

# Code of Conduct

of CeoTronics AG  
May 2020

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## 1. Introduction/Scope

The reputation of CeoTronics AG and its group companies (hereinafter “CeoTronics”) as well as the trust of clients, lenders, employees and the general public depend decisively on the concrete behaviour of every single person who works at CeoTronics (\*). Everyone must contribute to CeoTronics living up to the described responsibilities and values, and to ensuring that the positive expectations associated with the CeoTronics brand are met.

This Code of Conduct contains minimum standards which are binding on every CeoTronics employee. It is intended to help manage legal and ethical challenges in day-to-day work, to create a sense of orientation and thus to further strengthen trust in the performance and integrity of CeoTronics.

This Code of Conduct is used in all group companies of CeoTronics AG and applies to all employees of the group, regardless of their employment status.

It must be ensured that all agents, representatives and consultants who act on behalf of a group company also commit to complying with this Code of Conduct in writing.

\*Although the male form has been chosen for reasons of legibility, such references apply to the members of all genders.

## 2. Particular responsibility of management staff

Management staff lead by example and have a duty of care towards their employees. Their integrity, conduct and

attention are very important for compliance with the Code of Conduct. Each manager bears responsibility for their employees. They must obtain their recognition through exemplary, integral conduct, performance, openness and social competence. The management staff place trust in their employees, agree clear, ambitious and realistic goals and give their employees as much self-responsibility and leeway as possible. They are responsible for practising active, forward-looking personnel management and control.

It is the duty of the management staff to pay attention to compliance with the Code. If the employees need information or have any questions about the Code of Conduct, the management staff act as their point of contact. They are supported by the Compliance Office of CeoTronics AG.

## 3. Conduct guidelines

### 3.1. Equal treatment, fairness, tolerance and human rights

All employees are valued equally at CeoTronics – regardless of nationality, culture, religion, ethnicity, gender, sexual orientation or age.

As a global firm, CeoTronics treats its employees fairly and openly with respect, understanding and tolerance.

In return, CeoTronics expects each employee to deal with colleagues, employees and third parties (especially customers and suppliers) in a professional, friendly, polite and fair manner, particularly when dealing with unpleasant/critical issues.

Each employee must respect the dignity, privacy and personality rights of every single person. Discrimination, bullying or insults will not be tolerated.

### 3.2. Dealing with internal knowledge and secrecy

All employees are required to ensure the fast and smooth exchange of information within the company. Knowledge of relevance to the task at hand and thus to CeoTronics must not be unlawfully withheld, falsified or selectively forwarded. Information must be forwarded to the respective affected areas correctly and completely, subject to the existence of overriding interests (e.g. secrecy) in exceptional circumstances.

The unauthorised passing of confidential/secret information can cause the customers and users of CeoTronics products and CeoTronics itself incalculable financial damage. CeoTronics therefore places great importance on the non-disclosure of confidential/secret information that comes to its knowledge in connection with the business activities. Within the scope of the agreements made with the respective third parties, all employees of CeoTronics are required to maintain secrecy, in particular those employees who are entrusted with confidential/secret information by virtue of order processing or who work on projects classified as confidential/secret. Each employee must ensure that confidential/secret information is not impermissibly used or disclosed to third parties under any circumstances whatsoever.

### 3.3. Health and safety

CeoTronics takes appropriate measures and observes all applicable statutory regulations and standards for a safe working environment.

All employees must ensure a safe and healthy working environment. Strict compliance with the safety regulations and practices of CeoTronics is an essential prerequisite. Employees are required to report violations of these principles to the safety specialist or safety officer without delay. Any grievances must be corrected without delay.

### 3.4. Conflicts of interest

The topics of secondary employment, participation in other companies and the duty of confidentiality are regulated in the employment contract. It is of fundamental importance to CeoTronics that no employee finds themselves in a conflict of interest. Decisions are to be taken on the basis of objective criteria and not on the basis of the personal interests of the individual.

Should conflicts of interest arise, the respective line manager or the executive board must be informed without delay.

### 3.5. Compliance with laws, regulations and legal provisions

The unconditional observation of and compliance with all relevant and applicable laws, regulations, legal provision, in particular human rights, rules around health, safety and environmental protection, as well as competition law, anti-money laundering laws and data protection in the countries in which CeoTronics operates are key basic principles of economically responsible conduct for the companies of the CeoTronics group. Each employee is obliged to observe the respective conditions.

All forms of extremism (in particular, for example, religiously or politically motivated) or conduct that harms the image or business of CeoTronics has no place in CeoTronics corporate culture and will be consistently dealt with by means of disciplinary measures.

### 3.6. Correct reporting

All records and reports, both for internal and external use, must be complete, correct and truthful.

Data collections and other records must always be complete, correct, timely and system-compliant.



### 3.7. Corruption

With regard to the regulations on the avoidance of corruption within CeoTronics, we refer to the separate Anti-Corruption Guideline.

### 3.8. Treatment of business partners

CeoTronics treats all business partners in a sincere and fair manner. Suppliers and service providers are chosen by the sales organisation in an orderly process based on objective and verifiable criteria. Orders are placed, where possible and meaningful, on the basis of competitive bids.

### 3.9. Environmental protection

CeoTronics abides by the national and international statutory provisions on environmental protection. It is important to CeoTronics to use resources and the environment in a careful and responsible way. All employees are required to reduce all burdens on the environment.

### 3.10. Data protection

Personal data are processed in mandatory compliance with the provisions of data protection law.

### 3.11. Protection of company property

All employees are required to handle the property of CeoTronics appropriately and with a sense of responsibility, in order to secure the company's long-term success. This means that all materials (e.g. office equipment, tools, measuring devices, company vehicles, etc.) and immaterial goods (e.g. intellectual property, data, etc.) are to be protected against loss, damage or improper use.

### 3.12. Insider information and insider deals

The term insider trading has its origins in the financial industry. It refers to the use of insider information to make transactions on the stock exchange that result in personal gain.

As this kind of information is above all suitable for significantly influencing the market or share price of the stock when disclosed, insider trading is legally regulated in Germany in the Securities Trading Act (WpHG). Insider trading is prohibited under German law and is a crime punishable with fines or imprisonment.

All employees are strictly required to comply with the applicable national (e.g. Securities Trading Act (WpHG)) and European regulations (e.g. Market Abuse Regulation (MMVO)) against the abuse of confidential information (insider trading).

### 3.13. Customs and export control

Compliance with the provisions of customer and export control laws is a matter of course for CeoTronics and its employees, and is of special importance for CeoTronics as a company that operates in the public sector worldwide.

In addition to complying with all laws, regulations and directives that concern CeoTronics, CeoTronics also fulfils moral/ethical requirements. CeoTronics thus exercises voluntary self-restraint on exports beyond the provisions of the export control laws.

## 4. Other important regulations at CeoTronics

Regulations on antitrust law, foreign trade and export control, data protection and IT security are documented separately at CeoTronics. Further important regulations on operational coexistence are contained in the employment contract.

## 5. Sanctions

Violations of the provisions of this Code of Conduct can also lead to action being taken under employment law, regardless of possible criminal consequences. Depending on the severity of the violation, this can lead to the loss of employment.

Rödermark, May 2020

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