

## **MS Technology GmbH Code of Conduct**

At MS Technology GmbH, we believe that integrity, transparency, and ethical conduct are the cornerstones of our success. Our Code of Conduct serves as a guiding framework for all employees, contractors, and stakeholders, outlining the principles and standards that govern our behavior and decision-making processes.

This Code of Conduct reflects our unwavering commitment to operating with honesty, fairness, and respect in all aspects of our business endeavors. It not only defines the values we uphold but also underscores the importance of maintaining the trust and confidence of our customers, partners, and the communities in which we operate.

By adhering to the principles outlined in this Code, we foster a culture of accountability, collaboration, and mutual respect, laying the foundation for sustainable growth and positive impact. Every member of our team plays a vital role in upholding these standards, contributing to the collective success and reputation of MS Technology GmbH.

We recognize that our actions not only reflect on ourselves but also on our colleagues, our company, and our stakeholders. Therefore, it is incumbent upon each of us to embrace the principles outlined in this Code and to demonstrate unwavering commitment to ethical conduct and integrity in all our endeavors.

Thank you for your dedication to upholding the values and principles outlined in this Code of Conduct. Together, we can build a culture of excellence, trust, and integrity that sets us apart and drives our continued success.

**1. Ethical Standards:** At MS Technology GmbH, we are committed to upholding the highest ethical standards in all aspects of our business.

### **Ethical Standards and Principles:**

At MS Technology GmbH, we are committed to upholding the following ethical standards and principles:

1. **Respect for Human Rights:** We respect and uphold the fundamental human rights of all individuals, both within our organization and in the communities where we operate. This includes the right to fair treatment, non-discrimination, and freedom from exploitation or abuse.
2. **Environmental Responsibility:** We recognize our responsibility to minimize our environmental impact and promote sustainability in all our operations. Our commitment to CO2 neutrality extends beyond compliance with regulations to actively seeking ways to reduce carbon emissions, conserve natural resources, and mitigate climate change.

3. **Integrity and Transparency:** We conduct our business with integrity, and transparency, adhering to the highest ethical standards in all our interactions. We communicate openly and honestly with our stakeholders, providing accurate and timely information about our activities, performance, and impacts.
4. **Fair and Ethical Business Practices:** We engage in fair and ethical business practices, upholding principles of fairness in all our dealings. We do not tolerate bribery, corruption, or any form of unethical behavior, and we expect the same standards from our partners, suppliers, and stakeholders.

#### **Ethical Decision-Making:**

1. **Promoting CO2 Neutrality:** When making decisions related to our operations, product development, and investments, we prioritize solutions that contribute to CO2 neutrality and support the transition to a low-carbon economy. This includes investing in renewable energy sources, implementing energy-efficient technologies, and reducing our carbon footprint throughout the supply chain.
2. **Respecting Indigenous Rights:** In our efforts to pursue sustainability and environmental responsibility, we recognize and respect the rights of indigenous communities and traditional landowners. We engage in meaningful consultation and collaboration with indigenous peoples, seeking their input and consent for projects that may impact their lands, resources, or livelihoods.
3. **Ensuring Supply Chain Transparency:** We are committed to ensuring transparency and accountability throughout our supply chain, particularly in industries with high environmental and social risks. We conduct due diligence to identify and address potential human rights violations, environmental impacts, and ethical concerns, working collaboratively with suppliers to drive positive change and improve sustainability practices.
4. **Empowering Stakeholder Engagement:** We actively engage with our stakeholders, including employees, customers, investors, and local communities, to gather input, address concerns, and build trust. We provide opportunities for meaningful participation in decision-making processes, ensuring that diverse perspectives are considered, and ethical considerations are integrated into our business strategies and operations.

**2. Compliance with Laws and Regulations:** MS Technology GmbH is dedicated to compliance with all applicable laws, regulations, and industry standards.

**Specific Legal Requirements and Regulatory Standards:**

In alignment with our commitment to compliance, MS Technology GmbH adheres to all relevant legal requirements and regulatory standards applicable to our industry and operations. This includes but is not limited to:

1. **Environmental Regulations:** We comply with environmental regulations aimed at reducing carbon emissions, conserving natural resources, and mitigating the impacts of climate change. This includes adherence to emissions standards, waste management protocols, and sustainable practices in our operations.
2. **Human Rights Legislation:** We uphold human rights legislation that protects the rights and dignity of individuals, both within our organization and in the communities where we operate. This includes compliance with anti-discrimination laws, labor rights regulations, and standards related to fair treatment and equal opportunity.
3. **Data Protection Laws:** We adhere to data protection laws and regulations to ensure the privacy, security, and confidentiality of personal and sensitive information. This includes compliance with data protection principles, data breach notification requirements, and regulations governing the collection, processing, and storage of data.

**Procedures for Reporting Potential Legal or Regulatory Violations:**

At MS Technology GmbH we take all reports of potential legal or regulatory violations seriously and are committed to addressing them promptly and effectively. To report a potential violation, individuals may follow these procedures:

1. **Internal Reporting Channel:** Employees, contractors, and stakeholders are encouraged to report potential legal or regulatory violations through our internal reporting channel. This can be done by contacting [designated individual or department], who will handle the matter with confidentiality and discretion.
2. **Anonymous Reporting Option:** We offer an anonymous reporting option for individuals who wish to report a potential violation without fear of retaliation. Reports can be made anonymously through [specified method or platform], and every effort will be made to protect the identity of the reporter.
3. **Investigation and Resolution:** Upon receiving a report of a potential violation, MS Technology GmbH will conduct a thorough investigation to determine the facts and circumstances surrounding the alleged misconduct. If a violation is substantiated, appropriate corrective action will be taken in

accordance with our policies and procedures, which may include disciplinary measures, remedial actions, or legal interventions.

**3. Confidentiality and Data Protection:** Protecting confidential information and respecting data privacy are fundamental principles at MS Technology GmbH.

**Confidential Information and Guidelines for Protection:**

At MS Technology GmbH, confidential information refers to any data, documents, or knowledge that is not publicly available and is deemed sensitive or proprietary to our organization. This includes, but is not limited to, the following:

1. **Trade Secrets:** Information that provides a competitive advantage and is not generally known or readily ascertainable by others outside the company.
2. **Financial Information:** Data related to our finances, including budgets, forecasts, pricing strategies, and financial performance metrics.
3. **Intellectual Property:** Patents, trademarks, copyrights, and other forms of intellectual property developed or owned by our company.
4. **Customer and Employee Data:** Personal and sensitive information about our customers, employees, contractors, and stakeholders.
5. **Strategic Plans and Business Operations:** Information related to our business strategies, marketing plans, product roadmaps, and operational processes.

To protect confidential information, employees, contractors, and stakeholders are expected to adhere to the following guidelines:

1. **Access Control:** Limit access to confidential information to authorized individuals only. Use strong passwords, encryption, and other access controls to prevent unauthorized access or disclosure.
2. **Physical Security:** Store physical documents and devices containing confidential information in secure locations, such as locked cabinets or secure data centers.
3. **Data Encryption:** Encrypt electronic files and communications containing confidential information to prevent interception or unauthorized access.
4. **Non-Disclosure Agreements:** Require employees, contractors, and third parties to sign non-disclosure agreements (NDAs) before accessing or handling confidential information.
5. **Training and Awareness:** Provide regular training and awareness programs to educate employees about the importance of confidentiality and their responsibilities for protecting sensitive information.

**Data Security Measures and Procedures for Handling Sensitive Information:**

In addition to protecting confidential information, MS Technology GmbH implements robust data security measures and procedures to safeguard sensitive information from unauthorized access, disclosure, or misuse. These measures include:

1. **Encryption:** Use encryption technologies to protect data at rest and in transit, including sensitive customer and employee information.
2. **Firewalls and Intrusion Detection Systems:** Deploy firewalls and intrusion detection systems to monitor network traffic and detect unauthorized access attempts.
3. **Access Controls:** Implement role-based access controls (RBAC) and least privilege principles to restrict access to sensitive information based on job roles and responsibilities.
4. **Data Backup and Recovery:** Regularly back up critical data and implement data recovery procedures to minimize the impact of data breaches or system failures.
5. **Security Audits and Assessments:** Conduct regular security audits and assessments to identify vulnerabilities and ensure compliance with security policies and regulations.

In the event of a data breach or security incident involving sensitive information, MS Technology GmbH will follow established incident response procedures to contain the breach, mitigate damages, and notify affected parties as required by law.

### **Workplace Behavior:**

At MS Technology GmbH, we are committed to fostering a workplace culture characterized by respect, inclusivity, and professionalism. We expect all employees to adhere to the following guidelines for workplace behavior:

1. **Expectations for Professional Behavior:**
  - Employees are expected to always conduct themselves professionally, treating colleagues, customers, and stakeholders with courtesy, respect, and fairness.
  - All interactions should be free from discrimination, harassment, bullying, or any form of disrespectful behavior.
  - Employees are encouraged to uphold the highest ethical standards and act in the best interests of the company and its stakeholders.
2. **Policies on Harassment, Discrimination, and Bullying:**
  - Harassment, discrimination, and bullying in any form are strictly prohibited and will not be tolerated.
  - This includes, but is not limited to, harassment or discrimination based on race, ethnicity, gender, sexual orientation, age, disability, religion, or any other protected characteristic.

- Employees who experience or witness harassment, discrimination, or bullying are encouraged to report it promptly through established channels for investigation and resolution.

### 3. **Guidance on Resolving Conflicts and Promoting Positive Workplace Relationships:**

- In the event of conflicts or disagreements, employees are encouraged to address them constructively and proactively, seeking resolution through open communication and respectful dialogue.
- Managers and supervisors are responsible for promoting a positive work environment and addressing conflicts or concerns in a fair and timely manner.
- Employees should strive to build positive relationships with colleagues, fostering collaboration, teamwork, and mutual support in achieving shared goals.
- MS Technology GmbH provides resources and support for conflict resolution, including mediation, counseling, and training on effective communication and conflict management skills.

### **Conflicts of Interest:**

Avoiding conflicts of interest is crucial to maintaining the integrity and credibility of MS Technology GmbH. Employees must adhere to the following guidelines:

#### 1. **Definition of a Conflict of Interest and Examples:**

- A conflict of interest arises when an individual's personal interests or obligations interfere, or appear to interfere, with their ability to act in the best interests of MS Technology GmbH.
- Examples of conflicts of interest may include:
  - Financial interests: Holding a financial stake in a competitor, supplier, or customer of MS Technology GmbH.
  - Outside employment: Engaging in outside employment or business activities that compete with or conflict with the interests of MS Technology GmbH.
  - Gifts and favors: Accepting gifts, favors, or other benefits from suppliers, customers, or partners that could influence decision-making.
  - Personal relationships: Making decisions or recommendations that benefit family members, friends, or close associates at the expense of MS Technology GmbH.

#### 2. **Procedures for Disclosing and Managing Conflicts of Interest:**

- Employees are required to promptly disclose any actual or potential conflicts of interest to their supervisor, manager, or the designated compliance officer.

- Upon disclosure, the conflict of interest will be evaluated and appropriate measures will be taken to manage or mitigate the conflict, which may include:
  - Recusal: Temporarily or permanently abstaining from involvement in decisions or activities that could be affected by the conflict of interest.
  - Transparency: Providing full disclosure of relevant facts and circumstances to affected parties, ensuring transparency and accountability.
  - Review and Approval: Seeking review and approval from higher management or the company's ethics committee for transactions or decisions that may involve a conflict of interest.
- Employees are expected to act in the best interests of MS Technology GmbH at all times and to avoid any actions or decisions that could compromise their objectivity, impartiality, or loyalty to the company.

### **Reporting Violations:**

MS Technology GmbH encourages the reporting of any violations of this Code of Conduct or any unethical behavior. Employees should take the following steps to report violations or concerns:

#### **1. Reporting Channels and Procedures:**

- Employees can report violations or concerns through multiple channels, including:
  - Directly to their supervisor, manager, or another member of management.
  - Through the company's anonymous reporting hotline or online platform, maintained by [designated department or third-party provider].
  - By contacting the company's compliance officer or designated ethics committee member.
- Reports should include detailed information about the alleged violation or unethical behavior, including dates, times, locations, individuals involved, and any supporting evidence or documentation.

#### **2. Protection for Whistleblowers and Non-Retaliation Policies:**

- MS Technology GmbH is committed to protecting whistleblowers from retaliation or adverse consequences for reporting violations or concerns in good faith.
- Whistleblowers who report violations or concerns will be treated with confidentiality, respect, and sensitivity throughout the investigation process.

- Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action, up to and including termination of employment.
- Employees who believe they have experienced retaliation for reporting violations or concerns should report it immediately through the same channels outlined above for reporting violations.

### **Consequences of Non-Compliance:**

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or legal consequences. MS Technology GmbH reserves the right to impose the following consequences for non-compliance:

1. **Verbal Warning:** In cases of minor or first-time violations, employees may receive a verbal warning from their supervisor or manager, outlining the nature of the violation and expectations for future conduct.
2. **Written Warning:** For more serious violations or repeated offenses, employees may receive a written warning documenting the violation and specifying the consequences of further non-compliance.
3. **Probationary Period:** In certain cases, employees may be placed on probationary status, during which their conduct and performance will be closely monitored to ensure compliance with the Code of Conduct.
4. **Suspension:** Employees may be suspended from work for a specified period as a disciplinary measure for significant violations of the Code of Conduct, pending further investigation or review.
5. **Termination of Employment:** Persistent or egregious violations of the Code of Conduct may result in termination of employment, with or without prior warning, depending on the severity of the offense.
6. **Legal Action:** In cases involving criminal misconduct or serious breaches of law or company policy, MS Technology GmbH reserves the right to pursue legal action against the responsible parties, which may result in civil or criminal penalties.



**Conclusion:**

Thank you for your commitment to upholding the values and principles outlined in this Code of Conduct. By adhering to these standards, we contribute to the success and reputation of MS Technology GmbH.

At MS Technology GmbH, integrity, professionalism, and ethical conduct are at the core of everything we do. Our Code of Conduct serves as a guiding framework for our actions and decisions, reflecting our unwavering commitment to excellence, fairness, and accountability.

Together, we create a workplace culture characterized by respect, inclusivity, and trust, where every individual is valued and empowered to contribute to our collective success. By embracing the principles outlined in this Code, we build a stronger, more resilient organization that is poised for sustainable growth and positive impact.

Thank you for your dedication to upholding these values and for your ongoing commitment to ethical conduct in all aspects of your work at MS Technology GmbH.