

# Code of Conduct

## 1. Corporate Social Responsibility

The respect for freedom and human rights is an essential principle of VIAOPTIC's business activities. It creates the framework of our operations and is prerequisite for our success. VIAOPTIC is committed to the principle of sustainability. This includes the responsible and sustainable use of available resources, at present and in the future.

VIAOPTIC is committed to honesty and integrity with respect towards employees, customers, suppliers, competitors and other stakeholders.

VIAOPTIC recognizes that legal and cultural requirements vary in a global market.

VIAOPTIC expects all of its Business Partners to act with the same fairness, honesty and responsibility and dedication to corporate social responsibility in all aspects of their business.

This Code of Conduct highlights important standards that are consistent with VIAOPTIC's values and which we expect each employee and business partner to observe and strictly adhere to.

## 2. Compliance with Laws, Rules and Legal Regulations

VIAOPTIC will comply with all applicable laws, rules and regulations in the countries in which it operates and will maintain suitable measures to ensure compliance with such laws, rules and legal regulations.

### Combating Slavery and Human Trafficking

VIAOPTIC will comply with all applicable laws, rules and legal regulations prohibiting slavery and human trafficking in its own business as well as in its supply chain.

### Compliance with Antitrust Laws

VIAOPTIC will strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers. VIAOPTIC will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

### Combating Corruption

VIAOPTIC does not tolerate any form of corruption. Thus, VIAOPTIC will comply with applicable laws and regulations concerning bribery and anti-corruption, including those concerning foreign corrupt practices.

VIAOPTIC will neither engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official, for the purpose of influencing the decision-making process in violation of applicable laws. Specifically, VIAOPTIC must not offer illegal benefits or illegal favors such as bribe payments, kick-backs, or other illegal benefits including inappropriate gifts and undue hospitality towards business partners for the exchange of business opportunities.

#### Conflict Minerals

VIAOPTIC is aware of applicable legal requirements in relation to “conflict minerals” including tin, tantalum, tungsten, their ores and gold originating from conflict areas and shall ensure compliance with such laws. Additionally, VIAOPTIC will take best efforts to avoid the use of raw materials in its products that directly or indirectly finance armed groups violating human rights.

#### Export and Import Regulations

VIAOPTIC will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology and payments.

#### Prevention of Money Laundering

At VIAOPTIC we expect our employees and business partners to comply with all applicable statutes governing the prevention of money laundering and not to participate in any money laundering activity.

### **3. Conflict of Interest**

Employees are expected to act in the best interest of their company. Private interests and personal consideration shall not affect any business decision.

VIAOPTIC will avoid any activity or situation which may lead to a conflict of private interest of a VIAOPTIC employee or business partner and the business interest of VIAOPTIC. An employee or business partner becoming aware of a conflict of interest situation are obliged immediately to notify VIAOPTIC-management about this.

### **4. Respect for Human Rights, Anti-Discrimination and Women’s Empowerment**

VIAOPTIC respects human rights and actively promotes their observance. We follow the Universal Declaration of Human Rights of the United Nations, which requires each individual, every organ of society and, by extension, economic agents and businesses, to contribute towards the observation of these rights.

VIAOPTIC will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations, including the prohibition of forced or child labor, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

VIAOPTIC will maintain an environment with no retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity, culture or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law.

VIAOPTIC supports the UN Women's Empowerment Principles and believes that empowering women to participate fully in economic life across all sectors is essential to build stronger economies, achieve internationally agreed goals for development and sustainability, and improve the quality of life for women, men, families and communities.

## **5. Freedom of Association and Right to Conclusion of Agreements**

VIAOPTIC employees, without exception, have the right to assemble, form a works council and conclude agreements with the employer.

VIAOPTIC takes an open attitude towards the activities of the works council. Employee representatives are not discriminated against and have the opportunity to carry out their representative functions in the workplace.

## **6. Product Safety, Health, and Environment**

With our processes and products, VIAOPTIC desires to make a substantial contribution to the sustainable use of resources, environmental protection, including climate protection in particular. VIAOPTIC strives to save resources by continually aligning our production, quality and performance of our products with environmental soundness, and by reducing consumption of energy, water, raw materials and supplies.

Thus, VIAOPTIC will be committed to manufacture and deliver safe products and provide a safe working environment that supports accident prevention and minimizes exposure to health risks to their and business partner's employees.

VIAOPTIC will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible.

## **7. Data Protection, Confidential Information and Intellectual Property**

VIAOPTIC will comply with all applicable national laws concerning data protection. It is VIAOPTIC's responsibility to ensure that any confidential business information or trade secrets gained by virtue of the business activities is held in strict confidence and not improperly used or disclosed to third parties. Furthermore, VIAOPTIC will protect and secure business partner's intellectual property as confidential Information.

## **8. Compliance with this Code of Conduct**

VIAOPTIC strives to become familiar with the business practices of its suppliers, subcontractors and other business partners and to require all employees and business partners to comply with this Code of Conduct or comparable values.

Wetzlar, 01.11.2021

Management of  
VIAOPTIC GmbH