



Code of Conduct



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Foreword by the management

Dear employees,

the trust of customers and business partners in our company and its products is our greatest asset. It is therefore our common task to secure this trust anew every day by acting with integrity and honesty. This includes that we all know the applicable internal rules and legal requirements - and comply with them.

We, the management of AP&S International GmbH, are convinced that our principles of conduct are an essential key to making AP&S even more successful in the long term.

That is why we ask you:

Familiarize yourself with these contents. And let us work together to ensure that in the future our company not only stands for excellent products and services, but also increasingly for integrity and fairness.

Thank you very much for your support.

Alexandra Laufer-Müller
CEO

Tobias Bausch
CMO & CTO

Tobias Drixler
COO



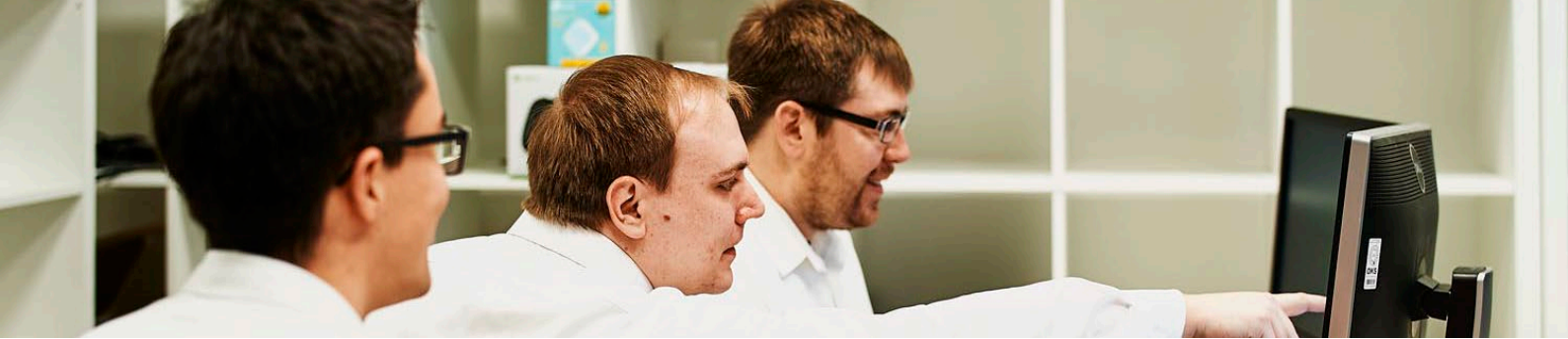
Application of this Code of Conduct

Preamble

Our Code of Conduct is intended to be a guideline for the entire company AP&S International GmbH and therefore applies equally to each of us. In detail, it is addressed to the top management, the executives and all our employees and suppliers. On the one hand, it represents the demand we make on ourselves to live up to the values and principles listed therein and, at the same time, it signals to the outside world that we behave responsibly towards our business partners, customers and employees.

Management commitment

The company AP&S International GmbH considers itself obliged to act economically, socially and environmentally conscious. The company strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and the acceptance of antitrust prohibitions or restrictions on competition. We want to avoid gaining undue advantages over customers, suppliers or competitors.



Corporate values

Open communication with employees

We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we will not tolerate intimidation or reprisals against them. We understand "in good faith" to mean that the employee is convinced that his or her account is true. This applies regardless of whether or not a subsequent investigation confirms the employee's version.

Team spirit, constructive cooperation

We constantly put existing solutions to the test and develop new ideas for the benefit of our customers. To this end, we support and promote constructive teamwork among our employees. Your interests and demands on us are decisive for our work and further development. We are successful in our cooperation through the innovative power of our employees and their commitment in the individual business areas.

Standards of cooperation

We expect all of our employees to always act in accordance with the highest professional standards and company guidelines. If employees violate existing policies, rules or regulations in the course of their work or through their conduct, they will be subject to disciplinary action.

Dealing with Company Internal Affairs

It is important to us that the products manufactured, the tools used and the company's intellectual property are handled carefully and responsibly.



Business Partners

Dialog with cooperation partners

All business information of our partners and their trade secrets are treated with sensitivity and confidentiality. Required documents are properly prepared, stored or, if necessary, destroyed at the end of the cooperation.

Customer orientation

We conduct ourselves fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a target-oriented implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners based on trust.

Fair competition

We are committed to fair competition and adhere to the applicable laws and rules. We refrain from making agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not take part in any anti-competitive boycott.

Compliance with applicable law

We require our managers to familiarize themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in fulfilling the Code of Conduct. The business practices of our business partners and their suppliers must also comply with the applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions. A violation of economic embargoes as well as of trade, import and export control regulations must also be excluded by our business partners.



Corruption measures / conflicts of interest

Acceptance of gifts, donations

a) Gifts to our employees

Our employees do not demand or accept any personal advantages from customers or suppliers that influence or could influence their own behavior with regard to their work for the company. If gifts are offered by third parties, these may only be accepted if they are common practice and can be accepted as courtesy (promotional gifts with the logo of the company giving them, such as calendars or pens).

In the case of gifts whose value exceeds the usual amount (€ 35.00), the Compliance Officer or management must be informed. If this is not possible, these gifts must be rejected as a matter of principle.

b) Gifts by our employees

Gifts on our part may also only be offered within the usual framework for the business relationship and to a materially appropriate extent. The recipient must not be able to associate any obligation with it that would influence his business decisions.

c) Donations

As a matter of principle, AP&S International GmbH does not make donations to political parties, to individuals or to organizations whose objectives contradict our corporate philosophy or damage our reputation. The allocation of donations is always transparent.

Bribery and corruption

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties. We have control mechanisms in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

Our employees are prohibited from accepting or granting favors of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (placing of orders, project award, etc.).

Our business partners are also required to avoid conflicts of interest that may involve a risk of corruption.



Environmental / data protection

Privacy

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obliged to take all measures to protect our IT system against internal and external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially inappropriate material from the Internet.

For further information on the subject of data protection / data protection officer, we refer to our website www.ap-s.com.

Protection of the environment

The protection of the environment and the climate are important to us. Our employees are required to treat all natural resources used in our company (e.g. energy, water, land) with care. Our employees are expected to act responsibly in the production and distribution of our products and/or services. For the protection of our employees, we comply with all laws and regulations concerning health and safety at work. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.



Human Rights

Prohibition of Discrimination

Any form of discrimination is prohibited in principle. It does not matter whether it concerns nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or belief. Promotions and new hires are always free of discrimination.

Protection from child labor or forced labor

We strictly reject children or forced labor without exception and expect the same from our business partners. School-age children (younger than 15 years) may not be employed even if the legal requirements of our supplier's country would allow it.

Health and safety

We pay attention to safety. Our concern is that everyone works in a safe and healthy environment, regardless of where we are in the world.

- We have clear health and safety standards, which we require all employees to comply with.
- Our standards are continually reviewed to prevent accidents in the workplace.
- No one goes to work to be injured.
- We prohibit all forms of alcohol, drugs and abuse of other substances in the workplace.

Fair wage

All employees receive a fair wage for their work, which is at least equal to the legal/tariff or industry standard minimum wage.

Implementation and enforcement

AP&S International GmbH undertakes to make the necessary efforts to comply with the principles and values described in this Code of Conduct.