

CODE OF CONDUCT



Berthold Technologies GmbH & Co. KG
Calmbacher Strasse 22
75323 Bad Wildbad
Germany

Table of Contents

| | |
|--|---|
| 1. Basic Understanding | 3 |
| 2. Compliance with the law | 3 |
| 3. Integrity and Compliance | 4 |
| 3.1 Anti-corruption | 4 |
| 3.2 Fair competition | 4 |
| 3.3 Prevention of money laundering | 4 |
| 3.4 Production of information and intellectual property | 4 |
| 3.5 Data protection | 4 |
| 3.6 Export control | 4 |
| 4. Health and Safety | 5 |
| 5. Remuneration and working hours | 5 |
| 6. Respect for human rights | 5 |
| 6.1 Prohibition of child labour | 5 |
| 6.2 Prohibition of forced labour | 6 |
| 6.3 Freedom of association and collective negotiation | 6 |
| 6.4 Promotion of diversity, equal opportunities | 6 |
| 6.5 Leadership culture | 6 |
| 7. Environment, energy and climate protection | 6 |
| 8. Handling of conflict materials | 7 |
| 9. Supply chain | 7 |
| 10. Quality | 7 |
| 11. Implementation and enforcement | 7 |
| 11.1 Communication | 7 |
| 11.2 Notification of violations | 8 |

Preamble

Berthold Technologies is an owner-managed technology company in the fields of life sciences, process measurement technology and radiation protection. We have been operating from Bad Wildbad in the Black Forest since 1949 and have subsidiaries and strong partners worldwide. Our innovative technological solutions *Made in Germany* are renowned for their accuracy, precision and unmatched reliability, helping our customers solve complex analytical challenges across a wide range of industries, academia, and federal and state agencies.

We pursue excellence and act with integrity in all facets of our business. Berthold Technologies - through its people, values, programs and policies - has made it a priority to ensure that we have an ethical culture where everyone has a sense of personal responsibility to do the right thing in the best possible way.

1. Basic Understanding

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in the sense of the following guidelines.

We, the undersigned company **Berthold Technologies GmbH & Co. KG**, assume responsibility within the framework of our respective possibilities and scope of action by taking into account the consequences of our entrepreneurial decisions and actions in legal, economic, technological as well as social and ecological respects. In this way, we contribute to the social and economic development of the countries and regions in which we operate. Our actions comply with the relevant statutory regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the core labour standards of the International Labour Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively demand our employees worldwide to observe. The contents apply in all of our company's subsidiaries and business units.

We expect the same basic understanding from our business partners. It is not intended to create rights in favour of third parties.

2. Compliance with the law

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles contained in this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we will endeavor to comply with the contents of this Code of Conduct.

3. Integrity and Compliance

We have taken appropriate compliance measures so that the following topics are adequately covered:

3.1 Anti-corruption

We do not tolerate corruption, bribery or extortion; these prevent fair competitive conditions. Inducements which relate to the intention or could give the impression of influencing business decisions or procuring any other improper advantage are neither promised, offered, granted, demanded or accepted in our business relationships, nor do we allow ourselves to be promised such benefits. A particularly strict standard must be applied in dealings with persons to whom special criminal and liability regulations apply (e.g., public officials). We also avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose these conflicts.

3.2 Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, sharing of markets or customers, or market and bid rigging.

3.3 Prevention of money laundering

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

3.4 Protection of Information und intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information, trade secrets and non-public information. We comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

3.5 Data protection

We process, store and protect personal data in compliance with legal regulations. Thus, personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We process personal data only if they are protected against loss, alteration and unauthorized use or disclosure by appropriate technical and organizational measures.

3.6 Export control

We undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and support prohibitions - in the context of the transfer and export of our goods.

4. Health & Safety

We safeguard the health of our employees, guests and visitors by taking appropriate health and safety measures that adequately cover the following topics:

- Compliance with an operational health and occupational safety management system.
- Compliance with applicable laws and orientation towards international standards regarding health and occupational safety.
- Appropriate workplace design, safety regulations and provision of suitable personal protective equipment.
- Implementation of preventive controls, emergency measures, an accident reporting system and other appropriate measures for continuous improvement.
- Provision of sufficient drinking water and clean sanitary facilities.

We ensure that all our employees, guests and visitors are instructed accordingly.

5. Remuneration and working hours

Remuneration is based at least on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Employees are informed clearly, in detail and regularly about the breakdown of their remuneration. We comply with applicable laws and labour standards regarding maximum permissible working hours and ensure that:

- working hours, including overtime, do not exceed the respective maximum limits permitted by law.
- weekly working hours, including overtime, do not exceed 60 hours, even in exceptional cases.
- employees have at least one full day off per calendar week.

6. Respect for human rights

We respect and support the observance of internationally recognized human rights and

- respect the personal dignity, privacy and personal rights of each individual.
- protect and grant the right to freedom of opinion and expression.
- do not tolerate unacceptable treatment such as physical and psychological hardship, sexual and personal harassment, or discrimination.

6.1 Prohibition of child labour

We do not tolerate child labour. We do not hire employees who do not have a minimum age of 15 years and ask for proof of age. We do not hire employees for hazardous work who cannot show a minimum age of 18 years according to ILO Convention No. 182.

6.2 Prohibition of forced labour

Forced labour, modern slave labour or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary, and it must be possible to terminate the employment relationship.

6.3 Freedom of association and collective negotiation

We respect the right of employees to freedom of association, freedom of assembly, and collective and wage negotiations to the extent that this is legally permissible and possible in the respective country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

6.4 Promotion of diversity and equal opportunities

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

6.5 Leadership culture

We regard our employees as a valuable asset. Our managers are therefore required to act as role models at all times and to encourage and support employees in their professional and personal development. We take our duty of care towards our employees very seriously and treat them with respect at all times. We expect our managers to provide clear and cooperative leadership that follows the principles of respect, fairness and professionalism and resolves conflicts in an objective manner.

7. Environment, Energy and Climate Protection

We act in accordance with applicable laws and are guided by international standards to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection.

All employees are sensitized to environmental protection and necessary training measures and courses are provided.

We have taken appropriate environmental protection measures (e. g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

- Objective setting, definition, and implementation of measures as well as their continuous improvement.
- Environmental aspects such as reducing CO₂ emissions, increasing energy efficiency as well as using renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly as well as handling hazardous substances responsibly for people and the environment.

8. Handling of conflict materials

We take due diligent measures to avoid the use of conflict minerals in our products in order to prevent human rights abuses, corruption, and funding of armed groups or the equivalent.

9. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent high ethical codes of conduct. We pursue a zero-tolerance policy against all forms of child labor, forced labor and human trafficking. We also encourage our suppliers to enforce the contents of this Code of Conduct in their supply chains.

We reserve the right to check the application of this Code of Conduct at our suppliers systematically and on an ad hoc basis. This may take the form of questionnaires, assessments, or audits, for example.

If there are still doubts regarding compliance with this Code of Conduct, the supplier will be requested to take appropriate countermeasures and report the matter to the responsible contact in our company. If necessary, the cooperation will be terminated.

10. Quality

We offer a quality standard that is based on the requirements of the customer as well as on the valid safety, radiation, health, and environmental protection standards. We define and implement our quality, safety, radiation, health, and environmental protection goals annually. Within the framework of regular reviews, as well as internal and external audits, we verify the effectiveness of our integrated quality management system and can quickly initiate corrective measures if necessary.

11. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement and apply the principles and values described in this Code of Conduct and to be able to provide evidence of them when required. All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labour law.

11.1 Communication

We communicate openly and in a dialog-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other stakeholders.

11.2 Notification of violations

We offer our employees and business partners access to a protected mechanism to confidentially report possible violations of the principles of this Code of Conduct.

If you have a report, please contact the following office:

Contact details:

E-mail: ombuds@berthold.com

Phone: +49 7081 177 561

Berthold Technologies GmbH & Co. KG



Thomas Bogner
CEO and Shareholder