



# CODE OF BUSINESS CONDUCT AMS TECHNOLOGIES AG

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## 1. INTRODUCTION

AMS Technologies, a team of around 100 innovative minds, is a one-stop shop with combined expertise in optical technologies, thermal management, and power electronics. With a wide network of qualified suppliers and our own capacities for engineering, testing, and production, we help our clients solve their technical challenges.

We believe the best solution for our clients always comes first. Our headquarter is in Martinsried near Munich, Germany, our Engineering and Production sites are in Hanover, Germany, Krakow and Skawina in Poland and the United Kingdom. With local sales offices in Germany, the United Kingdom, France, Italy, Spain and Sweden, we are close to our clients.

Over 40 years of experience has enabled us to cater to the needs of more than 2000 European clients from a wide range of high-tech sectors, such as medical technologies, renewable energies, aviation and defense, research and development, and many other industrial applications. We support universities, spin-offs, and start-ups in their journey to become technology leaders of tomorrow – and we are proudly working with many of Europe's most successful and influential companies.

We at AMS Technologies are fully committed to following high ethical standards in all applicable fields such as environmental protection, safety and health, human rights, and data protection. We are strongly focused on being compliant with all laws and regulations, as well as our internal standards.

**The Code of Conduct applies to AMS Technologies AG and to its subsidiary companies neoLASE GmbH and Elforlight Ltd. Every division at AMS Technologies functions according to the specific requirements presented in this document.**

All our employees are properly informed and trained to follow external and internal regulations at all times and are strongly encouraged to whistleblowing if something is out of order.

We invite our partners and suppliers to meet the same standards and be compliant with all essential principles in order to thrive on the European markets and ensure a better working culture. Let's contribute together to create a better and safer world!

A stylized, handwritten signature in blue ink, appearing to read "J. Meise".

Jan Meise, CEO

A stylized, handwritten signature in blue ink, appearing to read "P. Weber".

Philipp Weber, COO/CFO

## 2. PURPOSE OF CODE OF CONDUCT

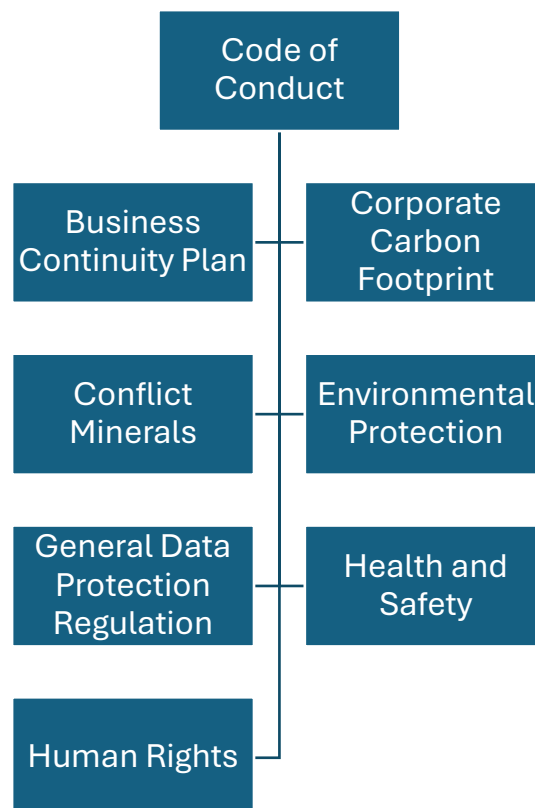
This document is to share our policy both internally and externally and present the level of fulfilment of all mandatory requirements stated in the Supply Chain Due Diligence Act. In case our CoC is in direct conflict with local laws, the local laws have priority.

The purpose is to introduce internal standards and practices developed in our organization to all our employees, partners and customers, and to present our agenda to comply with European laws and regulations. We want all parties involved to have full insight into our code of business conduct.

It is mandatory for all entities to acknowledge and sign this document. We would like to build strong relationships with suppliers and partners that share our values and the aspiration to create brighter future.

## 3. SCOPE OF CODE OF CONDUCT

Code of business conduct in AMS Technologies includes the following and related areas:



## 4. HUMAN RIGHTS AND LABOUR CONDITIONS

AMS Technologies always ensures that all aspects above are treated with great care and there is no violation of any rule concerning labour conditions and human rights. Cooperation on that field is expected from all parties in supply chain (partners, suppliers, subcontractors etc.).

### 4.1. MODERN SLAVERY AND CHILD LABOUR

Any form of child labour, human trafficking, slavery, coercion or abuse is denounced at our company. We follow European regulations in terms of minimum age for employment, protecting employees' rights and protecting children from any form of abuse. All work is voluntary and each employee is free to terminate his/her employment at any time (with the observance of contract conditions). We do not support any form of coercion, force or exploitation of vulnerable or underage persons.

Actions taken:

- Checking the age of every hired person (anybody under 16 years of age will be denied)
- Providing employment contracts that are transparent and compliant with labour law in country of employment
- Informing all employees that they can report any form of abuse or mistreatment to their supervisors or directly to top management
- Checking on our suppliers and partners to ensure that they do not support nor accept those actions
- Training for employees including this topic

### 4.2. DISCRIMINATION

AMS Technologies respects all cultural backgrounds and differences. We encourage equal opportunities. There is no room for any form of discrimination based on gender, origin, religion, nationality, political views, disability, age or sexual orientation. Any supplier that supports discrimination of any kind, will not be taken into consideration for future cooperation.

AMS Technology is also a workplace free from bullying, harassment or mobbing practices. Each employee is informed that he/she can report any form of discrimination or mobbing to the supervisor or directly to top management.

### 4.3. WORKING TIME AND SALARIES

We put strong emphasis on work-life balance, therefore according to European law, all employees work no more than 48 hours per week and have at least 11 hours per day of leisure time. Within a week, two full days are off. In exceptional circumstances, at least one day per week is free from work activities.

Salaries are no less than the minimum specified for each country. Overtime is paid in accordance with the company's internal procedures. By no means salaries can be withhold.

#### 4.4. WORK ENVIRONMENT

As we spend many hours during a day at work, the work environment has to be maximally comfortable, safe and fully equipped with working tools. AMS Technologies understands very well all necessities included and provides its employees with:

- Facilities that complies with laws and regulations of given country, including fire protection and construction safety, and offer proper ventilation, lighting and enough space
- Facilities with kitchen and toilet areas
- Working stations with all tools, machines, equipment required to perform every operation
- Personal protection equipment required to perform potentially hazardous or dangerous operations
- Safe storing places for all dangerous materials/components
- Machines and test equipment properly maintained and secured
- All necessary instructions at every working station
- Access to potable water and hygiene utensils
- Proper work clothing if applicable (production area, cleanroom)

#### 4.5. FREEDOM OF ASSOCIATION

Workers have a right to join labour unions, workers' councils and freely associate, if they are willing to do so. Employees can always openly communicate his/her grievances with management concerning working conditions and company practices, without fear of repression or harassment.

AMS Technologies puts emphasis on cooperative problem solving between management and subordinates, and atmosphere of honesty and cooperation on improving existing standards in the workplace.

### 5. HEALTH AND SAFETY

Health and safety of all workers is one of the highest priority of AMS Technologies. We emphasize the need for periodical trainings and make everybody aware of health and safety measures introduced within the company. Every effort is made to create a maximally safety workspace and to minimize any risk that is an inherent part of production/engineering processes.

Actions taken:

- Cooperation with an external company to ensure safety workspace and compliance with all the regulations – yearly control visits by external HSE officers
- Compliance with international and local laws and guidelines concerning health and safety at work
- Periodical trainings concerning health and safety rules
- Mandatory safety gloves, masks, boots, glasses where applicable
- Periodic discussions about risks and introduction of ideas to minimize those risks
- Control of all the tools and equipment (calibration, maintenance processes)
- High-quality medical care for all employees
- Promoting a healthy lifestyle, disease prevention, and prevention of substance abuse
- Taking care of both mental and physical health of employees

## 6. GENERAL DATA PROTECTION REGULATION

At AMS Technologies, all steps are taken to assure that our customers' data is protected and secured. We apply both data protection laws and our internal procedures to handle sensitive data, therefore no personal information will be passed to parties not involved. We also respect the right to privacy of our employees. Processing of data is always in accordance to applicable laws. Information provided by our customers is only used for purposes specified by contract. Received data is never the object of unauthorized access, forgery, improper usage or destruction. If we work on strictly confidential projects (for instance for the defense industry), we pay special attention to keep all involved information as classified data.

## 7. ENVIRONMENTAL PROTECTION

We very much care about nature and our environment. We make efforts to protect the environment by contributing to the reduction of greenhouse gas emissions and recycling of materials whenever possible. We take the following actions to make a world cleaner and safer space:

- We comply with environmental regulations
- We handle chemical and hazardous materials with great care and store them safely (cooperation with external company)
- We control the process of waste disposal in accordance to proper regulations
- We recycle and reuse components/materials whenever feasible
- We monitor and control the emission of aerosols and volatile chemicals
- We promote protection of life below water and life on land
- We promote clean and affordable energy

## 8. CONFLICT OF INTERESTS AND ANTI-CORRUPTION POLICY

AMS Technologies fights corruption and bribery. We neither give, nor accept bribes. No personal interests may interfere with company's interest. To prevent any form of conflict of interests, all employees are going through training and are encouraged to raise their hand if something seems out of order in that respect. Any gratification that aims to influence business decisions is neither given, nor accepted. We do not participate in money laundering or any other suspicious practice of this sort. We respect intellectual property, know-how, business secrets, and make sure private information is never presented to the public.

## 9. CONFLICT MINERALS

Term "conflict minerals" applies to the following minerals: gold, tin, tungsten, tantalum. Companies that import them have to make sure that they have been obtained in an ethical way without forced and slavery labour in the countries of origin. AMS Technologies makes sure that neither our company, nor our supply chain is involved in any illegal practices in this field. We require a special statement from our suppliers that are involved in the sourcing of conflict minerals.

## 10. CORPORATE CARBON FOOTPRINT

AMS Technologies actively participates in the calculation and reduction of greenhouse gas emissions. We measure our carbon footprint and prepare a yearly report to be shared internally and externally (to be introduced fully by 2026). We also introduced good practices (followed by all employees within the company) to reduce energy consumption and emission of CO<sub>2</sub>. All actions implied by this topic, are presented in a separate document and are made accessible internally and externally.

## 11. BUSINESS CONTINUITY PLAN

Considering the changeability of today's world and all sorts of unexpected events, we have a Business Continuity Plan (BCP) installed. It is our agenda how to cope with different situations that might occur from very serious and tragic ones, such as war, environmental disaster, pandemic, cyber-attack etc, to more mundane ones, such as lack of internet, accidental loss of data, temporary lack of electricity in the production plant etc. The BCP is discussed every year and updated if necessary, to make sure that we are prepared for any challenging times. We would also like to be sure that our suppliers have some agenda for such events, in order to minimize any potential impact on our cooperation.

## 12. INVOLVEMENT IN 17 SUSTAINABLE DEVELOPMENT GOALS

AMS Technologies AG supports the 17 Sustainable Development Goals, as defined by the United Nations:

- No Poverty
- Zero Hunger
- Good Health and Well-being
- Quality Education
- Gender Equality
- Clean Water and Sanitation
- Affordable and Clean Energy
- Decent Work and Economic Growth
- Industry, Innovation and Infrastructure
- Reduced Inequalities
- Sustainable Cities and Communities
- Responsible Consumption and Production
- Climate Action
- Life below Water
- Life on Land
- Peace, Justice and Strong Institutions
- Partnership for the Goals

Some of the goals are included within the 11 points of our Code of Conduct, others that are not applicable to our business are supported by us. Wherever possible, we would like to cooperate with all our business partners to meet those standards and add our input to all 17 objectives.

### 13. COMPLIANCE WITH THIS CODE OF CONDUCT

For the purpose of securing a prosperous partnership for the future, we kindly request you to acknowledge and sign this document. Please go through each section of the Code and make sure that your company is fully compliant with the principal rules and obligations.

Transparency plays big role in our business, therefore we would like to perform an audit at your site to ensure mutual excellence. In case of minor violation of the CoC, AMS and its business partner may agree on remedial measures. In the event of severe violation of the Supply Chain Due Diligence Act, international laws or principal guidelines of this CoC, we reserve the right to suspend or terminate the cooperation.

Date: .....

Signature: .....