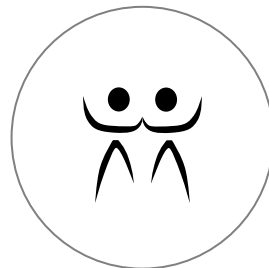


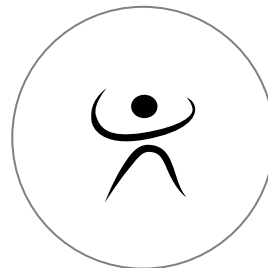


Code of Conduct

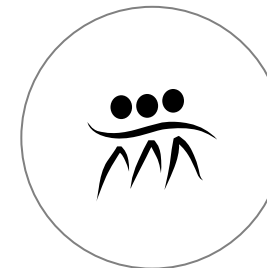
EOS GmbH Electro Optical Systems



Fair



Responsible



Together



Excellent

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Preface

Dear Colleagues,

Responsible behavior and excellent performance is the foundation of our company culture and our business mindset and activities: Our EOS values are the basis for this code of conduct that governs our behavior. The code of conduct summarizes the legal provisions and the guidelines applied in the company and makes them transparent for every Employee. Our Company values and culture go far beyond the minimum legal requirements.

We can only stay competitive and advance when we demonstrate a comprehensive and consistently enforced compliance management system that reduces our compliance risks. Consequently, each of us is responsible for acting in conformity with the law and complying with all the principles stated in the code of conduct - all of us are EOS! The EOS Corporate Management and all Managers have to act as role models for this. Neither economic nor personal advantages justify non-compliance with the rules stated in the code of conduct that would risk our joint success and our reputation. Violations of relevant regulations and laws also pose the danger of considerable legal and liability-related consequences and shall not be tolerated.



We trust you will contribute to our joint success and expect you to live up to this trust. This also means that we expect you to exhibit the fair, ethical, and legally compliant behavior the company requests from you.

Your Managing Directors,

| | | |
|-------------------------------------|--|---|
| Marie Langer CEO EOS GmbH | Dr. Florian Mes CPO EOS GmbH | Nikolai Zaepernick CSO EOS GmbH |
|-------------------------------------|--|---|

and

Dr. Hans Langer
Chairman of the Board of EOS Holding AG

Our EOS values

We have agreed on the following values for our dealings with each other at EOS as well as any dealings with our customers, suppliers, sponsors, and any other business partners. These values guide us in our actions and thoughts:

Fair



We face each other respectfully and openly and constructively discuss different opinions. We openly communicate with each other and with our partners and respect the dignity of each individual: We always distinguish between the facts and the relationship ("tough on the issue, soft on the person"). Everyone has the chance to achieve personal success. We value the services that are carried out and express this recognition.

Responsible



We act responsibly for our company. This includes making decisions wisely, taking all known circumstances and interests into consideration. We accept problems as tasks and combine them with solutions. We take responsibility for the outcome of our work. The objective of all our actions is to provide lasting benefits for ourselves and our business partners.

Together



Mutual trust is the basis of our collaboration. We agree on targets and make our decision-making process transparent and comprehensible. Each of us can contribute according to our abilities and skills. This also includes our business partners in an appropriate manner. We support the decisions we have made jointly and systematically work towards the agreed goals. We are proud of our success and acknowledge it.

Excellent



As an organization, we strive for excellent performance and expect this from each individual. We continually improve our products, processes and personal skills. Our sector is subject to constant changes. We welcome this and actively shape those changes. We are ready to take calculated risks to preserve our chances and to learn from mistakes.

Why do we have a code of conduct?

Establishing clear guidelines

→ We take our responsibility as an internationally operating company, business partner and employer seriously by providing clear guidelines for behavior with regard to business practices and socially acceptable behavior.

Integration of important compliance principles into the working day

→ We expect laws, regulations and internal guidelines to be complied with. These guidelines also serve to help integrate compliance principles into our daily lives in order to create sound knowledge regarding the code of conduct and make us more secure when we find ourselves in dubious situations.

Identification of fundamental values to govern the relationship with business partners, suppliers, customers and authorities

→ We also want our business partners, e.g. distributors, suppliers, clients and customers, to know the fundamental values that are at the core of our actions. We will strive to implement the compliance principles EOS applies into contracts.

Compliance with all legal provisions in the countries we are active in as an essential component of the EOS corporate policy

→ As an internationally active company, we commit to complying with relevant legal regulations in all the countries in which we conduct business activities and thus to contribute to global control and transparency in company activities.

Prevention of legal infringements that could permanently damage the public image of EOS and have financial consequences for EOS

→ Violation of the law may lead to personal liability in addition to high fines, official sanctions, exclusion from markets, claims for damages and loss of reputation. All this may cause great damage to the company and eventually endanger our jobs. Furthermore, infringements of the law may have criminal consequences, including fines or imprisonment, both for the Employees concerned and/or their respective Managers. Operations may be severely impacted even by the initiation of official investigations and proceedings. All these consequences can be avoided if a clear code of conduct is followed in the company. We shall immediately investigate any information we receive regarding possible legal issues, will inform the authorities as required and cooperate with them.

A close-up photograph of two people shaking hands. The person on the left is wearing a light blue and white striped shirt with yellow buttons. The person on the right is wearing a blue button-down shirt. The background is blurred, showing what appears to be a window with light coming through. The overall tone is professional and positive.

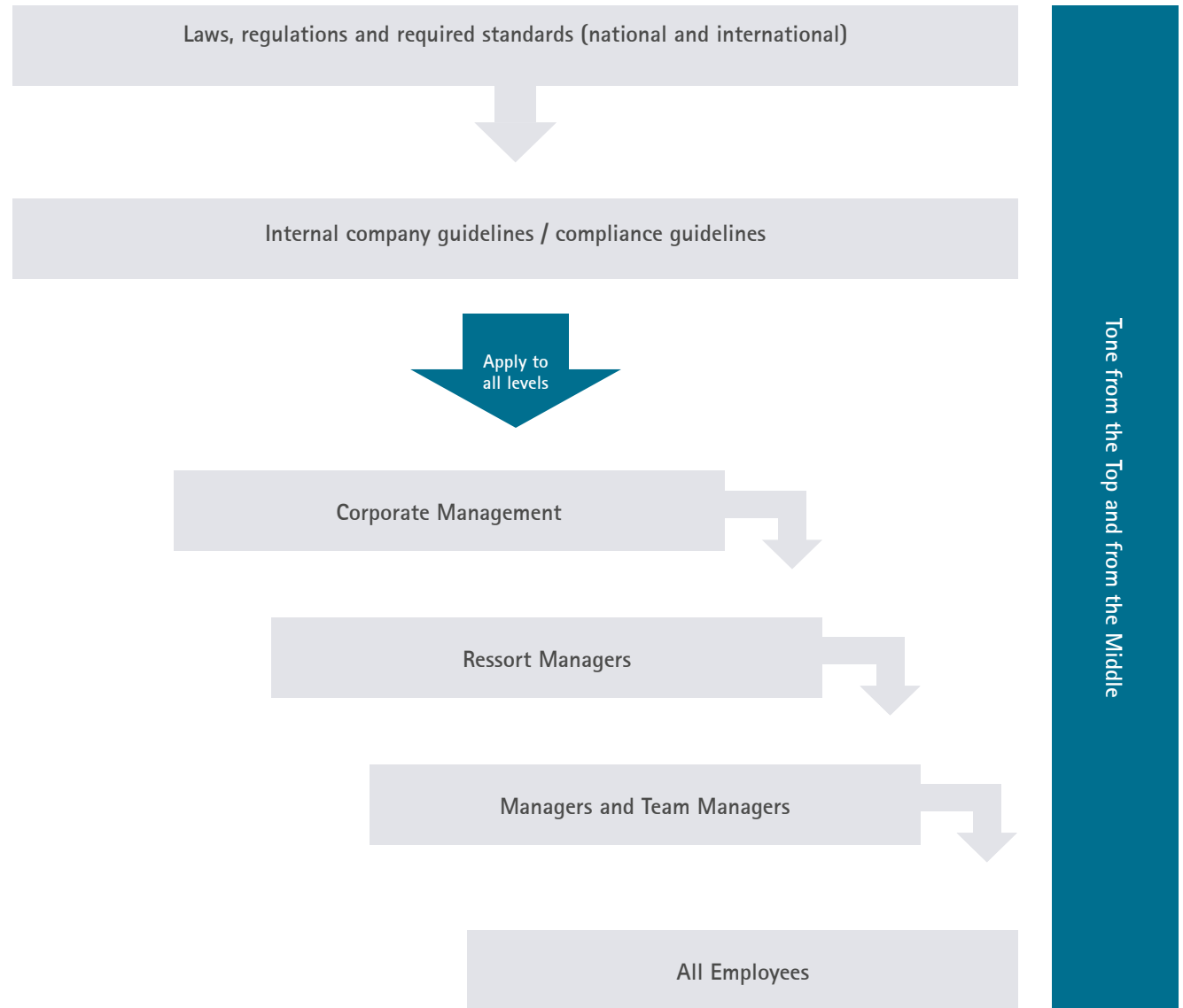
Components of
Compliance Risk
Management

I. Scope and definitions

1. Scope

The code of conduct applies to Corporate Management, Managers as well as all internal and external Employees of EOS, their affiliates and subsidiaries, to the extent this is applicable and possible considering the valid legal context in each country. This code of conduct provides our guidelines to prevent infringements. No violation will be tolerated, as this would endanger the economic success of the company and may have a negative impact on the reputation of EOS both publicly and in the eyes of our business partners.

We expect all managing directors and all management levels as well as every Employee of EOS to comply with the above-mentioned laws, the company guidelines and EOS values. In this context, we take particular care to safeguard legal positions of a very sensitive nature.



2. Definition of "Compliance"

Compliance includes any measure that serves to support company behavior as such in conformity with the law and regulations, and that determines Employee behavior with regard to any national and international legislation, regulations and standards.

All Employees is obliged without exception to act responsibly and according to the law. No Employee may endanger the reputation of EOS by violating internal regulations and applicable laws or by condoning unethical business practices.

Any valid compliance culture also requires a clear tone from the top and from the middle - the mission statement communicated by the Corporate Management that is applied by one and all. Such a culture is the basis for an appropriate and effective compliance system in the company and is essential for its application.

3. Managers

The term Managers as used in this guideline refers to all Employees who have a position with special responsibility for technology, budgeting, or personnel in our company.

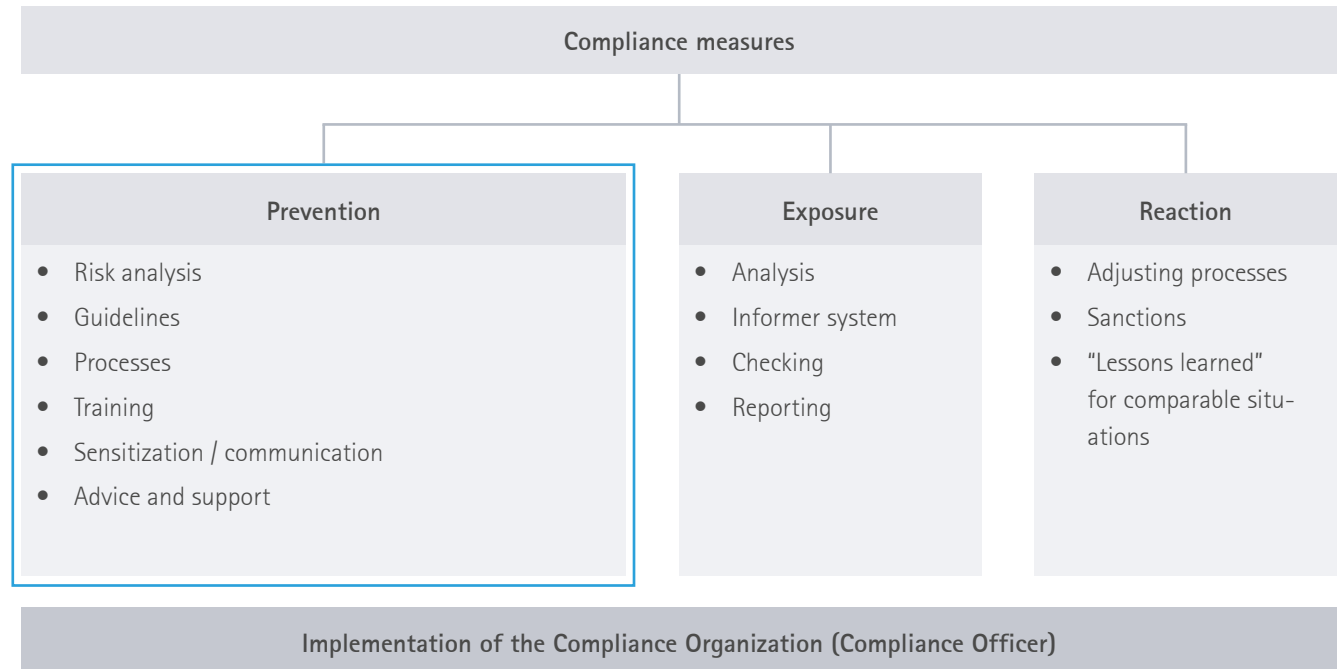
4. Compliance organization

We believe the term compliance organization refers firstly to Corporate Management, and secondly to those Employees who are in charge of maintaining, implementing, and monitoring our compliance structures.

Management, monitoring and further development of the compliance system and the respective implementation of further measures is the responsibility of the CFO of EOS GmbH, who has been put in charge of overseeing all compliance related issues at EOS as well as the

responsibility of those Employees who have been hired for this purpose, especially the compliance officer.

Employees may contact the external ombudsman for all issues they are unable or unwilling to discuss with their respective superior, the personnel department or the compliance organization in any other way. The contact information of the external ombudsman can be found on the compliance page in SharePoint.



5. "We"

"We" in the sense of this code of conduct refers to the company EOS, the Corporate Management, Managers and Employees. The use of the term "Employee" always refers to both male and female Employees.

6. Compliance guidelines

"Compliance guidelines" refers to all the regulations and guidelines regarding compliance-relevant issues. This includes the Business Partner Code of Conduct, relevant guidelines (e.g. for avoiding conflicts of interest) and the code of conduct.

7. Corporate Management

Corporate Management in the sense of this code of conduct refers to all managing directors of EOS GmbH.

8. Staff

Staff in the sense of this code of conduct refers to all Employees, freelancers and other external Employees.

9. EOS

EOS in this document refers to EOS GmbH as well as its subsidiaries and affiliated companies.



II. Our Actions

We commit to the following conduct in our business transactions:

1. We commit to observing all laws and regulations

We recognize the importance of upholding all relevant laws as well as internal and external regulations and guidelines and comply with them. Managers on all levels have to assume the responsibilities of role models and exemplify proper behavior. We expect all Employees to comply with legal provisions as well as all company guidelines in the course of any business activity and in any situation that is connected with such activity.

We declare our willingness to demonstrate impeccable behavior to Employees, customers, any other business partner as well as the authorities. We treat them fairly and take responsibility for our actions. Communication is marked by respect and professionalism in a constructive dialog.

2. We commit to integrity in our business activities

This applies equally to the Corporate Management, Managers and all EOS Employees. We will report possible legal issues and violations of internal company guidelines and thus make a contribution to compliance. A report is mandatory if there is a suspicion of criminally relevant behavior. The first contact for this may always be a direct superior and/or the compliance officer. If you wish to remain anonymous, it is possible to contact the responsible external ombudsman anonymously. Any contact data can be found in the SharePoint under

Compliance.

3. We commit to ensuring work environments that are characterized by good collaboration as well as the equal treatment of all Employees

We respect the principle of equal treatment for all Employees and reject any kind of arbitrariness. We ensure a pleasant work environment and a collegial interaction among Employees as well as between Managers and Employees at all levels of the hierarchy.

4. We commit to working towards these goals and principles with external partners, sub-contractors, suppliers and consultants

We inform our business partners and associations that we expect the same degree of integrity and compliance with all relevant legislation that we apply at EOS. We expressly terminate collaboration with business partners found to commit compliance-related legal violations.

III. Corporate Management behavior/ Managers

One particularly crucial element for a successful compliance culture is the behavior of Corporate Management and Managers who have to be role models for their Employees and act and communicate in the spirit of this Code of Conduct.

Socially acceptable behavior and absolute compliance with all laws and internal company guidelines as well as the company values of EOS by Corporate Management and Managers are the basis for ethically proper behavior for business and work. The function of Corporate Management and Managers as role models are particularly important in this respect. It is essential that the "tone from the top and from the middle" is embodied by them and also passed on to all levels of the company. When company guidelines are passed on to Employees, their acceptance is greatly increased. Furthermore, Managers are able to reach out to our large number of Employees. This ensures the greatest possible positive influence on corporate culture.



IV. General principles for the behavior of all EOS staff, including Corporate Management and Managers

The code of conduct distinguishes between general principles for the behavior of all Employees and specific behavioral principles in situations with major impacts on company policy. The general principles set out below should be followed to the letter without exception in any business dealings.

1. Conscientious application of the guidelines, manuals and common business practice in the respective area of responsibility

This Code of Conduct as well as other internal instructions and guidelines and the applicable business policies must be diligently followed by all EOS staff, Employees, the Corporate Management and Managers in order to ensure implementation of the compliance measures.

2. Promoting a work atmosphere that is characterized by trust, tolerance, professionalism and mutual respect

All Employees, Corporate Management and Managers commit to promoting a work environment that is characterized by trust, tolerance, professionalism and mutual respect and to ensure equal treatment of all Employees in this work environment. Discrimination of any type is not condoned by EOS.

3. Objective and transparent actions

The Employees, Corporate Management and Managers commit to acting objectively and transparently in order to avoid conflicts of interest and, in case of such conflicts of interest, to prevent harm to the company and its Employees. Obtaining goods and services as well as the conclusion of contracts must be based on the objective and transparent criteria of company principles.

Transparent actions for decision-making processes reinforce the culture of trust in a company. The basis for this is

proper documentation of business transactions. Appropriate documentation is achieved if at least the basic steps of a business transaction can be traced at a later time by an impartial third party.

4. Fair treatment of customers, suppliers, competitors and other third parties

The principles of fairness should also be observed when dealing with clients, suppliers, competitors and other third parties. Good business relations that are based on an objective and transparent way of dealing with others are key to the company's success. Therefore, everyone is obliged to adhere to these principles. Consequently, we refer to the concrete guidelines for behavior in case of bribery and corruption and urge everyone to comply with anti-trust regulations in this code of conduct.

V. Specific principles of conduct for business operations

We comply with the following guidelines in our business transactions in order to ensure the success of our company:

1. Basis for business activity

Ongoing EOS business operations are ensured by excluding corruption and vetting our business partners.

a. Prohibition of corruption and bribery

EOS declares its support for global standards in the fight against corruption and respects the legal standards to prevent white-collar crime, especially with regard to bribery in the public sector. According to Transparency International's definition, that we fully endorse, corruption is "the misuse of entrusted power for private gain or advantage". The selection of business partners, decisions about initiating business relations and the conclusion of contracts are to be based exclusively on objective criteria. We absolutely distance ourselves from any kind of corruption, bribery or other forms of white-collar crime in business transactions.

No Employee or Manager may demand, accept, offer or grant a personal advantage in the context of their business activities, especially during the initiation, tender or execution of a commission, with the company, a public institution/authority or a private person.

EOS and its Employees will offer no kind of bribery to any public official or private companies in order to influence a business decision or receive any other unlawful advantage. It is equally prohibited to make such an attempt, to condone or to promise the same. Demanding or accepting bribes or other advantages from public officials or private companies is also prohibited.



Equally, no third party (e.g. distributors) may be commissioned to take action that may not be executed by us for ethical or legal reasons.

Remuneration guidelines for business partners (provisions, commissions or other recruitment fees must only be agreed in writing and as part of a contract concluded with a business partner who has been vetted by the compliance organization (distributors - in the sense of sales mediators, agents, resellers, or consultants). The provisions that are agreed must be compatible with applicable legislation, appropriate and standard in the industry. No provision or recruitment fee contracts may be concluded with companies and institutions in the public sector, or those that are part owned by a public body, unless this is legally acceptable and the management has agreed to this in writing. Provisions and recruitment fees may not be cut or increased without a contractual basis – agreements beyond the amount stipulated in the contract are only possible in special individual cases. Such cases must be permitted by the Manager, documented sufficiently in writing, and be approved by the compliance officer. Employees and Managers may not accept any payment from business partners in the context of business transactions.

Payments to business partners must be documented according to the principles of proper accounting.

Employees and Managers may not participate in client loyalty programs run by EOS business partners in the context of business transactions, if those programs offer

premiums that are cash prizes, goods, services or other advantages, or unless this has been expressly permitted by EOS, such as, for example, the current Deutsche Bahn bonus program, the Lufthansa Miles&More program or the customer programs operated by other airlines.

b. Money laundering

We take a stand against money laundering. Money laundering is a criminal act (Section 261 of the Criminal Code [StGB]). The term is used to describe the introduction of illegally obtained assets into the legal economic cycle. Transactions that are presumed to be assets originating from unlawful acts should be rejected. The Manager, compliance officer or ombudsman must be informed about such transactions.

Cash transactions can underline money laundering, other illegal financial transactions as well as generally transactions that support criminal acts. If a cash transaction should be necessary in an exceptional case, the compliance officer must be consulted and their approval obtained. This especially applies if the cash transaction is to be concluded in a country with no stable financial system.

c. Vetting of business partners

The selection of business partners (customers, suppliers, distributors, consultants, etc.) is based on objective criteria and follows a unified and transparent process. Necessary company information that must be obtained before initiating business relations and be verified by the compliance organization is set out in detail in the

guideline regarding the selection of business partners.

We only initiate business relations with business partners who exhibit appropriate moral standards that have been vetted by us.

2. Avoiding conflicts of interest and distracting outside activities

Employees and Managers and executives give priority to the interests of EOS over private interests in their work and thus avoid any conflicts of interest.

A conflict of interest in the meaning of this guideline occurs if there is a risk of private interests endangering the company's interests or of the former conflicting with the latter. A conflict of interest may arise, for example, if Employees, their family members or close acquaintances receive or are offered prohibited personal advantages due to their position. In the same way, personnel decisions such as recruitment or promotion must not be based on private interests.

EOS maintains professional business relations free of conflicts of interest with its business partners. In order to avoid any conflict of interest, Employees and Managers must therefore not take part in private deals with business partners, family members or close acquaintances, or benefit from such deals, if illicit influences cannot be excluded. In addition, Employees must not hold any direct or indirect shares in another non-listed company that is in direct competition with EOS and where there is a possibility of

dishonest influence, unless they have permission from the Corporate Management.

This selection of business partners occurs on the basis of objective criteria, e.g. price, quality and quality assurance, reliability, technical standards, certification and product properties. Personal relations or interests must not influence the conclusion of a contract. Consulting services or recommendations that Employees provide for others must not be motivated by material or immaterial advantages.

EOS Employees shall inform a Manager or the compliance officer if they would like to conclude deals for EOS with companies that employ their family members or close friends. The Manager communicates this to the Corporate Management and the compliance officer. No one may maintain business relations on behalf of EOS in which close family members or acquaintances personally benefit from the agreement (e.g. are involved in the deal on the other side or have their own financial interests). In cases in which business partners would be family members or close acquaintances, a clear selection according to the above-mentioned objective criteria must be documented. In addition, the selection of business partners and contract conclusion must not be conducted by the respective Employee or the respective Manager personally.

To the extent that EOS Employees or Managers plan to take on a paid secondary activity or an active entrepreneurial activity/investment, this has to be communicated to the personnel department in writing. The acceptance of a position in a company that maintains business relations

with EOS or which might be a competitor of EOS requires express prior written permission. In addition, no function as a member of a client institution, distributor, supplier or any other business partner may be accepted without prior written permission from the Corporate Management.

Private commitments in clubs, parties or other social or political institutions is welcome, if such commitments do not endanger the proper execution of the Employee's duties according to their contract or cause any conflict of interest.

3. Responsible handling of gifts

We can only accept or grant socially acceptable gifts, hospitality or other non-recurring benefits. Gifts are regarded as being socially acceptable if they have a small value and can be regarded as generally customary. Similarly, business meals or other small services are regarded as gifts. In individual cases and as agreed with the Manager, higher value business meals and hospitality may be offered or accepted, as long as they take place in a socially acceptable context (for example a business dinner in a city where dining in restaurants may generally be regarded as expensive), if they are not exaggerated and do not serve to gain an unfair advantage.

Any impression of non-performance based considerations must be strictly avoided.

Please refer to the EOS guideline on "handling gifts and hospitality" for further information.

The general rule is that granting or receiving presents or personal advantages is prohibited in the context of business relations. This means that presents and advantages may under no circumstances be offered or accepted in the context of initiating, concluding or conducting business relations.

This limitation applies in particular to gifts and personal advantages from or for representatives of current or potential customers, distributors, suppliers, other business partners and competitors. This limitation also applies to their family members, the families of EOS Employees and Managers and other people with whom we or our business partners maintain close personal relations. Furthermore, this also applies to dealings with authorities and officials.

If a violation is identified and accepted by EOS, this is no justification for one's own misconduct.

4. Donations and sponsoring

We must not provide direct or indirect donations to political organizations or individual politicians in the context of our business relations. Donations outside a direct business relation in the context of a political, communal, and social commitment as well as any kind of sponsoring require a majority decision from the Corporate Management (at least two managing directors) and are subject to the legal requirements. Donations and sponsoring that benefit other, non-political recipients must not be used to circumvent the above regulation regarding political donations.

5. Compliance with anti-trust regulations

EOS is fully committed to the principles of fair and open competition.

We observe the relevant anti-trust and competition laws and will not conclude illicit agreements with competitors on economically sensitive questions such as prices, products, business conditions or the division of customers, suppliers or markets in violation of anti-trust laws. Information exchanges and conversations aimed at limiting competition (so-called "concerted behavior") are subject to prohibitions in certain countries. Even the impression of such action should be avoided. These competition rules apply not only to formal agreements, but also may apply to informal agreements and arrangements.

Comparative analysis with competitors is allowed in principle. However, competitive, sensitive information must be anonymous so that its origins are no longer be identified and any influence on current market activities can therefore be excluded.

6. Data and information protection

All Employees, Corporate Management and Managers must adhere to the principles adopted to protect the data of Employees, customers, suppliers and other third parties.

a. Protection of personal data

Appropriate care must be taken to protect personal data in the context of one's tasks. Personal data according to

the legal definition refers to individual information about the personal or factual circumstances of an identified or identifiable natural person (person concerned).

Capturing, processing and using personal data is only permitted when complying with legal requirements are complied with. Personal data must never be passed on to third parties and strictly controlled as to other companies in the EOS group. Any exceptions are dealt with individually. To protect such data, technical and organizational measures against unauthorized access or disruption have been implemented.

b. Data protection officer

EOS defines contacts for data protection according to the currently valid legal situation of the respective country or the geographical region (e.g. EU).

c. Information protection

The availability, confidentiality, and integrity of EOS IT-systems and electronic data are of the highest importance. Therefore EOS initiated an Information Security Management System in accordance with ISO 27001. The goal of this management system is the secure construction of internal IT, external IT-services (e.g. Cloud) and the appropriate handling of systems and information in the EOS fields.

The EOS guideline for information security generally provides the framework. This is specified in further individual ISMS-guidelines for the respective target groups (inter alia IT-sectors, fields, external service providers and suppliers).

Strategic clients and partners themselves provide specific information security requirements, with which EOS and participating external third parties must comply. We are aware of our responsibility in the handling of information and electronic data and support the implementation of diligent information security. We will regularly review the subject of information security.

In general, it holds that EOS as well as clients and suppliers are to handle trade and business secrets in strict confidentiality. Trade and business secrets (Confidential Information) are facts, knowledge, and documents which are connected with the technical operation and their processes or with the economic activities of the company. They are not published, and only available and known to a limited group of persons, thus not open. Trade and business secrets should be kept secret in accordance with the policies of the company, insofar as there is a legal interest in keeping them secret. If a disclosure to a customer or supplier is required, a corresponding confidentiality or non-disclosure agreement is to be concluded. If third parties participate in a transaction, it must be contractually ensured that these parties handle the connected information they receive confidentially. The Employee's obligation to secrecy continues after leaving the company, corresponding to individual contract provisions. It does not continue if there is an official legal disclosure obligation.

Shortcomings are attributable to the respective Managers, the data protection officers, and/or the information security office of the EOS.

7. Third party performance – external employment relationships

In our business activities, we often work with third-parties. The contractual relationship with external parties is to be designed in a way that fulfills all legal requirements. When employment contracts are concluded, it must be ensured that the incidental social security contributions and taxes are paid to the relevant competent authorities.

This also applies to the distinction between self-employed persons and Employees. In this respect, the design of the respective contractual relationship is important. It is imperative to avoid treating a worker as self-employed, although they perform the actual work of an Employee and are thus pseudo self-employed. Pseudo self-employment can also exist if a self-employed activity is established in the contract itself, insofar as the affected person is integrated as an Employee in the operation of EOS. Pseudo self-employment constitutes an infringement and missing social security contributions create serious consequences for EOS. Therefore, before concluding and implementing a contract, it should be checked whether there is an activity requiring social security contributions.

With the use of temporary Employees and Employee transfers, the EOS commits itself to checking contracts with temporary services with the greatest of care. It should always be checked whether it is an Employee transfer which requires an authorization. An Employee transfer that requires authorization in accordance with the Arbeitnehmerüberlassungsgesetz ([law on temporary workers] AÜG) requires a triangular relationship between

the employer (lender), the Employee (temporary worker) and the borrower. Above all, care is to be taken that the respective customary minimum wage is paid. In Germany, an authorization which includes the activity in accordance with § 1 AÜG of the German Federal Employment Agency for the professional Employee transfer must be provided.

8. Prohibition on illegal employment relationships

All forms of illegal work, or illegal employment relationships, in which related social security contribution and taxes are not paid, are prohibited by EOS. Suspicious cases are to be unconditionally and promptly brought to the attention of the respective Managers or the compliance organization.

Labor and social law provisions on the prevention of illegal employment relationships are to be complied with in all countries without exception.

Additionally, the EOS rejects illegal employment conditions in the form of forced or child labor.

Any related incidents are to be discussed and documented with the respective Manager or the compliance organization. Illegal employment relationships or collaboration with partners who support such employment relationships must be terminated immediately.

9. Intellectual property

Innovations and the knowledge possessed by the company are the basis for our entrepreneurial success. Intellectual

property rights and protection against counterfeiting therefore have special meaning for EOS. Patents, trademarks, official licenses, copyrights, business secrets and all intellectual legally protected property rights are fundamental for our business. In order to ensure their protection, all laws regarding intellectual property must be complied with. In addition to the company's own rights, EOS is also committed to respecting the intellectual property rights of third parties.

Without permission from Corporate Management, intellectual property of EOS as well as information related to it must not be disclosed. We also take care to protect the intellectual property of third parties and under no circumstances allow related violations by EOS. If you believe a license or other permission may be required, contact the IP group at EOS.

10. Company property and assets

All Employees and Managers are obliged to manage the property and assets of the company appropriately, economically and responsibly in every way. The use of work equipment is governed by the EOS guidelines. Theft and misappropriation of company property will be prosecuted.

VI. Responsibilities of the compliance organization

1. Compliance Officer and Compliance Committee

The compliance officer is responsible for dealing with any compliance-related issues within EOS. This especially includes the planning, scheduling and implementation of internal measures based on the code of conduct and other company guidelines as well as the management of individual compliance cases. The Compliance Officer works closely with the Corporate Management and Managers, investigates suspicious cases and supports Employees in maintaining internal requirements.

In addition, the Compliance Officer is part of the Compliance Committee, which additionally assesses relevant compliance topics.

2. Reporting violations

Any actual or suspected violations of laws or internal company guidelines that have been recognized as such under this guideline must be reported to the respective Manager or the compliance organization.

EOS furthermore has an external ombudsman for voluntary (and, if so desired, anonymous) reporting of violations that Employees cannot or do not want to discuss with their respective Manager or the compliance organization.

Employees will be protected by EOS in fulfilling these reporting obligations.



VII. Consequences of non-compliance

EOS monitors compliance with all relevant instructions both in an internal company revision as well as, when expressly asked to do so, by means of external checks.

a. Corporate Management, Employees and Managers

Compliance violations, i.e. infringement of laws and internal company guidelines may have criminal, civil and possibly disciplinary consequences for Employees, Corporate Management and Managers.

The person in question may also be subject to claims for liability from third parties. EOS furthermore retains the right to ask for compensation in case of compliance-related violations on the part of an EOS Employee, managing director or Managers. In addition, compliance violations may have criminal consequences such as fines or imprisonment.

b. EOS

In addition to third party compensation claims, there may be fines and cost-intensive court proceedings involved. The resulting loss is not only monetary, but of goodwill and reputation.

VIII. Conclusion

EOS believes that all Employees understand the importance of the regulations in these compliance guidelines and trusts that they will embrace these guidelines and apply them in their daily work, and that sanctions will not have to be imposed.



Contacts

Our compliance officer is the first contact for any queries regarding compliance.

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