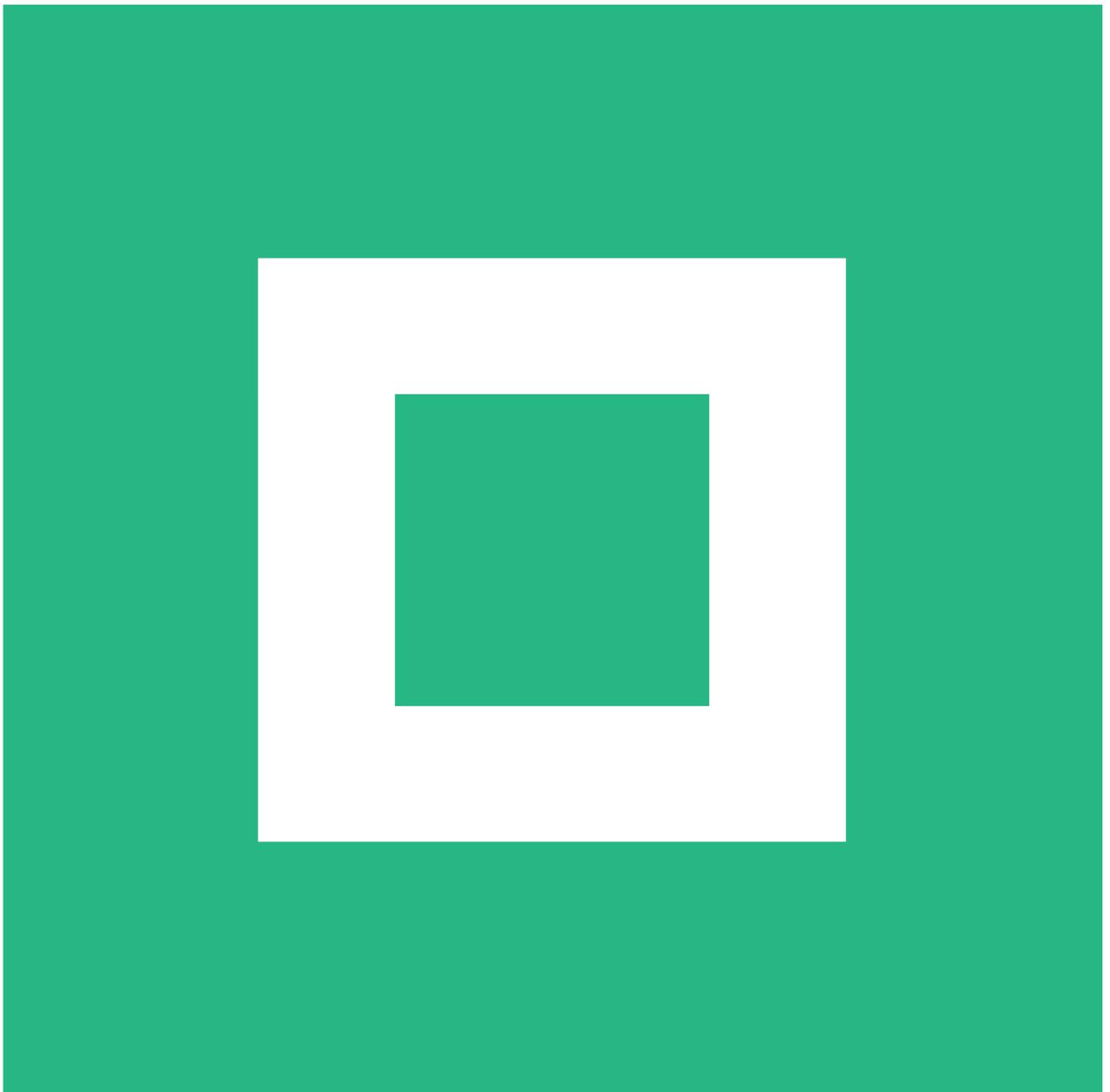


# Code of Business Conduct

## Syntegon Group



# Code of Business Conduct

## Principles of Legal Compliance

### Preamble

For us as company, observing the principle of legality and practicing business responsibly and fairly have always been paramount for all our associates, managers and executive management and part of our Syntegon values. Specific guidelines and directives govern our actions as associates of the Syntegon Group. To facilitate this compliance, essential aspects of these company rules are summarized in simplified form in this Code of Business Conduct.

Certain activities may also be governed by laws or rules from one or more different legal systems. We always comply with the law that is applicable in each individual case. This also includes the laws of the country for which our product or our service is intended.

If this Code of Business Conduct conflicts with local laws, local laws take precedence. In unclear situations, if any other questions arise or above-mentioned guidelines and directives contradict this Code of Business Conduct, we contact the compliance organization or the legal department right away.

### 1. Basic principles

#### Lawful, regulation-compliant, responsible, and fair conduct

We adhere to the principle of legality in all dealings, actions, contracts, and other activities of the Syntegon Group. In particular, we do not deceive customers, government agencies, or the public, nor do we collude in such deceit by third parties.

This basic principle is not driven solely by consideration of the grave consequences of violations and the harm that can be done to the company as a result of prosecution, fines, and claims for damages. Instead, we support the principle of strict legality regardless of whether the Syntegon Group benefits from it. In case of conflicts legality and the Syntegon values take precedence over customer requests and other business interests.

We are responsible for abiding by the laws that apply in our field of activity and are required to assess our working environment continuously from the standpoint of legality, responsibility, and fairness.

If we are unsure as to the decision to make from the standpoint of legality, responsibility, and fairness, we contact our supervisor, the

compliance organization or the legal department.

Regardless of any legal sanctions, a violation of this Code of Business Conduct will, as a matter of principle, result in disciplinary action, up to and including termination and the right to assert claims for damages against those involved.

#### Reporting suspected irregularities

We are expected to report any possible violations of the rules embodied in this Code of Business Conduct. We can always contact our supervisors the compliance organization or the legal department at any time. Furthermore, there is the option of reporting our suspicions – also anonymous – to the compliance hotline. This possibility is also given to our business partners and any third party. Reports will be treated confidentially. In addition, reports made in good faith will not result in any disadvantage whatsoever for Syntegon associates or business partners. This is also the case if the report is subsequently found to be unjustified.

Reports about possible violations are dealt with immediately in internal investigations. If the reports are substantiated, the necessary actions are initiated.

**Cooperation with authorities** In its dealings with the authorities, Syntegon pursues a cooperative approach. As Syntegon associates and supervisors, we fully cooperate when Syntegon or the authorities conduct lawful investigations.

This does not affect legal privilege, the right to withhold information, and any other procedural rights.

#### Supervisors' responsibility

For all Syntegon-supervisors applies: We are notably responsible to ensure that there are no violations of legal regulations or of this Code of Business Conduct in our area of responsibility, which could have been prevented or impeded through appropriate controls.

As supervisors, we act as role models for our associates, inform them about the rules embodied in this Code of Business Conduct and ensure that compliance with statutory and internal regulations is monitored continuously and properly in our particular area of responsibility. We discuss these rules

with them and – together with the compliance organization and the legal department – make ourselves available as a contact partner.

Furthermore, we also ensure that our associates are aware that violations of the principle of legality and the Code of Business Conduct are prohibited and will, as a matter of principle and regardless of the associate's position in the company, result in disciplinary action.

If, as supervisors, we receive information about possible violations by associates or third parties, we contact the department responsible. We forward legally significant matters to the departments responsible for the specific legal advice.

#### Social responsibility

On our own initiative and in the interest of the company, we act responsibly, also taking our impact on society and the environment into account. When working with others in the company and with business partners, we believe our success depends on fairness. We reject any violation of human rights (for instance, forced or child labor), also on the part of our business partners. When performing our tasks, we keep the reputation of the Syntegon Group in mind. We abide by the principle of legality and uphold the basic principles of responsible and fair action.

#### Conduct with respect to fellow associates

We respect and defend the personal dignity of each individual. We do not tolerate any discrimination or harassment of our fellow associates, and encourage diversity.

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### 2. Avoiding conflicts of interest

#### Secondary employment and shareholdings

We take on secondary employment only with the written consent of our employer. This consent will be granted if the secondary employment does not compromise any justified interest of the company.

As associates, furthermore, we may only be involved in competitors, suppliers, or customers after notifying the company in writing of each individual case in advance. In the case of shareholdings, this rule does not apply if the shareholding is less than ten percent. We must notify the company in writing before we engage in business with companies in which we, our spouse or partner, or close family members have a shareholding or perform an executive function, provided we can influence the business relationship and there is a potential conflict of interest.

#### Engaging business partners for private purposes

If our work means we are immediately involved in the awarding or settlement of orders, and this gives rise to a potential conflict of interest, we may only engage a business partner of Syntegon for private purposes after obtaining the written consent of the executive management responsible. This does not apply to generally available goods and services

### 3. Dealing with information

#### Written documents

All records and reports, whether internal or external, must be accurate and truthful. We observe generally applicable accounting principles, which require that data and other records must always be complete, correct, up-to-date, and system-compliant. We may only use confidential company information to create records, files, and the like if this immediately serves the interest of Syntegon.

#### Confidentiality

Confidential company information we keep secret and protect them by applying appropriate measures. This obligation of confidentiality remains in effect even after our employment contract ends

#### Data protection and information security

In all business processes and in compliance with the applicable statutory requirements, we ensure that privacy is safe-guarded, personal data is protected, and all business information is kept secure.

When developing Syntegon products and new business models, we ensure that the legal requirements governing data protection and information security are taken into account at an early stage. The contact for questions regarding how to handle data properly is the data security officer and his organization.

#### Insider information

Insider information is information not known to the public that could affect the price of stock or other financial instruments ("securities"). If we are party to insider information, the following principles apply: (1) We do not purchase or sell any securities on the basis of this insider information. This applies regardless of whether these transactions are carried out for our own account, for the account of third parties, or on behalf of others. (2) We do not use our insider information to recommend that anyone purchase or sell securities, nor do we induce anyone to do so in any other way. (3) We treat insider information strictly confidentially. We never make such information available to third parties.

We only make insider information available to fellow associates or consultants from outside the company if the recipient needs the information to perform their tasks, and has been sworn to strict confidentiality.

### 4. Conduct toward business partners and third parties

#### Competition and antitrust laws

We observe the rules of fair competition as defined by applicable law. In particular, we are aware that competitors are not allowed to exchange information or reach agreements on allocation of territories and customers, prices and components of prices, supply relationships and the conditions governing them, production capacities, and the terms and conditions of bids. The same applies to exchange of information concerning market strategies and investment strategies.

We are aware that it is prohibited not only to make written agreements in this respect, but also to make verbal agreements and to practice tacit, conscious parallelism.

Only in strictly defined exceptional cases do we collaborate or exchange information relating to research and development projects. We comply with the applicable national regulations governing anti-competitive clauses in contracts with customers or suppliers. We do not abuse a dominant market position.

#### Supplier and customer relationships

The agreements we make with customers and suppliers are complete, unambiguous, and documented, including any subsequent changes and additions. We select suppliers solely on competitive merit, after comparing the price, quality, performance, and suitability of the product or service offered.

#### Anti-Corruption

We do not tolerate corruption in any form. Corrupt behavior of associates or business partners is liable to prosecution. It distorts competition, results in financial loss, and harms the company's reputation.

In the course of business, and especially in our dealings with customers and suppliers, we also refrain from any form of corruption or other unfair attempt to influence business decisions. We oblige agents or other intermediaries that we engage to procure orders or permits neither to pay or to accept bribes, nor to grant any undue benefits.

When it comes to accepting and giving gifts and other gratuities, including invitations, we apply extreme restrictions.

When it comes to giving gratuities to public officials or people in similar positions, we apply extreme restrictions. We wish to avoid even the appearance of an attempt to gain influence. We ourselves do not accept gratuities from public officials.

If we allow ourselves to be influenced unfairly by public officials, customers, suppliers, or other third parties, or ourselves attempt to unfairly influence such individuals, we will be subject to disciplinary action – regardless of the consequences under criminal law. We report any of such attempts to the executive management responsible and the compliance officer. Also against our business

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partners we take appropriate action in such cases, e.g. an order embargo or termination of contract.

### Donations and Sponsoring

Syntegon does not make political contributions (donations to politicians, political parties or political organizations).

As a responsible member of society, in individual cases Syntegon makes monetary or product donations for social and humanitarian projects. When making such donations, we are not motivated by self-interest, and make a clear distinction between such donations and sponsoring.

Sponsoring means any contribution in money or in kind by Syntegon towards an event organized by a third party in return for the opportunity to advertise the Syntegon brands. All sponsoring contributions must be transparent, pursuant to written agreement, for legitimate business purposes, and commensurate with the consideration offered by the event host.

### Anti-Money Laundry

It is Syntegon's objective to conduct business with reputable customers, consultants and business partners who are involved in lawful business activities and whose funds are derived from legitimate sources. We do not facilitate money laundering. All employees must abide by applicable anti-money laundering laws. Any member of the Syntegon-Group does not allow making or receiving cash payments of EUR 10.000 or more.

### International Trade

In all countries in which we operate, we honor the law, especially the trade laws and the import and export control laws. We expect all of our business partners to do the same.

Doing business in embargoed countries, or with embargoed persons or organizations is subject to restrictions or may be outright prohibited.

### 5. Standards for our products and services

Outstanding quality is our strength. We

deliver safe products of the highest quality and reliability. In this way, we satisfy our customers' requirements and expectations. When developing and manufacturing products and providing services, we are guided at all times as well by the principle of legality.

### 6. Intellectual property of third parties

The intellectual property of third parties comprises both the protected commercial rights (such as patents, trademarks, registered designs) and the copyrighted items (such as software, image rights) of third parties. We respect the intellectual property of third parties and, as a matter of principle, may only use it if granted the right to do so. We may only use and distribute third-party know-how that does not have protected commercial rights or copyright protection if such use and distribution is not prohibited by other statutory regulations. If this third-party know-how was provided to us under a confidentiality agreement, it may only be used and distributed as stipulated by the provisions of that confidentiality agreement. This particularly includes third party manufacturing drawings as well as individual data, dimensions, and tolerances obtained from third parties. We use third-party software – including open-source software and firmware – only within the scope allowed by law and in compliance with the respective license conditions.

### 7. Occupational safety, health, fire prevention and environmental protection

It is our duty to keep people and the environment from harm, to minimize our impact on the environment, and to use resources sparingly. Processes, operating facilities, and operating materials must comply with statutory and internal occupational safety requirements, as well as with health, fire prevention, and environmental protection regulations.

### 8. Communication and Training

We will be informed regularly about current topics relating to this Code of Business Conduct. We engage in regular dialog on compliance issues and address risks openly. We regularly receive training on individual

subjects.

### 9. Implementation and Control

Within their area of responsibility, the executive management of the Syntegon Technology GmbH and the management of its affiliated companies are responsible for compliance with the rules contained in this Code of Business Conduct as well as with any additional company rules.

The internal auditing department has an unlimited right to request information and conduct audits, provided these do not run contrary to statutory or company regulations.

#### Note:

The rules contained in this Code of Conduct apply to the employment contracts between the respective Syntegon Group companies and their associates. They are mandatory directives. Third parties may not derive any rights from this Code of Conduct.

### Information and contacts

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