

Code of Conduct Vistec GmbH

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Foreword

At Vistec GmbH, we are firmly committed to core values such as appreciation, honesty, and trust, as well as responsibility for our actions and credibility. We believe that respecting and protecting human rights should be the foundation of all sustainable business practices.

This Code of Conduct sets out our binding requirements and expectations for ourselves and our business partners to respect and uphold these values, particularly with regard to social responsibility, ethical corporate governance, and occupational safety. In doing so, we are guided by the following human rights standards and guidelines:

- Universal Declaration of Human Rights of the United Nations (UN)
- UN Guiding Principles on Business and Human Rights (UNGPR)
- Labour and Social Standards of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- Principles of the UN Global Compact

Our internal policies and regulations take into account the content of these international principles and standards. The Vistec GmbH Code of Conduct forms the basis of our actions and is a binding framework for our employees. At Vistec GmbH, we support our employees in acting responsibly and with integrity.

In our supply chain, we require our suppliers and business partners to comply with human rights standards through our Compliance Code for Suppliers and Business Partners. This Compliance Code defines minimum requirements for social and environmental standards for our suppliers and business partners and serves as the foundation for collaboration with Vistec GmbH.

Compliance with this Code of Conduct significantly influences the selection and structuring of all business relationships between Vistec GmbH and our business partners. In the event of violations of human rights or environmental obligations by a contractual partner, Vistec GmbH is entitled to suspend or terminate the contractual relationship, provided the legal requirements are met (cf. Sections 6 (4), 7 of the German Supply Chain Due Diligence Act – “LkSG”).

Human rights due diligence is also an integral part of our compliance and risk management system, through which we actively address opportunities and risks. Internal policies complement and complete this holistic approach and define responsibilities. The effectiveness of our policies and processes is monitored through internal training and audits.

In cases of suspected violations or complaints regarding potential breaches of human rights standards, these can be reported to our email address: Hinweisgeberschutz@vistec-ag.de. This ensures that anyone – regardless of their contractual or business relationship with Vistec GmbH – can raise their concerns. All reports are treated confidentially and followed up. Whistleblowers may remain anonymous.

The Vistec GmbH Code of Conduct is reviewed regularly and updated as necessary. Any changes will be communicated to business partners in a timely manner and submitted for approval.

Olching, February 24, 2026

Nicolas Dehelly
Managing Director

For ease of reading, only the masculine form is used in this Code of Conduct. This is intended to refer to individuals of all genders equally

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Responsibility as a Member of Society

Vistec GmbH acts responsibly, particularly with regard to the well-being of people and the environment. As a company, we contribute to sustainable development.

Human Rights

The Universal Declaration of Human Rights of the United Nations and the European Convention on Human Rights and Fundamental Freedoms clearly define the international community's expectations regarding the respect and observance of human rights.

Vistec GmbH and its business partners respect, protect, and promote applicable regulations for the protection of human and children's rights worldwide. These are fundamental and universally valid principles for us. We categorically reject any use of child labour, forced or compulsory labour, as well as any form of modern slavery or human trafficking. This applies not only to cooperation within Vistec GmbH but is also expected in the behaviour of and toward business partners.

Equal Opportunity and Non-Discrimination

Vistec GmbH is committed to fair, unbiased, and open interaction. We actively promote equal opportunity and non-discrimination. Vistec GmbH fosters a respectful and cooperative working environment — and expects the same from its business partners. Diversity and tolerance are not just buzzwords for us, but lived values. Vistec GmbH believes that together we can maintain and enhance productivity, competitiveness, innovation, creativity, and efficiency.

Vistec GmbH and its business partners provide equal opportunities for all — without exception. We do not discriminate and do not tolerate discrimination based on ethnic or national origin, gender, religion, belief, age, disability, sexual orientation, skin colour, pregnancy, political opinion, social background, or any other characteristic.

At Vistec GmbH, we embrace diversity, actively promote inclusion, and create an environment that supports the individuality of each person in the interest of the company.

Freedom of Association

Vistec GmbH respects employees' rights to freedom of association and assembly, as well as the right to collective bargaining, provided this is permitted in the respective country of employment.

Joining, forming, or simply being a member of such associations must not lead to discrimination or punishment.

Fair Wages

Fair and adequate remuneration is essential for employees to secure their livelihood, cover basic living expenses, and build a minimum level of savings. Therefore, wages for regular working hours and overtime must at least meet national legal minimum wages or industry-standard minimums. Vistec GmbH and its business partners ensure that all employees receive at least the statutory minimum wage of the respective country and all legally mandated benefits.

Environmental Protection and Sustainability

Vistec GmbH takes its ecological responsibility seriously by applying applicable legal requirements and recognized standards for the protection of the environment and climate. Vistec GmbH is committed to continuously reducing the negative environmental and climate impacts of its business activities.

The company complies with current legislation and takes appropriate measures aligned with legal and internationally recognized standards, covering the following areas:

- Proper, professional and responsible handling of hazardous substances, chemicals, and waste, including their disposal
- Measures to reduce or avoid waste
- Minimizing emissions from operational processes (e.g., wastewater, exhaust air, noise, greenhouse gases)
- Conservation of natural resources, such as through initiatives to reduce water, chemicals, and other raw materials, and by promoting recycling management
- Use of climate- and environmentally friendly technologies, processes, raw materials, and products
- Measures to improve energy efficiency and increase the share of renewable energy in energy consumption at company sites

Responsibility as a Business Partner: Ethical Corporate Governance, Anti-Corruption, and Occupational Health and Safety

Integrity, transparency, and fairness are essential to being credible and trustworthy in our business dealings. For this reason, Vistec GmbH places great importance not only on complying with legal requirements and internal guidelines but also on consistently implementing and clearly communicating the values of ethical corporate governance.

As a business partner, we are aware of our responsibilities and act accordingly. This means in concrete terms:

Corruption, Trade Controls, and Money Laundering

Vistec GmbH rejects all forms of bribery and corruption. We avoid even the appearance of such behaviour — whether in the form of offering or accepting improper advantages. Vistec GmbH acts in accordance with applicable import and export control regulations and complies with legal requirements for the prevention of money laundering.

Gifts, Hospitality, and Invitations

Gifts, hospitality, and invitations are common in business relationships. Vistec GmbH has clear rules on when such gestures are appropriate—and when they exceed acceptable limits and may improperly and unlawfully influence the recipient. We expect the same standards from our business partners.

Conflicts of Interest

A potential conflict of interest arises when an employee’s private interests conflict with the interests of the company. This can particularly result from secondary employment. If an employee prioritizes personal interests over those of the company, it can cause harm to the company. Vistec GmbH addresses this through internal regulations and expects the same from its business partners.

Prohibition of Money Laundering and Terrorism Financing

Vistec GmbH is aware of its responsibilities and acts accordingly: In all countries where Vistec GmbH operates, laws against money laundering and terrorism financing are in place. Money laundering is the concealment of the origin of funds or other assets derived from criminal activity. Even unintentional involvement in money laundering can result in severe penalties for all parties involved. Terrorism financing occurs when funds or other resources are provided for terrorist acts or to support terrorist organizations. We expect our business partners to always comply with applicable legal provisions in their area of operation. In particular, they must implement and maintain measures to prevent money laundering and terrorism financing.

Vistec GmbH carefully verifies the identity of customers, business partners, and other third parties before entering into business relationships. Vistec GmbH and its business partners maintain business relationships only with reputable partners whose operations comply with legal requirements and whose resources are of legitimate origin.

Incoming payments are promptly allocated and recorded to ensure transparent and traceable financial flows.

Taxes and Customs Duties

Due to activities in other countries and the potential expansion into new markets, a wide range of legal regulations in foreign trade, tax, and customs law must be observed. Compliance with tax and customs regulations is a matter of course and helps build trust with customers, tax authorities, and the public. Irregularities in this area can result in significant financial damage and serious reputational harm for the companies involved. Responsible individuals may also face personal legal consequences. Vistec GmbH's business partners are aware that they must ensure ongoing compliance with all applicable tax, foreign trade, and customs regulations.

Fair and Free Competition

Applicable competition and antitrust laws protect fair and free competition. Compliance with these laws ensures that market distortions are avoided—for the benefit of all market participants. It is prohibited to enter into agreements or coordinated practices between competitors that prevent or restrict free competition. It is also prohibited to abuse a dominant market position. Such abuse may include, for example, unjustified discrimination against customers, refusal to supply, imposition of unreasonable purchase or sales prices and conditions, or tying arrangements without objective justification for the demanded services. Anti-competitive behaviour not only severely damages the reputation of the companies involved but also leads to substantial fines and penalties — including for the individuals responsible. Vistec GmbH expects its business partners to uphold fair and free competition.

Export Control

Cross-border trade is subject to export control regulations, including prohibitions, restrictions, licensing requirements, and other monitoring measures. These regulations apply not only to goods but also to technologies and software. Even temporary exports — such as taking items or technical drawings on business trips — or technical transfers via email or cloud services are covered.

Transactions with individuals or companies listed on sanctions lists are generally prohibited, regardless of whether a delivery is involved. Vistec GmbH and its business partners commit to complying with all applicable export control regulations and to observing any prohibitions that may apply.

Occupational Safety, Employee Rights, and Health Protection

Vistec GmbH takes its responsibility for the safety and health of its employees very seriously. We ensure occupational health and safety in accordance with the applicable national regulations. We create the best possible conditions for every employee to perform their daily work efficiently and effectively. Vistec GmbH pays particular attention to ensuring appropriate and legally compliant remuneration, adherence to working time regulations, avoidance of precarious employment, and the maintenance of a consistent and adequate level of occupational safety at all company sites. Child or forced labour is not tolerated. Young workers are granted special protection. Vistec GmbH also affirms the right to freedom of association and collective bargaining. Compliance with these principles is a fundamental requirement for cooperation with Vistec GmbH. We expect our business partners to uphold and ensure compliance with these principles as well.

Data Protection

To protect privacy, special legal regulations apply to the handling of personal data. If personal data is to be collected, stored, or processed, this generally requires the consent of the data subject — unless contractual agreements and/or other legal grounds exist that govern the handling of such data. Vistec GmbH always complies with current data protection regulations and raises awareness among its employees on this topic. The same behaviour is expected from our business partners.

IT Security

Information technology (IT) and electronic data processing (EDP) are essential parts of everyday work but also involve numerous risks. These include, in particular, the disruption of data processing by malicious software (viruses), data loss due to software errors, or data misuse (e.g., by hackers). Vistec GmbH and its business partners ensure that an appropriate level of protection is always maintained to safeguard data sets and protect data used in electronic processing from loss and unauthorized access by third parties.

Declaration of Commitment

We (as business partners of Vistec GmbH):

- comply with the principles set out in this Code of Conduct and commit to enforcing them within our own business operations and workforce,

and

- commit to communicating the human rights and environmental expectations defined in this Code of Conduct to our employees, agents, subcontractors, and upstream suppliers in a manner that is at least equivalent in scope and clarity. We will address these expectations appropriately throughout the supply chain and take all necessary measures to implement the requirements.

Company Name / Supplier # (if applicable)

Date / Place		Signature / Stamp	
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