



Code of Conduct of Mikrogen GmbH

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Mikrogen GmbH founded in 1989 has in its long history grown into a company which is serving a wide range of customers in Germany as well as in more than 40 other countries around the world.

We are committed to respecting human rights and environmental obligations and consider the protection of human rights to be a central element. We implement applicable law, respect internationally recognized human rights and environmental obligations and ensure that human rights violations and environmental pollution are prevented in the course of our business activities. In particular, we condemn all forms of child and forced labor, all forms of slavery and (modern) human trafficking, and all forms of discrimination. We are also committed to complying with the occupational health and safety regulations applicable at the respective place of employment, paying reasonable wages and protecting the freedom of association of our employees

By means of this code of conduct we intend to establish a basis which will guarantee our company's sustained positive development in the years to come. Thus, in accordance with the aforementioned our focus is to globally align our company as an attractive employer and provider. Moreover, this codex is to emphasize our particular attention to all our actions.

We defined these rules of conduct in our code of conduct and made them available to all of our employees, customers and business partners alike. These standards are meant to help ensure the consistent compliance with our rules.

As managing partner of Mikrogen I will ensure that we actively live our values and that we adhere to the highest legal and ethical standards.

Neuried, February 2023

Dr. Erwin Soutschek
Mikrogen GmbH

Guidelines of Mikrogen's Code of Conduct

- Compliance -

- I. We are committed to compliance with all legal regulations and standards and to a value-based corporate action.
- II. We are committed to respecting human rights and environmental obligations and consider the protection of human rights to be a central element.
- III. We respect our employees as essential partners in ensuring the commercial development of our company.
- IV. We promote fair and free competition.
- V. We are opposed to any form of corruption.
- VI. We acknowledge our responsibility to protect our own property and that of others.
- VII. We strictly separate professional and private interests
- VIII. We feel obliged towards the idea of sustainability from an economic, social and ecological point of view in all our corporate actions.

Basic Information on our Code of Conduct

As a globally active company we aim to create values on a sustainable basis which benefit all of us: Our customers and business partners, our employees as well as our company Mikrogen.

1. Objectives

In order to remain successful and to achieve our growth targets we as Mikrogen are aware of keeping the trust and respect of our customers, business partners and employees. These values need to be both expressed and lived consistently. This demands that Mikrogen is acting in a sense of commitment and responsibility, in addition to manufacturing excellent products.

The code of conduct aims to draw up guidelines of our corporate dealing as a responsible company.

2. Application

This code applies to all employees and managing directors of Mikrogen as well as to all consultants, representatives and other appropriately authorized persons; it applies to both genders.

Any violations of the basic principles of this code of conduct by externals, e.g. suppliers will not be tolerated and will lead up to the termination of the business relationship.

As there are different laws and regulations applicable in the countries in which Mikrogen is operating, necessary country-specific amendments or adjustments of this code may be made in order to comply with specific national and local laws, culture, customs and practices.

3. Compliance

This code comprises Mikrogen's fundamental rules of conduct and is supposed to provide guidance and decision support to all employees in view of appropriate conduct and behavior in business. In this way, Mikrogen wishes to fulfil its legal, social and business responsibilities. Any conduct and all decisions being made by employees in business must at any time comply with the principles underlying this code of conduct.

The Standards Guiding our Actions

I. Compliance with Laws – Value-Based Conduct

We comply with national and international laws, rules and regulations of each specific jurisdiction in which Mikrogen is operating. This very code of conduct renders support to all our employees in this respect and is supposed to give confidence in their daily routine decision-making.

Mikrogen will not tolerate any violations of the law. Whereas strict compliance with the law constitutes a fundamental standard of good practice, our employees also endeavor to incorporate values, ethics and respect for other peoples and cultures into their activities.

Every country and each society has its own social, religious and cultural standards and values. The employees of Mikrogen thoroughly consider these standards and values when conducting business in these countries.

Our employees are striving to behave in a socially responsible manner. When conducting business they do consider any consequences and effects on society that may occur by their actions.

II. Behavioral Standards Regarding Human Rights

a) Respect for Human Rights

Respecting human rights constitutes a fundamental element for modern society. Mikrogen guarantees that humans rights must be protected when conducting business and in doing so will Mikrogen not tolerate any violation or breach of human rights. Mikrogen respects the human rights of all of its employees.

We condemn all forms of child and forced labour, as well as slavery.

b) Compliance with Labor Law and Data Protection Regulations

Mikrogen is committed to compliance with all existing regulations and provisions regarding labor law and data protection.

We are strictly opposed to any form of harassment and aim to raise problem awareness among the employees by means of comprehensive information. Furthermore, we take every effort necessary within a preventive framework.

We undertake to comply with the occupational safety regulations and health obligations applicable under the law of the place of employment and thus to prevent the risk of accidents at work or work-related health hazards.

We reject any disregard for freedom of association. All of our officers and employees, regardless of their position within our company, have a duty to respect our employees' rights to organize or join unions and not to form, join or belong to a union as a reason for use unjustified discrimination or retaliation. In addition, all of our managers and employees respect the right of unions to operate freely and in accordance with the laws of their place of employment.

We are committed to paying a reasonable wage.

c) Principle of Non-Discrimination

All people enjoy equal of treatment. We reject any form of discrimination based on gender, age, national and ethnic origin, color, political opinion, religion, belief, social, origin, marital status, sexual orientation, health status, disability or any other by applicable laws and regulations protected characteristic, unless this is based on the requirements of the employment; unequal treatment includes, in particular, the payment of unequal remuneration for work of equal value.

III. Commitment to Fair Competition

As a matter of principle Mikrogen is committed to conduct business activities in a fair, ethical and transparent manner in order to obtain, encourage and strengthen the confidence of the general public, customers and business partners as well as of all employees.

a) Compliance with the Competition and Antitrust Laws

Mikrogen is committed to a free market as well as to promoting fair competition; Mikrogen complies with all applicable rules of competition.

Our company acknowledges that national competition laws may differ from one country to another and that all applicable laws and regulations must be complied with without exception. It is a matter of course for Mikrogen and our employees that we will not engage, whether directly or indirectly, in any to form of anticompetitive, monopolistic or unfair business practices.

Anticompetitive business practices of this kind might include for example price fixing, bid-rigging (collusive bidding), the determination of limitations on production or sales quotas, market sharing or market segmentation, by assignment of customers and suppliers, territories or business segments, rejection of business (boycott), illegal price maintenance, illegal price discrimination or other arrangements with the aim of suppressing competition. Furthermore, we do not participate in international trusts.

If our employees enter into contact with competitors, whether intentionally or unintentionally, they take care not to accept or provide any information that allows conclusions on the present or future market behavior of Mikrogen or any on other market participant.

b) Standards of Good Conduct in the Absence of Applicable Laws

Mikrogen endeavours even in countries without applicable competition laws to do business in a fair and ethical manner and to refrain from applying anticompetitive practices such as mentioned above.

IV. Prohibition of Any Form of Bribery and Corruption

a) General Remarks

Mikrogen and all employees are committed to conducting business with third parties only in a fair and ethical manner, to refrain from bribery and from any form of illegal action or behavior towards public officials.

b) Prohibition of Bribery

Bribes or other illegal advantages in order to obtain or keep orders or inequitable benefits shall not be offered, promised or given whether directly or indirectly to any third party.

No employee of Mikrogen shall accept or demand bribes or other illegal benefits, neither directly or indirectly.

Subcontracts, purchase orders or consultancy agreements shall not be used as a means to execute payments to employees of business partners or other third parties.

Occasional gifts, customary business entertainment or other low-value benefits which are consistent with customary business practice shall only be permitted if in line with applicable national legal provisions and on the condition that any influence on a business or authority's decision can be ruled out from the outset.

Offering, granting, demanding or accepting money is always inadmissible.

Mikrogen and its employees shall refrain from granting illegal donations to candidates for public office, or political parties or other political organizations. Any gratuity has to be in full compliance with the disclosure obligations in the respective jurisdictions.

V. Handling Mikrogen Company Property

Responsibility towards Mikrogen's and our business partners' property is essential for maintaining our company's trustworthiness.

Property belonging to our company includes both physical and intangible assets, like business-related information, company secrets, know-how, industrial property rights. This also includes our inventions and patents which are of significant importance for the long-term success of Mikrogen.

Every employee shall handle such property with the utmost care and responsibility and shall act in good faith as can be reasonably expected by an employer and a business partner.

Confidential business information must always be kept secret and must be protected against unauthorized access of third parties, especially when confidential information has been made available to us by third parties, such as business partners.

VI. Business Conduct and Separation of Interests

We treat our suppliers, customers and business partners with fairness and respect. In doing so we consciously draw a line between our employees' private interests and that of Mikrogen GmbH. We aim to avoid conflicts of interest; where this is not possible these latter shall be made transparent.

Mikrogen does not tolerate any business activities on behalf of the company be influenced by personal relationships or interests.

Rather, decisions are exclusively made on soundly based foundations and on the principle of objectivity. Any secondary occupation shall not affect the management of Mikrogen's business.

VII. Sustained Actions

Mikrogen and its employees shall place the highest value on their business activities in order to prevent any negative effect on the environment and on society. This ensures with a lasting effect that Mikrogen shall continue to successfully conduct business in an ecologically sound environment and to preserve a healthy environment for our employees to work and live in. We expect our managers and employees to prevent any kind of environmental damage. This includes preventing harmful soil changes, water and air pollution, harmful noise emissions and excessive water consumption.

General Remarks

The guidelines mentioned in this code of conduct derive from Mikrogen's corporate philosophy. Thus, it is of utmost importance, that all employees understand, live and follow these rules.

Violations of this code of conduct will not be tolerated and will have serious consequences. We will offer necessary training and instructions to all employees and will ensure that every employee has the opportunity to seek advice from the managing director if questions or problems arise in their daily work. The CEO will ensure that the guidelines as described above will be implemented and complied with at any time.