle for routine transactions during the normal course of business.

8. Handling of assets

Responsible and diligent handling: All employees have a duty to handle company assets in a responsible and diligent manner and to protect them against loss, theft, misuse and access by third parties. Assets include not only real estate and other material assets (such as machines, tools, computers, copying machines, telephones), but also non-material assets (such as inventions, expertise, trade secrets, copyrights, patents and other industrial property rights).

Removal from the company premises: Company assets must not be removed from the company premises except with the permission of the responsible supervisor on an individual basis, whereby permission must be properly documented.

Use only for the business purpose of the company: Assets of the company are only to be used for pursuing the business of the company, subject to the explicit and duly documented consent of the responsible supervisor in the individual case, and not for private purposes or the business of third parties. Mobile phones and computers must only be used for private purposes in accordance with the specific rules as defined by the company. Under no circumstances, however, must mobile phones and computers (as well as the other assets) be used to make harassing, discriminatory or offensive comments or criticisms of third parties.

Computer programmes: A lot of computer programmes have been licensed to the company to be used for business purposes by their employees. Employees are not permitted to make any copies for their personal use or, due to the routinely limited number of licences, for the company's use, except with the explicit permission of the IT department. Computer programs have the potential to harbour viruses or other dangerous elements that may attack or even destroy the company's IT system. It is therefore prohibited for any employee to install computer programs or other software on the company's IT systems except with the explicit prior consent of the IT Department.

9. Confidentiality

Expertise of the company: The long-term success of the company relies heavily on the company's business and technical expertise. All of the company's expertise that is not in the public domain must therefore always be kept confidential and protected against unauthorised access by third parties. If it becomes necessary in the pursuit of the company's business interests to disclose the company's confidential expertise to a third party (e.g. a customer or cooperation partner), then care must be taken to ensure that the third party remains bound by appropriate confidentiality obligations.

Third-party expertise: Confidential information pertaining to third parties (e.g. customers, suppliers, agents, consultants) is often disclosed or otherwise made available to the company and its employees. All employees have a duty to hold this information in the same confidence as the confidential information of the company itself.

10. Data security and the protection of personal data

General: The company is reliant on the use of electronic data processing systems and the global exchange of electronic data in order to conduct its business. These systems and data exchanges entail the risks that (i) third parties may obtain unauthorised access to the data of the company and harm the company by using, altering or destroying such data and (ii) personal data may be abused and individual privacy may be violated.

Data security: All employees have to ensure by taking appropriate measures that third parties do not gain access to data (especially, but not limited to, electronic data) of the company. These measures include, but are not limited to,

- that the company premises are protected against unauthorised access by third parties,
- that documents containing sensitive data are not left unprotected at the workplace once the room is vacated,
- that documents containing sensitive data are not taken out of the office if and when this is not necessary (e.g. to visit a client or to work from home),
- that company computers are protected against theft and unauthorised access (especially when travelling),
- that suitable passwords are used, that they are changed on a regular basis and that they are not made known to third parties,
- that firewalls and regularly updated anti-virus programmes are installed on the computers,
- that IT hardware (especially external hard drives and memory sticks) are not connected to the company's computers except when the hardware and its use have been approved by the IT department,
- that no software is installed on the company's computers except with the prior express consent of the IT Department,
- that no company data is stored on a private computer or private computer accessories (especially hard drives and memory sticks).

Employees who are responsible for data security must also ensure (i) that each employee can only access such data as they actually need for completing their tasks, (ii) that access is restricted by suitable technical measures, and (iii) that the restrictions on access are checked and audited on a regular basis.

Data protection laws: Many jurisdictions (such as the European Union and its Member States) safeguard personal data and the privacy of individuals through strict laws. The term "*personal data*" encompasses all data relating to an individual (such as name, address, telephone number, birthday, salary, race, religion, etc.), regardless of whether the individual is an employee, a customer or any other person. It is expected of all employees that they acquaint themselves with and adhere to the relevant data protection laws.

11. Communication

Appropriate external and internal communication is essential for making the company a success. When it comes to communication, every employee is regarded as a representative and ambassador of the company. Consequently, it must be ensured that communication is always conducted in a professional and prudent manner.

External communications (e.g. with customers and suppliers) must not reveal business forecasts or company business or financial information except where the company has officially published the respective forecasts and information.

It is expected that all employees will exercise the same care when sending emails as they would when sending formal letters. Since messages can easily be sent to the wrong address, the identity of the recipient must always be verified prior to sending. It is important to note that emails can be easily forwarded to additional addressees unbeknownst to the sender - meaning that what may sound amusing to a close friend may sound offensive to someone else. It is also important to keep in mind that if a summons or disclosure order is issued, then electronic information may be subject to disclosure and that deleted electronic information may also be re-produced on a regular basis.

All communications with the *media* (press, radio, television) should only be made through or must be approved by the company's communications department/manager.

All communication with *banks* and other *investors* must be conducted solely by the company's finance department. All employees are therefore required to forward questions from banks or other investors to the finance department for a response.

12. Records and financial information

Books and records: All employees maintaining or otherwise responsible for the books and records of the company must ensure that

- the books and records are complete and accurate and reasonably reflect every transaction, expense, asset and liability of the company,
- the books and records are free from false, misleading or other inaccurate entries
- all entries are made in a timely fashion
- the entries are made in conformity with all applicable accounting principles and standards,
- all books and records are kept in conformity with all applicable laws, regulations and accounting standards.

Unregistered or undisclosed funds: It shall be prohibited for any employee to create or hold any funds or assets of the company which are not registered or disclosed.

Disclosure of financial information: Financial data of the company (such as turnover, EBITDA, EBIT, profit or loss) must not be discussed with or disclosed to third parties except where the respective data has been officially communicated by the Finance Department.

13. Fundamental rules for payments

Type of payments: Payments by or on behalf of the company should be made by bank transfer or cheque to the greatest extent possible in order to ensure transparency; cash payments should be avoided as much as possible.

Payments to the respective party only: All payments must be made directly to the respective party. No employee is permitted to make any payments under a special name or to a numbered account or the account of a third party (even when requested to do so by the business partner).

Payments in cash: In the event that it is not possible to avoid a cash payment, the employee is required to document the respective payment and state the name of the payer as well as the person who authorised the payment, the name and address of the recipient of the payment, the amount, the date as well as the purpose of the payment. The documentation has to be sent immediately to the company's finance department.

Payments to oneself: No employee shall make, authorise or influence any payment by the company to themselves or any relative.

14. Money laundering

The company strives to ensure that business is only conducted with customers in good standing and other business partners who do business in a legitimate manner where funds are derived from lawful sources. As such, all employees are required to comply with relevant money laundering laws and the company's internal processes that are designed to detect and deter suspicious payments. All employees have to report suspicious behaviour by customers or other (potential) business partners to the compliance officer and adhere to all accounting, recording and financial reporting requirements applicable to payments made in cash and other payments related to transactions.

15. Human rights, employment and occupational health and safety

Human rights: The company respects and supports the protection of internationally proclaimed human rights in conformity with the Universal Declaration of Human Rights of the United Nations².

International Labour Organisation (ILO): The company supports the principles enshrined in the Declaration on Fundamental Principles and Rights at Work³ of the International Labour Organisation (ILO)⁴. It supports the work of the ILO in formulating and implementing international labour and social standards and in creating dignified working conditions as an essential prerequisite in the fight against poverty.

Freedom of association: The company acknowledges and promotes freedom of association and the right of workers to enter into collective agreements within the limits of applicable laws. The company takes steps to ensure that trade union representatives are not discriminated against.

Forced labour: The company does not tolerate any form of forced labour.

Child labour: The company is supportive of eliminating exploitative child labour. It only employs those workers who are at least 15 years old or, in the case of a higher age limit in the country, workers who have reached that higher age limit. The company shall only accept a minimum age of 14 years by way of exception if a legal minimum age of 14 years applies in the relevant country. The company is committed to complying with the Minimum Age for Employment Convention (ILO Convention No. 138) as well as the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO Convention No. 182). If a national regulation establishes stricter standards for child labour, then such stricter standards shall take precedence.

Equal employment opportunities: The company adheres to all regulations on equal employment opportunities prevailing in the respective countries and does not tolerate any discrimination of employees contrary to the law, unless the respective national law stipulates that selection is based on certain criteria.

Pay: The company observes the principle of "equal pay for work of equal value".

Discrimination: The company is firmly committed to opposing all forms of discrimination as permitted by applicable laws. This includes ensuring that no employee discriminates against another employee or business partner on the grounds of ethnic background, culture, religion, age, disability, race, gender, sexual orientation or beliefs.

Abusive conduct and harassment: Our company's culture is based on respect for others. Each and every employee must therefore endeavour to make sure that the working environment is respectful and free from any abusive behaviour and harassment. Any harassment against an employee or business partner and any offensive behaviour, sexual or otherwise, is strictly prohibited.

Complaints: Any employee who believes that they have been or are being unlawfully discriminated against or abused or harassed should immediately report the incident to their supervisor, HR department or the Compliance Officer. Any complaints will be immediately investigated. Should the investigation corroborate the discrimination, abuse or harassment, prompt remedial action will follow. An employee who makes a complaint in good faith shall not be reprimanded or discriminated against for making such a complaint.

Occupational health and safety: The company strives to provide a safe and healthy working environment. All employees are required to pay continuous attention to occupational health and safety and to perform work in such a way as to protect the company and the safety of employees in the workplace. It is the responsibility of management to establish the best possible accident prevention measures in order to ensure that the work environment reflects the requirements for an environment that is health-oriented, and to ensure that all employees are sufficiently instructed in safety-related matters.

² Universal Declaration of Human Rights of the United Nations

³ Declaration on Fundamental Principles and Rights at Work

⁴ International Labour Organisation (ILO)

16. Product safety

Ensuring that the company's products are safe is of paramount importance to the company and its long-term success. Employees in charge of the development, marketing and/or sale of products are therefore obliged to ensure that

- before marketing and selling new products, the possible impact on the safety and health of people as well as on the environment is carefully investigated and the results are documented,
- new products are only placed on the market if it can be ensured that, when used as intended or in a foreseeable manner, they do not pose a risk to the safety and health of people and do not have any avoidable negative impact on the environment,
- all the company's products are monitored on a continuous basis with a view to new findings on their impact on safety, health and the environment.

17. Environmental protection

The company places great importance on the protection of the environment and the conservation of natural resources. The company aspires to do business in a way that is safe for the environment and continuously improves the eco-balance. All employees are expected to familiarise themselves with and strictly adhere to environmental laws and regulations and to contribute to the objectives of environmental protection and conservation of natural resources through their own behaviour, which goes beyond the requirements of current legislation.

18. Promoting exemplary business practices among business partners

The company shall convey the fundamental principles of this Code of Conduct to its suppliers and service providers. More specifically, the company will promote and require the following to the best of its ability among its suppliers and service providers:

- that they adhere to all applicable laws and regulations (especially the basic provisions relating to antitrust law and anti-corruption laws and regulations),
- that they observe the principles enshrined in the Universal Declaration of Human Rights of the United Nations,
- that they observe the principles enshrined in the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) (including particularly the promotion of equal employment opportunities and equal treatment of employees irrespective of skin colour, race, nationality, disability, gender or sexual orientation, political or religious beliefs or age, as well as the rejection of any form of prohibited child labour or forced labour),
- taking responsibility for the health and safety of employees,
- respecting the principles of environmental protection.

The company will also encourage its suppliers and service providers to insist that their suppliers and service providers adhere to and promote such principles.

The company will, when selecting its suppliers and service providers, take into account the extent to which the respective supplier and service provider has made a commitment to strictly observe such principles.

19. Questions; reporting infringements; sanctions

Questions: If an employee has any questions about the Code of Conduct or the pertinent laws and regulations, or if they are unsure about what to do in a specific situation, they should be urged to contact their supervisor or the compliance officer. If an employee is uncertain as to

whether their actions are lawful or in compliance with the Code of Conduct, the principle should be followed: *Question first, act later.*

Reporting infringements: Employees who know or have good cause to believe that laws or regulations, this Code of Conduct or other internal rules have been violated should raise the relevant matter with their supervisor or the compliance officer. The report should be made irrespective of the position of the person who is responsible for the violation. All reports will be promptly investigated. Corrective action will be taken if necessary.

Protection of employees who have made a report: An employee who reports a violation that they know or have good reason to believe has taken place shall not be reprimanded or discriminated in any way for making the report. The identity of the employee who made the report shall be kept confidential upon request, except as otherwise required by law.

Sanctions: Breaches of the Code of Conduct and other company regulations are punishable by official sanctions.