

Dear congatec Team,

As the management, it is important to us to introduce our new Code of Conduct to you. This central document outlines the shared values and principles upon which our company is built.

We believe that the success of a company should be measured not only by financial metrics but also by the way we conduct our business. Our Code of Conduct serves as a guide for our daily actions and ensures that we always operate in alignment with our values. It clearly defines the behavioral standards we expect from every member of our organization and lays the foundation for an ethical corporate culture based on integrity, respect, and responsibility.

Within this Code of Conduct, you will find clear guidelines and behaviors pertaining to various areas, including ethics, legal compliance, confidentiality, fair competition, environmental protection, and social responsibility. It serves as a reference point and ensures that we consistently uphold the highest standards as a company.

It is our responsibility to live and actively implement the Code of Conduct, which is why we ask you to carefully read it and adhere to it in your daily work. Each one of us is accountable for following these guidelines, regardless of our position within the company. Through our collective efforts, we can create a corporate culture based on integrity, trust, and respect.

We recognize that maintaining these standards requires continuous effort. If you have any questions or concerns, the Compliance Department is always available to assist you. We are committed to supporting you in implementing the Code of Conduct and creating a supportive environment.

We are proud to be a part of congatec and would like to express our gratitude to you for your commitment and collaboration. Together, we can achieve our objectives and put our company values into action.

Best regards,

The Management

CODE OF CONDUCT

Important Notice:

Everyone - the management, executives and employees - must know, understand, be able and willing to implement the essential content of this Code of Conduct (CoC) and observe it in their daily work.

Overview

1. Preamble
2. The congatec behavioral rule pyramid
 - 2.1 The pyramid of rules of conduct
 - 2.1.1 Compliance with mandatory legal requirements - Level 1
 - 2.1.2 Compliance with the "Recognized state of science and practice" - Level 2
 - 2.1.3 Compliance with regulations from employment contracts / collective bargaining agreements / company agreements - Level 3
 - 2.1.4 Compliance with internally issued guidelines - Level 4
 - 2.2 Principles of all internal rules of conduct
 - 2.2.1 Inalienable human rights
 - 2.2.2 Acting dutifully and reasonably
 - 2.2.3 Sustainability
3. Rules of conduct of congatec
 - 3.1. Areas of responsibility and rules of conduct
 - 3.1.1 Sustainability
 - 3.1.2 Conduct towards own employees, employees of other companies as well as other third parties
 - 3.1.4 Confidentiality
 - 3.1.5 Conflicts of interest
 - 3.1.6 Gifts and invitations / anti-corruption
 - 3.1.7 Sponsoring
 - 3.1.8 Protection of company property
 - 3.1.9 Transparency and information
 - 3.1.10. Data protection (general)
 - 3.2 Complaints procedure and whistleblower system
 - 3.3 Compliance monitoring and consequences of violations
4. Concluding remarks





We are a highly motivated team working towards excellence.

1. Preamble

congatec is currently in a process of change and is therefore faced with new challenges and expectations. Due to constant growth, the introduction of new technologies, developments in sustainability and environmental protection, as well as increasing social responsibility, we can truly call this a “turning point in time”. Everything is about to change. But through the skills, knowledge, and experience of everyone at congatec, we have the opportunity as a team to grow and develop together facing these new challenges.

Nevertheless, further steps are needed in these times of transformation, because both congatec's reputation and integrity are not only valuable, but also significantly determining for the success of our company in these times. We all are responsible for ensuring that congatec's corporate actions reflect the highest standards of integrity. This Code of Conduct provides a framework for complying with external requirements as well as our own principles. It defines the expectations and contains directives and guidelines for compliance with laws and regulations as well as our own business standards and is therefore valid for all employees of the company worldwide.

The Code of Conduct cannot and is not intended to address every individual situation. congatec expects the entire congatec team, including management, executives and employees, to act honestly, fairly, ethically and in compliance with the law in every instance. Any improper, unethical or illegal actions are a violation of this Code of Conduct, even though the specific situation may not be explicitly mentioned in this document.

Every employee at congatec must take responsibility for their actions. Making mistakes is a natural part of growth and therefore sometimes unavoidable. They offer us the opportunity to learn from them and avoid them in the future. Nevertheless, congatec can be damaged immensely if the Code of Conduct is violated. Therefore, negligent or intentional violations of this Code of Conduct may result in disciplinary action, termination of employment and claims for damages. If there is any doubt, please consult the contact persons listed on page 16.

Purpose of the Code of Conduct

Decided by the management, these internal rules of conduct are regarded as the “mother of all rules” in the company. In addition, the Code of Conduct is intended to ensure comprehensive (legal) security and compliance

- at the present time,
- for the ongoing transformation process and
- for the future state

The Code of Conduct does not explicitly address every possible situation, but rather refers to the instructions and guidelines that exist decentrally at congatec which are intended to serve as a basis for action and guidance.

But even a Code of Conduct is not set in stone. A regular review of the contents by the management and a critical update of the contents should take place at least once a year. Employees may support the management at any time with their own suggestions.

Scope of the Code of Conduct

The Code of Conduct applies to each member of the congatec team, including the management, the executives, and all employees of current and future subsidiaries as well as other corporate bodies.

The original version of the Code of Conduct is in English. In case of inconsistencies, the English version has priority.

2. congatec's Pyramid of Conduct Rules

2.1 The Conduct-Rules Pyramid

Our private, social and professional lives are influenced by numerous laws, rules and regulations. Correct, dutiful and lawful behavior is mandatory, e.g., for the maintenance of law and order in the public, for safety on the roads and even during shopping. This behavior is also necessary for companies and serves as a basis for long-term participation in economic life.

Therefore, not only individuals are threatened with consequences such as charges, fines or restrictions on personal freedom in the case of violations of the law. Unlawful companies can also be subject to penalties such as exclusion from public procurement procedures, inclusion in "negative" lists, suspension of business operations or other sanctions. Every single employee at congatec is therefore obliged to always act correctly, in compliance with the law and in accordance with their duties to protect the company from such negative consequences. The following diagram provides an overview of the regulatory levels that can be identified:

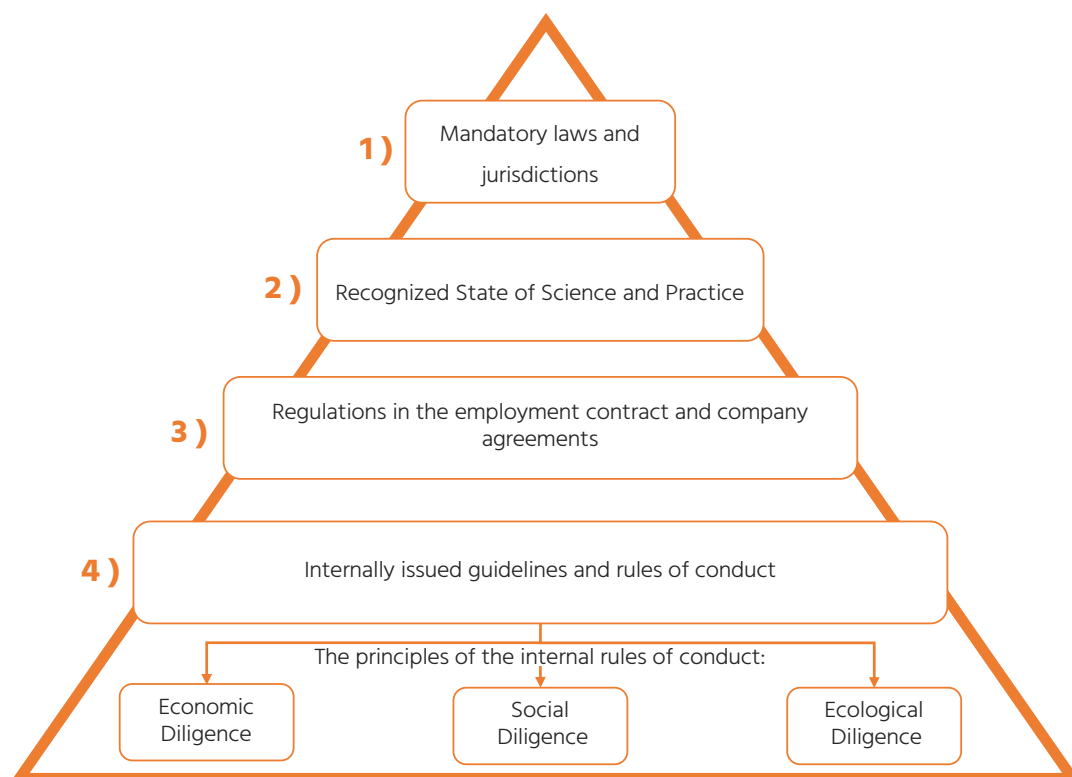


Figure 1: The behavioral rule pyramid

The four levels within the pyramid of rules of conduct

The pyramid of rules of conduct shows four levels, which must be observed by the individuals, the companies and their legal representatives.

- Level one (1) and two (2) apply generally,
- Level three (3) based on agreements.
- The fourth (4) level contains the internal - issued by the management on its own - guidelines.

In the following sections, these four levels are applied and interpreted to the corporate reality of congatec.

2.1.1 Compliance with Mandatory Legal Requirements - Level 1

All congatec employees must strictly comply with the requirements of national and international laws, regulations and jurisdiction applicable to their particular job (so-called duty of legality). One example is compliance with work safety regulations.

At congatec, the relevant legal areas are managed using a legal register. The individuals responsible for this regularly check the different areas of law for changes and innovations and their impact on the company. In this way, they act as the first point of contact for our company when technical questions arise. This means that it is always clear which regulations apply specifically to the individual working environment.

2.1.2 Compliance with the "Accepted State of Science and Practice" - Level 2

The "accepted state of science and practice" must also be complied with at any time. The accepted state is usually reflected in norms and standards. Standards describe the absolute minimum, e.g., in the design and development of IT components, implementation of maintenance work on technical equipment, introduction of a compliance management system, or compliance with security and data protection regulations in development and production.

2.1.3 Compliance with regulations from employment contracts / collective bargaining agreements / company agreements - Level 3

Compliance with employment contract regulations is also mandatory at congatec. The Human Resources department at congatec has an overview of the various regulations and can also answer individual questions. For more in-depth legal questions, the company's legal counsel can also be consulted.

2.1.4 Compliance with Internal Directives - Level 4

Since the legal requirements, which are usually of a general nature, are often not specific enough or leave unintended scope for decision-making, congatec's management has additionally established rules of conduct.

The determination of requirements, creation and roll-out of the directives is carried out by the so-called policy management. All internal rules of conduct or directives are administered, documented and trained via this directive management system.

Example:

Environmental guideline, anti-corruption guideline. At congatec, we differentiate between policies and company directives when it comes to the numerous internal rules and regulations.

2.2 Principles of all Internal Rules

The challenge of internal rules is to ensure that all employees comply with the individual rules at any time in their day-to-day work, whether in development or in operations. Therefore, the management of congatec established principles of internal regulations of conduct. These rules of conduct apply to management, executives and employees. These rules are always based on the same clear scheme.

2.2.1 Diversity and Non-Discrimination

At congatec, we are committed to creating an inclusive and diverse work environment in which each individual is respected, valued and encouraged. All employees must ensure at all times that discrimination against employees, customers, business partners or third parties does not occur, for example, on the basis of ethnic origin or national origin, skin color, religion or ideology, gender, sexual orientation, gender identity and/or gender expression, age, physical or mental disability, political or trade union affiliation, nationality, maternity, marital status or any other characteristic protected by law.

We do not tolerate any kind of insult, harassment, discrimination or bullying.



Example:

Within your department, you notice that an employee is often exposed to harsh comments due to the person's origin. Since it is our responsibility at congatec to ensure that each and every person in our company is treated respectfully, fairly and equally, you support the concerned person, try to mediate and - if necessary - contact your manager, the corporate compliance department or the Ombudsman.

2.2.2 Acting Dutifully and Wisely

All members of the congatec team, including management, executives and employees, work together to ensure that the requirements applying to congatec and measures to meet these requirements are known and implemented. Each employee has the responsibility to act wisely, dutifully and in accordance with the law.



Example:

As part of the congatec team, you will comply with existing company regulations and procedures, including the Code of Conduct, Policies and Company Directives and Guidelines. Using this as a basis, you act responsibly and make your decisions. By acting in a dutiful and sensible manner, you not only minimize the number of mistakes, but also make a significant contribution to optimizing efficiency, cooperation and the success of congatec.

2.2.3 Sustainability

Making a positive impact on society and the environment is a major goal for us as a company. Therefore, sustainability requirements must be fulfilled in the economic, social and ecological areas. The rules below address these three areas.



Economical:

All congatec employees are expected to work economically and efficiently. We are aware that the economic success of the company secures jobs. That is why we all make the best possible contribution to achieving the goals we have set. In addition, economic success enables congatec to take even better care of social and ecological issues.



Social:

Social sustainability refers to our company's ability to take social impacts into consideration and to contribute to social development and the well-being of the community. At congatec, the focus is on equal treatment, diversity and equal opportunities, respect for human rights, including in the value chain, as well as an appropriate working environment with occupational safety and occupational health management, and much more, providing the basis for sustainably good working conditions.



Ecological:

congatec also has a responsibility to the environment and promotes environmentally friendly practices and the reduction of our ecological footprint. We all have to ensure the highest possible resource and energy efficiency through our environmentally responsible behavior, and we also have an impact on our value chain in this context.



3. congatec Code of Conduct

At congatec, fair and correct behavior is a core component of the company's philosophy, which is also represented by the Code of Conduct. Whether in the sales force, in support or in development, whether at the executive, department management, group management or administrative level: we are all part of the congatec team, so it is also important to have common values and rules. For all the areas of responsibility and rules of conduct listed in section 3.1, there are detailed documents such as Self Commitments, Company Directives, Guidelines and Internal Standards in Confluence.

3.1 Areas of Responsibility and Standards of Conduct

3.1.1 Sustainability

At congatec, we place great importance on sustainability and bear responsibility for the economical, social and ecological consequences of our decisions and activities. We are committed to establishing and continuously improving sustainability as an integral part of our company strategy, e.g., by reviewing our supply chains, increasing energy efficiency in our production facilities, and engaging in environmental protection. We pride ourselves on maintaining a sustainable corporate culture and supporting our customers in implementing sustainable solutions.

3.1.2 Conduct towards congatec Employees, Employees of Other Companies and Other Third Parties.

congatec is committed to the personal and professional development of its employees and cultivates a supportive corporate culture. Employees receive honest and regular feedback. Each of us acts with a high degree of personal responsibility and, in the event of mistakes and errors, takes responsibility, corrects them and derives appropriate measures in order to avoid them in the best possible way in the future. In addition, congatec is committed to innovation and treats customers and suppliers as partners.

We stand for open communication, honest feedback and treat everyone with respect. Our managers are not allowed to take any reprisals against our employees who comply with the Code and must take employee concerns seriously. congatec provides a protected work environment and is committed to avoiding harassment in any form.

3.1.3 General Compliance with Laws

A wide range of laws apply to congatec and its operations. Employees of the company are expected to comply with these laws as well as with rules and regulations.

The Company reports all criminal violations to the appropriate authorities for possible prosecution and investigates, prosecutes, and reports non-criminal violations as appropriate

3.1.4 Confidentiality

We handle internal company information, knowledge and data very confidentially. Without permission, we do not disclose information, knowledge or data, nor do we publish internal company information.

3.1.5 Conflicts of Interest

Employees at congatec must make independent decisions for the benefit of the company without pursuing personal relationships or interests that could lead to conflicts of interest. Potential conflicts include financial or personal relationships with customers, suppliers or competitors of the Company, relationships with employees with responsibilities, as well as private activities that could impact the work. Company approval is required before employees may accept paid secondary employment outside of congatec.

3.1.6 Gifts and Invitations / Anti-Corruption

We are committed to avoiding any activity that could improperly influence business decisions or transactions. This includes, among other things, that we do not accept or make any gifts or invitations that go beyond the customary business framework. In addition, we reject agreements intended to be made in return for benefits.

Further information on anti-corruption can be found in the following Company Directive: Accepting and giving gifts. If you have any further questions, please contact the Compliance Team at any time.

3.1.7 Sponsorship

Donations in the name of congatec for political organizations, parties or individual politicians as well as sponsoring and donations to other receivers are made exclusively - within the framework of our Code of Conduct - by the management or in coordination with it.

3.1.8 Protection of Company Property

We are extremely careful with the equipment and all other assets that are the property of congatec. We use company property only for its intended purpose and do not misuse it.

3.1.9 Transparency and information

We document all business transactions completely and properly. We are committed to ensuring a proper flow of information. Together, we are committed to not unlawfully withholding, falsifying or selectively passing on relevant knowledge.

3.1.10. Data Protection (general)

It is our duty to consistently comply with the applicable data protection regulations. Thereby, we strive for economical storage and commit ourselves to protect the privacy of our employees as well as our customers as well as our business contacts and treat the personal data provided to us confidentially.



3.2 Procedure for Complaints and Whistleblowing System

All employees may report to their supervisors, the management, the ombudsman or the company's internal legal counsel if it is observed that required rules and guidelines are not being followed. This is explicitly encouraged by congatec. The anonymity of whistleblowers will be strictly protected upon request, especially when contacting the ombudsman, which is guaranteed by legal guidelines.

congatec is committed to a positive compliance culture that allows whistleblowers to make their contribution through the reporting system and takes it seriously. Every hint is followed up and appropriate measures are initiated.

In the case of complaints, hints or observations, the independent ombudsman can be contacted at any time.

E-Mail: ombudsmann-congatec@sws-p.de

Telefon: + 49 991-379175-293

You can also contact the Compliance department. These complaints can also be handled anonymously if requested:

corporate-compliance@congatec.com

3.3 Compliance monitoring and consequences of violations

Violations of this Code of Conduct as well as violations of internal or legal requirements may result in economic disadvantages for the company and in a loss of confidence in the company. Depending on the severity of the violation, misconduct can lead to consequences under employment law, civil law or even criminal law.

In addition, employees who knowingly make false accusations of misconduct are in violation of this Code of Conduct and their contractual obligations.

4. Conclusion

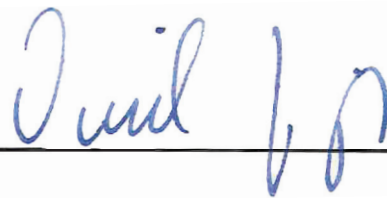
Correct behavior in accordance with the applicable legal standards and the internal rules of conduct determines all actions of congatec and all employees. Therefore, all congatec employees must consider it their duty to comply with the Code of Conduct and are responsible for their own actions.

The management as well as the top management of congatec act as role models here. Their compliance with the Code of Conduct is of particular importance to the Company. The managers support the employees in complying with the Code of Conduct and are available for consultation.

Strict compliance with the Code of Conduct is mandatory for all congatec employees and applies throughout the company in all areas.

18.10.2023

Date

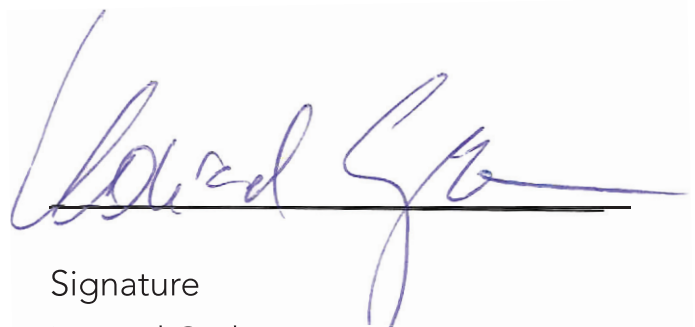


Signature

Daniel Jürgens, Managing Director
congatec group GmbH

18.10.2023

Date



Signature

Konrad Garhammer, Managing Director
congatec group GmbH