

Code of Conduct

Preamble – Compliance

Sustainable action, personal responsibility, transparency, as well as legally compliant and ethically correct behaviour at all times are crucial to creating and securing long-term values and building trustful partnerships.

Therefore, we hereby establish and apply binding general guidelines of conduct for *proionic GmbH* based on laws and general standards (this "Code of Conduct"). Illegal and non-compliant behaviour will not be tolerated under any circumstances.

At the same time, these behavioural guidelines document our basic attitude and provide us with a generally binding guideline for the definition of our business goals and their implementation.

Service for the individual

We prohibit all forms of human trafficking and modern slavery as well as child and forced labour. We respect internationally recognised human rights and support their observance. We do not tolerate discrimination in any form whatsoever.

We promote equal opportunities and prevent discrimination in the recruitment and promotion of employees and granting of training and development measures. We create a working environment characterised by respect and are committed to mutual responsibility and trust.

We attach great importance to the safety and health of our employees. Occupational safety and health protection are an integral part of all operational processes and are included in the technical, economical and social considerations from the very beginning.

Communication and data protection

In the fulfilment of their duties our employees observe their professional duty of confidentiality and protect confidential information as well as other information that comes to their knowledge in the course of their professional activities. This confidential information may neither be used for the pursuit of one's own interests nor made accessible for the use of the interests of any third parties.

In addition, all employees are obliged to protect the intellectual property of proionic and its business partners and to prevent competitors or other unauthorised third parties from gaining access to this knowledge. We respect the intellectual property and know-how of our competitors and business partners and expect our partners to respect the intellectual property rights of others.

We are also committed to complying with the requirements of data protection law. During our business activities we process personal data of employees, customers, suppliers, and other business partners. The processing of personal data is only permitted in compliance with the legal provisions. All employees must handle personal data carefully and conscientiously. It is very important to us that personal data is effectively protected and only used for legitimate purposes.

Prevention of money laundering and terrorism financing

Money laundering refers to the concealment of the origin of funds or other assets from criminal activities with the aim of infiltrating them into the legal financial and economic cycle.

We want to prevent and combat money laundering and terrorist financing and therefore take all measures to prevent this within our sphere of influence.

Competition and cartel law

We are committed to the principles of the market economy and to the applicable laws for the protection of fair and equitable competition. Restricting free competition and violating competition and antitrust laws are not compatible with our corporate culture. Our employees therefore do not enter into any market-relevant agreements with competitors. It must never be the aim to influence the competitive behaviour of the respective competitors if this leads to a restriction of competition. Even the mere appearance of an infringement must be avoided.

Anti-corruption

We do not tolerate any form of corruption, bribery, embezzlement, or extortion and prohibit any form of illegal influence. Employees may not accept or demand any financial or other benefits of value from third parties or allow themselves to be promised any such benefits that could give the impression of influencing business decisions. The only exceptions to this are gifts of small value and hospitality within the scope of customary business practices. All other gifts must be refused or returned, and the superior must be informed. Under no circumstances is the offering or acceptance of monetary value permitted.

Avoiding conflicts of interest

A conflict of interest always exists when official decisions are influenced by private interests. Our employees are obliged to separate private and business interests and to make decisions impartially and in the interests of the company. Every employee is obliged to disclose actual or potential conflicts of interest, even if only the appearance of such a conflict of interest could arise, immediately, unsolicited and in full to the respective superior. Secondary activities of employees require the written consent of the management and may not be in conflict with the interests of the company.

Donations and sponsorship

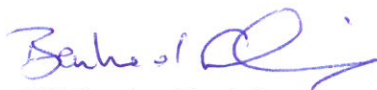
We are aware of our responsibility and therefore support institutions, organisations and projects in the areas of culture, science and business, sports as well as charitable, social and humanitarian causes to a small extent with financial and in-kind donations and sponsoring. Any commitment to donations and all sponsoring activities must always be appropriate, transparent and in compliance with applicable law. The approval for donations and sponsoring must always be given by 2 persons of the management (managing director or authorised signatory).

Environmental commitment

We are aware of the responsibility we have as a manufacturing company towards the environment. That is why we want to

- constantly improve the saving of (natural) resources in the manufacture of our products;
- pay attention to the greatest possible energy efficiency in the development of our products;
- already doing what we can to preserve a clean and unpolluted environment
- take measures to reduce emissions and save energy; and
- understand and accept occupational safety, health and environmental protection as well as quality management as a management task and obligation.

The Compliance Office, which reports exclusively to top management, supports the implementation of the Code of Conduct and the compliance regulations and monitors their observance. Our staff is regularly trained and the effectiveness of the measures we take is monitored.



DDI Bernhard Ludwig
Executive Board

05.08.2021
status Q3/2021



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