



Contents

1 Guiding principles of our company	
2 Working conditions and Human Rights	
2.a Human Rights	3
2.b Working conditions	3
2.c Safety at work and data security	2
3 Business ethics	
3.a Compliance with laws	
3.a Compliance with laws	
3.c Fair competition	
4 Environmental protection	
5 Supplier management	ı
o ouppilor management	
6 Responsible procurement of critical raw materials	



Code of Conduct – compliance with our principles of sustainability (January 2020)

mk-messtechnik GmbH was founded in Kirchheim / Teck, Germany, in 1999. As a first generation family business we stand for development and production of high-quality and innovative electronic test and measuring systems with a high immunity against electromagnetic fields. We are committed to an environment friendly production, for social and economical accountability and to the preservation of the industrial and economic location Germany. It is our declared aim, to combine a sustained economic value with values of moral and ethics.

The basic requirements of mk-messtechnik GmbH to both ourselves and our suppliers are defined in this Code of Conduct. The principles regulated in this code of conduct shall be deemed as a self-commitment of a strict fulfilment of its fundamental requirements. Furthermore mk-messtechnik GmbH is determined to exceed these requirements as often as possible.

1 Guiding principles of our company

We achieve results with high expertise and high motivation. At the same time we assume responsibility for humankind and nature and raise the hence necessary sense of awareness among our employees.

Every management decision and every daily to-do at mk-messtechnik GmbH is evaluated according to our guiding principles and adapted to the requirements of economical, social and ecological sustainability and compliance.

Our CEO and general management is prepared to to be liable for the adherence of our ethical, ecological and economical values and doing so enforces compliance with our obligations throughout the entire company.

2 Working conditions and Human Rights

2.a Human Rights

A consistent respect for Human Rights is important to us. We strictly condemn any violation of human rights as well as child and forced labor.

2.b Working conditions

We treat all of our employees with honesty, respect and fairness. We pay attention to the necessity of promoting equal opportunities for all in all aspects of employment, including recruitment, selection, hiring, training and promotion.

We offer our employees both a fair and appropriate salary and additional voluntary benefits as

- beverages for free
- · lunch for free
- company bicycle leasing

We will punish any discrimination in whatever form on grounds of gender, race, background, religion, sexual orientation or other reasons. This is the case both for internal cooperation as well as for business transactions with external partners.

mk-messtechnik GmbH Page 3 / 5



2.c Safety at work and data security

The safety and health of our employees is among our highest priorities. In all our activities and decisions we strictly respect the legal requirements of industrial safety.

3 Business ethics

We maintain the highest level of integrity both in our internal cooperation and in our dealings with external business partners. We value reliability, fairness and professionalism in all business relationships.

We always comply to our requirements of legal, ethically and unimpeachable conduct. This involves the consideration of legal and cultural framework conditions.

We show social commitment outside the company through monetary donations and sponsoring.

3.a Compliance with laws

mk-messtechnik GmbH recognizes local, national and international laws. This concerns in particular

- applicable labor and social law
- applicable regulations of industrial safety and health protection
- · applicable environmental requirements
- provisions for importing and exporting goods, services and information
- legal regulations prohibiting the use or transmission of inside information
- compliance to tax and customs requirements
- legal requirements of orderly bookkeeping and financial statement

3.b Conflicts of interest

mk-messtechnik GmbH takes the needs of both customers and business partners in account. All employees make sure, that their private interests do not conflict with those of the company. We take our decisions on the basis of factual reasons and do not let ourselves be influenced by private interests or relationships.

We pursue a "zero-tolerance" policy towards fraud and corruption.

Both management and employees are asked not to personally accept and collect any gifts or invitations, nor any other direct or indirect preferential treatment from our suppliers and business partners. Any gifts will be collected and raffled off to the employees.

In addition we do not arrange gifts, payment or other benefit that is more than the usual advertising gadgets.

3.c Fair competition

Our prices are always competitive for what we provide, which is high quality, tailored, and specialized products. As such we do not generally offer arbitrary discounts. That said, we always try to propose solutions which accommodate our clients' available budgets and timescales. Wherever possible we state our prices and basis of charges clearly in advance, so that we and our clients can plan reliably for what lies ahead, and how it is to be achieved and financially justified.

mk-messtechnik GmbH Page 4 / 5



We expressly reject anti competitive agreements. In the event that we have a dominant market position, we will not unduly use our position in this.

4 Environmental protection

We align our procedures and processes according to environmental compatibility and a careful use of resources. We make sure our activities have minimum negative effect to our environment and to nature and comply with the applicable environmental requirements:

- most of the companys' energy supply is based on renewable energy sources (=solar power)
- we pay special attention to the responsible use of raw materials and energy (e.g. lighting and heating)
- electrical consumers within the company are either technically set to low consumption or are strictly utilized in accordance to low consumption.
- our purchasing behavior combines economic principles with maximum possible level of bundling and short delivery distances
- we always focus on an efficient and frugal handling of consumable supplies

5 Supplier management

Our cooperation and relationship with our suppliers is adapted according to our guiding principles and to the requirements of economical, social and ecological sustainability and compliance.

We carefully check the identity of our customers and business partners. We make sure to maintain business only with business partners, whose business is aligned to applicable law and regulations. It is of great importance to us that the production equipment of our business partners funds from legitimate sources.

Our management of payments is based on transparency, candor and mutual respect. Incoming payments are immediately assigned to the related supply or service and are booked promptly.

6 Responsible procurement of critical raw materials

We do not use relevant raw materials as tin, tantalum, tungsten, gold, cobalt or glint in a direct processing. We handle these materials through the procurement of circuit boards, components and tantalum capacitors. We buy these articles solely from suppliers which are aware of their social responsibility regarding the purchase of conflict minerals and which make sure these minerals will solely be bought from a conflict-free area.

CEO Dr. Martin Kull

mk-messtechnik GmbH Page 5 / 5