

CODE OF CONDUCT

of CEST GmbH

CEST GmbH is a competence centre for electrochemical surface technology and is owned by AIT, Austrian companies and universities.

In the fulfilment of our business activities, we also feel responsible in our dealings with and towards our business partners, shareholders from industry and science, as well as employees. This Code of Conduct is intended to support our employees in the responsible performance of their business activities. It is the basis for morally, ethically and legally correct behaviour of all employees of CEST GmbH.

Our employees make a significant contribution to the success of our company and are the basis of the trust placed in us by our corporate and scientific partners, as well as our customers and stakeholders. For this very reason, it is important to us to establish clear principles of ethics and morals in business life. The Code of Conduct is intended to be an integral part of our corporate culture through the example set by each individual.

1.) Introduction and Objectives

Due to its research activities and its cooperation with university and industrial research institutions, CEST GmbH is subject to a wide range of social, political and legal framework conditions that must be observed. Violations of these framework conditions can cause considerable financial disadvantages for the company and cause lasting damage to the organisation's reputation.

This Code of Conduct forms the basis for all business actions and decisions at CEST GmbH. It is the basis for morally, ethically and legally impeccable conduct of all employees¹ of the company.

In the event of a violation of legal regulations, internal guidelines, rules and directives or of provisions of this Code of Conduct, each employee must expect disciplinary consequences. In addition, violations may also result in criminal and civil law consequences, such as claims for recourse and damages, for the person concerned.

The Code of Conduct will be updated as required by resolution of the management of CEST GmbH and supplemented by special guidelines if necessary.

2.) Scope of application

This Code of Conduct applies to all employees of CEST GmbH.

Furthermore, it is in the interest of the company that the Code of Conduct is brought to the attention of important business partners (industrial or scientific partners, consultants, etc.).

3.) Responsibility for implementation

Each individual employee is responsible for compliance with and implementation of the Code of Conduct.

¹ In this content, the term "employee" is used for both male and female staff members; other gender-specific terms also automatically apply to both genders in the following.

The company's executives (i.e. management, scientific management and area managers) are to be role models for the employees in implementing the contents of the Code of Conduct through lived practice.

When interpreting the rules of the Code of Conduct, employees must also be guided by common sense and question whether, based on reasonable ethical and moral standards, a specific course of action could give rise to criticism. In the case of legal regulations, there is no discretionary power.

In the event of ambiguities or questions, each employee's direct supervisor is available to provide appropriate advice and decision-making support.

The compliance bodies responsible for CEST GmbH are the management and the works council and, in the event of disputes or questions of interpretation, also the highest authority for the binding interpretation of the Code of Conduct.

This Code of Conduct is available on the CEST homepage at <http://cest.at>.

4.) Compliance with laws and other external and internal regulations

All employees are required to inform themselves comprehensively about the laws, other regulations and internal guidelines and rules applicable to their respective areas of responsibility and, in cases of doubt, to contact the competent bodies (see section 3.).

5.) Fair competition

Transparent and fair conduct in the market ensures the competitiveness of the company as a whole in the long term. Restrictions of free competition and violations of competition and anti-trust regulations are not compatible with the corporate philosophy and culture as well as the self-image of the company.

6.) Corruption/Bribery/Gift Acceptance

All employees are strictly prohibited from offering or accepting advantages, either directly or indirectly, if this is intended to influence business transactions in an improper manner or could even create such an impression.

Offering or accepting money or benefits of monetary value is not permitted under any circumstances.

7.) Respect and Integrity

Based on the European Convention on Human Rights, human rights are considered fundamental values that must be respected and observed by all employees.

CEST GmbH dissociates itself from any kind of discrimination. In particular, any form of sexual harassment, for example through obvious advances, as well as humiliation, defamation through foul language and comments, suggestive gestures or through the publication of relevant visual material inside and outside the company.

These principles also apply to conduct towards external partners.

²Advantages may include gifts, invitations, purchasing opportunities at conditions not customary for third parties, interest-free loans, etc.

8.) Conflicts of interest

In the course of business, employees may find themselves in situations where their personal or economic interests conflict or may conflict with the interests of the company. In such situations, CEST GmbH expects its employees to act exclusively in the interests of the company. Since such conflicts of interest cannot always be ruled out, CEST GmbH obliges its employees to deal with such issues in a transparent manner.

Every employee is obliged to disclose actual or potential conflicts of interest, even if only the appearance of such a conflict of interest could arise, immediately and in full to the respective superior without being asked and, if necessary, to request special approval.

Conflicts of interest may arise in particular in connection with the following aspect:

- Secondary activities may contradict the duties in CEST GmbH or lead to a collision of interests and therefore require prior written approval by the management in any case.

9.) Handling of company information/confidentiality

Confidential information of any kind obtained in the course of professional activity, including information outside one's own field of activity, may neither be used for the pursuit of one's own interests nor made accessible for the use of the interests of third parties.

It must be ensured that company information of any kind (documents, extracts, files, drawings, plans, forms, etc., including reproductions thereof on paper as well as electronic or other data carriers) is always kept safe on the platforms provided by the company. If such information has to be taken outside the company for business reasons, it must be secured against inspection or access by third parties.

Strict confidentiality must be maintained with regard to all company and business secrets, in particular research and development processes, acquisition strategies or acquisition targets as well as significant investments, regardless of the source of the information.

This also includes information from which trade and business secrets can be derived.

If external partners (e.g. industrial and scientific partners) are involved, suitable confidentiality agreements must be concluded and signed by the management.

The obligation to maintain confidentiality shall continue to exist without restriction even after termination of the employment relationship.

In addition, the relevant confidentiality provisions of the respective service and cooperation agreements shall apply.

10.) Corporate Communications

All oral and written announcements and press releases concerning the interests of CEST GmbH shall be made exclusively via the management. This refers to both classic and digital communication.

11.) Internet

The communication facilities of CEST GmbH, such as the Internet and e-mail, are primarily used for operational requirements and must always be used with an expected degree of care.

12.) IT usage

IT equipment (PC, notebook, etc.) must always be stored in a suitable manner and equipped with password protection within the scope of technical possibilities.

On business trips, only the immediately necessary data should be carried.

Personal passwords must not be passed on to other employees or third parties. Clear and verifiable regulations must be made for substitutes.

In particular, the passing on of personal passwords for personal time and performance recording is strictly prohibited.

Should company-related data be stolen or become untraceable, a report must be made immediately to the respective supervisor. If this concerns electronic data, the passwords must be blocked or other appropriate steps taken immediately in consultation with the responsible area manager or management.

13.) Declaration of commitment

Every new employee will be made aware of the CEST guidelines on confidentiality and data protection by presenting and signing the declaration of commitment to data protection confidentiality and the protection of business and company secrets.

14.) Reports of misconduct

It may happen that employees of CEST GmbH discover violations of provisions of the Code of Conduct, of other internal guidelines and regulations or of legal provisions.

If employees identify such misconduct, they are free to report it immediately. The following options are available for this purpose:

- Information to the direct supervisor, or
- Informing the management

Compliance violations should first and foremost be reported openly, i.e. by naming the whistleblower. All incoming reports are carefully investigated and treated confidentially if requested. In order to promote open and trusting communication, it is expressly stated that employees who report identified violations of laws, the Code of Conduct or other internal guidelines and regulations will under no circumstances suffer negative consequences of any kind as a result. This applies equally to other persons who contribute important information to the investigation of such misconduct.

However, CEST GmbH expressly reserves the right to take disciplinary action against employees who intentionally or grossly negligently make false allegations.

Managing Director CEST GmbH

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