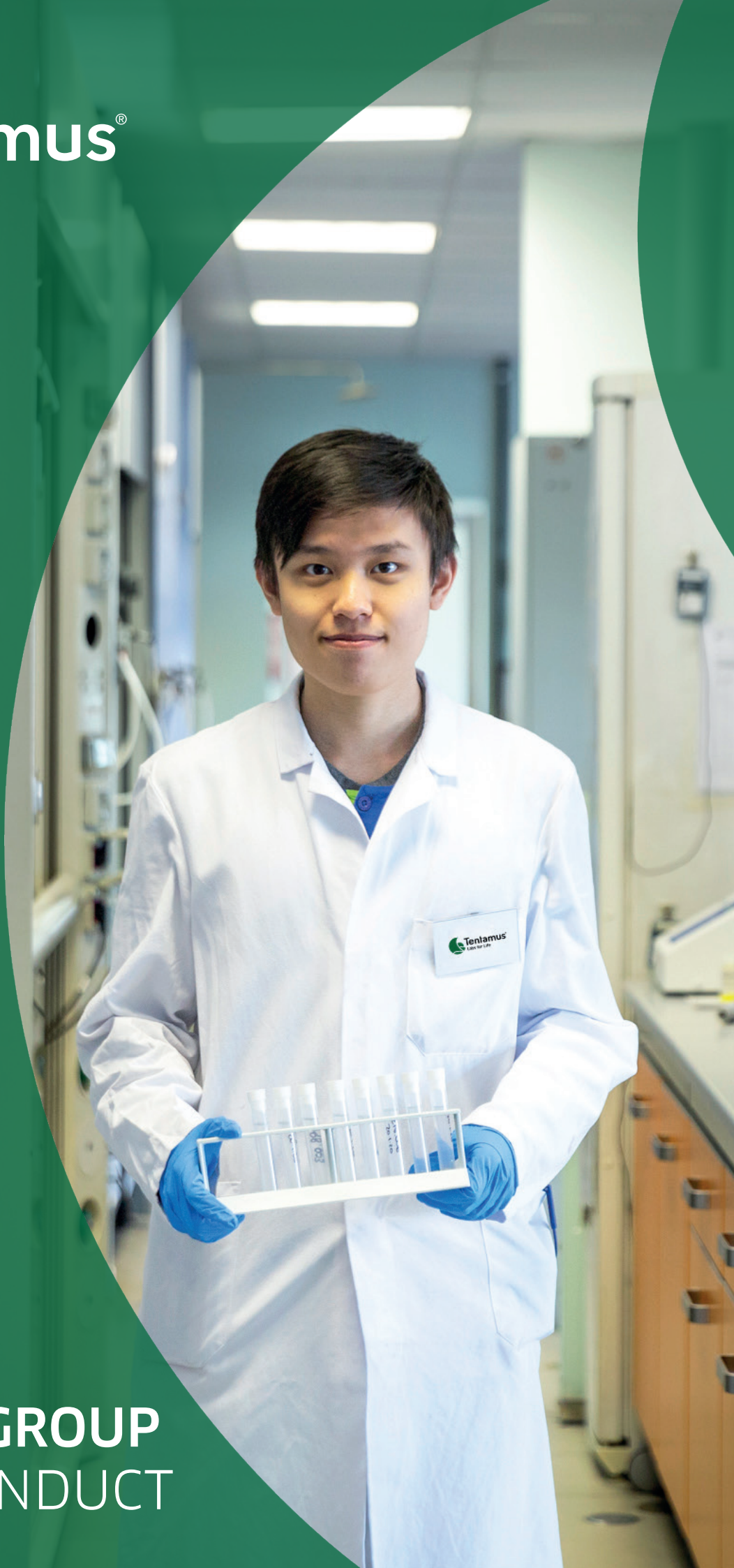




TENTAMUS GROUP CODE OF CONDUCT



Code of Conduct

- T**rust to our clients
- E**xcellence in our services
- N**etworking within the group
- T**ransparency in what we are doing
- A**ccuracy in our services
- M**ethodological in our analyses
- U**nity for all laboratories
- S**atisfaction for our clients



Foreword



Dear colleagues

A warm welcome at the Tentamus Group.

This Code of Conduct represents our values, beliefs and ethical foundations regarding personal responsibility, openness and transparency, as well as ensuring lawful and ethical behaviour at all times.

The Code of Conduct places a demand on all of us, as it is both the promise to the outside world for responsible behaviour vis-à-vis customers and the public, but also defines how we should treat each other within the company. We are jointly responsible for confirming our company's reputation anew every day.

This is why we would like you, appreciated colleagues, to read this Code of Conduct carefully and to use it jointly with us as a policy for our everyday actions.

Dr. Christian Rebhan
CEO



Tentamus Group
(hereinafter "company")

1. Policy Overview & Objective

Our Employees' Code of Conduct illustrates the company's expectations regarding both its employees' behaviour vis-à-vis colleagues, superiors and the entire company and other stakeholders like customers, suppliers, public authorities, co-partners and the public. Although we encourage freedom of expression and a culture of open communication, all employees are obliged to comply with the code of appropriate conduct established by the company. This code is required to avoid annoyances, disputes and disruptions in the work environment. It is also necessary to convey a genuine image of a well-organised, respectful and collaborative working atmosphere.

2. Scope of Application

This policy applies to all future and current employees of the company, regardless of employment contract or rank. All employees are obliged to know the Employees' Code of Conduct and to comply with the regulations laid down therein.

3. Legal Compliance

All employees are obliged to ensure the company's lawful action by complying with all legal stipulations. Such stipulations also include all policies of local and international law in terms of environment, safety and fair business practices. Moreover, employees must ensure that third-party intellectual property rights are not infringed. In addition, all employees are obliged to refrain from unlawful or objectionable behaviour vis-à-vis the company regarding its finances, products, partnerships or its public image.

4. Integrity

The company expects all its employees, suppliers, dealers and intermediate dealers to carry out any activity for and in the name of the company in line with the laws of all countries and all internal policies. Offences committed within the framework of the activity for the company are not acceptable and result in the employee's employment relationship or the contract of suppliers, dealers and intermediate dealers with the company being terminated and/or legal action being taken against the tortfeasor. Offences committed by employees during and outside their employment relationship are taken very seriously and may entail consequences like disciplinary sanctions and even dismissal in case of serious circumstances.

Our customers appreciate our integrity and expect us to ensure maximum independence. Data, test results and other essential facts must be reported to the best of our knowledge, must not be altered improperly and should correctly illustrate the actual findings, expert assessments and results obtained.

The distortion or manipulation of estimations, testing operations, quality assurance surveys and reports is not tolerated and results in disciplinary sanctions including dismissal. Any unlawful attempt by external or internal parties to influence test results must be communicated to the responsible manager.

Whistleblowing System

A whistleblowing case arises when there are serious violations or risks affecting the company, employees, or the public. EthicsPoint is the secure platform for our staff to raise genuine concerns in situations where they feel uncomfortable about speaking directly with their line manager. This platform can be used by all Tentamus Group employees worldwide. All concerns raised will be treated fairly and appropriately. Harassment or victimization of anyone raising a genuine concern will not be tolerated. Individuals making disclosures will remain anonymous unless they agree otherwise. No employee will suffer retaliation for raising a concern, even if the concern proves to be mistaken. However, this protection does not extend to individuals who knowingly raises malicious or false claims.



5. Respect in the workplace

All employees must behave respectfully vis-à-vis their colleagues within the framework of the anti-discrimination law and imperatively refrain from any kind of discriminatory behaviour, harassment or unfair treatment. This equally applies to all situations at the workplace, from recruitment and evaluation processes through to interpersonal relationships between the employees. Such behaviour is not tolerated by the company and may be penalised by disciplinary sanctions, if necessary.

6. Company Property

Protection of Company Property

All employees are expected to treat the company's tangible and intangible property with respect and care. The company's property must not be handled improperly or carelessly. All kinds of intangible property, including legally protected products like trademarks or copyrights and other products, to which the company retains title (information, reports, etc.), must be respected and may only be used within the framework of the competences of the specific position. Company facilities and other tangible property must not be damaged or destroyed by employees. Such actions entail disciplinary sanctions and/or legal action.

Use of Company Cars

When making journeys with company cars for work purposes, road traffic regulations must be observed while taking care to ensure road safety and safe driving behaviour. Unless explicitly agreed otherwise, company cars may only be used for work purposes. Any withdrawal of the driving licence must be immediately communicated to the responsible manager. Company cars may be used only with permission.

Use of IT Systems

Operational IT systems, Internet access, e-mail and company phone may only be used for business purposes. Using company mobile phones for private purposes is permitted only during business trips. Any use of private mobile phones in the lab area is strictly prohibited, unless as previously authorised (i.e. for Multi-Factor Authentication).

It is strictly prohibited to use devices (like USB sticks, CDs, etc.) or software not expressly approved by the company. Data must be protected and must not be copied to external devices or exported in any other manner without the company's explicit permission. All data must be retained safely, i.e. with sufficient backups, and accessible for authorised colleagues to ensure data availability in case of illness-related or other absences. In particular, employees leaving the company must make all relevant data accessible to the responsible manager and/or other employees.

All safety-relevant incidents regarding the IT systems must be immediately communicated to the responsible manager. Access to the company's IT systems may be granted only to authorised individuals. The company may monitor the use of IT systems without notifying the respective employees beforehand. Moreover, any separate policies stipulated by the company for using the IT must be complied with.

7. Confidentiality

Our employees are required to treat customer and company-related information as well as personal data of colleagues confidentially. Sensitive and confidential information includes, inter alia, any information that is not publicly available, used, controlled or owned by the company and relates to the company's technology, products, services, finances and business operations. Confidential information also includes, amongst others, not publicly available information about the company's employees, suppliers, manufacturers, vicarious agents, joint venture partners and copartners. Forwarding confidential data of the company outside the intended framework may damage the company's reputation. For this reason, we want to protect the confidentiality of company, employee and customer information. In particular, test results may only be communicated directly to the respective customers. In case of doubt, employees must not respond to requests by unknown individuals on the phone, but must ask for a written request instead. Employees will continue to be bound to these confidentiality obligation even after termination of the employment relationship with the company.



Data Protection

Furthermore, our employees are required to process personal data in such a way that the rights of the persons affected by the processing to confidentiality and integrity of their data are guaranteed. You may process personal data only to the extent necessary to perform the tasks assigned to you. Employees must not process personal data in an unauthorized or unlawful manner or breach the security of the processing in a manner that could result in its destruction, loss, alteration, unauthorized disclosure or access. Our employees are required to report any data breaches that occur in the handling of personal data to the Data Protection Officer and their supervisor without delay. Violations of data protection regulations may be punished by a fine, a monetary penalty or imprisonment. If the data subject suffers material or immaterial damage as a result of the unauthorized processing of his or her personal data, a claim for damages may arise. A breach of confidentiality and data protection regulations constitutes a breach of employment contract obligations, which may be punished accordingly.

8. Public and External Communication

Employees are not permitted to speak or to forward company-related information to the media, the capital markets or the public in the company's name without express permission. Our employees are required to neither discuss nor disclose sensitive or confidential information regarding the company's finances or business operations outside their work.

Lectures at congresses, releases in specialist journals and other publications must be clearly based on scientific facts. Personal evaluations must not be made in this context. Publications and comments on product and process quality assessment issues in all other media (besides congresses and specialist journals), such as TV, are permissible only with the prior consent of and in close coordination with or at the behest of the executive management. Otherwise, such actions are to be omitted. Publications and presentations at customers or potential new customers are only of a scientific nature and must be substantiated by reference sources, additional citations or referenced specialist articles to demonstrate that the lecture content is also supported by other scientific circles.

9. Professionalism

All employees must observe certain rules to demonstrate integrity and a high level of professionalism while performing their tasks at the workplace. The expectations placed by the company on its employees are illustrated below:

Personal Appearance

Dress style and personal appearance must be appropriate to the respective job and conform to the customary standards.

Drug / Alcohol Consumption

Employees under the influence of drugs or alcohol jeopardise themselves and others. They put both the life and health of their colleagues and their own life and health at risk in the business. Apart from that, employees under the influence of drugs or alcohol might cause incalculable damage to devices, installations and facilities. On account of the employment contract and according to the accident prevention regulations of the employers' liability insurance association, employees must not put themselves in a state in which they are no longer able to perform their work properly or might jeopardise themselves or others through the consumption of drugs and/or alcohol.

Anti-Bribery and Corruption

All employees must not give, offer or accept bribes, whether in cash or otherwise, to or from any third party, including but not restricted to government officials, clients and brokers or their representatives. In addition, there is a general prohibition on the use of advisors, and facilitation payments are also prohibited in all circumstances. All employees must not offer any items of personal inducement to secure business. This is not intended to prohibit appropriate entertainment or the making of occasional gifts of minor value unless the client has a policy which restricts this. Gifts and entertainment are permitted as long as they are not excessive either in value or volume and are not associated with a business decision. Gifts and entertainment require documented pre-approval from Country Managers for items over a certain de-minimis level set appropriately for the local market, but in any event not more than EUR200 per person.



Duties and Powers

All employees must give their attention to and perform their duties with integrity and respect towards their colleagues, the customers, the stakeholders and the community. Superiors and managers are prohibited from misusing their powers. They are expected to delegate tasks to their subordinates in line with the latter's competences and workload. Mentoring and motivation should be actively encouraged. All employees are expected to follow their superiors' instructions and to execute all tasks proficiently and timely as instructed. The company implies for all employees and suppliers, dealers and intermediate dealers to have the qualification required to carry out their work for the company.

Absence & Lateness

An essential element of each employee's professionalism is compliance with fixed schedules. This is particularly the case as regards the general attitude toward punctuality and the time required to execute the tasks.

Conflicts of Interests

All employees are expected to avoid personal, financial or other interests that may compromise their ability or willingness to execute their duties or that may harm the company. Any voluntarily or involuntarily materialised situation likely to be comprehended as a conflict of interests must be communicated to the relevant manager.

Cooperation

All employees are expected to maintain a friendly and harmonic working atmosphere and to endeavour to neither disturb the work environment nor prevent their colleagues from working. It is important to respect the work and achievements of others. All employees are encouraged to cooperate, wherever possible.

Communication

All employees must be open-minded to the communication with their colleagues, superiors and subordinates. It is important that every employee can address others at the workplace to organise his/her working conditions as productively and smoothly as possible.

Benefits

Benefits offered by the company must not be misused. This applies, e.g., to time off granted to an employee for a specific reason (e.g. sick leave) and to insurances, facilities, contributions or other privileges offered by the company, if any.

Policies

The employees are obliged to inform themselves of as well as to observe and apply all policies established by the company for and applicable to processes, benefits and relations at the workplace.

10. Environment & Sustainability

Climate

As a global provider of laboratory and quality services, we are also aware of our social responsibility. It is important to us to set our own standards and values as high as those of our customers.

We are working to minimize our environmental footprint and create a sustainable and responsible future. Therefore, we adhere to the following principles:

1. Reducing energy consumption (e.g. turning off computers and monitors)
2. Use of renewable energy whenever possible
3. Compensation of residual emissions (e.g., power-saving equipment, fuel-efficient company vehicles).

Environment / Sustainability

We protect our environment, use all natural resources sparingly and avoid or reduce burdens on people and nature (e.g. save paper – paper-free digitization is our future).

We take into account the requirements of an intact environment when working in the laboratory, when disposing of and shipping samples, and when improving procedures and introducing new equipment and facilities. When disposing of waste, the most environmentally friendly disposal route is to be chosen that is justifiable from an economic point of view.



11. Disciplinary Sanctions

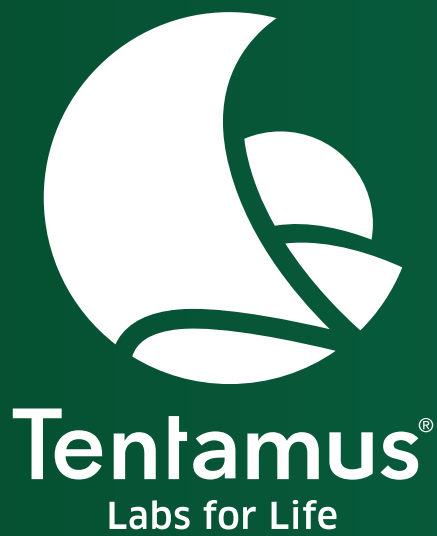
Non-compliance with the Code of Conduct may result in relevant disciplinary sanctions. The party responsibly for such non-compliance must bear the relevant consequences, which may differ depending on the seriousness of the violation. Possible implications include warnings, definite or indefinite withdrawal of benefits, downgrading, suspension or even dismissal in case of more serious offences. Moreover, in case of bribery, theft, embezzlement or other illegal conduct, further legal measures may be taken.

By signing this document, I confirm that I have read and understood the Code of Conduct above, have been informed sufficiently and undertake to comply with the provisions laid down therein.

Full name (in block letters)

Place, Date

Signature



Scan this QR code &
learn more about the Tentamus Group!

