

Code of Conduct

Docter Optics Group

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1 Introduction

The companies of the Docter Optics Group, their employees and the organizations with which they partner expressly acknowledge the responsibility towards society associated with their activities (Corporate Social Responsibility).

The present Code represents a commitment to ethical and moral conduct and provides guidelines intended to ensure compliance with legislation governing competition.

Companies that recognize this Code of Conduct also provide their employees with information on the content, ethical goals and principles contained therein.

The Docter Optics Code of Conduct is a voluntary undertaking. Compliance is controlled by the Compliance Officer of Docter Optics SE in the context of regular ongoing assessment.

Neustadt an der Orla, 1 September 2022



Martin Enenkel
CEO Docter Optics SE

2 General Rules

2.1 Laws, Regulations and Ethical Conduct

The Company complies with applicable laws and regulations in effect in the various countries, in which it operates. It is guided by generally accepted ethical values and principles, including but not limited to integrity, fairness and human dignity.

2.2 Business Partners, Governmental Authorities and Customers

The Company conducts its operations on the basis of the generally accepted business practices of fairness and honesty. It conducts its business with governmental institutions on the basis of mutual respect and complies with regulations governing consumer rights.

2.3 Trade Secrets

The Company treats trade secrets of other companies confidentially. Disclosure of such information to third parties or the public is prohibited. This provision also survives agreements entered into by the Company.

3 Anti-Trust and Competition Law

3.1 Anti-Trust Legislation

The Company is committed to fair competition. The Company complies with legislation governing and controlling competition, including in particular anti-trust legislation. Collusive agreements to fix prices or other conditions, sales territories or customers as well as abusive exercise of market power are inconsistent with the principles of the Company.

3.2 Bribery and Corrupt Practices

The Company disapproves of bribery and corruption and does not tolerate such conduct. Employees make every effort to avoid dependence upon or obligations towards customers or suppliers. In particular, Group employees may not accept or give gifts or favors that a reasonable observer would have to assume have an effect upon business decisions. In the case of countries in which custom and courtesy call for gifts, every effort is made to avoid any binding obligations. Appropriate measures will be taken in the case of violation.

4 Global Guidelines

4.1 Human Rights

The Company firmly and expressly embraces internationally recognized human rights ⁽¹⁾. All Group employees must also be treated with dignity and respect in the case of disciplinary measures. Such measures may be taken only if consistent with applicable national and international standards and without violation of internationally accepted human rights.

4.2 Forced Labor

All forms of forced labor, bonded labor, serfdom and slave labor or slavery or similar circumstances are considered unacceptable. Violence and intimidation may not be used, directly or indirectly, to force employees to work⁽²⁾.

4.3 Remuneration

All employees must receive a fair wage that is at least sufficient to cover basic needs. Wages must be paid in the manner agreed and appropriate payroll advice provided ⁽³⁾.

4.4 Working Hours

Working hours must comply with applicable national law, industry standards or the relevant ILO Conventions. Extra work must always be voluntary⁽⁴⁾.

4.5 Occupational Health and Safety

National and international regulations governing occupational health and safety must be observed. Appropriate measures must be implemented to avoid risks to health and safety⁽⁵⁾.

4.6 Protection of the Environment

The Company is committed to the goal of a sustainable environmental protection. Efforts are made in this context to develop and introduce environmentally friendly production methods. The Company supports responsible use of natural resources in accordance with the principles of the Rio Declaration of the United Nations⁽⁶⁾.

5 Ethical and Social Principles

5.1 Non-Discrimination

The Company disapproves of discriminatory hiring or employment practices, in particular on the basis of race, ethnic or national origin, skin color, gender, mental or physical disability, age, creed, membership in a labor organization or other personal characteristics ⁽⁷⁾.

5.2 Harassment

The Company disapproves of physical, psychological or sexual violence.

5.3 Freedom of Opinion

The right to freedom of opinion and freedom of speech is respected.

5.4 Private Sphere

The private sphere is respected.

6 Whistleblower Protection

6.1 General Principles

The company aims to ensure that all operational activities of all organizational units and their employees comply with applicable EU laws/regulations, the national legislation of the Federal Republic of Germany, and the company's internal regulations. The company has the same expectations for all external partners with whom it cooperates.

6.2 Whistleblowers and Reporting Obligation

Whistleblowers are all natural persons who report observed or suspected cases of non-compliant behavior as defined in Section 6.1. This includes employees, self-employed individuals, shareholders, interns, volunteers, employees of suppliers and customers, as well as individuals whose employment relationship has already ended or has not yet begun and is in a pre-contractual stage. For employees of the company, this reporting obligation generally exists as an ancillary duty under their employment relationship.

6.3 Types of Reports

Reports help uncover, investigate, prosecute, and prevent legal violations. Reports of non-compliant behavior may include, in particular, violations of Sections 2 to 5 of this Code of Conduct.

6.4 Reporting of Incidents

Whistleblowers have the option to submit reports either in writing via the compliance management email address cm@docteroptics.com, by mail, and/or orally via telephone extension -136 (Compliance Officer). Upon request, a personal meeting with the Compliance Officer is also possible. The company ensures the confidentiality of the whistleblower through all reporting channels.

6.5 Protection of Whistleblowers

The company guarantees every whistleblower maximum protection against any form of retaliation or discrimination that may result from their report and that could deter them from making a report.

7 Compliance with the Code

7.1 Implementation within the Company

The company ensures that this Code of Conduct is communicated to all affected employees in an appropriate manner. As part of internal self-monitoring, compliance with the requirements is reviewed and evaluated.

7.2 Confirmation for External Organizations

Contractually bound external organizations are assessed by the Compliance Officer or the Procurement Department of Docter Optics SE. The following prerequisites must be met:

- A fully completed and authorized self-disclosure form.
- A risk assessment for outsourced processes conducted by Docter Optics SE.
- A declaration of commitment from the company's management.

For selected strategic partners and in cases of identified increased risk, compliance with this Code is confirmed through a compliance audit.

The compliance confirmation is part of the assessment of outsourced processes by Docter Optics SE and is generally valid for two years. However, it may be revoked at any time in case of incidents.

8 References to Regulatory Requirements

- (1) Universal Declaration of Human Rights, UN Doc. 217
- (2) ILO Conventions 29 and 105
- (3) ILO Conventions 26 and 131
- (4) ILO Conventions 1 and 14
- (5) ILO Convention 155
- (6) Twenty-seven principles of the Rio Declaration on Environment and Development, produced at the United Nations Conference Environment and Development (UNCED), Rio de Janeiro, 1992
- (7) ILO Conventions 100, 111, 158 and 159
- (8) EU-Guideline 2019/1937