



Code of Conduct

for business partners

Version 1V0

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Preamble

The MicroNova Group (hereinafter referred to as "MicroNova") is increasingly focussing on aspects of sustainability and we are aware that our business activities have social, technological, economic and ecological effects. In line with the principle of sustainability, MicroNova strives to take responsibility, minimise its own footprint and also sensitise suppliers in this regard. This Code of Conduct is based on a common basic understanding of socially responsible corporate governance: we are guided by universally recognised ethical values and principles, in particular integrity, honesty and human dignity.

We, the

MicroNova Group of Companies
(MicroNova AG, ks.MicroNova GmbH and cz.MicroNova s.r.o.)
(hereinafter also referred to as "we", "us", "our" or "MicroNova"),

is committed to respecting core human rights, labour rights, environmental protection and the fight against corruption in all its business activities and is committed to ecologically and socially responsible corporate governance. Our Code of Conduct sets out the standards on which we base our behaviour - and also expects all business partners and suppliers from whom we purchase or intend to purchase products and/or services (hereinafter referred to as "business partners") to conduct their business in an ethical and socially responsible manner. In doing so, we aim to ensure mutual respect, honesty and fairness in our dealings with our business partners. Furthermore, we strive to continuously optimise our business activities, our products and our services in terms of sustainability; we ask our business partners to contribute to this in the sense of a holistic approach. This also includes building sustainable relationships with our suppliers.

This Code of Conduct is based on national laws and regulations such as the German Supply Chain Duty of Care Act (LkSG), which we are obliged to comply with, as well as international conventions. The fundamental elements of this are responsible business practices and respect for human rights as defined by the International Bill of Human Rights (ICCPR), the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the International Labour Organisation (ILO) and the OECD Due Diligence Guidance for Responsible Business Conduct.

The MicroNova Group is committed to promoting compliance with this Code of Conduct (CoC) among its direct suppliers and the associated value chain within the scope of its possibilities and room for manoeuvre. This also applies to business partners who, as far as is reasonable and possible for them, ensure that the sustainability requirements are also passed on within their direct supply chains.

In the event of a breach or suspected breach of the human rights and environmental expectations set out below, we will report this to our business partners. We also grant the business partner the right to carry out assessments and inspections on site at our business premises and production sites and to inspect the relevant documents, subject to reasonable prior notice and during normal business hours. Obligations to provide information to business partners only extend as far as they are not affected by trade and business secrets or conflict with compliance with statutory data protection regulations. In return, we expect that any infringements will also be reported to MicroNova without delay and that appropriate countermeasures will be taken.

The following Code of Conduct therefore defines our principles and requirements for all employees of the MicroNova Group and third parties working on our behalf.



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1 Responsible working conditions and protection of human rights (social sustainability)

The business partners respect and support compliance with internationally recognised human rights, in particular the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the fundamental conventions of the International Labour Organisation (ILO). In particular, the following principles are observed:

1.1 Human rights, modern slavery and indigenous peoples' rights

Business partners respect the observance of internationally recognised human rights and ensure that there is no involvement in human rights violations. They guarantee that all activities in the working environment are carried out by employees voluntarily and without coercion or threat of punishment. To this end, they must take appropriate measures to effectively prevent forced labour, debt bondage, involuntary prison labour and any form of modern slavery.

In addition, business partners must ensure that they fully respect the rights of local communities and indigenous peoples. Any impact of business activities and adverse effects on the local population and their livelihoods must be minimised.

1.2 Child labour

Business partners shall comply with applicable laws regarding the minimum age for employees and ensure that prohibited child labour is not used in their operations. They shall ensure that child labour within the meaning of the ILO conventions (International Labour Standards) and the exploitation of children are not practised or tolerated and that the minimum age for the employment of young workers is observed.

They must also ensure that when employing young people and young employees, care is taken to ensure that legal regulations on working hours, rest breaks and hazardous work are observed. This includes prohibiting any activities that are classified as dangerous and/or that could jeopardise physical or mental health and development.

1.3 Protection of physical integrity and the hiring of security personnel

The business partners guarantee the protection of physical integrity and initiate suitable measures to ensure that this indispensable protected right is safeguarded.



Business partners shall also ensure that any form of physical, psychological or sexual violence, war crimes or other serious violations of international humanitarian law, genocide or crimes against humanity are excluded both in their own business operations and along their supply chain. This includes, in particular, complicity or participation in torture, kidnapping, killings or the like.

Business partners shall refrain from commissioning or using security forces if their deployment results in inhuman or degrading treatment or injury to persons or if freedom of association is impaired.

1.4 Occupational health and safety

The business partners guarantee that the applicable national legislation on health protection and occupational safety is complied with. These include, for example, emergency preparedness, accident and incident management, workplace ergonomics and fire protection. Business partners are also obliged to comply with all health and safety-related laws and regulations. They should actively take measures above and beyond the legal requirements to ensure safe and healthy working conditions for employees, contractors and visitors and to continuously minimise risks.



1.5 Non-discrimination, diversity, harassment and equal opportunities

The business partners are committed to promoting equal opportunities and equal treatment. They ensure that there is no discrimination in the recruitment of employees or in the promotion or granting of training and further education programmes. The highest principles of ethics, fairness, integrity and professional behaviour as well as fair practices in dealing with all parties should be observed.

No one in a partner company may be disadvantaged because of their gender, age, skin colour, culture, ethnic origin, sexual identity or sexuality, disability, religious affiliation or world view. This includes harsh or inhumane treatment, including sexual harassment, abuse of any kind, corporal punishment, mental or physical coercion or verbal abuse of employees, as well as the threat of such treatment or other mental or physical violence. The payment of unequal pay for work of equal value also constitutes unequal treatment.

1.6 Gender equality

The business partners shall ensure that they evaluate and remunerate work uniformly - regardless of whether it is performed by men, women or diverse persons - if the requirements are comparable. In order to prevent unequal treatment, business partners must make the wage determination process as transparent as possible.

1.7 Remuneration and working hours

Business partners shall provide remuneration and social benefits in accordance with the basic principles on minimum wages, overtime and statutory social benefits and pay them directly, in full and on time.

Working hours are in accordance with the applicable national laws and standards of the industry or the relevant ILO conventions.

1.8 Freedom of assembly and association

The business partners guarantee that the rights of employees to freedom of association and unionisation are upheld in accordance with national legislation. In addition, the business partners undertake to ensure that employee representatives

and trade union members are treated fairly and without discrimination and that cooperation based on trust is promoted. The business partners recognise the right to free collective bargaining and the right of employees to strike.

1.9 No forced eviction

The business partners undertake to observe the prohibitions on unlawful forced eviction and the unlawful seizure of land, forests and water in the event of acquisition, development or utilisation.

1.10 Conflict-free origin of minerals and raw materials

The business partners are aware of a possible link between the production of raw materials and armed conflicts or gross human rights violations. Due to the significant impact on people and our planet, all parties involved in the supply chains must exercise particular care with regard to compliance with human rights and environmental protection.

When sourcing minerals from conflict-affected or high-risk areas, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from such regions must be followed.

Conflict Minerals are currently columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives, limited to tantalum, tin and tungsten. Suppliers of 3TG (tin, tantalum, tungsten and gold) and suppliers that use these raw materials in their products should avoid smelters and refineries in their supply chain without appropriate, audited due diligence processes.

2 Environmental compatibility and climate protection

The aim is to minimise the environmental impact of the supplier's business activities by using resources as sparingly as possible. The business partners endeavour to support this objective to the best of their ability and to reduce any environmental impact in their business activities.



2.1 Careful use of resources

The business partners undertake to minimise the consumption of resources such as water, energy, raw materials and materials in their business activities (efficiency). In addition, the business partners endeavour, as far as possible, to favour the use of renewable energies and sustainable resource management.

2.2 Avoidance and minimisation of environmental pollution

In order to maintain air quality, the business partners minimise emissions in accordance with the state of the art, control polluting emissions and treat them before they are released into the environment. They are also committed to actively reducing greenhouse gases along their entire supply chain. They guarantee to use materials as sparingly as possible and to avoid or recycle waste as far as possible. They also define measures to regulate resource-conserving transport and the safe and environmentally friendly storage, treatment and disposal of waste.

2.3 Animal welfare, biodiversity, land use, deforestation, soil quality

Business partners are obliged to deal responsibly with the issues of animal welfare, biodiversity, land use and deforestation. Contamination of soil and water - especially groundwater - must be avoided under all circumstances. Business partners ensure that the land, forest and water rights of others are respected.

2.4 Environmentally friendly products & avoidance of hazardous substances

When developing products and services, business partners shall ensure that the consumption of energy and natural resources is minimised. Their products should also be suitable for reuse, recycling or safe disposal. The business partners undertake to avoid, wherever possible, substances that pose a risk to people and the environment if released. They also maintain a hazardous substance management system that ensures the safe use, transport, storage, reprocessing, reuse and disposal of hazardous substances.

3 Compliance and corporate ethics

The business partners comply with national and international laws and regulations as well as the relevant agreements and normative requirements and undertake to act with honesty, integrity and in full compliance with applicable law in global competition. They refrain from all forms of corruption, extortion and embezzlement and do not engage in any business with suppliers who are involved in such practices. The business partners undertake to fulfil their social and environmental responsibility in all business transactions in the countries in which they do business. As a minimum, the following points must be complied with:



3.1 Prevention of corruption

The business partners guarantee that they do not tolerate corruption and ensure compliance with the United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions on combating corruption and the relevant anti-corruption laws. They also ensure that employees, subcontractors or representatives do not offer, promise or grant any advantages to employees of MicroNova, other clients or related third parties with the aim of obtaining an order or other preferential treatment in business dealings.

3.2 Competition and antitrust law

The business partners conduct their business in accordance with free and fair competition and in compliance with all applicable competition and antitrust laws. In doing so, they must neither enter into agreements with competitors that violate antitrust law nor abuse any dominant market position that may exist.

3.3 Avoiding conflicts of interest

The business partners guarantee that all decisions are based exclusively on objective criteria and that they do not allow themselves to be influenced by competing interests or relationships. They must check and eliminate all indications of any conflicts of interest.



3.4 Fraud and anti-money laundering

The business partners guarantee to take appropriate measures to prevent any form of fraud and to ensure that the business relationships with MicroNova are not misused for money laundering or other illegal activities. They must comply with the relevant legal provisions on money laundering prevention, establish appropriate preventive measures and must not participate in any money laundering activities.

3.5 Confidentiality and data protection

When processing personal data, business partners shall ensure that they implement and comply with all freedom of information laws, in particular the European Union's Freedom of Information Act, data protection laws such as the EU

General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG), as well as all applicable regulations.

Business partners shall ensure that they treat trade and business secrets and all other confidential information as strictly confidential. Such information must be appropriately protected from disclosure to and access by third parties. In addition, the collection, processing, safeguarding and destruction of personal data shall be carried out appropriately and in accordance with the law.

3.6 Intellectual property

Business partners shall ensure that the intellectual property rights of third parties are fully respected and that they hold all necessary rights of use to avoid any infringements of intellectual property rights.

3.7 Artificial intelligence

Business partners who use artificial intelligence (AI) in their supply chains, development or production must guarantee that it is handled responsibly. All AI-based developments may only be used in a non-discriminatory, safe and reliable manner within the framework of the applicable regulations. The control of AI systems is the responsibility of humans at all times and must take into account the current state of data security and data protection.

3.8 Product safety

Business partners shall ensure that their products and services do not endanger people or the environment and fulfil the agreed or legally prescribed product safety standards. They communicate information on safe use.



3.9 Counterfeit parts

Business partners develop, implement and maintain methods and processes to minimise the risk of counterfeit parts and materials in products or in components of related services.

3.10 Export controls and economic sanctions

The business partners ensure that export restrictions are not violated in the event of an export transaction. The object of the delivery, the country to which the delivery is to be made, the recipient of the delivery and the purpose of the use of the goods must be checked. This must be done in particular before the contract is concluded and before actual delivery. It is essential to have reliable, quickly accessible and up-to-date knowledge of your own products and their components.

4 Sustainability policy within the supply chain

4.1 Disclosure and monitoring of information

At MicroNova's request, business partners disclose information on supply chains in order to identify sustainability risks and comply with legal obligations. The business partners also ensure that a corresponding disclosure agreement is in place with suppliers. Raw material supply chains in particular must be considered with extraordinary care, especially with regard to their significant impact on people and the environment.

In order to minimise and identify any sustainability risks within supply chains as well, the business partners will communicate all the principles and requirements described here to subcontractors and the entire supply chain and take them into account

when selecting them. They should encourage suppliers and subcontractors to comply with the described standards on human rights, working conditions, corruption prevention and environmental protection as part of the fulfilment of their contractual obligations.

Business partners are obliged to immediately address critical points that could negatively affect the quality of goods and services. They grant MicroNova the right to assess their sustainability performance after prior notice and within a reasonable period of time. In addition, they undertake to provide all necessary information for an initial assessment correctly and comprehensively on request as part of a self-assessment.

Business partners undertake to inform MicroNova immediately of any events that conflict with the principles of this Code of Conduct.

4.2 Duty of care and compliance management system

In particular, business partners undertake to introduce a risk management process to identify, minimise and ideally prevent risks and impacts on the environment and people. Each business partner is responsible for ensuring that its employees, representatives and authorised agents comply with this Code of Conduct for Suppliers and Business Partners in their business relationships with MicroNova. To this end, the business partner must use a compliance management system that includes communication within its supply chains, a risk management procedure and employee training on sustainability requirements. Whistleblowers shall be protected from persecution, threats, harassment or other detrimental measures; in addition, the business partner shall maintain the confidentiality of their identity, in particular the protection of personal data, during all phases of the procedure.



5 Reporting of misconduct and whistleblower system

The business partners undertake to provide a reporting procedure; it gives participants in supply chains the opportunity to report potential misconduct via an internal whistleblower system. The business partner makes its supply chains aware of the available channels for reporting complaints and ensures that this information is passed on to the lower levels of the supply chain.

MicroNova has also set up a whistleblowing platform where all partners in the supply chain can report violations of these requirements. If a violation falls within the sphere of influence of suppliers, they must immediately eliminate the associated risks.

6 Violation of the Code of Conduct; possible consequences

If MicroNova discovers a violation of the regulations of this Code of Conduct by a business partner, MicroNova will inform him in writing within one month and set a reasonable grace period to bring his behaviour in line with these regulations. If such a breach is culpable and makes it unreasonable to continue the contract until its ordinary termination, MicroNova may terminate the business relationship with the supplier, including all supply contracts, after fruitless expiry of the set period. A statutory right to extraordinary termination without setting a grace period remains unaffected, as does the right to compensation.

