Code of Conduct
MEKRA Lang Group
CODE OF CONDUCT
As a family business, we know that our continued success hinges on the support and cooperation of our employees and business partners and is based on our common values. It is only by letting these values guide us in everything we do, and treating each other and our business partners with respect, that we will be able to sustain the success of the MEKRA Lang Group as a leading manufacturer of vision systems. We have developed this code of conduct to show how our values influence the work we do every day and to provide all MEKRA Lang employees with binding guidelines for their daily activities.

Let us abide by this code of conduct both inside and outside of our company to support each other in living our values and treating each other with fairness and respect.

Your MEKRA Lang Group Leadership Team
Law-Abiding Conduct
We affirm the principle of legality and pledge that any actions, measures, agreements, and other procedures of the MEKRA Lang Group will be implemented in strict compliance with applicable laws and legal regulations. Each employee is personally responsible for complying with the law in his or her specific field. We will not cause third parties to engage in unlawful activities or knowingly participate in such activities.

Management personnel must ensure that there are no violations of legal regulations or this code of conduct in their areas of responsibility which could have been avoided by proper supervision. They must make clear that infringements are unacceptable and will lead to disciplinary action, regardless of the rank or status of the infringing party within the company.

Responsibility for the Reputation of the MEKRA Lang Group
All employees are required to uphold the reputation of the MEKRA Lang Group when performing their duties and in private life. Each employee must hold himself or herself personally accountable for protecting the good name of the company as a whole, as the conduct of every single employee affects our image and reputation within the larger community.

Every employee is required to conduct himself/herself in a manner that does not negatively reflect on the reputation of the MEKRA Lang Group. This applies also for the employee’s private life. Preferably, there should be no reference to the company during private activities, particularly in social media publications.
HUMAN RIGHTS
As a global player, the MEKRA Lang Group is firmly committed to meeting its social and societal responsibilities. Above all, we are committed to upholding human rights, as defined in Article I of the United Nations' Universal Declaration of Human Rights:

“All human beings are born free and equal in dignity and rights”, and as amended by Article 29.1 which reads: "Everyone has duties to the community in which alone the free and full development of his personality is possible".

As management team, we are doing our utmost to create a community whose rules respect and uphold these inalienable human rights, as well as an environment in which our employees can develop their talents and personalities freely and flourish professionally. Based on these value-driven management principles and in consideration of the Universal Declaration of Human Rights, the fundamental principles of the International Labor Organization (ILO), and the applicable laws in various countries and locations, as well as in recognition and support of cultural differences, we pledge to abide by the following principles:

**a. Treatment of Employees**

We respect and protect every individual’s personal dignity. Any form of discrimination and harassment will not be tolerated at any of the MEKRA Lang Group’s locations. We are committed to respecting the fundamental rights of all employees, including without limitation:

**I:** Equal opportunities and non-discrimination for all employees, regardless of color, race, nationality, social background, disability, sexual orientation, political or religious convictions, gender, or age.

**II:** Respect for each individual’s personal dignity, privacy, and personality rights.

**III:** No forced employment or forced labor.

**IV:** Zero tolerance for unacceptable treatment of personnel, such as mental cruelty, sexual and personal harassment or discrimination.

**V:** Zero tolerance for sexually coercive, threatening, abusive, or exploitative behaviour.

**VI:** Appropriate compensation and the payment of nationally applicable legal minimum wages.

**VII:** Compliance with any nationally or locally applicable legal limits on working hours.
b. Child Labor and Forced Labor
It is of particular importance to us to state that we will not tolerate and will take action against any case of child labor and forced labor, including at our business partners’ locations. Child labor is prohibited according to ILO and UN conventions and/or national laws. Of these different standards the one with the most stringent requirements shall apply. Any form of child exploitation is prohibited. Working conditions which resemble those of slavery or which endanger the health of children are prohibited.

The rights of young employees are to be protected. Should children be found in situations which fulfil the definition of child labor as stipulated by the above standards, the supplier must take appropriate remedial action and provide the corresponding supporting documentation.

Additionally, the supplier must support said children adequately to ensure their ability to attend school during their childhood years.

Any non-compliance with these rules entitles the MEKRA Lang Group, after granting a reasonable period of time for rectifying the situation, to terminate the contractual relationship for cause. Child protection measures at the MEKRA Lang Group are based on the following definitions:

**Definition of a Child:**
A person under the age of 15, unless applicable local minimum-age laws stipulate a higher age for gainful employment or compulsory schooling, in which case the higher age shall apply. If, however, the local minimum age is set to 14 years according to the exceptions for developing countries stipulated in ILO Convention No. 138, such lower minimum age is applicable.

**Definition of a Young Person:**
A worker who is older than a child according to the above definition, but younger than 18 years.

**Definition of Child Labor:**
Work performed by a child or a young person under the minimum age as defined above which does not comply with the provisions of the relevant ILO standards. Child labor is defined as work which deprives children of their childhood, robs them of their potential and their dignity and is detrimental to their mental and physical development.

The definition applies to work which is mentally, physically, socially and morally dangerous and harmful to children, deprives them of or limits their opportunity to attend school, obliges them to leave school prematurely, or requires them to attempt to combine school attendance with excessively long and hard work. Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.
c. Occupational Health and Safety, Fire Prevention and Environmental Protection
All employees are responsible for avoiding situations which pose risks to people and the environment, for minimizing the environmental impact and for using resources sparingly.

Processes, facilities and supplies must meet all applicable legal and company requirements concerning occupational health and safety, fire prevention and environmental protection. Occupational health and safety as well as humane working conditions represent essential aspects of our company policies.

The foregoing particularly applies to the provision and use of personal protective gear, clean restrooms and access to drinking water. In some situations, facilities for hygienic food storage must also be provided. Practices and workplace conditions which violate basic human rights are prohibited. Above all, young employees must not be exposed to hazardous, unsafe or unhealthy conditions.

Any non-compliance with the above rules entitles the MEKRA Lang Group to terminate the contractual relationship for cause.

d. No Forced Labor and Disciplinary Measures
All forms of forced labor are prohibited, including those effected by requiring a deposit or withholding employees’ identification papers at the outset of the employment relationship.

Prison labor which violates basic human rights is also prohibited. Corporal punishment as well as mental or physical coercion and verbal abuse are equally prohibited. Any non-compliance with these rules entitles the MEKRA Lang Group to terminate the contractual relationship for cause.
HANDLING OF INFORMATION
a. Reporting
All of our records, reports and announcements must be accurate and true. The principles of proper accounting and bookkeeping must be adhered to at all times. Data collection as well as other types of record keeping must be complete, accurate, timely and well organized.

Using the company’s confidential information for the creation of records, files, and similar items is not permissible, unless it serves the interests of the MEKRA Lang Group directly and is performed in accordance with all applicable data protection standards.

b. Data Protection and Information Security
When designing and performing any business processes (including those based on IT), the protection of personality rights as well as privacy and information security must be ensured based on and in accordance with all applicable legal requirements and operating procedures relating to data protection, IT and data security.

Each employee of the MEKRA Lang Group is required to protect confidential information from misuse or dissemination.

Confidential information is defined as any non-public information, including but not limited to any trade secrets of the MEKRA Lang Group, business plans, marketing campaigns, product development information, inventions, manufacturing procedures, medical records and business results. Confidential information entrusted to the MEKRA Lang Group by third parties must be handled with the same amount of care as is afforded to MEKRA Lang Group’s own confidential information.

Specifically, personal data (of customers, suppliers, employees or other affected persons) collected, processed or transmitted in connection with business processes within the European Union (EU) and the European Economic Area (EEA) is subject to the applicable data protection regulations.

c. Non-Disclosure
The company’s confidential information must not be disclosed. This obligation shall survive the termination of the employment relationship. Should the disclosure of information be required to ensure the proper conduct of business, every effort must be made to ensure that said information is evaluated regarding its non-disclosure requirements, as stipulated by current company policies, and protected accordingly (e.g. by means of a non-disclosure agreement).
Each employee must abide by all applicable rules and legal regulations relating to fair competition. Specifically, competitors must refrain from any division of sales territories or customer allocations, and from agreements or exchange of information on prices/price elements, supplier relationships or terms and conditions of any kind as well as capacities or bidding approaches.

The same applies to the exchange of information on market and investment strategies. As a matter of principle, neither written or verbal agreements, nor any tacit, conscious parallel behaviour concerning these matters are permissible.

Agreements with customers and suppliers which are intended to limit customers’ freedom to independently determine their resale prices or other terms and conditions are not allowed.

**a. Supplier and Customer Relationships**

Any agreement concluded with customers and suppliers must exclusively serve the interests of the company. Each employee is required to abide by the applicable internal control rules (e.g. dual control principle). Supplier selection must be based solely on competitive factors, after careful consideration of pricing, quality, performance, company strategy and suitability of the products and services offered.

**b. Bribery, Gifts, and other Gratuities**

Agreements or subsidiary agreements relating to the acceptance or granting of advantages by or to individuals in connection with any order procurement, placement, delivery, processing, and payment are not permissible. Any attempt by suppliers or customers to improperly influence employees of the MEKRA Lang Group in their decision-making must be reported to the appropriate supervisor or manager. Commissions and compensation paid to authorized dealers, sales representatives, or consultants must be reasonably and justifiably proportionate to their performance. No benefits may be agreed upon which, as a whole or in part, could be reasonably assumed to be intended as bribes.

Accepting and giving gifts and other gratuities (such as participation in events which are not directly business-related), including invitations (of and by suppliers or customers), must be handled in an extremely restrictive manner. Financially, these must be limited to amounts which the recipient can openly acknowledge and which do not force him or her into a position of dependence.

When in doubt, written approval of the appropriate supervisor or manager should be obtained. In your capacity as an employee, you must at all times act in the interest of the MEKRA Lang Group and avoid any conflicts of interest.
c. Company Assets
All business and capital assets of the MEKRA Lang Group may be used for business purposes only. They may not be used for personal ends, fraudulent intentions or other similarly inappropriate purposes. This applies to both tangible and intangible assets (such as patents, know-how, trademarks, data processing systems, etc.).

d. Conflicts of Interest
A conflict of interest is created, when your private interests, personal relationships, or activities outside of the company influence you, or create the impression of influencing you, in performing your professional duties.

Every employee has to make sure that any conflict of interest be resolved in favor of the MEKRA Lang Group and in compliance with the requirements of this Code of Conduct. Therefore, any conflicts of interest are to be addressed internally and, following the so-called “four-eye-principle,” need to be discussed with either the employee’s direct supervisor, the head of human resources or the head of the legal department.

Any gifts of any kind received by employees in their capacity as MEKRA Lang Group personnel must be handed over to management without exception. In most cases, these items will be entered into the annual raffle which is open to all employees and ensures the equal treatment of all employees.
CORPORATE RESPONSIBILITY
As an integral part of the larger society, we are aware of our corporate responsibility. The MEKRA Lang Group of companies supports educational, scientific, cultural, and social causes through financial and in-kind donations. The allocation of such donations is solely determined by management and must be based on altruistic motives.

**a. Product Quality and Safety**
Our slogan „Passion for Excellence“ refers to our goal of meeting our customers‘ high quality and safety expectations. Any improvements helping us to achieve this goal will be implemented thoroughly and sustainably.

Should defects occur despite our best efforts, we will take the appropriate corrective action in accordance with legal requirements and contractual obligations, always placing the highest priority on the prevention of dangers to life and limb.

**b. Reporting of Irregularities**
The rules stipulated in this code of conduct form a central part of the company values we all live by. Each employee must do everything in his or her power to ensure that these values are adhered to uniformly throughout the Group.

Supervisors and managers have a special responsibility to lead by example and to communicate the contents of this code of conduct by the way they comport themselves. Each employee is entitled to bring to the attention of his or her supervisor or the HR department any circumstances which may point to a violation of the regulations contained herein; where appropriate, this may be done anonymously. These notifications will be investigated and any necessary remedial action will be taken.

If you are not sure about how to handle a certain situation, or if you wish to report a violation of this code of conduct, please send an email to info@mekra.de.

At any time, relevant information may be submitted to the HR department via its mailbox or to the supervisor using interoffice mail (where appropriate, this may be done anonymously).
c. Environmental Protection
As our corporate philosophy is based on the principle of sustainable growth, we have always championed an energy-efficient and eco-friendly utilization of resources. We are committed to upholding the principles of environmental protection in accordance with legal regulations and international standards, and pledge to implement management systems which reduce the utilization of resources and environmental burdens in a continuous and transparent manner.

Additionally, we apply the latest technologies and standards to lead by example when it comes to environmental protection, even taking on a pioneering role in some selected areas.

d. Monitoring
Each MEKRA Lang Group company is responsible for ensuring that the rules and regulations contained in this code of conduct as well as other internal company rules are followed within their area of responsibility.

e. Sanctions
In case of serious violation of the rules stipulated in this Code of Conduct or unreasonable interference of its auditing, we are entitled to adequate sanctions (including termination of business relationship or articles of employment). General place of jurisdiction shall be Germany unless otherwise agreed.

f. Contact
Within the MEKRA Lang Group the Compliance Department is responsible to ensure that these requirements are met. If you have any questions or indications of possible misconduct please contact:

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