

## Code of Conduct

We place great importance on laws and regulations, ethics and compliance. For us, ethics and compliance are not just abstract concepts, but rather a code of conduct that applies to everyone in our company. This code of conduct applies to our employees and to all those who work for us, regardless of their position, the business area in which they work, the country in which they work or the nature and duration of the work they perform.

It is only through strict compliance with these requirements that we can avoid significant legal and business risks for our entire business and thus for all of us. We also safeguard the legitimate interests of all our employees, customers, suppliers and owners. We respect the needs of society and protect people and the environment. We believe that integrity is fundamental to continuing to succeed.

Our company does not engage in business activities that are possible only in violation of laws or company rules. Instructions to the contrary may not come from any supervisor. We expect all employees and anyone working for us to understand the rules contained in this policy, apply them fully to their own work and take advantage of training on the subject. You are strongly encouraged to make use of the help that is available to you. Let's work together for our reputation!

Sven & Christian

## Compliance

All applicable national and international laws apply to INNOVESYS and all of its employees. This includes, e.g., paying due taxes and duties, obtaining required administrative permits, respecting legally protected tangible and intangible interests (e.g., intellectual property) of third parties, as well as observing all prohibitions under criminal law, including, but not limited to, money laundering and fraud.

This list is by no means exhaustive. All affected employees are obliged to comply with any regulations (e.g. company agreements) and guidelines that exist within the company.

## Fair Competition & Antitrust

INNOVESYS is a firm believer in fair competition. Within the legal framework, all employees are required to comply with the rules of fair competition in the countries in which we operate. In particular, INNOVESYS complies with applicable competition and antitrust laws.

These laws prohibit agreements or conduct that may alter or restrict trade or competition. Irrespective of the situation, it is in particular strictly forbidden to agree on offers, prices, terms and conditions of business, production plans, sales quotas or market shares with competitors.

This also includes unofficial meetings. It may also violate competition laws to exchange or disclose commercially sensitive information about competitors, customers or suppliers. Even appearing to compete unfairly needs to be avoided.

## Quality & Safety

Our company has quality as a central concern. Its priorities are customer satisfaction, process management, prevention and continuous improvement and total quality management. The aim is to meet the customer's requirements in terms of quality, reliability, speed and price.

Regarding product safety, all employees are responsible for eliminating, as far as possible, risks and hazards to health and safety arising from using our products. The applicable technical and legal standards and regulations must be in place and be observed.

## Social & Ethical Responsibility

INNOVESYS is committed to fulfilling social and ethical responsibilities. INNOVESYS fosters a corporate culture of fairness and mutual respect and respects and protects the personal dignity of each employee. INNOVESYS has a particular commitment to the demands of the international social and ethical standard SA 8000®.

Harassing or discriminating against our employees in any way (verbal or physical), e.g. based on nationality, origin, religion, gender, age, sexual orientation or the like, is prohibited.

No employee may be discriminated against because he or she exercises his or her personal rights. This includes, in particular, prohibiting child labour, forced labour, discrimination, harassment and physical discipline, workplace safety and health, and complying with legal regulations.

## Giving and Receiving

Courtesies such as gifts and entertainment are commonly exchanged with customers, suppliers and other partners to build goodwill and show appreciation in business relationships. However, these courtesies must not influence or appear to influence business decisions and must reflect normal business practice.

Good judgement should always be our guide in these situations. In some circumstances and countries, business courtesies may be prohibited by law. Each of us must be in compliance with the guidelines that are applicable to us.

Gifts and entertainment include anything of value given or received for personal use resulting from a business relationship for which the receiving party does not pay fair market value.

## Information and training

Our employees will receive regular training on relevant topics related to this Code of Conduct in order to raise awareness and ensure compliance. Training may be classroom or e-learning based.



## Security, Data Protection & the Handling of Confidential Information

It is paramount to our success that we protect our data, assets, premises, employees, visitors, information systems and telecommunications networks from hostile acts and competitors. The sustainable business success of INNOVESYS is particularly dependent on the use of confidential information and data (both of INNOVESYS and of third parties, e.g. business partners) and its non-disclosure.

Confidential information of any kind (e.g. business secrets, inventions, designs, sketches, technical or economic data) must not be disclosed to unauthorized persons - neither internally nor externally.

Even after termination of an existing employment contract, this obligation remains in force. This confidentiality obligation shall also be included in contracts with our business partners in order to protect such information.

## Export Control & Customs Clearance

As a globally operating company, INNOVESYS is required to comply with regulations that restrict the free movement of goods as it operates worldwide. Various international and national laws, regulations and embargoes restrict or prohibit trade, export or import of technology, goods or services, capital and payments.

The nature of the goods, the country of origin or end-use, or the identity of the business partner may result in such restrictions and prohibitions. In addition to the laws and regulations of the countries in which we operate (e.g. Belgium, France, Germany, etc.), we may have internal restrictions based on intended use.

For example, it is our policy not to get involved in developing, producing or distributing ABC weapons. INNOVESYS checks each order according to the criteria of the various export control lists as well as according to the end use and the intended purpose, regardless of the destination.

If necessary, the appropriate licences will be obtained or orders will be cancelled.

## Sustainability and protection of the environment

INNOVESYS is committed to operating in a sustainable and environmentally responsible manner.

Prevention and avoidance of environmental incidents and their causes are paramount to our activities.

All employees have a responsibility to be good stewards of our resources and to play an active role in sustainability and environmental protection.

Priority goals include conserving and protecting natural resources; using raw materials responsibly; preventing, reducing, recycling and properly disposing of harmful emissions and waste; expanding renewable energy sources; and preventing environmental incidents and limiting potential risks.

We also recognize our responsibility to maintain sustainability and environmental protection with suppliers, business partners and contractors.

## Dealing with company assets

INNOVESYS' tangible and intangible assets (e.g. our products, office equipment, software, patents, trademarks, logos, know-how, etc.) are entrusted to employees for a specific purpose. They serve the purpose of supporting the respective employees of INNOVESYS in the achievement of the business objectives of INNOVESYS and to promote the same. These assets are to be used exclusively for business purposes and are not to be the subject of any personal use. Attempts by business partners or third parties to improperly influence employees in their decisions (e.g. through disproportionate gifts, benefits or similar) must be reported to the respective supervisor. To ensure full transparency and to facilitate any audit or review, all gifts and entertainment given or received must be fully and accurately recorded.

## Avoidance of conflicts of interest

Business conduct must be directed exclusively towards the interests of the Company, irrespective of any personal interests that may exist. Any outside employment, whether remunerated or not, that adversely affects the interests of INNOVESYS is generally only permitted following prior written approval by INNOVESYS.

Without good cause, INNOVESYS will not withhold its consent. In general, employees are required to avoid conflicting interests. In the event that this is not possible, the employee must inform his or her line manager in order to find a fair and transparent solution.

## Violation of the Code of Conduct

Compliance with our Code of Conduct is the responsibility of each INNOVESYS employee. In case of doubt, any employee may contact his/her supervisor. Disciplinary, civil and possibly criminal sanctions may be imposed for failure to comply with this Code of Conduct.

