

# Code of Conduct

Code of Conduct for  
ethical business conduct



## VetterTec GmbH

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## 1. Implementation of the Code of Conduct

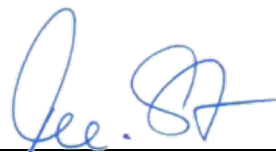
All employees of **VetterTec GmbH** are bound by the regulations of this Code of Conduct.

It determines the values, principles and courses of action that determine the entrepreneurial actions of **VetterTec GmbH**. The management's target is to uphold ethical standards and create a work environment that promotes integrity, respect, and fair behavior.

The management of **VetterTec GmbH** approves the Code of Conduct and hereby puts it into effect.

Kassel, 07/09/2023

Place, Date



General Manager

Thomas Holst

## **2. Compliance with laws and other regulations at home and abroad**

In all business decisions and actions, VetterTec GmbH strives to comply with applicable laws and other authoritative regulations in Germany and abroad. Integrity and honesty promote a fair competition, also in relation to our customers and suppliers.

## **3. Obligations of the management**

VetterTec GmbH considers its obligation to act economically, socially, and environmentally conscious. Therefore, it strives to conduct its business competently and ethically and to protect fair competition in all markets in which it operates by complying with applicable laws on antitrust prohibitions, competition, and restraints of competition.

## **4. Exposure with assets**

All employees of VetterTec GmbH are responsible for the proper and careful handling of the company's property. Thus, the employee is obliged to protect the property of VetterTec GmbH against loss, damage, misuse, theft, embezzlement, or destruction. Every employee has the duty to inform his superior immediately about any use of assets contrary to the foregoing.

## **5. Conflicts of interests**

VetterTec GmbH expects its employees to be loyal to the company. All employees must avoid situations in which their personal or financial interests' conflict with those of VetterTec GmbH. Therefore, it is particularly prohibited to participate in competitors, suppliers or customers in any way or to enter into business relationships with them in a private environment, insofar as this may lead to a conflict of interest and the interests of VetterTec GmbH are impaired.

Invitations must remain within the limits of customary hospitality. Employees shall not personally gain direct and/or indirect advantages through access to confidential information due to their position in VetterTec GmbH. All employees have the duty to promote the legitimate interests of VetterTec GmbH as far as possible. Any competitive situation with the company is to be avoided.

Any actual or potential conflict of interest must be reported and discussed with the supervisors concerned.

## 6. Prohibition of corruption and bribery

VetterTec GmbH does not tolerate corruption or bribery. Any business relations shall be based solely on objective criteria. In addition to quality, reliability and competitive prices, this also includes the observance of ecological and social standards as well as the principles of good corporate governance. The acceptance and giving of gifts, invitations and donations is generally prohibited except for (a) typical industry "giveaways"\*, such as pens, calendars, small office, and other accessories, etc. and (b) typical invitations to company dinners and industry-typical events / conventions / etc. Personal benefits that go beyond this must always and in principle be discussed and agreed with the management for possible exceptional permissions. VetterTec GmbH also undertakes to comply with the relevant country-specific anti-bribery and anti-corruption laws and regulations.

*Smaller gifts\* up to a value of 50 euros are not considered; however, national tax law requirements may have to be observed here. The acceptance of money is generally prohibited.*

## 7. Money laundering and trade controls

**VetterTec GmbH** does not tolerate activities related to money laundering under any circumstances. It carefully verifies the identity of customers, service providers, consultants and other third parties with whom it maintains or initiates business relationships. **VetterTec GmbH** ensures, in compliance with national and international laws, that business transactions with third parties do not violate trade regulations such as economic embargos, import and export control requirements or applicable requirements for the prevention of terrorist financing.

## 8. Health and safety at work

### 8.1. Discrimination

**VetterTec GmbH** prohibits any kind of unlawful discrimination against employees or applicants. Therefore, in employment decisions such as hiring, promotion and compensation, characteristics may never play a role that may not be considered according to the law. While these characteristics may vary by country, they usually include skin color, religion, gender, national origin, citizenship, age, disability, sexual orientation, military or veteran status, and marital status. In addition, **VetterTec GmbH** generally also stands for any anti-discrimination outside its own workforce.

### 8.2. Harassment/Bullying

**VetterTec GmbH** strives to provide all employees with a workplace where they are treated with dignity and respect. The company does not tolerate any type of unlawful

harassment. Harassment refers to conduct related to a person's legally protected characteristics that may create a hostile or derogatory work environment. Examples of harassment include obscene or derogatory remarks or jokes, physical advances, or inappropriate visual depictions. Harassment can occur, for example, at the hands of colleagues, supervisors, customers, or suppliers, and can be in sexual or non-sexual nature.

### **8.3. Violence in the workplace**

Violence in the workplace, including threats, intimidation, and physical violence, will not be tolerated in any way at **VetterTec GmbH**. It is prohibited to bring weapons into **VetterTec GmbH** companies. If you become aware of any threat of violence, you should immediately report this situation to your supervisor or a member of the works council.

### **8.4. Alcohol and drug abuse**

**VetterTec GmbH** prohibits the use of or working under the influence of alcohol, illegal drugs, controlled substances or misappropriated over the counter / prescription medications throughout the company.

## **9. Working conditions**

### **9.1. Safe working conditions**

The goal of **VetterTec GmbH** is to avoid any kind of incidents by making safety an integral part of all sites and business units through continuous improvement. No matter where or what work is done: Safety must always come first. All **VetterTec GmbH** policies and applicable laws and regulations must be followed to prevent risks in the workplace and to promote a safe and healthy work environment. Therefore, any incidents or circumstances that could endanger health or safety in the workplace should be reported immediately to a supervisor or the works council.

### **9.2. Fair working conditions**

All employees of **VetterTec GmbH** must ensure a safe and healthy environment. As a result, safety regulations and practices are to be strictly adhered to.

As a socially responsible employer, **VetterTec GmbH** considers its employees to be of great value. It demands great commitment from its employees and shares business success with them in return.

### 9.3. Child and forced labor

**VetterTec GmbH** does not accept any form of child labor, forced or compulsory labor. It complies with all relevant national and international laws, rules, and regulations applicable in the respective countries as well as with the applicable international standards.

Young employees in particular must be protected from performing work that in all likelihood will impair their education or endanger their health or their physical, psychological, social or spiritual development.

## 10. Secrecy

### 10.1. Data protection

A large part of the business information of **VetterTec GmbH** is confidential or legally protected, so that there is an obligation to maintain secrecy. This does not apply if publication of the information has been approved in writing by **VetterTec GmbH** or is mandatory due to laws or regulations.

The duty of confidentiality relates in particular to intellectual property. This includes trade secrets, patents, trademarks, and copyrights, but also business and marketing plans, drafts, business papers, salary data and all other unpublished financial data and reports.

All personal information about employees, customers, business partners and suppliers as well as other third parties is used carefully and treated confidentially in **VetterTec GmbH** in full compliance with data protection laws.

### 10.2. Handling of internal knowledge

All employees of **VetterTec GmbH** are obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to the areas concerned, unless in exceptional cases, in particular due to confidentiality obligations, overriding interests exist. Relevant knowledge may not be unlawfully withheld, falsified, or selectively passed on.

Dishonest reporting within the company or to organizations or persons outside the company is strictly prohibited. All financial statements and annual reports, business papers and accounting records of **VetterTec GmbH** must accurately present business events and transactions and comply with legal requirements and **VetterTec GmbH's** accounting policies and internal accounting procedures.

### 10.3. Implementation and monitoring

The rules contained in this Code of Conduct form a core part of the corporate culture of **VetterTec GmbH**. The uniform compliance with these principles is indispensable. Every employee is responsible for this.

If an employee has concerns or complaints about any of the items listed in this Code of Conduct, or knowledge of any breach of the standards of conduct contained herein, he or she should immediately bring it to a supervisor or the works council for clarification.

This can also be done anonymously or in a confidential manner. **VetterTec GmbH** does not permit any reprisals based on complaints made in good faith within the scope of this Code of Conduct.

## 11. Responsibility

All employees of **VetterTec GmbH** are bound by the rules of this Code of Conduct. Violations of this Code of Conduct will result in consequences under labor law. In serious cases, this may lead to termination of employment.

*\*All personal designations apply equally to all genders.*