

# **Code of Conduct**

Note: translated from the original German document. For reference only.

These principles of conduct apply to all companies within the PicoQuant Group. They represent the essential principles and basic values to which we adhere in our daily dealings with employees, customers, suppliers, society and the environment as part of our corporate activities. We expect every employee to be committed to these principles and to act accordingly.

# Core values

## We comply with the law

As a matter of principle, we act in compliance with all applicable law and regulations as well as with due respect for the customs and traditions of all countries in which we operate. Illegal activities are not in our interest, as they may lead to prosecution, damages and loss of business and may cause lasting damage to PicoQuant's reputation.

Our employees are obliged to inform themselves about applicable regulations in their area of responsibility and to comply with them. When in doubt, the respective managers or designated specialists (e.g., import/export) must be consulted. In addition, every employee is required to report violations to the respective manager.

## Sustainability is the core of our actions

Sustainability is an important factor for our actions, not only regarding environmental aspects, but also in the use of corporate resources.

#### We protect property, trade secrets and personal data

We protect the intellectual and material property of PicoQuant. We treat equipment with care and use it only for its intended purpose. In this way we ensure long-term usability and thus also make a contribution to sustainability. As a technology company, we are particularly careful with trade secrets and ensure that confidential information is not passed on to unauthorized third parties. In individual cases, this also applies to our colleagues, e.g., when an appropriate confidentiality agreement with a customer exists.

In return, we respect the intellectual and material property of others and adhere to the relevant legal provisions. We protect the personal data of our customers, suppliers and employees in accordance with the European General Data Protection Regulation (GDPR) and use data exclusively for the purposes for which they were made available to us.

## We disapprove of bribery and corruption

We strictly disapprove of bribery and corruption. No employee may give advantages to business partners, third parties or himself by acting unlawfully. We do not accept any valuable gifts or invitations, nor do we issue any ourselves. Exceptions to this rule are giveaways or small gifts that are in line with normal business practices within the framework of law and employment contracts. We only accept or issue invitations if they are within the limits of customary business hospitality.

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#### We respect workers' rights

We respect the fundamental rights of employees and promote a non-discriminatory corporate culture characterized by open communication, responsibility, and respect. All employees are encouraged and supported regardless of their age, disability, race, color, sexual orientation, social background, or religious beliefs. We do not tolerate discrimination or mobbing at PicoQuant. Every employee is required to report violations to the respective manager. In addition, we highly value education and support professional development and continuing education of our employees.

We do not employ children or people under the age of 16.

#### We show social commitment

We are committed to education as well as furthering the general public interest. We also take our obligations towards the environment and society seriously. We place a special focus on supporting the next generation of scientists through a variety of activities.

# Work and health

#### We take occupational health and workplace safety seriously

We take our responsibility for the safety and health of our employees at work very seriously. Managers are responsible for implementing all measures required by occupational health and safety regulations in areas under their control.

We systematically record workplace dangers, risks and stresses and take measures to eliminate or reduce them.

We expect our employees to comply with all regulations and instructions applicable to their area of work and to report identified defects and risks to the respective manager. To this end, we train all employees at least once a year in occupational health and safety issues. We encourage all employees to actively participate in preventive health measures offered by the company.

We review the status of occupational safety and health protection at regular intervals. Deficiencies and risks are eliminated as part of a continuous improvement process.

# Safety is also a top priority in our products

Safety and health protection play a decisive role for us starting already at the planning phase of products or workplaces. This enables us to identify and avoid safety risks at an early stage.

In the development and manufacturing of our products, we comply with all applicable laws and regulations, e.g., regarding the prohibition of or restriction on the use of specific substances.

## Environment

# We protect natural resources

We are committed to sustainability and use natural resources sparingly. Compliance with laws and regulations for the protection of the environment is a matter of course for us.

We compensate the CO₂ emissions caused by our unavoidable international travel through a cooperation with the company Atmosfair.

We strive to design our development and production processes in such a way that the necessary use of resources is minimized and that emissions of unfiltered pollutants into the environment are excluded. We collect waste separately and send it to certified recycling or professional disposal centers.

Our products are designed to be used over many years and we support our customers in this by ensuring support, repairability and expandability over as many years as possible.

## We involve our suppliers

We expect our suppliers to comply with applicable laws and industry standards throughout the supply chain. This includes compliance with relevant international regulations such as RoHS, but also ensuring conflict-free procurement of raw materials, as well as compliance with basic workers' rights.

January 2020

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