

# NOACK LABORATORIEN

**Noack Laboratorien GmbH**

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## Ethics Code of Conduct

Noack Laboratorien GmbH is a company which emphasizes its good reputation as a reliable and responsible partner for our stakeholders. We are committed to standards that are compliant with legal and ethical regulations.

This Code of Conduct for Fair Business Practices underlines the commitments we dedicate ourselves to. It is valid for all employees of Noack Laboratorien GmbH. Therefore, we encourage our employees and business partners to report incidents that are not in compliance with the code or the GLP principles and guarantee confidentiality and anonymity. However, this does not necessarily apply to persons who have committed the code violation.

### 1. Legal Compliance

All tasks have to be conducted in compliance with all legal regulations and internal policies and procedures.

### 2. Conflict of Interests

All actions by employees shall be in the best interests of Noack Laboratorien GmbH. Situations, in which personal conflicts of interest or those of related parties like family or business partners apply, shall be avoided. These conflicts of interest can potentially be due to secondary employment, financial interests in competitors, business partners or other companies connected to Noack Laboratorien GmbH or business transactions and decisions involving relatives and other related parties.

If employees wish to pursue an external activity which could conflict with the interests of Noack Laboratorien GmbH, they must obtain written management approval.

Existing conflicts of interest shall be discussed with Noack Laboratorien GmbH and solved as soon as possible.

### **3. Corruption and Bribery**

Active or passive bribery are not tolerated by Noack Laboratorien GmbH. Employees must not offer or accept any illegal payment or financial advantage to influence business or other services or decisions. This applies to company and personal property as well as for indirect contributions by consultants, advisors, suppliers or other third parties. During business trips, acceptance of gifts exceeding a monetary value of 150 EUR in connection with their position is prohibited for employees of Noack Laboratorien GmbH. This includes business-related entertainment or catering, which is allowed where it is customary and in reasonable dimensions.

### **4. Insider Trading**

It is prohibited to employees of Noack Laboratorien GmbH to trade or pass on insider information of the company which could possibly be relevant for investors or business partners. This includes confidential data, business decisions or strategies, finances or relevant agreements. Third parties like family, advisers, press and customers are not to be filled in about this information either.

### **5. Money Laundering**

Employees of Noack Laboratorien GmbH are prohibited to involve in or tolerate actions of money laundering. This includes actions which introduce money or other valuables into the economic cycle, which directly or indirectly originate from criminal operations.

### **6. Fair competition**

Noack Laboratorien GmbH complies with full extent to all relevant competition, fair trade and antitrust laws and expects its employees to do so, too.

In particular, horizontal agreements between competitors to influence competition must not be done. Additionally, no critical information must be shared that can be used as a hint towards future business strategies. Vertical agreements with clients or suppliers in order to influence competition are interdicted likewise.

### **7. Confidentiality**

Employees of Noack Laboratorien GmbH are committed to maintain strict confidentiality during and after their employment. The employee has to protect the interests of the company and to maintain discretion about all company issues with regard to other parties. This includes internal data, strategies, client data and other relevant information. These must not be given to any third party, including family and other persons, unless for business purposes.

Produced and received data are protected by state-of-the-art security technology. Additionally, strict actions are taken to prevent unauthorized access to data and equipment.

## **8. Patent / license agreement**

All works, inventions or developments resulting from a contract agreement are so called „works for hire“, and are therefore entitled to copyright protection and belong only to the client. The employee involved in said work assigns all their rights to the client.

Through this agreement no further ownership, licensing law, exploitation right and other rights can be derived.

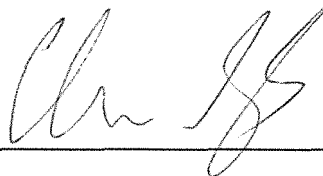
## **9. Fair treatment of employees**

It is the policy of Noack Laboratorien GmbH to choose and treat employees only based on their qualifications and abilities with regard to their professional tasks. Discrimination or preference based on other features like ethnicity, sex, age, religion or other non-relevant properties are not tolerated. Noack Laboratorien GmbH provides a working environment protecting the health and safety of all employees, based on mutual respect and free of harassment. Violations of human rights like child labour and other offenses are not tolerated and Noack Laboratorien GmbH will not knowingly do business with suppliers who do not comply with the same standards.

## **10. Implementation**

The Code of Conduct is acknowledged and implemented by the management of Noack Laboratorien GmbH. Every employee of Noack Laboratorien GmbH must take notice of the Code of Conduct and confirm this. The Code of Conduct will be part of the employee training.

Sarstedt, November 2019



Dr. Christian Maeß, CEO