

Mikro-Technik GmbH & Co. KG

Code of ethics and business conduct

Introductory remarks by Managing Director Kai Weingarten

Our commitment to correct behavior and a solid moral foundation is an integral part of Mikro-Technik's business. We are committed to conducting our business in the right way, based on a culture of integrity and compliance.

In the long term, we can only successfully meet the challenges of a competitive market environment if we accept moral responsibility as individuals and as a company. In performing their duties, employees should always act lawfully, ethically and in the best interests of Mikro-Technik.

Thank you for upholding our values and helping us to do things right. This means not only providing well-made, reasonably priced, high-quality products and services, but also always putting ethics and integrity first. We only source our materials from suppliers with an impeccable human rights and compliance record, ensure that our supply chain has a high level of integrity and monitor adherence to our Code across all our business areas.



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Mikro Technik GmbH & Co. KG

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1. Introduction

Mikro-Technik's Code of Ethics and Business Conduct serves as our ethical commitment and as a guide for proper business behavior for all our stakeholders. We, Mikro-Technik, are committed to conducting our business lawfully, ethically and transparently.

This document applies to all employees who work for Mikro-Technik (including officers, department heads, employees, temporary workers, agency workers, interim workers, subcontractors or consultants) and also includes other organizations that do business with us.

Mikro-Technik expects its employees to be impartial and honest in all matters related to their work. All employees have a general responsibility to act in good faith and not to do anything that destroys the trust necessary for employment.

The success of our company is based on the trust we enjoy with our employees and customers. We gain credibility by committing to fairness and achieving our goals solely through ethical behavior. All employees are expected to uphold this code in both their professional and personal conduct and to treat everyone with respect, honesty and fairness.

Mikro-Technik is always open to questions and will not allow punishment or retaliation against anyone who reports misconduct in good faith.

Our managers have a greater responsibility to demonstrate the importance of this Code through their actions as well. All managers are responsible for ensuring that any ethical issue or concern raised is dealt with promptly. Employees must cooperate in the investigation of potential or alleged misconduct.

Failure to comply with this Code is considered misconduct that may warrant disciplinary action up to and including termination of employment or other contracts in meritorious cases.

We are committed to applying our values and standards throughout the value chain of our own suppliers, subcontractors, service providers and business partners.

2. Ethical principles and values

Mikro-Technik is committed to the highest ethical standards and places integrity, respect, teamwork and sustainability at the heart of its actions.

Integrity is the foundation of our business: we act honestly, responsibly and transparently in all our undertakings.

Respect is key to a positive working environment; we value diversity, promote inclusion and treat everyone with dignity and respect.

Teamwork is critical to our success; we work collaboratively, share knowledge and foster a culture of support and common purpose.

Sustainability guides our decisions; we are committed to environmentally friendly practices and strive to leave a positive impact on society and the environment.

These principles are not just empty words, but the pillars on which Mikro-Technik's corporate culture rests and which are expressed in our daily actions. They are essential for building trust with our customers, partners and employees and form the foundation for long-term success and growth.

3. Ethical Decision-making

Ethical decision-making is a central component of Mikro-Technik's corporate culture. Our approach is based on transparency, integrity and responsibility. We are committed to upholding and promoting ethical standards in all areas of our business. This includes complying with all relevant laws and regulations, protecting the privacy and data of our customers and employees, and rejecting corruption and bribery in any form.

We recognize that our decisions can have far-reaching consequences and therefore always strive to consider the well-being of all stakeholders. Our managers and employees are required to act ethically in every situation and to make decisions that are in line with our values and principles. We promote a culture of open dialog where concerns about ethical issues can be raised without fear of retribution.

Mikro-Technik is committed to continuously improving our ethical policies and ensuring that they are practiced in our daily activities. The Code of Ethics and Business Conduct serves as a guide for our actions and reflects our commitment to ethical excellence.

4. Compliance with laws and regulations

At Mikro-Technik, compliance with laws and regulations is a fundamental part of our corporate ethics. Our Code of Ethics and Business Conduct requires all employees to conduct themselves in compliance with the law at all times and to uphold the integrity of the company. This includes strict compliance with all relevant local, national and international laws as well as adherence to industry standards and internal guidelines.

We recognize that compliance is more than just following the rules; it is an attitude that promotes transparency, accountability and fair business conduct. Every Mikro-Technik employee is required to report any signs of legal violations or ethical concerns to management immediately.

We are committed to thoroughly investigating and responding appropriately to all reported matters. Our managers serve as role models for ethical behavior and ensure that compliance is embedded in all business processes. Through regular training and communication, we ensure that our employees have the necessary knowledge to make ethical decisions and minimize compliance risks.

Mikro-Technik strives to promote a culture of integrity in which compliance is seen as an opportunity to increase value and not as a restriction.

5. Sustainability: People + Profit + Planet

Mikro-Technik views sustainability not just as a business strategy, but as a fundamental attitude that is deeply rooted in the company's identity. This attitude is based on the principle that economic success is inextricably linked to the well-being of people and the protection of our planet. We recognize that our employees are the heart of our company and that their commitment and satisfaction are crucial to our long-term success. Therefore, we continuously invest in their professional development and create a working environment that promotes health and well-being.

In terms of profit, we understand that sustainable profitability must not be achieved at the expense of ethical compromise or environmental damage. Our business models and processes are designed to create long-term value that benefits both our stakeholders and society. We are committed to fair

business practices, supporting local communities and promoting a culture of accountability and transparency.

Protecting the planet is another cornerstone of our sustainability efforts. Mikro-Technik is committed to minimizing the environmental footprint of our operations by practicing efficient resource use and waste reduction. We are constantly working to improve our processes and products to reduce environmental impact and maximize sustainability. We actively contribute to environmental protection by implementing green technologies and promoting renewable energy.

Our Code of Ethics and Business Conduct reflects these values and serves as a guide for the behavior of every individual in our company. It includes guidelines for ethical behavior, social responsibility and environmental protection. This Code is not just a document, but a living agreement that shapes our daily actions and encourages us to always act in the best interests of everyone involved. Mikro-Technik's Code of Ethics and Business Conduct is a promise to ourselves and to the world that we are committed to a sustainable and equitable future.

6. Human rights

Mikro-Technik is committed to respecting human rights in its Code of Ethics and Business Conduct. This includes respect for the personal dignity, privacy and personal rights of each individual. We stand for fair working conditions, equal rights and non-discrimination in every respect. Our company recognizes the importance of international human rights standards as set out in the Universal Declaration of Human Rights and the principles of the United Nations Global Compact.

We are committed to respecting and implementing these principles in all our business activities and decisions. Mikro-Technik endeavors to promote and protect human rights not only within its own company, but also in its cooperation with partners and suppliers. Any form of forced or child labor is strictly rejected.

We promote the professional and personal development of our employees and offer safe and healthy working conditions. Through regular training and awareness-raising measures, we ensure that our employees are informed about their rights and can demand them.

Mikro-Technik is committed to open dialog and continuous improvement in all areas of human rights. We recognize our responsibility to society and actively work to make a positive contribution.

7. Fair labor practices and working conditions

Mikro-Technik is committed to fair labor practices and working conditions that respect the dignity, rights and well-being of all employees.

We reject forced labor and child labor in all its forms and are committed to respecting human rights. Our corporate policy ensures that all employees work voluntarily, have reasonable working hours and receive fair remuneration that is at least equal to the statutory or industry minimum wage.

We promote a safe and healthy working environment by implementing strict safety standards and providing regular training on occupational safety. In addition, we support the professional development of our employees through ongoing education and training programs. Mikro-Technik strives to foster a culture of openness and dialog in which employees are encouraged to raise concerns about unethical or unfair work practices without fear of retaliation. We are committed to taking all complaints seriously and investigating them appropriately.

By adhering to these principles, Mikro-Technik reaffirms its commitment to ethical business practices and the promotion of a sustainable and equitable global economy.

8. Discrimination and harassment

Mikro-Technik is committed to a working environment in which all employees are treated with dignity and respect. Discrimination and harassment of any kind will not be tolerated. This includes, but is not limited to, discrimination based on race, gender, sexual orientation, religion, ethnicity, disability or age. Any incident that could be interpreted as discrimination or harassment will be taken seriously and investigated immediately.

Mikro-Technik expects all employees and managers to uphold the principles of equality and respect in all their interactions both inside and outside the company. Violations of these policies may result in disciplinary action, including the possibility of termination.

We encourage all employees to report any behavior that is perceived as inappropriate so that it can be addressed appropriately.

Mikro-Technik is committed to fostering an inclusive culture that values and supports diversity. We believe that such an environment is beneficial not only for our employees, but also for the company as a whole. Our commitment to these values is unwavering and is reflected in all of our business practices.

9. Health, Safety and Environment

As part of our commitment to excellence, Mikro-Technik is committed to protecting and promoting the health and safety of our employees, customers and the communities in which we operate. We recognize that a safe and healthy workplace is essential to the quality of our products and services. Therefore, we strictly adhere to all relevant laws and regulations and also strive to continuously improve our processes and systems. Our goal is to achieve zero accidents and work-related illnesses by proactively identifying, assessing and managing risks.

Environmental protection is an integral part of our business philosophy. Mikro-Technik strives to minimize the environmental impact of our activities, products and services through efficient resource management, waste reduction and emission reduction. We are committed to developing and implementing environmental management systems that go beyond compliance with legal requirements and utilize the best available techniques and practices.

We encourage all employees to participate in our health, safety and environmental programs and to take responsibility for their own health and safety and that of their colleagues. Through regular training and awareness-raising, we ensure that our employees understand the importance of these programs and how they can contribute to their success. We encourage a culture of openness where concerns about health, safety and the environment can be freely raised and addressed.

Compliance with this Code of Conduct is mandatory for all Mikro-Technik employees. Violations of this Code will not be tolerated and may result in disciplinary action, including termination of employment. We are committed to regularly reviewing and updating it to ensure that our standards comply with changing laws, regulations and industry best practices.

Mikro-Technik recognizes that our long-term success depends not only on the quality of our products and services, but also on the way we conduct our business. A responsible approach to health, safety and the environment is not only a legal obligation for us, but also a central aspect of our corporate ethics and our contribution to a sustainable future.

10. Money laundering

Mikro-Technik is committed to complying with all applicable anti-money laundering laws and regulations.

Money laundering undermines the integrity of the global financial system and can lead to significant legal and reputational risks for our company. It is Mikro-Technik's policy not to engage in business relationships or transactions that could be considered money laundering.

All employees are required to immediately report any suspicious activity that may indicate money laundering. Mikro-Technik will investigate all suspicious transactions and, if necessary, report them to the relevant authorities.

This section of the Code of Ethics is intended to raise awareness of the importance of preventing money laundering and to set out the basic principles that all employees must follow.

11. Embargo and trade control regulations

Mikro-Technik undertakes to strictly comply with all applicable embargo and trade control regulations.

This includes compliance with all relevant international and national laws, regulations and sanctions governing trade with specific countries, individuals or organizations.

Compliance with these regulations is essential to maintain the integrity of the global trading system and to ensure that our business activities do not contribute to the support of activities that violate international law or human rights.

Mikro-Technik expects all employees, suppliers and business partners to share this commitment and act accordingly. Any transactions that could violate embargo and trade control regulations must be avoided. If there is any uncertainty regarding the legality of actions, the responsible compliance officer must be contacted immediately. Mikro-Technik will not enter into any transactions that could directly or indirectly circumvent embargoes or trade restrictions.

This principle is firmly anchored in our Code of Ethics and reflects our commitment to legal and ethical behavior.

12. Fair competition and business conduct

Mikro-Technik is committed to fair competition and ethical business practices. We believe that integrity and transparency are the cornerstones of any business and are committed to upholding these values in all our activities.

Our company strictly complies with all applicable competition laws and regulations and avoids any behavior that could hinder free and fair competition. We promote a culture in which unethical behavior is not tolerated and encourage our employees to openly communicate any concerns about our business conduct.

Mikro-Technik strives to win through innovation, quality and service, not through unfair or unethical practices. We believe that fair competition and ethical behavior are not only legally required, but also critical to the long-term success of our company.

13. Anti-corruption

Mikro-Technik is committed to strict compliance with all applicable anti-corruption laws and regulations in its Code of Ethics and Business Conduct.

We recognize that corruption in any form undermines the rule of law, distorts the fair business environment and hinders the development of a just society. Therefore, it is our policy not to tolerate any form of bribery or unethical behavior, whether directly or indirectly through third parties. All employees are required to report any suspected cases of corruption immediately and to maintain integrity and transparency in their daily work.

We are committed to cooperating with the authorities and taking all necessary measures to prevent corruption in all areas of business.

14. Gifts and Hospitality

As part of Mikro-Technik's Code of Ethics, our goal is to promote a culture of hospitality and generosity that reflects both the integrity of our company and the values we uphold.

Gifts and hospitality are seen as an expression of our appreciation and recognition for our business partners, customers and employees. However, they should always be given in accordance with the applicable laws and regulations and in consideration of the interests of all parties involved. Gifts must be appropriate and must never be seen as a means of exerting undue influence or in return for preferential treatment.

Our policies ensure that any form of hospitality or gift-giving is transparent, accountable and consistent with our commitment to ethical behavior. We are committed to acting honestly, fairly and respectfully in all our business relationships and expect the same from our partners.

15. Security, protection and proper use of company assets

As part of Mikro-Technik's Code of Ethics, it is of the utmost importance that all employees ensure the security, protection and proper use of company property. This includes not only physical property, but also intellectual property and confidential information.

It is everyone's duty to ensure that company property is not misused, damaged or used in a way that is contrary to the interests of Mikro-Technik. Employees must follow all security protocols that help protect property and maintain a safe work environment.

In addition, it is important that each employee takes responsibility for monitoring and reporting any security risks or suspicious activity. By following these guidelines, each employee demonstrates their commitment to the integrity and success of Mikro-Technik.

16. Confidentiality, information security, proprietary information and intellectual property

Confidentiality and information security are of the utmost importance to Mikro-Technik.

We are committed to maintaining and protecting the integrity and confidentiality of all proprietary information. This includes all forms of intellectual property, including patents, copyrights, trademarks and trade secrets.

Our employees are required to exercise the utmost care in their daily work to ensure that no sensitive data is disclosed or compromised without authorization. Protecting this information is not only a legal requirement, but also an ethical obligation that strengthens the trust of our customers, partners and the public in our company.

Any breach of these guidelines is considered serious and may result in disciplinary action.

17. Bookkeeping, true reporting and financial integrity

Accounting, accurate reporting and financial integrity are fundamental pillars of ethical corporate governance that are firmly anchored in Mikro-Technik's Code of Ethics and Business Conduct. The company's accounting is conducted to the highest standards of accuracy and transparency to ensure that all financial transactions are fully and accurately recorded. This creates a solid foundation for the integrity of the company and strengthens stakeholder confidence.

Accurate reporting is not only a legal obligation, but also a sign of respect for shareholders, customers and society.

Mikro-Technik is committed to communicating all relevant information promptly and without distortion in order to ensure a clear and truthful presentation of the financial situation.

Financial integrity goes beyond compliance with laws and regulations; it reflects a moral obligation to conduct all business activities honestly and ethically. Mikro-Technik's Code of Ethics and Business Conduct emphasizes the importance of ethical behavior in all aspects of business and serves as a guide for making decisions that are consistent with the company's values.

By adhering to these principles, Mikro-Technik demonstrates its commitment to a culture of excellence, responsibility and ethical leadership.

18. Anti-Fraud

Mikro-Technik is committed to upholding the highest ethical standards and firmly combating all forms of fraud. Our company has a zero-tolerance policy towards fraudulent activities, which can affect both internal and external business processes.

We recognize that fraud not only causes financial losses, but can also undermine trust in our company and its employees.

Every suspected case is thoroughly investigated and, if confirmed, consistently punished. Mikro-Technik encourages all employees to report suspicious activities without fear of reprisals.

We believe that transparency, integrity and accountability create a working environment where fraud has no place.

19. Conflict of Interests

Conflicts of interest can jeopardize the integrity of a company and undermine stakeholder trust. As part of Mikro-Technik's Code of Ethics, it is therefore of paramount importance that all employees and managers undertake to avoid any situation that could lead to an actual, potential or perceived conflict of interest.

This excludes private or other outside business activities that could compete with the company or interfere with the ability to make decisions in the best interests of Mikro-Technik.

Employees are required to immediately disclose any conflict of interest and refrain from making decisions where such a conflict exists. Mikro-Technik's Code of Ethics also emphasizes the importance of transparency and encourages employees to report not only actual but also potential conflicts of interest in order to maintain the integrity of the company and promote ethical behavior.

20. Privacy, personal data protection

As part of our ethical code of conduct, Mikro-Technik is committed to protecting the privacy and personal data of our customers, employees and partners.

We recognize the importance of the trust placed in us and the responsibility we have to keep this information secure and confidential. Our privacy policies are strict and meet the highest standards to ensure that all data is handled with the utmost care and in accordance with the latest security protocols.

We employ advanced technologies and procedures to prevent unauthorized access, disclosure, alteration or destruction of personal information. Each Mikro-Technik employee is personally responsible for following these guidelines and maintaining the confidentiality of all personal information.

Violations of our data protection principles will not be tolerated and will result in consistent action. Through this commitment, we strengthen trust in our corporate integrity and promote a culture of respect and protection of privacy.