

Goal:

Responsible corporate governance is the foundation of our business. With the TRIPS Group Business Conduct Guidelines, we want to permanently anchor compliance in the thoughts and actions of all employees. **This code of conduct applies to all TRIPS Group companies at all locations.**

Our top priority is: zero tolerance for violations of the law.

For this reason, the TRIPS Group Business Conduct Guidelines bundle measures with which we want to ensure that our business is always in full compliance with the law and our internal principles and rules.

In the following, the term "employees" is used for staff members.

Table of contents

- 1. Self - conception of the TRIPS Group 2
- 2. Rule – consistent behavior 3
- 3. Compliance with the competition law and antitrust law 3
- 4. Integrity in competition 3
- 5. Avoidance of conflicts of interest..... 3
- 6. Avoidance of corruption, bribery, extortion 4
- 7. Confidentiality and data protection, protection of privacy 5
- 8. Donations and sponsoring 5
- 9. Health, occupational safety and environment 5
- 10. Anti-money laundering and trade controls, financial responsibility, disclosure of information 7
- 11. Product safety..... 7
- 12. Suppliers..... 7
- 13. Due diligence to promote responsible supply chains for minerals from conflict and high-risk areas, REACH 8
- 14. Handling of company equipment..... 8
- 15. Contact person for compliance issues..... 9
- 16. Disciplinary consequences of non-compliant behaviour 9
- 17. Complaints and advice 9
- 18. Compliance Self-Test 9

1. Self - conception of the TRIPS Group

It is part of our self-image to respect the personal dignity, privacy and personal rights of every individual. TRIPS Group does not tolerate any discrimination based on ethnic origin, culture, religion, age, disability, skin colour, sexual identity, world view and gender. We promote equal opportunities and equal treatment. We are committed to human rights and the principles and values set out in our mission statement. Agreements and recommendations of international organisations are an important guideline for us.

This self-image applies both to internal cooperation and to our conduct towards external partners. We expect our external partners to share this self-image. Business partners are always committed to our Code of Conduct and must confirm compliance in writing in accordance with our QMF 7406.

Essential principles are compliance with all legal requirements and the following principles are in line with the TRIPS Group's self-image and are laid down in these Business Conduct Guidelines:

- We do not accept child labor, forced or compulsory labor, slavery or human trafficking
- We pay attention to adequate wages and social benefits, working conditions and compliance with statutory working time regulations, as well as minimum wage regulations
- We have a sustainable management system for compliance with occupational health and safety requirements. This includes human health protection obligations to ensure the integrity of life and health of our employees.
- The health and safety of our employees is one of our corporate goals
- We respect the fundamental rights of freedom of association and collective bargaining
- We do not tolerate harassment and discrimination
- We do not tolerate corruption, extortion and bribery
- We observe the legal data protection regulations
- Disclose information as required by law
- We preserve identity, protect privacy and protect against retaliation
- We are committed to financial responsibility
- We stand for fair competition and compliance with antitrust law
- We avoid conflicts of interest
- We do not use plagiarism and respect and protect intellectual property
- We comply with national and international export regulations and economic sanctions within the framework of our export control system.
- Environmental protection is an important concern for us. In particular, this includes reducing energy consumption, reducing greenhouse gas emissions, improving water quality, reducing water consumption, improving air quality. We separate and avoid waste. Our environmental and waste management is certified according to DIN EN ISO 14001.
- Responsible chemical management

We conduct sustainability training to strengthen our employees' awareness of these principles.

Integrity and compliance with legal requirements start at the top of the company. The management and every executive should promote compliance with this self-image through exemplary personal conduct.

2. Rule – consistent behavior

The observance of law and order, for TRIPS group, is the base for every business action. Each employee should note the current guidelines, company agreements as well as collecting bargaining agreements and statutory provisions of the legal system according to which they act. In case of doubt the employees need to inform themselves about the regulations with their superiors. Under all circumstances contraventions need to be avoided. The executives and superiors are responsible for the mediation of the TRIPS group – guidelines as well as for the legal regulations.

The reputation of the TRIPS group is shaped by the appearance, action and behavior of the employees. Inappropriate behavior of only one employee can harm the whole company.

That's why every employee should take care of the reputation of the TRIPS group, to preserve and promote these. Especially the executives have to take care of the compliance of the Business Conduct Guidelines through their own actions.

3. Compliance with the competition law and antitrust law

Every employee is obligated to observe the laws and rules of the competition - and antitrust laws.

The antitrust assessment might be difficult in some cases; in case of doubt the employees contact the legal department. But there are behaviors, which constitute a regular cartel infringement.

Employees are not allowed to have conversations with competitors on competition – sensitive information (p.e. prices, costs and capacities) or pass these information to the competitors

Employees may not, for example, influence resale prices or attempt to enforce export or import restrictions. Neither may employees acquire competition – relevant information through illegal conduct or knowingly disseminate false information about a competitor or its products and services

Agreements with competitors on noncompetition, on the submission of fake proposals in response to invitations to tender or on the allocation of customers, territories or production programmes are also inadmissible.

4. Integrity in competition

Free, unrestricted and fair competition is not only a fundamental principle of our social order, but also of our corporate culture.

It corresponds with our business politics and expectations in relation to our employees to promote and ensure a fair trade. In competition, we focus on performance, customer orientation and quality of our products and services.

We do not use plagiarism and respect and protect the intellectual property of third parties.

5. Avoidance of conflicts of interest

TRIPS Group attaches great importance to ensure that its employees or they relatives do not become involved in conflicts of interest or loyalty during their work. These conflicts arise especially if an employee is working or is involved in another company outside of TRIPS Group. It's not permitted to operate a company that is in full or partial competition with the TRIPS Group. As well permitted is the

direct or indirect participation in an unlisted company which competes with the TRIPS Group in whole or in part. The participation in unlisted companies, which are business partners of the TRIPS Group, need to be notified in writing with the personnel department. The assumption as well as the existence (in the case of new hires) of a secondary activity for remuneration must also be notified in advance in writing to the personnel department. The secondary activity can be prohibited, if it insults in an impairment, contradicts the duties or if there might be the danger of a collision of interests. Occasional writing activities, presentations and other occasional activities are not seen as secondary activities. Nonetheless, all unpaid secondary activities and honorary posts which are performed outside working hours with a normal donation are considered to be approved as a general allowance, provided that they do not conflict with the business interests of TRIPS group. In case of doubt, please contact the personnel department.

6. Avoidance of corruption, bribery, extortion

We fight for orders with innovation, quality and price of our products and services. We assume the compliance with all applicable laws, corruption regulations, bribery and extortion. We don't tolerate any form of corruption. Offering, granting, demanding and accepting advantages is inadmissible even if it only gives the appearance of corrupt behavior. No employee may offer or grant unlawful advantages - directly or indirectly - to business partners in connection with the business activity, neither as cash payments nor in the form of other benefits. Promotional gifts to business partners must be selected so as to avoid any appearance of dishonesty or incorrectness on the part of the recipient. In case of doubt, the recipient should be asked to obtain prior approval from his or her superior. If the recipient resists this, this shows that he/she himself classifies the receipt as incorrect.

In the case of civil servants or other employees of public authorities or public institutions, gifts must not be made in any case. Employees who enter into contracts with consultants, intermediaries, agents or comparable third parties must ensure that they do not offer or grant any unlawful advantages. No employee may use his official position to demand, accept, procure or be promised advantages. This does not include the acceptance of occasional gifts of small value (up to a maximum of € 40.00). Other gifts must be rejected and, if necessary, returned. Whoever applies for an order expects a fair and unbiased examination of his offer from us. Employees who are involved in awarding contracts must observe the following rules in particular:

- The employee should inform his superior about every personal interest, which stands in connection with the performing of official tasks.
- In a competition suppliers should not be preferred unfairly or handicapped
- Invitations of interview partners should only be accepted, if reason and amount of the invitation is appropriate and the refusal of the invitation would be contrary to the requirement of courtesy.
 - Gifts from business partners must be rejected and returned, unless they are insignificant occasional gifts of little or ideal value.
 - No employee may have private orders executed by companies with which he has business dealings if this could benefit him.
 - If meetings with Incentive - character are organised by TRIPS Group for external business partners, then these must be open budgeted, need an objective reason in the forefront and must be excluded a reward for achievements already furnished

7. Confidentiality and data protection, protection of privacy

We observe the legal requirements for data protection. Every employee is obliged to comply with data protection requirements and is regularly trained in data protection. Each manager is responsible for compliance with data protection requirements within the framework of their processes.

Every employee is obliged not to disclose information and data to third parties without authorisation. This applies in particular to business secrets or information and data that are confidential or subject to data protection. Non-public information from or about our external partners must also be protected in accordance with legal and contractual requirements. All employees are bound by the applicable laws on data protection.

TRIPS Group respects the fundamental and human rights and the right to privacy of its employees. This means: "No one shall be subjected to arbitrary interference with his or her private life, family, home and correspondence, or to impairment of his or her honour and reputation. Everyone is entitled to legal protection against such interference or impairment."

In our company, we therefore also pay particular attention to the protection of personal data with regard to storage and use. These may only be collected, processed or used to the extent that this is necessary for defined, clear and lawful purposes.

8. Donations and sponsoring

TRIPS Group grants donations in cash and in kind for education and science, for art and culture and for social causes. We receive requests for donations from a wide variety of organisations, institutions and associations. The following rules apply to the allocation of donations:

- Requests for donations from individuals must always be rejected
- Payments to private accounts are not permitted
- Donations to political parties are not permitted
- Under no circumstances may a donation be made to persons or organisations whose reputation is damaged
- The donation must be transparent
- The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time
- Donations should be tax deductible

9. Health, occupational safety and environment

TRIPS Group has a certified management system and is aware of its responsibility for its employees and ensures precautions against accident and health hazards. Therefore, the health and safety of employees at their workplace is a high priority for TRIPS Group and one of our corporate objectives.

TRIPS Group complies with the relevant legal requirements on working hours, safety and health worldwide. We are committed to providing a safe and healthy working environment for all our employees. We consistently aim to minimise all risks and hazards in all workplaces to protect the health and well-being of employees, suppliers, visitors and local communities, as well as users of our products. In this context, we implement comprehensive safety and health standards in interaction with environmental protection, occupational safety, fire protection and health care. Occupational

safety and health care are characterised by a continuous learning and improvement process, which includes regular Health and Safety Committee meetings, inspections, health and safety training of employees.

Our occupational safety measures follow the precautionary principle. Every employee must take into account the occupational safety measures and actively contribute to improving related processes. Every employee is obliged to act in a safety-conscious manner.

TRIPS Group does not tolerate employment against the will of any person or child labour as defined in the ILO Convention on the Minimum Age for Admission to Employment (Convention 138).

We do not tolerate any form of harassment or discrimination in our company. Respectful and mindful interaction with each other is an important concern for us. We provide various communication channels and measures. We take time for our employees and listen to them at all times.

We pay attention to appropriate wages and social benefits in our company and with our suppliers and have established corresponding measures and processes in our company for this purpose. Within the framework of our management system, working conditions, occupational safety and compliance with working time regulations are monitored accordingly.

TRIPS Group respects the fundamental right of freedom of association and collective bargaining of workers and members in workers' organisations or trade unions are neither favoured nor disadvantaged.

We are committed to protecting our environment. Environmental protection in our company is geared towards the continuous optimization of our environmental management system in accordance with DIN EN ISO 14001 and includes, in a holistic approach, communication, the development of new products, the operation of our plants and facilities, as well as the further training and motivation of our employees and our business partners. All supplied products, equipment, materials and erected plants as well as the services provided by our suppliers must meet our environmental protection requirements.

We are committed to keeping the impact of our activities on the environment to an absolute minimum. Ecological responsibility and economic success are not mutually exclusive; for example, they go hand in hand in resource consumption and waste management.

In assessing our environmental activities, we follow the general principle that long-term effects are preferable to short-term benefits. We consider the potential environmental impact of our activities as early as the product development stage and during all production processes, and take measures to ensure sustainable environmental protection. We are committed to limiting the amount of waste associated with our activities and to disposing of our operational waste in an environmentally sound manner.

The use of pollutants and chemicals shall be avoided wherever possible. If no alternative is available, the use of hazardous substances shall be kept to a minimum and safe handling and disposal shall be ensured. Chemicals are recorded in a register of hazardous substances, operating instructions are regularly updated and employees are trained in the handling of hazardous substances as part of occupational safety. The relevant laws are strictly observed. We refrain from using substances that are harmful to the health and safety of our employees. These include carcinogenic, mutagenic and reprotoxic substances (CMR substances).

TRIPS Group completely avoids the use of asbestos in the equipment and packaging it supplies.

Environmental protection is an important concern for us and an integral part of our management system. This includes, in particular, reducing energy consumption by using modern and energy-efficient equipment and electricity-saving measures. We rely on sustainable energies and an energy monitoring system as part of our photovoltaic installations. We want to contribute to the reduction of greenhouse gas emissions as well as to the improvement of water quality and the reduction of water consumption. Participation in environmental initiatives and progressive measures are close to our hearts. We contribute through hybrid and e-cars and the provision of charging points for e-cars on our premises. Waste prevention and separation is an essential part of our daily operations.

10. Anti-money laundering and trade controls, financial responsibility, disclosure of information

TRIPS Group only enters into business relationships with reputable external partners whose business activities are in compliance with the law and whose financial resources are of legitimate origin. TRIPS Group does not support money laundering and complies with anti-money laundering laws worldwide.

TRIPS Group complies with all export control and customs laws applicable in each country. We comply with national and international export regulations and economic sanctions as part of our export controls.

TRIPS Group does not export or import from or to sanctioned countries or do business with third parties suspected of national security or criminal activities.

TRIPS Group respects and honours its financial responsibilities. We maintain all of our business records, books and records in accordance with applicable law and generally accepted accounting principles. In addition, we are committed to complying with legal requirements for the disclosure of financial and non-financial information about our company and our employees.

11. Product safety

Our commitment to providing our customers with products and services that meet their needs is matched only by our commitment to design, manufacture and distribute products that are safe for both their intended use and disposal.

12. Suppliers

In a complex supply chain, compliance is of central importance. To ensure uniformly high standards in our supply relationships, we contractually oblige our suppliers to comply with our Code of Conduct for TRIPS Suppliers, which includes basic requirements on human rights, labour standards, environmental protection and occupational safety, as well as the obligation to comply with the law and refrain from corruption.

Suppliers can also commit to complying with their own rules of conduct if these are at least equivalent to the Code of Conduct for TRIPS Suppliers. The delivery of the ordered goods shall simultaneously constitute confirmation that the supplier recognises and complies with the "Business Conduct Guidelines of TRIPS Group" and the "Code of Conduct for TRIPS Suppliers". TRIPS Group is entitled

to carry out or have carried out a sustainability audit at the supplier's premises after prior notification. The supplier is obliged to fully cooperate. The costs for the audit shall be borne by the supplier.

13. Due diligence to promote responsible supply chains for minerals from conflict and high-risk areas, REACH

TRIPS GmbH expects its suppliers to avoid any use of smelters and refineries that do not meet the requirements of the OECD Guidance on Due Diligence in the Supply Chain of Mineral Resources from Conflict and High-Risk Areas. Minerals are classified as conflict-affected if their extraction, transport, trade, handling/processing or export directly or indirectly supports non-state armed groups and serious human rights violations, such as child labour, forced labour or slavery.

Information on smelters or refineries used for minerals such as tin, tantalum, tungsten, gold and cobalt must be provided to TRIPS GmbH upon request.

Our suppliers are required to fulfill their due diligence obligations along the supply chain. This includes the implementation of measures that ensure that the minerals used by the supplier - especially tantalum, tin, tungsten, gold and cobalt - do not contribute to the direct or indirect promotion or support of armed conflicts and serious human rights violations, such as child and forced labour or slavery. The due diligence requirements are an extension of the above sustainability requirements, which are integral parts of the due diligence implementation.

We only order products that comply with the REACH and RoHS regulations. This is anchored in our purchasing conditions and in all orders of TRIPS GmbH accordingly. Suppliers are required to provide us with appropriate information about their products.

14. Handling of company equipment

TRIPS Group has numerous facilities and equipment in its offices and premises such as telephones, photocopiers, computers, software, internet/intranet, machines and other work equipment such as email systems.

These may only be used for company purposes and not for personal benefit. Exceptions and, if applicable, payment may be regulated locally, provided that the use of the facilities

- is not related to illegal activities,
- does not create a conflict of interest or the appearance of such a conflict,
- does not result in significant additional costs, disruption to the business of TRIPS or other negative impact on the Company, for example, through a conflict of interest with respect to the professional duties of the relevant employee or other employees.

In no case shall information be accessed or disclosed that supports or incites racial hatred, glorification of violence or other criminal offences, or has content that is sexually offensive in the relevant cultural context. No employee is permitted to make any recordings, files, images, sounds or reproductions using TRIPS equipment without the consent of the manager, unless this is directly related to the professional activity.

15. Contact person for compliance issues

In case of doubt about the legality of individual conduct, the management is available to employees and managers as a point of contact. Please note the integration of the TRIPS Group Business Conduct Guidelines in your daily work.

16. Disciplinary consequences of non-compliant behaviour

Compliance is mandatory for all employees. The TRIPS Group's Business Conduct Guidelines therefore stipulate that in the event of behaviour contrary to compliance, every employee - irrespective of the sanctions prescribed by law - must expect disciplinary consequences due to the violation of his or her employment contract obligations. Depending on the type and severity of the misconduct, the following disciplinary measures may be applied:

- Informal warning
- Formal warning
- Compliance discussion
- Ordinary or extraordinary dismissal

The assessment and decision on the appropriate response to behaviour contrary to compliance is made by the management.

17. Complaints and advice

Any employee may make a complaint to his or her manager, the Legal Department, Human Resources Manager or other designated person/office.

Circumstances that indicate a violation of the TRIPS Group Business Conduct Guidelines can be reported to the above-mentioned persons. Confidential and anonymous complaints may be made; all reports will be dealt with. Appropriate action will be taken where necessary.

All records will be kept confidential to the extent permitted by law. Reprisals (coercive measures) against complainants of any kind will not be tolerated.

18. Compliance Self-Test

Questions to ask yourself before making a decision:

1. Have I weighed up all the relevant issues correctly when making my decision?
2. Am my decision within the framework of internal and legal requirements?
3. Do I stand by my decision if it is questioned by my superiors?
4. What would my family say about my decision?
5. Would I accept my own decision as a person concerned?
6. Do I agree that the same decision should be taken in all similar cases throughout the company?
7. Do I still think my decision is right if TRIPS Group has to represent it in public?