

All of us at Gottinger Instruments GmbH are aware of our responsibility for the company and its future. This is why we need to live and implement the culture and values we are committed to during our daily work. The Gottinger Instruments GmbH CODE OF CONDUCT helps us with this. It describes what we are and aren't allowed to do in the most important sectors. Those defined rules apply to all of us.

Legality, competition, partnership, fairness, attention

1. Legality

We respect the laws of the countries we work in as our minimum standard. When faced with irregularities, exceptional risks or criminal activities, we make sure to inform the corresponding public institutions. This information is treated as strictly confidential.

2. Competition

We are committed to a free and competitive but also socially bound market economy. We respect the laws and regulations of the cartel and competition law.

We refrain from formal and informal agreements with competitors which could be used to settle on certain prices or to divide markets (industry sectors, products, areas, customers).

We do not give out any information about prices, margins, costs, offers, distribution channels, conditions or singular customers.

We do not agree on resale prices with customers, nor do we demand them.

We do not participate in any boycotts against customers or suppliers.

3. Partnership

When interacting with customers, suppliers, distribution partners and authorities, we behave full of integrity.

When interacting with customers' employees, authorities or other business partners, we don't offer any befitting financial or other benefits.

We also do not promise such benefits.

We oppose gaining unjustified commercial advantages through financial donations or other contributions.

We decline any presents or other contributions from our business partners if they go beyond normal measures of hospitality or minor occasional gifts.

Commission payments to representatives or consultants must be in comprehensible proportion to the provided services and have to withstand a third comparison.

Agreements with consultants, agents, representatives or other service providers shall not be used to make unjustified payments to third parties.

4. Fairness

Our business is run in a fair way.

Customers who stick together in competition are neither privileged nor disadvantaged in an unfair way. When dealing with suppliers or project partners, we behave appropriately.

Choosing a supplier should be dependent exclusively on interests of Gottinger Instruments GmbH and our customers.

5. Attention

We behave properly in business transactions. We make sure to pay close attention in order to prevent abuse. Every business transaction (offers, order confirmations, bills, credits and debits, accounting entries etc.) is carried out appropriately and abides by the corresponding laws and applicable rules (e.g., accounting standards, credit limitations).

We adhere to every regulation regarding money laundering. We are committed to help determine money laundering activities (incomplete information about transactions or customers requesting cash payment might be suspicious factors) and to prevent them in the process.

We adhere to all regulations against terrorist financing. We do not accept payments nor do we make payments if we suspect a connection to terrorism or other crimes.

Integrity, sustainability, trust and respect, responsibility, solidarity

6. Integrity

We adhere to legal regulations regarding export control.

We adhere to bans of deliveries to certain countries or people, resulting of national law or UN embargo measures.

We do not call in intermediaries to bypass embargo measures. When in doubt, we contact our logistics experts or request an export license at the responsible institutions.

7. Sustainability

We support sustainable development and are aware of our responsibility towards customers, employees, shareholders, society and the environment.

We avow our social responsibility, the most important part of it being the protection of existing jobs and the creation of new ones. We disapprove of child labour and forced labour. We do not use products which have been produced by such means.

We support the protection of our environment and behave accordingly. We adhere to environmental regulations and their corresponding laws and even exceed those whenever it's economically responsible.

Even as a strict service company, we acknowledge legal norms and international standards concerning the environmental protection.

This essentially means:

- reducing ecological damage
- continuously improving environmental protection
- warranting regular schoolings regarding our management system.

Our top priorities:

- Avoidance before reduction
- the cleanest form of energy is the one we don't expend.

This principle is being carried out by all of our employees. The protection of the environment is a fundamental part of our corporate philosophy and is regarded a dynamic process, urging every employee to be aware of the ecological impact of their actions and to keep this impact as small as possible.

8. Trust and respect

We respect confidentiality of personal information regarding employees, customers, suppliers and other business partners.

Every employee is required to remain silent about all business matters known to them, especially company and business secrets. This obligation remains in function even after the employment relationship is ended.

9. Responsibility

We treat the company's property with care.

Its movable assets and immovable property, property rights and information are handled carefully to prevent losses, theft or damage.

Information is considered the company's property and requires special protection.

10. Solidarity

We prevent conflicts of interest whenever possible. We actively take care of resolving recognized conflicts of interest.

We consider situations conflicts of interest if personal interests – also those of family members, relatives or friends – possibly conflict with the company.

Examples of conflicts of interest:

- another form of employment alongside employment by Gottinger Instruments GmbH,
- order placement with companies which are of interest (property, relatives belonging to the management team)
- occupation at supervisory bodies of other companies
- substantial shareholding of companies considered suppliers or competitors of Gottinger Instruments GmbH

We do not wish for internal competition and we cooperate trustfully across borders.

We separate private and business communication. Employees are advised not to affect the company's interests when using social media.

When recognizing possible conflicts of interest which cannot be solved internally, we contact public institutions and facilities.

11. Teamwork and cooperation

Teamwork

We apply the four-eyes principle. Which means we make sure to have two or more employees involved in business processes or have results of said processes checked by a second employee.

Cooperation

We protect the health and safety of all people involved in orders or other forms of work for the company. Members of our company respect and help each other. We treat each other politely and we inform each other openly, responsibly and regularly.

We take responsibility for the safety and health of our employees by ensuring a safe work environment and ideal precaution measures against risks and accidents. Schoolings regarding occupational safety are being held regularly.

Gottinger Instruments GmbH consists of employees from many different countries. We value and respect them irrespective of their gender, religion, ethnicity, nationality, age or any possible disability. We cooperate with customers and other business partners without regarding their differences or similarities.

For a person to be employed or promoted, their skills are essential. Nobody is allowed to discriminate against anyone in our company. We decide on recruitment, promotion, pay, access to training, dismissal or retirement without regarding gender, religion, ethnicity, nationality, age or any possible disability.

We want our employees to feel comfortable at Gottinger Instruments GmbH. We do not tolerate any form of bullying or harassment during conversations, phone calls or in written communication.

Reinhard Gottinger