COCREATE.
COSUCCEED.

SYNTEGON

Code of Conduct
Principles of lawful conduct

Preamble

If this Code of Conduct conflicts with local laws, the latter take precedence. In such a case, the Legal & Compliance Department should be contacted immediately.

1. Basic principles

Lawful, compliant, responsible and fair behavior

Syntegon and all of its employees, officers and directors are responsible for complying with applicable laws in all of our dealings, contracts and other business actions. In particular, we do not deceive customers, authorities or the public, nor do we participate in any such deception by third parties.

This basic principle is not driven solely by the fact that we fear the consequences of violations. Rather, our excellent reputation and our entrepreneurial success motivates us to always give priority to the principle of legality. Furthermore, in case of conflict, our Syntegon values should take precedence over customer wishes and other business interests.

Compliance violations can result in significant fines, claims for damages by third parties, operational disruptions, the loss of public contracts or the loss of the company's reputation. For employees, violations can lead to personal liability as well as imprisonment and labor law sanctions by the employer.

Reporting of suspected irregularities

Syntegon expects all of its employees to report possible violations of the rules laid down in this Code of Conduct to a superior or to the Legal & Compliance Department. Alternatively, an employee can contact - also anonymously - the SyntegonCompliance Hotline[1)] The hotline is also open to our business partners and any other third party. Syntegon will confirm the receipt of reports and treat them confidentially. No whistleblower will suffer any disadvantage as a result of reports made in good faith. This also applies even if a report subsequently turns out to be unjustified.

Syntegon will immediately persue indications of possible violations through internal investigations. If a suspicion is substantiated, the company will initiate appropriate measures.



Cooperation with authorities

Syntegon takes a cooperative approach in dealing with authorities. Employees, executives and management should cooperate fully when Syntegon or authorities conduct lawful investigations.

The professional secrecy of lawyers, the right to refuse information and other legal procedural rights shall remain unaffected.

Responsibility of managers

All Syntegon managers are responsible for ensuring that no violations of legal requirements or of this Code of Conduct occur within their area of responsibility. Proper and appropriate controls must be in place to prevent violations.

Managers act as role models for their employees and inform them about the rules laid down in this Code of Conduct. They ensure that statutory and internal regulations are continuously observed and complied with. Compliance requirements are openly discussed with employees. In this way, we ensure that they are known and that the Legal & Compliance department may be contacted immediately if clarification is required.

All employees are reminded that violations of the principle of legality and the Code of Conduct are prohibited and will result in disciplinary action as a matter of principle, regardless of the employee's position in the company.

If a manager receives indications of possible violations by employees or third parties, he or she must immediately contact the Legal & Compliance Department.

Social responsibility

We act responsibly on our own initiative and in the interests of our company. In doing so, we also take into account the impact on society and the environment. We regard fairness in cooperation, both within the company and with business partners, as a prerequisite for sustainable success. We condemn the violation of human rights, including in the supply chain and among our business partners. In performing our tasks, we pay attention to Syntegon's reputation as a fair, responsible and trustworthy business partner, employer and social actor.

Behavior towards colleagues

All Syntegon employees are treated with dignity and respect. We do not tolerate discrimination or harassment. Syntegon values and promotes diversity because we believe it enables us to achieve our goals while leveraging the best talent available.

2. Avoiding conflicts of interest

Secondary activities and equity investments

Secondary employment requires the written consent of management. Management shall give its consent if the secondary activity does not impair any legitimate interests of the company.

Employees of Syntegon may only acquire financial interests in competitors, suppliers or customers after prior written notification to Syntegon of the individual case. The duty of disclosure does not apply to equity investments of less than ten percent. Transactions with companies in which a spouse, partner or close family member holds an interest or exercises an executive function must also be reported in advance in writing to the respective executive. This applies if the transactions may influence the business relationship or give rise to a potential conflict of interest.

Engaging business partners for private purposes

Anyone who is directly involved in the awarding or processing of contracts on behalf of Syntegon may only involve business partners of Syntegon for private purposes with the written consent of such employee's superior. In this way we avoid possible conflicts of interest. This regulation does not apply to "generally available" goods and services, however. "Generally available" goods and services are defined as products or services that are offered to the general public at the same prices, such as goods in retail stores.

3. Dealing with information

Written documents

Records and reports, whether internal or external, must be accurate and truthful. We follow generally accepted accounting principles. In addition, we only use confidential company information to create records, files and the like when it directly serves Syntegon's interests.

Confidentiality

Confidential company information must be kept secret and protected by appropriate measures. The obligation to maintain secrecy shall continue to apply even after termination of the employment relationship.

Data protection and information security

We observe the protection and security of business information and personal data in all business processes and in accordance with applicable legal requirements.

When developing products and new business models, we ensure that the legal requirements for data privacy and information security are taken into account at an early stage. If an employee has any questions about the proper handling of data, they should contact the data protection officer.

Insider information

Insider information is defined as information that is not known to the public and can influence the price of shares or other financial instruments. Employees and managers who possess insider information must observe the following principles:

(1) The purchase or sale of securities on the basis of inside information is not permitted. This applies irrespective of whether these transactions are carried out for the company's own account or for the account of third parties.

(2) Insider information may not be used to recommend or otherwise induce anyone to buy or sell securities.

(3) Insider information shall be treated as strictly confidential and may not be disclosed to third parties.

(4) Insider information shall only be disclosed if the recipient requires the information to perform his or her duties and has been obligated to maintain strict confidentiality.



4. Conduct towards business partners and third parties

Competition and antitrust law

We adhere to the rules of fair competition. Competitors are not permitted to exchange information or reach agreements on the allocation of territories and customers, prices and price components, supply relationships and their conditions, or production capacities and supply conditions. The same restriction applies to the exchange of information on market and investment strategies.

Cooperation or exchange of information in connection with research and development projects should take place only in strictly defined exceptional cases. In addition, applicable national regulations on anti-competitive clauses in contracts with customers or suppliers must also be observed.

Even if we have a strong market position, we will not abuse such position to enforce price discrimination or refusals to supply, for example.



Supplier and customer relations

We always document agreements made with customers and suppliers - including all subsequent changes and amendments. Suppliers shall be selected exclusively on the basis of objective and competitive criteria, i.e. after comparing price, quality, performance and suitability of the product or service offered.

Anti-Corruption



Syntegon does not tolerate any form of corruption. Corruption is punishable by law, distorts competition, leads to financial losses and damages the company's reputation.

Agents or other intermediaries engaged to procure orders are not exempt from these anti-corruption measures.

The granting of benefits to public officials or persons in similar positions must be handled in an extremely restrictive manner. Even the appearance of an attempt to exert influence must be avoided. "Public officials" are defined as persons who perform sovereign duties - for example, civil servants, judges, professors at public universities, and employees of public authorities and testing institutes with sovereign duties. Employees of public-sector companies that are organized under private law and perform sovereign tasks (e.g. public utilities) may also be considered public officials.

Undue influence on public officials, customers, suppliers or other third parties or attempts to unduly influence such persons will be subject to disciplinary action by Syntegon - irrespective of the consequences under criminal law. Corresponding indications are to be reported immediately to Syntegon management and the Legal & Compliance Department. Syntegon will also take appropriate measures against business partners in such cases, e.g. a suspension of orders or termination of contracts.

Donations and sponsoring

Syntegon does not make donations to politicians, political parties or political organizations.

As a responsible member of society, Syntegon supports social and humanitarian projects. Donations and

sponsoring contributions must be made transparently. They should be proportionate to the purpose pursued by the donation recipient or the consideration offered by the sponsoring partner.

Anti Money Laundering

It is Syntegon's goal to do business with reputable clients, consultants and business partners who are involved in legitimate business activities and whose funds come from legitimate sources. Money laundering is strictly prohibited and we comply with applicable money laundering laws. Cash transactions of 10,000 euros or more (or the equivalent in foreign currency) are prohibited.

International Trade

In all countries in which we operate, we comply with the laws applicable there. This includes import and export control laws. We expect the same compliance from our business partners.



5. Standards for our products and services

Syntegon's strength is to deliver innovative and safe products of the highest quality and reliability. Only in this way can we meet the requirements and expectations of our customers. In addition, the principle of legality guides us in the development and manufacture of products and the provision of services.

6. Intellectual property of third parties

Third-party intellectual property includes both industrial property rights (for example, patents and trademarks) and copyrighted works (for example, software and image rights) of third parties.

We respect the intellectual property of third parties and only use it if we have been granted the corresponding rights of use. We only use third-party know-how that is not protected by industrial property rights or copyrights insofar as there are no legal regulations to the contrary. If we have been informed of this third-party know-how under a confidentiality agreement, we may only use and pass it on in compliance with the provisions of this confidentiality agreement. This includes, in particular, third-party production drawings as well as individual data, dimensions and tolerances received from third parties. We shall use third party software - including open source software and firmware - only within the scope of rights granted and in compliance with the relevant license terms.

7. Occupational safety, health, fire and environmental protection

We consider it our duty to protect people and the environment from harm, to minimize harmful effects on our environment and to use resources sparingly. Processes, operating facilities and equipment must comply with legal and internal requirements for occupational safety as well as health, fire and environmental protection regulations.

8. Communication and training

We welcome dialog on compliance issues, openly address potential situations and risks, and actively take advantage of the training offered by the company on this Code of Conduct and the topics it addresses.

9. Implementation and control

The management of Syntegon Technology GmbH and the management of its affiliated companies are responsible within their area of responsibility for compliance with the rules contained in this Code of Conduct, as well as any additional company rules.

Internal Auditing has an unrestricted right to request information and conduct audits, unless this conflicts with statutory or company regulations.

10. Due Diligence in the Supply Chain

We are committed to complying with applicable legal regulations on human rights and environmental due diligence, both in its own business operations and throughout its supply chain.



Notice:

The regulations contained in this Code of Conduct apply in the relationship between the respective company of the Syntegon Group and its employees. They represent binding instructions for action. Third parties cannot derive any rights from this Code of Conduct.

Information and contacts

Syntegon Technology GmbH
Legal & Compliance
Mercedesstraße 41
70372 Stuttgart
compliance.management@Syntegon.com

[1] https://syntegon.integrityline.app/?lang=en