PHOTONICS SYSTEMS GROUP

Code of Business Conduct

July 2025

PHOTONICS SYSTEMS GROUP

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I. Foreword by the management

Photonics Systems Holding GmbH and its subsidiaries can look back on a history rich in success and tradition. It now spans more than 20 years. The InnoLas brand is known and valued worldwide. Many customer relationships have grown over the years. They are based on a trusting relationship. The products of the Photonics Systems Group (hereinafter referred to as PSG) are reliable, efficient and innovative.

In order to strengthen this status in the long term, the management is keen to lay down the principles and basic rules of conduct that will further promote this development and help to secure the future of our group of companies. The Code of Conduct lays down fundamental ethical principles of conduct that are intended to govern the actions of management and employees (hereinafter referred to as employees) in their day-to-day work.

All employees of the Photonics Systems Group have a duty of integrity, which is expressed in particular in the following rules of conduct. They must actively engage with the associated values. Each employee is personally responsible for compliance with the laws in his or her area of work. It is strictly forbidden to induce third parties to commit unlawful acts or to knowingly participate in such acts. Deviating actions are not accepted, regardless of the sanctions provided for by law. In order to ensure compliance with our values in all business activities, the management - together with the executives - assumes responsibility for the necessary leadership function and is prepared to act as a role model for all employees without restriction.

Dr. Marcus Rennekamp
Chief Executive Officer (CEO)

Niels Krauch
Chief Technology Officer (CTO)

II. Introduction

1. Core values

PSG is committed to conducting business with our customers, suppliers, authorities and all other business partners in a responsible, ethically correct and sustainable manner and to complying with applicable laws and our own guidelines. This applies equally to our employees.

Fundamental principles:

- We respect human rights and the rights of employees. All employees have the same opportunities based on performance.
- We do not tolerate unequal treatment, exclusion, discrimination or bullying, whether based on origin, race, religion, gender or disability. Any such behavior will be severely sanctioned.
- We pay attention to the safety, health, physical and psychological integrity of our employees at all workplaces.
- We pay attention to the safety of our products in order to protect the lives and health of our employees, our customers' employees and all end users.
- We are committed to being fair and honest with our customers and providing them with high quality products to promote their commercial success.
- We strive to do business only with those individuals, business partners or companies who share our commitment to ethical business practices.
- We also pay particular attention to our responsibility in the area of competition law and compete vigorously, fairly and always within the legally permissible framework with our competitors.
- We avoid conflicts of interest, are vigilant against suspected fraud and reject inappropriate gifts and preferential benefits.
- We use the company's assets and resources properly and for their intended purpose.
- We do not tolerate any form of corruption or bribery and are always committed to the highest standards of corporate ethics in our business dealings.
- We maintain the confidentiality of information with all our business partners and employees.

2. Purpose and aim of the Code

The Code helps us to implement and uphold our values and maintain the trust we have built with the people and organizations involved in the success of the company. These include all customers, employees and external bodies such as authorities. The Code of Conduct is the basis for further company regulations, which may take into account industry-specific and country-specific features, as long as they comply with the principles set out here. It extends to official matters in the company and to all areas in which employees are perceived as representatives of our company.

Each employee is personally responsible for compliance with the Code of Conduct and the associated legal regulations in his or her area of work. It is strictly forbidden to induce third parties to commit unlawful acts or to knowingly participate in such acts. **Deviating actions will lead to disciplinary consequences, irrespective of the sanctions provided for by law.** Insofar as gaps in knowledge and information can lead to non-compliance with regulations and laws, the corresponding training requirements must be reported immediately to the relevant line manager so that measures can be initiated to close the knowledge gap.

The Management Board and all managers must act as role models with regard to compliance with the Code of Conduct. They are required to work towards compliance within their area of responsibility. Violations of the Code of Conduct will not be accepted. Particularly strict standards apply when evaluating the conduct of managers.

3. For whom is this code intended

This Code applies to all domestic and foreign parts of the company as well as all PSG agencies. If special features in individual legal systems contain further requirements, these must be taken into account by the respective representative offices and their employees in the countries concerned. Insofar as rules of conduct for individual agencies or groups of persons are laid down in separate guidelines, these guidelines apply without restriction in addition to this Code of Conduct.

III. Principles of conduct

1. Equal treatment, equality (AGG, General Equal Treatment Act)

No employee or applicant will be discriminated against on the grounds of gender, race, ethnic origin, nationality, age, religion, sexual orientation, trade union membership, political opinion or disability. Decisions on the selection, training and promotion of employees are made solely on the basis of job-related criteria. People are recruited and promoted by PSG on the basis of their abilities. Employees should not participate in or support discrimination in employment, compensation, participation in training, promotion, termination or retirement based on the above criteria.

2. Mutual respect and tolerance, bullying

We respect the dignity and personality of every employee. Mutual interaction is characterized by respect, fairness, team spirit, professionalism and openness. We respect and protect the personal dignity of each individual and do not tolerate discrimination, insults or sexual harassment or bullying of our employees. Managers act as role models and prove themselves to be competent contacts, especially in conflict situations.

PSG expects its employees to treat each other with respect.

3. Equal opportunities

We promote equal opportunities and diversity. At PSG, both are essential prerequisites for a good reputation and entrepreneurial success. Commitment to work, performance and integrity are the principles that determine a person's opportunities for further development in our company. Our employment policy aims to encourage initiative and cooperation and to offer us all the opportunity to reach our full potential as we develop.

Recruitment, selection and promotion decisions are made on the basis of individual performance and in accordance with the principles of equal opportunities and non-discrimination. Every employee is given the same opportunities.

Recruitment, remuneration, employment conditions and access to training and promotions are based exclusively on the requirements of the job in question and the task undertaken.

4. Protection of the life and health of employees

It is the responsibility of all employees to avoid hazards to people and the environment. Processes, operating sites and equipment must comply with the relevant statutory and internal regulations on occupational safety and health, fire and environmental protection. PSG works continuously to improve occupational safety and health protection. Every employee is jointly responsible for the protection of people and the environment in their working environment. All relevant laws and regulations must be complied with. All managers are obliged to instruct and support their employees in fulfilling this responsibility. In the event of violations or accidents, the responsible authorities must be notified immediately. It is our duty to our employees and their families to protect the health and safety of every employee at work.

PSG's basic principles for employees are: Work safely and protect yourself, your colleagues. You should know and follow the applicable law and the resulting company rules if you are responsible for areas related to occupational safety. Another requirement is the immediate reporting of dangerous conditions and other unacceptable circumstances relating to occupational health and safety so that occupational accidents, physical and mental injuries and occupational illnesses can be minimized and corrective action taken.

5. Protecting the lives and health of our customers' employees

The health and lives of the users of our systems and machines are of the utmost importance to PSG and PSG constantly makes great efforts to ensure this. All employees are obliged to contribute to the safety of our products in their field of activity and to pass on grievances or recognized safety gaps to superiors or other responsible employees. If there is a need for training or instructions at any point in order to achieve the above-mentioned objectives, this must be reported to the relevant line manager, who must implement appropriate measures with the help of the person responsible for product safety.

6. Environmental protection and sustainability

All PSG employees have a responsibility to comply with environmental laws and regulations, both literally and figuratively, and to protect the environment wherever they work.

PSG also supports the agenda of the United Nations (UN) to enable the protection of the ecological basis of life in all countries of the world. Access to education, clean air, clean water and intact ecosystems are not only the most suitable weapons against hunger and poverty, but also the prerequisites for peace and social stability.

7. Compliance with all relevant laws

In order to maintain PSG's good reputation, the company and its employees are expected to fully respect the law. The latter are expected to be familiar with the law as it relates to their professional activities. Management is responsible for ensuring that the workforce is trained and advised accordingly. PSG expects its employees to comply with all laws, such as those relating to the protection of health, fair competition, product safety and the protection of the environment and resources. All permits required for business operations must be obtained and observed so that business operations are conducted in accordance with the applicable laws.

8. Lack of knowledge, training and training

Every employee is obliged to report to his or her line manager any training or education required to perform his or her duties in a lawful, professional and effective manner.

9. Prohibited Cartel agreements

It is PSG's business policy to promote fair competition. In competition, PSG focuses on performance, customer orientation and the quality of its products and services. It observes all applicable domestic, supranational and foreign antitrust laws and the laws on the protection of intellectual property, in particular the property rights of third parties and the law against unfair competition. PSG expects the same compliance from its competitors, customers and suppliers. Every employee is obliged to comply with the rules of fair competition within the framework of the statutory provisions. In particular, the allocation of territories or customers, agreements or exchange of information on prices or price components, supply relationships and their conditions as well as on capacities or supply behavior are not permitted among competitors. The same applies to the exchange of information on market and participation strategies.

Not only corresponding written contracts, but also verbal agreements or tacit, deliberate parallel behavior are generally not permitted. Agreements or the exchange of information on research and development projects are only permitted in strictly limited exceptional cases. The company's market position may not be unlawfully exploited, for example to enforce price discrimination or the supply of unsolicited products. Further details can be found in the „Antitrust Law Guideline".

10. Conflicts of interest

It is the duty of all PSG employees to avoid conflicts of interest between their private interests (direct or indirect, or through related persons or companies) and the interests of PSG. The avoidance of conflicts of interest also requires that all employees of PSG avoid even the appearance of preferential treatment in business dealings with competitors, consultants, customers, suppliers, service providers and other business partners of PSG due to personal proximity to individual persons mentioned above.

Conflicts of interest exist, for example:

By acting as an employee, board member, consultant or investor with competitors, with consultants, customers, suppliers, service providers and other business partners of PSG; in private business relationships with the above group of persons; or in the private exploitation of business opportunities, the property or the workforce of the company.

In cases of doubt, the line manager must be consulted or the possible conflict of interest disclosed and the opinion of the Compliance Officer obtained. The interests of PSG always have priority.

11. Fraudulent activities

We do not engage in business transactions that may be, or even appear to be, illegal or fraudulent. We only do business with customers of impeccable reputation. To this end, we screen our customers and business partners in the event of suspicions and take the necessary steps to ensure that we are not involved in transactions related to money laundering or other illegal activities.

Any officer, employee, agent, contractor or representative of PSG who becomes aware of or observes conduct that is or may be fraudulent shall immediately report such conduct in writing to management or the Compliance Officer. Internal and external financial records must be true and accurate at all times. Any officer, employee, contractor, agent or representative of the Company who becomes aware or suspects that financial transactions have not been properly recorded must immediately report such knowledge or suspicion in writing to management or the Compliance Officer.

12. Bribery/corruption

PSG rejects corruption in business dealings in Germany and abroad. This applies both in relation to public officials, representatives of politics and the judiciary as well as in relation to bodies and employees of other companies. In connection with PSG's activities in Germany and abroad, no personal advantages may be promised or granted to the executive bodies and employees of other companies or to public officials in return for preferential treatment.

What is bribery?

Bribery is the offer of a financial or other advantage that is offered, promised, given or received with the intention of influencing the behavior of a person or a company. This can take the form of money, gifts, hospitality or other favors or benefits. **At PSG, we do not tolerate any form of bribery** and all employees are strictly prohibited from offering, paying, soliciting or accepting bribes. Many of the locations where we do business have particularly strict anti-bribery laws, including international legislation such as the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. We will always comply with these laws, regardless of local customs or business practices.

Corruption, gifts and other benefits, agreements or ancillary agreements relating to the acceptance of advantages or favors by individuals or companies in connection with the procurement, awarding, delivery, processing and payment of contracts are prohibited. Employees who allow themselves to be unfairly influenced by customers or suppliers or who attempt to influence them in an unfair manner will be subject to disciplinary action, regardless of the consequences under criminal law. Attempts by suppliers, representatives or customers to unfairly influence PSG employees in their decisions must be reported to the management. Depending on the individual case, an appropriate response must be taken, for example by blocking orders or terminating contracts.

Commissions and remuneration paid to authorized dealers, representatives or consultants must be in an appropriate and justifiable relationship to their activities. No services may be agreed where it can be assumed that they are intended in whole or in part for the payment of bribes.

Representatives or other intermediaries used by PSG to obtain orders or approvals, in particular authorized dealers, commercial agents, customs agents and consultants, must expressly undertake not to engage in bribery and not to accept bribes.

13. Accepting and giving gifts or invitations

Gifts and invitations must be within reasonable limits. Appropriateness is also based on country-specific characteristics. Furthermore, standard business practice is a decisive criterion. When accepting and giving gifts and other benefits (e.g. participation in events without a direct business connection, donations or sponsoring), including invitations (from and to suppliers or customers), an extremely restrictive approach must be taken. Their financial scope must be measured in such a way that their acceptance does not have to be concealed by the recipient and does not place the recipient in a position of obligatory dependency.
A helpful control question to determine the appropriateness is e.g:
Would the recipient or donee have a problem with the gift being reported in the local newspaper read by family and neighbors and could the gift then give the appearance of dishonesty? In cases of doubt, the written consent of the superior must be obtained.

Civil servants, politicians and other representatives of public institutions:

This group of people should ***not*** receive gifts, gratuities or invitations. PSG complies with the rules of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. They prohibit making payments or gifts of value to foreign government officials, international public or governmental organizations, political parties, candidates for political office or their representatives or front men in return for obtaining or retaining business.

14. Money laundering

Money laundering is a process by which individuals or companies use legitimate businesses as conduits for the „laundering" of funds obtained through illegal activities. PSG does not condone, facilitate or support money laundering. We must all be alert to irregularities in payments, particularly in the case of large sums of cash and unusual transactions. We also check our suppliers, sales agents and business partners. The provisions of the Money Laundering Act also apply.

15. Compliance review of suppliers and consultants

Our suppliers and business partners are important for the performance of our company. We expect them to be quality-oriented, innovative and efficient and to supply PSG with goods at a reasonable price, but never at the expense of disregarding laws, regulations or ethically incorrect, questionable practices.

16. Payments via risk areas

Indirect payments to customers, suppliers and service providers via „risk areas" such as the Cayman Islands or Cyprus should be avoided in order to prevent third parties from diverting funds to finance unfair business practices such as bribery, for example. Any indirect payment via countries other than the country of the business partner's company location or any indirect payment to companies other than the business partner's company must be checked for compliance with the law.

17. Sales risk checklist - compliance with requirements

In order to provide each customer with a fair and reasonable balance of cost to value of the equipment components and service provided, orders that present a disproportionate risk in terms of likelihood of financial loss or other risks must be avoided. The costs of such high risks would have to be passed on to other orders, which would represent an unacceptable disadvantage to the respective customers. Furthermore, the continued existence of the company could be jeopardized by such orders.

18. Confidentiality and property rights

The results of our research and technical development are valuable assets. Our technicians are therefore obliged to develop and document the results of their work in accordance with the applicable scientific standards. Inventions, patents and other know-how are of outstanding value for the future of our company. The greatest care must therefore be taken to ensure that inventions are legally protected. No employee may pass on new findings or company secrets to third parties in any form. Processes and techniques must be kept secret under all circumstances, unless they are generally known. During product development, the legal situation with regard to existing industrial property rights must be carefully researched.

Every employee must respect the effective property rights of third parties and refrain from using them without authorization. In cases of doubt, the legal situation must be examined in advance by an expert. No employee may obtain or use the secrets or development services of a third party without authorization if this is prohibited by law. In case of doubt, the employee in question must contact internal or external lawyers.

Due to the high value of information, it may be appropriate to require external parties who are given access to confidential information to sign a confidentiality agreement. This agreement must be approved by the Corporate Compliance/Legal function. PSG protects its own secrets and respects the intellectual property rights of other parties.

Employees may not use improper means to obtain confidential information from other parties or disclose such information without authorization.

19. Access to IT

PSG's information systems are designed to help us work efficiently and professionally. These systems should be used for business purposes only and in a manner that does not infringe PSG's rights or interests and complies with PSG's policies.

Remember that any communication via e-mail may be considered a binding statement by PSG. Employees must therefore be careful not to transmit information that is commercially sensitive or controversial or that may have undesirable contractual or other legal consequences for PSG.

20. Record keeping

Investors, creditors and others have a legitimate interest in PSG's accounts. The credibility of the accounts depends on the accuracy, completeness and timeliness of the entries. All PSG business transactions must be recorded completely and honestly in accordance with PSG's accounting principles and the applicable legal requirements (GoB, generally accepted accounting principles). Inaccurate or fraudulent documentation or reporting is illegal.

21. Dealing with company property

The Group's assets and resources include, among other things Property, plant and equipment, factory and office equipment and vehicles, raw materials and supplies, work in progress and inventories, cash and cash equivalents (cash on hand, bank balances, investments), working time, intellectual property, business books and other accounting records, confidential information, computer hardware and software, e-mail and Internet access. Our fixed assets, intellectual property rights and information must be handled with care to prevent loss, theft or damage.

22. Compliance with internal guidelines

Separate guidelines are issued for particularly important or extensive compliance issues. These are part of this Code and are equally binding. These include, for example, the signature guidelines.

23. Data protection

The protection of privacy when using personal data and the security of all business data must be ensured in all business processes, taking into account applicable legal requirements. When it comes to technical protection against unauthorized access, an appropriate standard must be maintained that corresponds to the state of the art.

PSG is fully committed to the statutory provisions of the EU General Data Protection Regulation (GDPR). It regulates how companies and authorities should handle the personal data of their visitors, customers or users, how the right to use data, the right to information and the right to delete data is defined.

24. Foreign trade regulations, import/export, embargoes and sanctions

PSG is a company with very close global economic ties (import of components, export of products, devices, software and services). For this reason, our management, in particular the person responsible for exports, is obliged to comply with all legal regulations relating to foreign trade.

This applies in particular to import and export restrictions, embargoes and sanctions as well as the applicable provisions of the EU Customs Code.

In order to avoid the associated penalties and fines, all employees are obliged to observe and comply with the licensing, procedural and reporting regulations to the best of their knowledge and belief.

In case of doubt, internal or external experts must be consulted for decision-making.

IV. Ensuring compliance with our principles of conduct

1. Consequences of violations

We enforce compliance with the above regulations. Violations may be punished with warnings, the assertion of claims for damages or the termination of employment. In order to avoid violations of the law, every employee must therefore seek advice from the Compliance Officer and/or the management in cases of doubt.

2. Monitoring by employees

Employees are regularly informed about current issues in connection with this Code. Special training courses are offered to employees on certain topics (e.g. product liability, occupational safety, antitrust, labor and insurance law) and in selected risk areas (e.g. sales, purchasing).

Every employee has the right to inform their manager of circumstances that indicate a breach of the regulations contained in this Code of Business Conduct; this can also be done anonymously. All PSG employees must be aware that violations of the Code of Conduct will not be tolerated under any circumstances and may lead to consequences under employment and labor law depending on the severity of the violation.
If an employee has indications of a possible violation of the Code of Conduct by themselves or by another employee, these should also be clarified in the respective work environment first. If this is not possible or does not appear to be appropriate, any employee may contact the Compliance Officer responsible for monitoring the principles set out in this Code of Conduct.
Every question, tip-off and suggestion will be treated in strict confidence and investigated in the manner required by the individual concern. On request, the employee will be informed of how his or her report will be handled and whether and what measures have been taken.

3. Monitoring by superiors

Managers are called upon to actively promote the implementation of this policy. This includes ensuring that all employees assigned to them are aware of the policy and are therefore able to implement and comply with it in practice. Managers must also ensure compliance with the Code of Conduct and its implementation in company practice through careful and continuous monitoring.

Every manager must organize their area in such a way that reports of legal violations can reach them. They must actively address and counteract any irregularities identified. Each department is responsible for compliance with the regulations contained in this Code of Business Conduct and other internal company rules in its area of responsibility.

4. Control body

The responsible auditor / compliance officer can be found below under „Officers of Photonics Systems Holding GmbH". This officer is responsible for investigating reported violations and initiating any necessary corrective measures. He reports to the management. For his part, the Compliance Officer maintains an internal control system and is supported by a Compliance Committee. He documents all inquiries, incidents and controls and reports to the Management Board every six months, unless special knowledge requires the Management Board to be informed immediately. The Compliance Officer has an unrestricted right to information and audit, provided that this does not conflict with statutory or internally agreed regulations.

Mr. Frank Gollwitzer Tel.: +49 151 27 640 375

Compliance Officer for monitoring the Code of Conduct:

PHOTONICS SYSTEMS TRUST CHANNEL / VERTRAULICHE MELDUNGEN

Hinweise und Verstöße

Can reports also be made anonymously?

PHOTONICS expressly permits anonymous reports in order to ensure a credible, effective and transparent compliance program. This is also intended to give whistleblowers who fear disadvantages as a result of reporting an opportunity to report a compliance violation. Anonymous reports should contain as detailed information and facts about the compliance violation or suspicion as possible so that the information can be followed up to the extent necessary and as part of an internal investigation.

What happens after the report?

Once a report has been received, it is first checked for conclusiveness and credibility. If both points are met, an internal investigation of the matter is then initiated. The Compliance Officer - if necessary with the support of the Compliance Committee - is responsible for ensuring that the reported matter is properly investigated, documented and resolved. If necessary, other departments may also be involved. Insofar as this is possible in the context of protecting confidential data, you as the whistleblower will be informed of the outcome of the proceedings once the investigation has been completed.

As a PHOTONICS employee, will I be at a disadvantage as a result of reporting?

No person may suffer any disadvantage as a result of reporting a compliance violation or suspicion.

If you report a suspected compliance violation in good faith and in good conscience, you will not suffer any disadvantages as a result of the report. PHOTONICS only reserves the right to take disciplinary action and measures against the whistleblower in the event of an improper report, i.e. if processes are reported that clearly contain unfounded allegations.

How can compliance violations be reported?

Reports can be made to the PHOTONICS COMPLIANCE COMMITTEE by letter, e-mail, telephone or via the PHOTONICS TRUS CHANNEL at the e-mail address: compliance@ps-group.net.

Who can report a compliance violation?

All affected parties Employees of the PHOTONICS SYSTEMS GROUP; external service providers, business partners or other third parties can report circumstances that indicate a violation of the Code of Conduct.