

Code of Conduct ('CoC') for Kraftwerk Living Technologies GmbH ('KLT')

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I. Principles, application of and adherence to the CoC

As a global AV integrator, we wish to create sustainable values for the benefit of our employees, business partners and customers.

Ethics, respect, loyalty, team spirit, and adherence to the law form the foundation and universal basis of our collaborations and our business relations.

Regarding to these values, we abide by applicable national and international laws, regulations, and directives, and therefore expect our business partners and customers also to observe, respect and strictly comply with these laws at all times.

Every country and every cultural community has its own social, religious, and cultural norms and values. KLT fully respects these norms and values.

This CoC sets out the principles and rules by which KLT conducts its business. It is binding on all subsidiaries, employees, managers, and all consultants, commercial agents, freelancers, as well as business partners and customers of KLT, and is addressed equally to both women and men.

II. Compliance rules in detail

A. Human rights, respect and integrity, diversity, social media, health and safety at work

1.

KLT will not tolerate any violation of human rights.

We promote working together fairly, trustingly, and respectfully. We intend to create a work environment marked by mutual trust, where each person is treated with dignity and respect, and where people from many different cultures, and countries with different personal backgrounds, are valued and appreciated. As an international company, we value the diversity expressed in the origins, cultures, languages, and ideas of our employees.

We respect the personal dignity and privacy of each employee. We respect and value all people irrespective of their age, gender, race, religion, any disability they might have, their sexual orientation, and origin. In conducting our business, we make sure to protect human rights, and we will not accept any discriminatory behaviour towards employees, customers, or business partners.

KLT prohibits any form of sexual harassment, such as advances, derogatory remarks, jokes, abusive language, lewd gestures, or the exhibition of such pictures in KLT business premises. Such behaviour may be deemed to constitute harassment even if it was not intended as such.

2.

The internet and social media platforms are innovative and communicative. They allow people to exchange information and ideas. As an international company, we value the benefits of these platforms and also use them for professional communications and the exchange of information.

In this context, however, we do not tolerate the dissemination of either indiscreet, objectionable, discriminatory, violence glorifying, sexual, racist or right-wing extremist ideas in any way whatsoever by our employees, customers and business partners.

3.

KLT complies with all applicable provisions under employment and social law.

KLT is committed to complying with the International Labour Organization's Convention concerning Minimum Age for Admission to Employment (ILO C138). Accordingly, the employment of children under 13 years of age will not be tolerated by KLT in any circumstances.

As health is the highest good of mankind, it is a special priority for KLT to always offer its employees the highest possible protection for this.

B. Sustainability

We are committed to protecting the environment and to the conservation of natural resources, and we support international efforts for combating climate change. KLT will always strive to act in an environmentally friendly manner and will refrain from conducting business or implementing projects which palpably endanger the environment.

C. Fair competition, prohibition of cartels

We are fully committed to fair competition and we support and comply with anti-trust and competition laws in all markets where we operate. All our business activities are conducted in a fair, ethical, and transparent manner.

Unfair business practices (e.g., discrediting statements, misleading or aggressive business practices, spying on business secrets) as well as cartel practices (e.g., arrangements with competitors for price-fixing or the allocation of markets or customers) are prohibited.

D. Corruption, money-laundering, terrorist financing, export controls

1.

KLT fully complies with relevant national and international provisions for combating corruption (e.g., UNCAC, U.S. Foreign Corrupt Practices Act, UK Bribery Act) and is therefore opposed to any form of corruption and bribery.

We (and our family members) therefore will not accept gifts, invitations, hospitality or other benefits or favours from business partners, customers, or other persons, except where these are within socially customary and appropriate limits for the relevant country or culture and whose acceptance or whose value would not reasonably be expected to influence our business decisions or actions.

The acceptance of cash is not allowed under any circumstances.

Gifts, invitations, hospitality or other benefits or favours must not be actively solicited.

2.

We only do business with reputable business partners and with funds exclusively from legal sources.

Therefore, we are clear in opposing any form of money-laundering and terrorist financing.

Money-laundering means the concealment of the illegal source of income from certain criminal activities by transforming and channelling it into the legal economy.

Terrorist financing is the provision of financial assets (including legal ones) to terrorist groups and/or for perpetrating a terrorist act.

3.

We strictly comply with international provisions for preventing breaches of export control laws (Dual-Use Regulation, EAR, ITAR). In particular, we also observe country-specific, goods-specific, or person-specific embargoes. Therefore, our business partners are also instructed by us to strictly comply with international export control laws.

E. Conflicts of interest, handling company property, dealing with trade and business secrets, data protection

1.

Our activities are aimed towards avoiding any kind of conflict of interest which may adversely affect our company. We will avoid any situation in which personal or economic interests may come into conflict with the interests of the company.

2.

We treat our own property and that of our business partners available to us with the utmost responsibility, propriety and care. This includes both physical objects and intangible assets such as business-related information, trade secrets, know-how, as well as industrial property rights.

3.

We will keep any business information available or made available to us in any way whatsoever and not already known to the public strictly confidential and will not disclose such information to unauthorised third parties.

4.

We are fully committed to complying with data protection legislation, which is why personal data concerning natural persons or legal entities will only be used by us in accordance with relevant national and/or international statutory provisions.

III. Final provisions

1.

The application of and adherence to the above provisions will be ensured by each employee receiving a copy of this CoC when taking up employment, as well as by face-to-face trainings. External consultants, agents, customers, and business partners will each also receive this CoC.

Managers must lead by example and have a particular responsibility for communicating, applying, and enforcing these provisions.

2.

Any violation of this CoC may lead to significant adverse economic effects for KLT (prosecution, fines, loss of business, etc.). If we become aware of such violations, they will be strictly sanctioned (e.g., termination, dismissal, criminal prosecution, civil liability, etc.).

3.

Any employee may report a violation or suspected violation of this CoC. Those reporting such violations to the best of their knowledge and belief will not suffer any disadvantage. Anyone wishing to report a violation should contact their immediate line manager in the first place, who will provide appropriate assistance. If this route is not appropriate, violations may be reported to compliance@kraftwerk.at at any time.

The information provided will be researched and checked in strict confidence by persons sworn to secrecy. Knowingly disseminating false statements concerning other employees shall itself constitute misconduct.

Wels, 01.06.2021



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