



Worldwide Code of Legal and Ethical Business Conduct

(January the 04th 2021)

Preamble

Ethical conduct is the basis of professionally sound and legally correct business relationships. For this reason, the Dr. Dieter Murmann Beteiligungsgesellschaft II mbH and its subsidiaries (hereafter collectively referred to as the “Company” or “Sichert Group”) establish this Code of Business Conduct (hereafter referred to as the “Code”) to be observed by all Company employees, directors and agents.

It is the intention of the Company that the name of the Sichert Group be synonymous with the highest business standards. The Company and all of its employees will conduct business according to high moral and ethical principles and in compliance with applicable law. Integrity, honesty and legality will govern every action and every decision that is made in all relationships internally and externally with shareholders, suppliers, distributors, customers, competitors, government officials and the public.

The Sichert Group Code of Business Conduct is generally stated. While the Code does not refer to every possible situation, it does provide guidance. Every employee is expected to use sound judgment in following this Code in situations not specifically addressed. The Company has adopted, and may from time to time adopt, policies and guidelines which address more specifically certain activities that are more broadly stated in this Code. Such policies and guidelines are intended to be supplemental to this Code and every employee is expected to be familiar with and comply with such policies and guidelines.

As a global company, we do business in many different countries where the laws, business practices and customs may vary significantly. It is the Company’s policy to follow the national and local laws of the countries in which we operate. It is also our intent to follow local customs and practices unless they conflict with a policy in this Code or applicable laws or regulations, in which event this Code or applicable laws or regulations should be followed. If any questions arise in this regard, please contact a member of the Sichert Group as described below.

1. Responsibilities

This Code applies to the Company and all its business units and subsidiaries worldwide. All employees have an affirmative obligation to be familiar with and comply with this Code and report any actual or potential violations of this Code.

Managing directors/General managers of local units shall inform their employees of this Code and Company requirements for high ethical standards and compliance to laws and shall establish appropriate procedures to support and ensure compliance.

2. Authority

Overall administration of this Code shall be the responsibility of the Managing Directors of the Dr. Dieter Murmann Beteiligungsgesellschaft II mbH. The day-to-day administration of this Code shall be the responsibility of the Managing Director of the local entity.

3. Certification

Employees in designated job positions shall annually certify compliance with this Code. The administration shall be done by the Sichert Group.

4. Reporting Instances of Possible Non-compliance

Any exceptions to, deviations from, violations, or suspected violations of this Code shall be immediately reported to the Managing Directors of the Sichert Group. The Company wants it clearly understood that adherence to this Code carries the highest priority worldwide.

There can be no retaliation for making a report. Identities of those making a report will remain confidential to the extent practicable. Any employee reporting in good faith a possible violation shall not be disciplined for so reporting, providing the employee is not involved in a violation of the Code.

5. Violations of the Code

Violations of this Code will result in disciplinary action up to and including discharge. Disciplinary action will be taken against any individual who is found to have authorized, tolerated, participated in or concealed actions that violate this Code and against any individuals who retaliate, directly or indirectly, or encourage others to retaliate against an employee who reports a violation of this Code.

6. Compliance to Laws

We will comply with the applicable laws in the countries where we do business. If there is uncertainty about the legality of a business practice, or if the applicability of the law is unclear, legal advice should be sought.

7. Financial Control and Accuracy of Records

Company funds, assets and services shall not be used for non-business purposes without approval nor be used for any purpose that is unlawful or for any purpose other than what is described in documents supporting the payment. Under no circumstances shall any undisclosed or unrecorded fund be established or maintained.

The Company's business transactions worldwide must be properly authorized and be completely and accurately recorded on the Company's books and records in accordance with generally accepted accounting practice and established Company financial policy. The Company prohibits false or misleading entries in its books and records or in any governmental filing for any reason.

The retention or proper disposal of Company records shall be in accordance with established Company policies and applicable statutory and legal requirements.

8. Export & Import Controls

Employees are to comply with the export and import controls embodied in the laws and regulations of the countries where the Company conducts business. The Company shall not export, import or re-export any commodity or technical data in violation of law, or incorporate any such item within any other device. Employees are not to take any action that would put the Company in violation of the law.

General managers shall appoint individuals to be responsible for establishing export and import control procedures and for applying for export licenses as necessary for contracts, agreements and foreign sales.

9. Antitrust Laws and Competitive Practices

Employees are to comply with antitrust laws of the countries in which the Company operates which prohibit agreements with competitors regarding pricing, terms or conditions of sale, or allocation of products, business markets, customers or territories. Employees who must deal directly or indirectly with a competitor are to obtain a working knowledge of and abide by applicable antitrust laws.

Sharing certain types of information with competitors under some circumstances can violate the law. To avoid any appearance of impropriety and illegality, any discussion or communication of any kind with a competitor relating to pricing, production, marketing, inventories, product development, sales territories and goals, market studies and proprietary or confidential information should be avoided.

The Company and its employees will not engage in any illegal or improper acts to acquire a competitor's trade secrets, customer lists, information about the competitor's facilities, technical developments or operations. The Company and its employees will not approach or pay anyone to obtain confidential information or urge competitive personnel or customers to disclose anything that could be regarded as confidential.

10. Conflict of Interest

Each employee must be careful to avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company, its shareholders, customers or suppliers. A conflict of interest is a situation in which an employee, officer or director, or their family or friends, stands to benefit personally, or could appear to benefit, at the expense of the best interests of the Company. A conflict, or appearance of a conflict, might arise, for example, by owning a financial interest in, or serving in a business capacity with, an outside enterprise that does or wishes to do business with, or is a competitor of the Company; serving as an intermediary for the benefit of a third party in transactions involving the Company; using confidential Company information or other corporate assets for personal profit, conducting business for another enterprise during our normal working hours or using Company property to conduct business for another enterprise. An employee should report any situation perceived to be a conflict of interest, or any potential conflict of interest, to a member or members of the Sichert Group.

11. Political Contributions

Employees, as private individuals, are encouraged to participate in public affairs and appropriate political and charitable activities, so long as they make it clear that their views and actions are not those of the Company. In no event shall any officer or employee make any contribution (money, services or use of Company property) in support of a political party or candidate on behalf of the Company. The Company shall not reimburse any officer or employee for any political contribution.

12. Money Laundering

The Company complies strictly with laws and regulations established to combat money laundering activity. Money laundering refers to the legitimization of money or other assets obtained from a criminal offence and its introduction into the regular economic cycle. Therefore, the Company will conduct business only with reputable customers involved in legitimate business activities with funds derived from legitimate sources. No employee may act in a way

that violates the money laundering laws and regulations of the countries in which the Company conducts business.

13. Bribery Prohibition

Employees and Company representatives shall not make or offer to make any payments to or bribe officials for the purpose of influencing, obtaining, or retaining business for the Company, or otherwise securing an improper business advantage over competitors. Paying bribes or providing any other illegal inducement shall not be authorized, offered or made to any official, political party or candidate, or to any other person, who may influence an official act or decision.

14. Dealing with Customers and Suppliers

Conducting business with suppliers and customers requires care to avoid ethical and legal problems. We do not seek to gain any unfair competitive advantage through the use of improper influence, and it is important that our actions do not even present the appearance of improper activity.

All payments to customers or suppliers of the Company must be made in the ordinary course of business under established review and approval procedures. Kickbacks, unauthorized rebates or other unjustified payments whether in money, property or services given to employees, customers, suppliers, or agents are prohibited.

Reciprocity occurs when two companies buy each other's products. This practice is normal and acceptable. However, no employee may buy or accept another company's products as a condition of selling company products or services or require a supplier to buy our products in order to sell products or services to the Company.

Employees and their immediate family members may not solicit, accept, or give gifts of money, gratuities, loans, services, vacations or pleasure trips, or any other favor of any kind in their dealings with suppliers or customers, or potential suppliers or customers. However, to accommodate reasonable business courtesies, employees and members of their immediate families may accept or give unsolicited gifts (other than money).

Employees may offer and/or accept entertainment that is business related, but only if the entertainment is reasonable, occurs infrequently, arises out of the usual course of business, does not involve inappropriate excessive expenditures, and does not obligate the recipient(s) in any manner.

Any doubt about the propriety of accepting any gift or entertainment should be resolved by disclosure to the employee's supervisor prior to acceptance.

Agreements with agents, distributors, consultants, licensees and all other Company representatives must be in writing and clearly and accurately describe the services to be performed, the basis for all compensation, and the actual commission or fee to be paid. Payments must be reasonable in amount and not excessive under local trade custom.

All payments to agents, distributors, consultants, licensees and all other Company representatives should be made directly to the contracting party or their accounts in the country of the contracting party's residence or registered place of business. Payments to accounts in another country may result in charges of aiding or conspiring to violate tax or exchange control laws. The only exceptions to this policy shall be in cases where there is a need-documented justification for a payment in another country or account and documented by the contracting party that such payments will not violate applicable tax, exchange control or other laws.

15. Internet Use

The Company recognizes that the Internet is a valuable resource to support our business. All IT-related resources including internet and e-mail are provided for business related matters only and should not be used during work time for personal matters. Unauthorized access to information and information systems is prohibited. All users are committed not to use the Internet in a way which is unethical or illegal and will strictly adhere to copyright laws. The use of any IT-related company resource to download, retrieve or store any material is prohibited.

16. Use and Protection of Information

The Company is a market leader in its business area in the design, manufacture, and sale of a variety of technical products. These technology-based products require significant investment, including research and development costs as well as processing expertise. Information about these products and their development, like other Company information, is critical to the success of the Company. Like physical assets, information assets require care and protection. Therefore, all users must protect the confidentiality, integrity, and availability of such information. Unauthorized release of information or failure to maintain proper control over our technology has serious implications and could result in irreparable harm to the Company. Its unauthorized disclosure can have significant business, legal and economic consequences and is prohibited.

In the same way as we protect our own business information, the Company respects intellectual property rights of others. Therefore, it is prohibited to bring any confidential information from prior employers into the Company or accept or use any confidential information of third parties. Copyrights and patents of third parties are to be respected at all times.

17. Drug and Alcohol Use

The Company will abide with all applicable laws and regulations relative to the possession or use of alcohol or drugs. The Company's policy prohibits the illegal use, sale, purchase, transfer, possession, or presence in one's system, of drugs, other than medically prescribed drugs, while on Company premises. Similarly, the Company policy prohibits the use, sale, purchase, transfer, or possession of alcoholic beverages by employees while on Company premises, except as authorized by the Company.

18. Employee Relations

The Company is committed to a policy of equal employment opportunity to qualified individuals regardless of their race, religion, color, national origin, age, sex, sexual orientation, or disability. This policy applies to all phases of the employment relationship, including hiring new employees, promotions, selection for training programs, compensation administration, and benefit programs.

The Company is committed to providing a drug-free, safe, and healthy work environment. Each employee is responsible for compliance with environmental, health, and safety laws and regulations.

19. Modern Slavery

Slavery, human trafficking and forced labour do not take place in our Company. We recognize the growing potential risk of modern day slavery and human trafficking in the world. We are committed to ethical and lawful employment in accordance with ILO Convention 29 (Forced Labour Convention). Our stance is firmly against such activities both in our own Company and in those of our suppliers.

20. Child Labour

We are against any kind of child labour in our Company and request this from all our suppliers and customers. We are committed to follow ILO Convention 192 (Child Labour Convention).

21. Corporate Social Responsibility

We recognize that our business activities and processes may have an impact on social, economic and environmental issues outside the workplace. We are committed to ensure and maintain socially responsible behaviour in our Company.

22. Summary

Every employee must apply ethical standards and principles of integrity, honesty and legality in all they do for the Company. Everyone will avoid conflicts of interest; practice ethical principles in dealing with suppliers and customers; maintain books and records according to acceptable standards; and comply with all guidelines relating to competitive practices.

All employees must report non-compliance with this Code to the Managing Directors of the Sichert Group. There will be no retaliation for making a report. Violations of this Code will result in discipline up to and including discharge. All employees are expected to comply with this Code even if it means losing business or reducing profitability. Ethical conduct is not only the right thing to do; it is mandatory, and it upholds a long Company tradition.

January the 04th 2021

Dr. Dieter Murmann Beteiligungsgesellschaft II mbH



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Managing Director