

## **CODE OF CONDUCT (COC) FOR SIM GMBH**

### **Preamble**

SIM GmbH is characterized by competence, motivation, and responsible action by all employees. The values, principles, and procedures to which management and all employees are bound are set out in this Code of Conduct.

The aim of the management is to comply with ethical standards and to create a working environment that promotes integrity, respect and fair conduct. In doing so, the lawful and principled business policy serves a long-term, positive corporate development.

In addition to management, each employee and sales partner is responsible for compliance with the principles of this Code of Conduct.

### **Legal Conformity**

Fair competition is important to SIM GmbH. This includes compliance with applicable laws and other relevant provisions on antitrust prohibitions, competition, and restraints of competition in Germany and abroad. It applies to all business activities both internally and in relation to our customers and suppliers. Unfair advantages over customers, suppliers, or competitors must be avoided.

### **Conduct/Commitments of Management**

SIM GmbH strives to act economically, socially, and environmentally conscious. The corporate culture is characterized by ethical principles and the protection of fair competition in all markets it operates in.

The relationships with our employees and business partners (sales partners, customers, suppliers) should be characterized by mutual reliability and sustainability. As a socially responsible employer, SIM GmbH considers its employees and sales partners to be of great value. It demands great commitment and in return shares the business success with them. Every employee is offered the opportunity for professional and personal development. Open exchange of opinions, criticism and ideas are encouraged. Unlawful discrimination or harassment of any kind is condemned.

All business documents and account books of SIM GmbH must accurately present business transactions and comply with the legal requirements as well as the accounting principles and the internal accounting procedures of SIM GmbH. Therefore, it is necessary that all relevant facts are correctly and completely recorded and reproducibly documented and archived.

## **Prohibition of Corruption**

SIM GmbH wants to be successful in competition through price, performance, and quality of its products and services and thus strictly opposes corruption and bribery. The employees and sales partners of SIM GmbH may not demand, accept, offer, or grant any personal advantages (e.g. donations, vouchers, invitations, gifts in kind) from business partners during the initiation, awarding or processing of an order.

The granting or acceptance of invitations and gifts that fall under the term „social benefits“ (because they are not made with the purpose of unlawful preference in connection with, for example, contract awards) may also appear to have an improper influence. General restraint is required here.

## **Behaviour/Obligations of Employees and Sales Partners**

SIM GmbH expects complete loyalty to the company from its employees and sales partners at all times. They have the duty to promote the legitimate interests of SIM GmbH as best as possible and to avoid any competitive situation with the company. This means, to avoid situations in which their personal or financial interests conflict with those of SIM GmbH, for example when entering into business relationships with competitors, suppliers, or customers (in the private sphere). In addition, employees and sales partners may not obtain direct and/or indirect benefits by accessing confidential information due to their position.

Every employee and sales partner is obligated to treat operating equipment, in particular machines and tools, as well as information and communication systems carefully and purposively. The equipment also needs to be protected against loss, damage, theft, embezzlement, or destruction.

Furthermore, every employee and sales partner should ensure a fast and smooth exchange of information within the company. This includes passing on information correctly and completely to areas concerned except, for example, priority interests exist due to confidentiality obligations. Relevant knowledge must not be unlawfully withheld, falsified, or selectively passed on.

## **Protection of Trade Secrets**

The expertise of SIM GmbH is of particular importance for the long-term success of our company. The loss of trade secrets can have a negative impact on the future success of the company and thus on employees and sales partners. Therefore, our intellectual property must be protected from third parties' notice and against unauthorized access by third parties. In addition to knowledge of inventions and prototypes as well as other confidential information, trade secrets such as business and marketing plans, drafts, business papers, salary data, details of customers, suppliers, and software also fall under intellectual property. This does not apply if a publication of the information has been approved by SIM GmbH or is mandatory due to laws or regulations.

All confidential information concerning the company, including information made available to us by third parties in confidence, must be kept secret and may not be passed on to unauthorized persons (including family and friends) or communicated in social media. The security standards specified by IT must be observed both in personal and electronic communication with third parties.

Employees may not participate in public discussions (e.g. lectures, internet forum etc.) or place company-relevant information in public (e.g. the Internet) without permission in their capacity as SIM employees.

### **Data Protection**

SIM GmbH uses all personal information about employees, customers, business partners as well as third parties carefully and confidentially in full compliance with data protection laws. All data is continuously backed up based on the latest security standards.