

InTiCa Systems



Future-
ORIENTED

Code of Conduct
Business Partners

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Preface

InTiCa Systems AG has the obligation and the self-conception to always act responsibly and lawfully. We are committed to complying with legal, professional and social rules.

Without appropriate and accepted behavior, no successful collaboration is possible. To achieve this, the Compliance Guideline shall be the moral, ethical and legal compass for our business partners. It contains the basic rules for collaboration with InTiCa Systems AG.

Our reputation and trust among our customers, suppliers, business partners, employees and shareholders are important to us. We want to be reliable and fair and actively assume our responsibility. The compliance policy serves to secure our economic success in the long term. The policy is intended to become an integral part of our corporate culture and the basis for our business relationships through the example set by each individual.

Passau, January 2022



Dr. Gregor Wasle

Chairman of the Board of Directors



Günther Kneidinger

Board of Directors

1. Introduction and objective

Like InTiCa Systems AG, our business partners must consider a wide range of social, political and legal conditions due to their national and international activities.

This Compliance Guideline forms the basis for all business transactions and decisions between InTiCa Systems AG and its business partners. It is the basis for morally, ethically and legally impeccable behavior of our employees and business partners. The term "InTiCa Systems AG", "InTiCa Systems" or "InTiCa" always refers to all companies or affiliated companies of the InTiCa Systems Group without exception. This Compliance Guideline therefore applies to all companies of the InTiCa Systems Group.

The Compliance Guideline may not be circumvented by ancillary agreements, such as contractual agreements or comparable arrangements.

This manual applies to all business partners of InTiCa Systems AG, hereinafter referred to as employees and business partners.

The Compliance Guideline will be updated as necessary by decision of the Board of Directors of InTiCa Systems AG and amended by any necessary guidelines.

The term "business partner" includes all suppliers, customers and other stakeholders with whom InTiCa Systems interacts in a corporate context.

2. Implementation responsibility

Each business partner bears responsibility for compliance with and implementation of the InTiCa Code of Conduct.

The management of our business partners is committed to setting an example for its employees in the implementation of the compliance guideline and, if necessary, to train staff in the use of the compliance handbook and to monitor compliance with the set guidelines among its further business partners.

Common sense serves as a compass for the interpretation and correct application of the compliance policy for employees of our business partners, who continuously align their own actions with reasonable ethical and moral standards.

The e-mail contact for compliance issues at InTiCa is: compliance@intica-systems.com.



3. Cooperation with InTiCa

InTiCa Systems AG generally expect its business partners to

- comply with all applicable laws
- refrain from corruption
- respect human rights
- comply with the laws against child labor
- comply with the ban of forced labor
- comply with the laws on international trade
- particularly comply with export and import bans as well as embargo regulations
- protect the health and safety of all employees
- comply with all relevant national and international laws
- set standards for occupational safety, environmental protection and data protection
- implement and comply with all the above-mentioned points in their respective supply chains.



4. Equal opportunities

InTiCa Systems expects its business partners to commit to the United Nations Charta and the European Convention for the Protection of Human Rights and Fundamental Freedoms and to ensure compliance with these in their supply chains. InTiCa Systems AG and its employees reject all forms of unlawful discrimination and unfair treatment.

Our business partners strictly prohibit discrimination, harassment and other unethical behavior for reasons of

- ethnic, national and social origin
- skin color
- gender
- religion and ideology
- political activism
- membership in an employee organization or trade union
- physical or mental disability
- age
- sexual identity
- or other personal characteristics.

The respective laws must be abided by.

In addition, business partners of InTiCa respect the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the International Labor Organization (ILO) of the United Nations and the OECD Guidelines for Multinational Enterprises.



5. Compliance with Laws and other Internal and External Regulations

In all activities and business relations, all employees of our business partners are required to

- comply with the prevailing national laws
- comply with all relevant internationally recognized standards, guidelines and principles
- uphold the principles of the UN Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations (UN), and the core labor standards of the International Labor Organization (ILO)
- and to keep themselves continuously informed about the laws, guidelines and regulations applying to their respective areas of responsibility

as well as to

- act in a respectful, fair and trustworthy manner
- value and promote the reputation of InTiCa Systems AG
- avoid conflicts of interest between corporate and private matters
- not seek unlawful advantages for themselves or others
- comply with the regulations on occupational safety, environmental protection and data protection and
- immediately report compliance violations.



6. Environmental protection

Every business partner is required to observe environmental and climate protection with regard to applicable international standards and legal requirements and to minimize the environmental impact of operational processes and products as far as possible.

To meet this requirement, the business partner pays specific attention to efficient management of resources (energy, water, raw materials and consumables), the use of materials that are as environmentally friendly as possible, the reduction or avoidance of emissions and waste and the environmentally friendly design of logistics processes. Chemicals and other materials that may pose a risk to the environment are handled responsibly and safely during processing, storage, transport and final disposal.

To continuously improve environmental and climate protection, a sustainable environmental management system in accordance with ISO 14001 should be employed.

For information on the environmentally relevant requirements for deliveries and services, please consult the general InTiCa purchasing conditions.



7. Occupational safety

The prevention both of accidents and illnesses in the workplace are important concerns for InTiCa, especially since health and safety in the workplace can significantly contribute to the well-being of employees. Therefore, both InTiCa Systems and each of its business partners undertake to comply with the applicable laws, regulations, instructions and standards on occupational safety in the interests of the health and safety of all employees and external visitors, both at the respective workplace and in the company in general.

As employers, InTiCa and its business partners are in turn committed to maintaining and promoting the health, performance and related personal well-being of employees through continuous improvement of working conditions and processes as well as through a diverse range of preventive and health promotion measures.



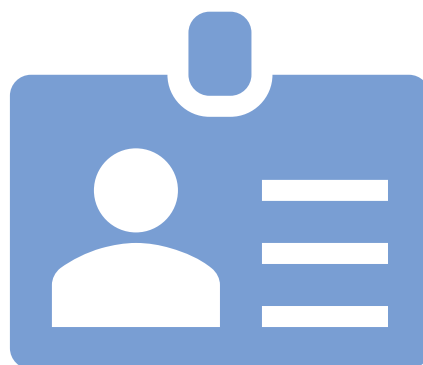
8. Data protection and confidentiality

Dealing with and protecting confidential information

Information, whether physical or digital, is a valuable resource for InTiCa Systems and its business partners. For this reason, sensitive data concerning individuals or internal company information in the wrong hands can have serious consequences for InTiCa as a company, its employees and business partners. Thus, InTiCa and its business partners protect sensitive commercial, technical and financial information, trade secrets and the personal data of employees in particular in order to ensure their integrity, availability and confidentiality. To the same extent, we respect the trade secrets of business partners and competitors. Each party undertakes to respect and protect the trade secrets of the other party.

Data protection

Personal data may only be collected, used and stored in accordance with the applicable data protection laws. Company and business-related data must be treated confidentially and may only be used for clearly specified and legally permitted purposes within the scope of the area of responsibility. Every employee must comply with data protection laws, regulations, instructions and standards. Similarly, we expect our business partners to comply with the applicable laws on the protection of personal data of employees, customers, suppliers and other parties and to apply the requirements of the GDPR accordingly. Retention and disclosure of personal data is based exclusively on the objective necessity resulting from a fulfillment of the mutual business relationship.



9. Intellectual property

We and our employees are committed to respecting the intellectual property of third parties and to only use such property if its use has been previously allowed. We may protect innovative products, processes and technologies developed at InTiCa by the registration of patents. We expect our business partners to respect patents, trade and business secrets as well as know-how of InTiCa and/or other third parties at all times and to neither disclose them nor pass them on to third parties without prior written consent of InTiCa. Any form of product piracy will be discouraged.

10. Protection of assets

Tangible and intangible company assets may only be used for legitimate business-related purposes and may not be used outside the corporate environment or for private purposes, unless this is expressly permitted.



11. Product conformity and safety

Given our role as a supplier to customers all over the world, many people around the world come into direct or indirect contact with InTiCa products on a daily basis. It is therefore particularly important to supply products that have been inspected for quality and safety, in order to minimize risks and hazards for people and the environment that may arise directly from the products as much as possible.

To meet this safety and quality requirement, our business partners ensure the compliance of their products with the applicable standards and statutory or official regulations, such as the REACH and RoHS requirements. Consistency in product safety standards, labeling and packaging of our products is a priority for us and must also be a priority for our business partners.

Business partners of InTiCa Systems are responsible for identifying, reporting and rectifying potential safety problems. If any defects become known, they are reported to InTiCa and the appropriate measures are initiated to ensure product safety.



12. Corruption / Bribery / Acceptance of gifts

Bribery and corruption will not be tolerated by InTiCa Systems AG in any case and under any circumstances. Every relationship with public officials, companies and private individuals must be designed in such a way that even the appearance of bribery and corruption is avoided.

In principle, our employees and business partners may not demand, be promised or accept personal benefits for themselves or close relations if this would influence business transactions or create such an impression.

The only exceptions are gifts of a low value (maximum limit of EUR 35.00) and hospitality within the scope of customary business practices. All other gifts must be refused or returned and the superior must be informed.

Offering or accepting money or monetary benefits in kind is not permitted. No free benefits are offered, promised or granted to business partners.

Furthermore, it is strictly forbidden to

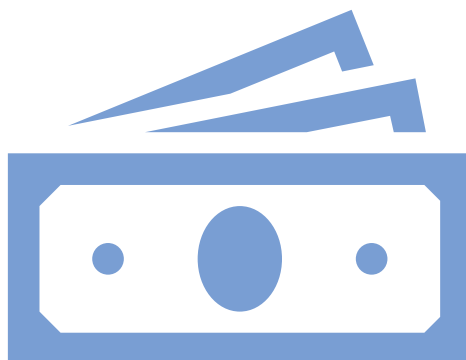
- support unlawful actions of others
- carry out acts of bribery with the help of others.



13. Fighting money laundering

Business partners of InTiCa Systems AG exclusively cooperate with reputable business partners who operate within the framework of legal regulations and do not use illegal financial resources.

All employees of InTiCa Systems and its business partners are prohibited from taking measures that violate money laundering regulations, either alone or in cooperation with third parties.



14. Import and export regulations

InTiCa Systems AG and its business partners act within the scope of applicable import and export control laws. This includes, but is not restricted to, sanctions, embargoes and other laws, regulations, government requirements and policies of the Federal Republic of Germany that control the transfer or shipment of goods, technology and payments.

15. Conflict minerals

InTiCa Systems AG and its business partners are aware of the applicable legal requirements relating to "conflict minerals". They ensure compliance with laws and, wherever possible, avoid using raw materials that directly or indirectly finance armed groups that violate human rights.



16. Insider trading

The business partners and their employees are obliged to maintain confidentiality, which also, but not exclusively, applies to insider information.

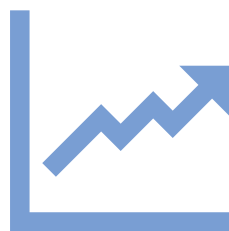
Trading in shares of InTiCa Systems AG is subject to strict legal regulations. Taking personal advantage for oneself or others by using insider information is not permitted. The same applies to the unauthorized disclosure of such insider knowledge.

Insider information is information concerning InTiCa Systems AG or (in particular) the InTiCa Systems share which is not publicly known, i.e., which is only available to a restricted group of people, and which, if it became publicly known, would be capable of significantly influencing the price of the InTiCa Systems share or the price of related derivative financial instruments (options, swaps, etc.).

The use of insider information for oneself or others, or the attempt to do so, is punishable by law and involves disciplinary consequences. The internal and external disclosure of insider information is also strictly prohibited and may result in the same legal consequences. The same applies to the recommendation to a third party to engage in insider trading or if a third party is induced to engage in insider trading.

17. Antitrust and Competition Law

InTiCa Systems and its business partners adhere to all applicable national and international antitrust laws as well as laws against unfair competition. Price fixing or condition agreements with competitors are therefore prohibited as well as other agreements restricting competition, in particular agreements with competitors regarding the allocation of markets and customers.



18. Donations and sponsoring

Donations

Donation requests to InTiCa Systems AG are made by various organizations and institutions. Monetary donations and donations in kind are made in a traceable manner, meaning recipient and purpose of the donation must be known.

Payments to private bank accounts are not permitted.

The company does not make direct or indirect donations to political organizations, parties or individual politicians.

Donations may only be made with prior written approval of the Board of Directors

Sponsoring

In contrast to donations, sponsoring involves an economic consideration in return. All sponsoring activities are based on written contracts with verifiable proportionality of performance and consideration. Sponsoring may not be used to circumvent donation regulations.



19. Conflicts of Interest

Within the scope of business activities, there is the possibility and risk that professional decisions may be influenced or affected by private interests. In their cooperation with InTiCa Systems AG, business partners and their employees undertake to strictly separate private and business interests and to make unbiased decisions in the interests of the business relationship and the company.

Even the appearance of such a conflict of interest must be immediately and fully disclosed to the supervisor and, if necessary, special approval must be sought.

Possible conflicts of interest may arise in particular, but not exclusively, from the following aspects:

- orders to close or related parties (for example, spouses, relatives, friends and private business partners)
- orders to companies in which related parties work
- contracts with companies in which related persons hold 5% or more shares
- secondary employment with competing companies
- secondary employment for business partners.



20. Training and Instruction

To ensure compliance with the InTiCa Compliance Guideline for Business Partners, business partners are under an obligation to provide continuous and verifiable training for their employees.

21. Consequences of Compliance Violations

For employees who violate the compliance guidelines, the Business Partner must impose internal disciplinary levels.

In addition, compliance violations can result in claims for damages by third parties, fines and even prison sentences for employees.

For InTiCa Systems AG and business partners, compliance violations can also involve claims for damages by third parties, expensive legal proceedings, fines and a corresponding loss of image.

Our business partners undertake to comply with similar compliance guidelines and to fulfill these along the supply chain.

If we become aware of a violation of our compliance guidelines by one of our business partners, the business partner will be given the opportunity to rectify the situation. If this does not happen, we reserve the right to implement further measures, up to and including termination of the business relationship.



22. Contacts and Compliance Officer

If you have any questions on compliance at InTiCa, need further information or wish to report suspected cases or violations, as a business partner of InTiCa Systems AG you can contact our central e-mail address for compliance issues:

E-Mail Compliance Officer: compliance@intica-systems.com

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