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## 1. Scope of Application

This compliance policy is valid and binding for all pro-beam group companies and their employees (hereinafter referred to as `staff`).

## 2. Principles

Our essential beliefs about correct and wrong behaviour, especially in the professional environment, unite and guide all pro-beam staff. Both individually and together we are responsible employees and each staff member is accordingly obliged to follow the active embodiment of these beliefs.

- We respect law and rights
- We follow generally accepted values and principles such as integrity, honesty and respect for human dignity
- When considering the impact of our business activities, we include economic, environmental, technological and social aspects in our decisions

## 3. Conditions and Standards of Employment

Our working environment should be safe and professional and all should have equal opportunities to make their contribution and benefit from their success. Discrimination, harassment and unsafe working conditions will not be tolerated. The guidelines that we should follow include that:

- we have respect for the personal rights and privacy of others
- we give equal treatment and opportunities of staff, regardless of their gender, religious beliefs, ethnic origin, race, age or sexual orientation
- we protect other staff in the event of sexual and personal harassment and discrimination
- we avoid any kind of sexual and personal harassment and discrimination
- we provide the highest possible work safety for the prevention of accidents and injuries
- we adhere to working standards and laws such as those regarding permissible working hours
- we provide a reasonable remuneration for all staff and at all times comply with the statutory minimum wage
- we respect the rights of staff in respect of unions and freedom of assembly and association
- we never employ any staff who are under the minimum age of 15 years

## 4. Corruption and Bribery

Corruption and bribery are not only prohibited by law, they create dependence, undermine trust and in the end damage all of those involved. The guidelines that we should follow include that:

- we do not ourselves and do not allow others to bribe or corrupt on our behalf
- we make no money created by cash benefits, even if this activity is permitted under local law
- we accept no gifts & invitations which may influence or affect our objectivity
- we offer no gifts & invitations which may influence or affect the objectivity of others

## 5. Competition

Fair and healthy competition is the basis of our economy and growth, and thus our prosperity. We are committed to follow this concept and not to hamper it. The guidelines that we should follow include that:

- we check our potential new customers and suppliers and only do business with companies who adhere to our standards
- we observe antitrust, tax and commercial law regulations
- we do not exclude any competitors and do not try to impede competition

## 6. Conflict of Interest

Conflict of interest arises when a staff member's personal, social or financial activities overlap their professional duties. The guidelines that we should follow include that:

- if professional activities overlap with work responsibilities, we make known any possible conflicts of interest; for example, business with close relatives
- we apply the four-eyes principle to all of our business activities with external third parties

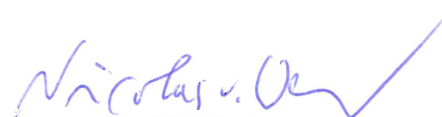
## 7. Ombudsman/ Moderation

In all cases and issues relating to compliance matters, the staff can make contact in complete confidence with the Ombudsman as designated by the Board of Management.

Gilching,

*04.12.2020*

Ort, Datum



Nicolas von Wolff  
CEO