

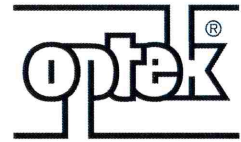


# Code of Conduct

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## Foreword

*Dear employees,*

*Dear business partners,*

*For more than 40 years, optek-Danulat GmbH (hereinafter: "optek"), a family-owned company that now employs more than 130 people, has been developing innovative products for our customers.*

*As a global group and a leading manufacturer of solutions for inline process monitoring, we are committed to responsible corporate governance. It is important to us that optek is seen and experienced by all as a company that takes responsibility for our customers, employees, society and the environment. In our fields of activity, we are therefore openly committed to implementing measures for a better tomorrow and want to be measured by concrete results.*

*This Code of Conduct summarizes the most important rules and principles of behavior in our company and thus forms our ethical and value-based foundation. It applies to all optek employees, regardless of their position or individual area of responsibility.*

*We are convinced that, together, we can use this guideline to help our company continue to grow and to protect optek's reputation as an attractive employer, reliable business partner and fair competitor.*

*Sincerely,*

  
**Jürgen Danulat**  
Geschäftsführer

  
**Sebastian Wiczorek**  
Geschäftsführer



## Introduction / about optek

Founded in 1984 as a start-up, optek focuses on the measurement of process fluids and their interaction with light in systems all over the world. As a family business with more than 150 qualified specialists, our team guarantees you the best product quality worldwide as well as expert advice and support.

Our confidence is based on the experience and knowledge gained from over 30,000 installations worldwide. Our high-quality materials can withstand the most adverse process conditions - including aggressive media, high temperatures and high-pressure applications.

As a globally positioned group of companies, our devices also "speak" your language and are easy to install and operate in all process environments (e.g., PROFIBUS® PA, FOUNDATION™ Fieldbus). Innovative design and cutting-edge technology enable a drift-free zero point and high reproducibility for global comparability of measured values. A robust, modular overall concept, calibration and inline validation ensure the lowest operating costs with the best long-term performance.

Our support guarantees long-term satisfaction through, for example, technical advice and support, spare parts available at short notice (SpeedParts) and a fast repair service (SwapRepair).

Conformity with international standards (e.g., ISO 9001, REACH, RoHS), industry-specific standards (e.g., PED, FM/ATEX approval) and company standards is easy to achieve with optek products. Wherever processes are monitored, the name "optek" stands for products and support of the highest quality.

## Code of Conduct of optek-Danulat GmbH (basic understanding)

This Code of Conduct defines the principles, requirements, and expectations of optek-Danulat GmbH towards and for employees, suppliers, and subcontractors regarding their responsibility towards society, the environment and persons involved in the manufacture of our products / goods and the provision of services. The Code of Conduct is based on a common basic understanding of socially responsible corporate governance.

The Code of Conduct provides a general framework for the conduct and actions of our employees and is based on ethical principles and standards. It helps and supports us to create a common understanding and thus a working environment based on integrity, respect, and fair conduct. The aim of the Code of Conduct is to prevent and avoid situations that could call into question the trustworthiness of our actions and the confidence in our services. With this Code of Conduct, we provide our employees with guidelines for the direction of their actions.

This Code of Conduct represents the minimum standard that we expect from our employees, our suppliers and their subcontractors. We expect our business partners to commit to the principles set out in this Code of Conduct and to communicate them in their own value chain. Alternatively, we expect that our key business partners have at least implemented their own code of conduct that reflects our requirements.



## Implementation and enforcement

### Communication

We make appropriate and reasonable efforts to continuously apply the principles and values described in this Code of Conduct. All employees are familiar with the content of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and, in serious cases, may result in consequences under labor law. We communicate the requirements of this Code of Conduct and its implementation to employees, customers, and suppliers in an open and dialog-oriented manner.

### Decision making

In principle, each situation must be assessed individually - a code of conduct cannot always prescribe the correct behavior for every case. Nevertheless, this Code of Conduct formulates rules and principles that must be adhered to and implemented sensibly by all optek employees and stakeholders. If an optek employee is not sure about the right behavior in a specific case or has general questions about this, he or she can find help in the following questions. Supervisors and colleagues can also be approached at any time to obtain help or clarification.

Questions for decision making:

- Is my decision in line with the company's laws and regulations?
- Will my decision stand up to scrutiny by third parties?
- Will my decision enhance optek's reputation, legal certainty and social responsibility?
- Can I make my decision impartially, in the best interests of the company and without self-interest?
- What would my superiors or colleagues say if they found out?
- Would it bother me if my decision was made transparent?

### Complaints and information

We are all entitled and encouraged to communicate any behavior that is contrary to the principles of the Code of Conduct at an early stage and to clarify it in discussion. Violations of the Code of Conduct can be reported confidentially by optek employees to their line manager or to the website listed below. optek undertakes to ensure that no employee is held negatively responsible if violations or alleged violations of the Code of Conduct are reported. Those who report suspected cases or violations will not suffer any form of disadvantage as a result and will be actively protected by us against such disadvantages. We provide our employees and business partners with access to a mechanism to confidentially report possible violations of the principles of this Code of Conduct. If you have any information, please report it to the relevant office at the following address: (<https://optek.whistleblower-system.de/>).

## Integrity and compliance

### Compliance with the law

optek's actions are in accordance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity.

### Corruption and bribery (gifts, business meals and events)

We do not tolerate corruption, bribery or corruptibility, the acceptance or granting of advantages or extortion; they prevent fair competitive conditions. All employees must ensure that no personal dependencies or obligations to business partners arise. In particular, employees may not give or accept gifts or other benefits that could reasonably be expected to influence actions or business decisions. A particularly strict standard must be applied when dealing with persons to whom special criminal and liability regulations apply (e.g., public officials).

### Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market or customer allocation, market or bid rigging. In this way, we support free and undistorted competition on the market and are committed to treating our competitors fairly.

### Money laundering prevention

We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

### Data protection and protection of information and intellectual property

We protect confidential information and respect intellectual property. We treat the confidential information of our employees and business partners accordingly. When it comes to technical protection against unauthorized access to data and information, we maintain an appropriate standard that corresponds to the state of the art to prevent misuse, theft, fraud, or unauthorized access. We pay strict attention to compliance with the regulations on the protection of personal data. Confidential information and documents about optek, our customers, our suppliers and employees are protected in an appropriate manner against access by third parties and colleagues who are not involved. Technology and know-how are transferred in such a way that intellectual property rights and customer information, business secrets and non-public information are protected. The contact details of optek's data protection officer and further information on the subject of data protection and data processing can be found on the optek homepage <https://www.optek.com>.

### Compliance with trade regulations

All export and import control regulations as well as all other applicable trade and customs regulations, in particular applicable law on sanctions programs and economic embargoes, are complied with.



### Avoidance of conflicts of interest

optek strives for sustainable business relationships with its customers and business partners for the benefit of both parties. Conflicts of interest can arise when private interests overlap with professional interests. If personal interests are placed above those of the company, this can harm the company and have a negative impact on our company and our business relationships. Every employee must therefore ensure that the interests of our customers and business partners are considered in a fair manner. The interests of customers or business partners must not be prioritized to the detriment of other customers. optek expects all employees to act in such a way as to avoid conflicts of interest.

### Health and safety

optek respects the relevant occupational health and safety laws as well as the self-imposed safety regulations and standards. We identify and assess potential health and safety risks for our employees. We learn from incidents to avoid similar problems in the future. The safety and well-being of our employees is important to us. We want to create an environment that fosters a sense of belonging to the team and where everyone feels valued. We are all responsible for always working safely and ensuring a safe and healthy working environment and processes. Employees are encouraged to actively work on their professional development, and we offer support when needed.

### Remuneration and working hours

Remuneration is based on the applicable laws and any existing, binding collective agreements. Employees are informed clearly, in detail and regularly about the composition of their remuneration. Employees are paid fairly and on time. We comply with the applicable laws and labor standards with regard to the maximum permissible working hours.

### Respect for human rights

We respect human rights. optek is committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights. We expect our suppliers to do the same. We want to ensure that our business activities do not contribute to human rights violations. At the same time, we strive to ensure that we procure all materials and services from responsible sources.

### Ban on child labor

Child labor and any form of exploitation of children are prohibited at optek and in our value chain. No persons may be employed who have not reached the minimum age required for work in the respective legal system. The special need for protection of young employees and trainees must be respected and observed.

### Ban on forced labor

optek respects the right to free choice of employment. We do not tolerate forced labor, involuntary prison labor or otherwise unlawfully bonded labor within our own organization or within the sphere of influence of our suppliers. Any coercive measures such as the withholding of passports, other identification documents or work permits are not permitted.



### Promotion of diversity and equal opportunities (prohibition of discrimination)

Our success is largely based on our employees and respectful interaction with and among each other. Our employees are our greatest asset. We promote equal opportunities based on qualifications and business needs. optek does not tolerate discrimination or harassment in the workplace, whether based on age, disability, race, ethnicity, gender, sexual orientation, religion, or belief. We promote diversity and strive to create an inclusive culture and work environment where all people feel safe and valued. We want to promote an inclusive culture and respect for others in our working environment. We welcome the talents of people with diverse skills and backgrounds.

## Sustainability

### Environment Energy and climate protection

Protecting the environment and the climate is an important concern for us. Our employees are required to treat all natural resources used in our company, e.g., energy, water, and land, with care. Our employees are expected to act responsibly in the manufacture and distribution of our products and/or services. We take our responsibility to protect the environment seriously by keeping the environmental impact of our production processes as low as possible. We maintain a fleet of vehicles that also includes electric vehicles that use photovoltaically generated energy on the company premises. New processes are designed with environmental protection in mind and new products are developed in such a way that natural resources are conserved and used efficiently. We always strive for the highest product safety and quality. The thermal insulation for our new buildings is state of the art, and retrofitting existing buildings is also a matter of course for us. The use of district heating enables us to heat our buildings efficiently while at the same time reducing our consumption of fossil fuels.

### Dealing with conflict minerals

To comply with the requirements of the US Dodd-Frank Act, some of optek's customers require us to disclose whether the minerals found in our products directly or indirectly finance or benefit armed groups. We take due diligence measures to avoid the use of conflict minerals in our products to prevent human rights abuses, corruption and the financing of armed conflicts or groups. optek expects its suppliers who are subject to reporting requirements to use their best efforts to trace the original sources of these minerals and provide evidence of their findings. As a downstream user, we expect reporting suppliers that use conflict minerals to provide optek with current reporting of conflict minerals (CMRT) in their products upon request. The supplier is responsible for ensuring that these source disclosure requirements are communicated to their own suppliers and that compliance with these requirements is monitored.