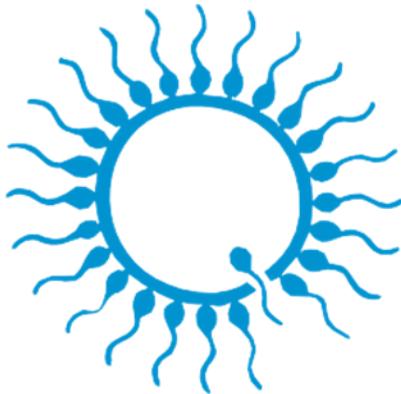


CODE OF CONDUCT

Minitube International AG



minitube

FOREWORD

Where are the roots that determine the success or failure of our business? We are convinced that there is not one single success factor. A good product alone will not succeed if lack of reputation or bad business practices jeopardize success.

Lawful and legal conduct, a respectful approach to business partners, as well as straightforwardness and prudent decision-making by all managers and employees are essential roots of success and ensure mutual trust, credibility and reliability. It is up to each one of us to make integrity, respect, consideration, honesty and tolerance a living reality through our actions and thus to live up to our personal and social responsibility. Law and order, morals and decency must be the basis for this. Our value-based compliance culture is just as much the basis of our business success as our products and services.

Our code of conduct serves as a compass and provides orientation on this path. Within the Minitube Group, it applies worldwide to every member of the Board of Directors, Managing Director, manager and all employees in order to ensure exemplary conduct and performance at all levels.

Based on our compliance culture and in accordance with legal requirements and administrative regulations, we all work together to ensure our long-term business success.

Tiefenbach, January 2021



Dr. Christian Simmet, CEO

1 OUR OBJECTIVES



Our primary objectives are set out in our corporate mission statement "Vision/Mission". Responsible and lawful behavior is the basis for the sustainable development of our business. We meet the various interests of our customers and business partners through integrity, fairness and honesty.

In our business dealings, we shall always abide by the relevant laws and regulations in all regions and countries, regardless if this be deemed ineffectual or uneconomical by any individual at any level in the corporation. We are aware that there are cultural as well as legal differences in the varying countries in which we do business. We shall make every attempt possible to familiarize ourselves with these laws and customs and adapt our behavior and actions accordingly.

We expect all employees to work for the interests of Minitube in an entrepreneurial and accountable manner. Employees are expected to conduct the business and affairs of Minitube solely in compliance with the prevailing laws, ethical norms, internal guidelines and our code of conduct.

2 OUR STANDARDS FOR TEAMWORK



MUTUAL APPRECIATION

"The Golden Rules" serve as guidelines for our behavior.

We place high value on involving all employees in our planning and decision-making processes. This enables a friendly working environment in which we can effectively pursue and achieve our goals.

OFFENSIVE BEHAVIOR IS NOT TOLERATED

Minitube insists on mutual respect and openness among its employees and is totally opposed to any form of harassment at the work place. Bullying and mobbing or any form of terrorizing behavior will not be tolerated, regardless if the perpetrator thinks his/her actions were justified or if the victim had the possibility to avoid the perpetration.

The personal behavior of every manager must always comply with our code of conduct to maintain a fair and productive working environment free from any form of harassment, manipulation, or any other offensive behavior. In the same light, each employee is expected to contribute to a positive working environment by treating one another with respect and dignity.

EQUAL OPPORTUNITY

One of Minitube's main strengths lies in the diversity of its employees. Professional qualification and performance are the key criteria used in the selection and further development of all employees. No one shall be discriminated against based on color, religion, creed, age, sex, gender identity, genetic information, national origin, disability, ancestry, sexual orientation, marital status, military/veteran status, arrest or conviction record, use or non-use of lawful products off the Minitube premises during non-working hours, or any other basis prohibited by local, state or federal law. This policy applies to all terms and conditions of employment including, but not limited to, hiring, training, promotion, discipline, compensation, benefits, and termination of employment.

2 OUR STANDARDS FOR TEAMWORK



COMPANY ASSETS

The protection of confidential business information and trade secrets is vital to the interests and the success of Minitube. All employees are responsible for protecting the company's assets and for ensuring they are used properly and only for legitimate business purposes. The usage of any company property for private purposes or the removal of such from the company premises is strictly prohibited unless a prior special agreement has been arranged.

Our company possesses valuable patents and proprietary knowledge or "know how", which comprises, but is not limited, to the following areas: company-specific secret information, confidential or restricted information, copyrights, trademarks, logos, customer data including contact information, business plans and internal company documents, and product specifications. These are considered to be company intellectual property regardless if it belongs to Minitube, one of its affiliated companies or a business partner. Every employee must handle the intellectual property of the company confidentially.

3 INTEGRITY OF OUR BUSINESS PRACTICE



FAIR COMPETITON PRACTICE

We work according to the principles of the free market and fair competition. Our business is conducted solely on the basis of merit and market economy principles as well as free and open competition. We engage suppliers and distributors only after a fair and careful evaluation of their merits. We are legally bound to make all our business decisions solely in the best interest of the company and without interaction of any kind with our competitors (e.g. discussing pricing, business plans, or strategies).

BRIBERY AND CORRUPTION

Minitube will not tolerate or proceed with any business deal that even appears to involve corruption. We rely solely on the merits of our products and services, not on improper payments, courtesies, or favors, to influence our business partners to do business with us. We exercise transparency in all our dealings with customers, suppliers and government agencies. Our business practice conforms to the anti-corruption standards and all applicable anti-corruption and anti-bribery laws and regulations.

Minitube employees and agents shall not offer, promise, authorize the payment of, or pay or provide anything of value to any employee, agent, or representative of another company to induce or reward the improper performance of any function or any business-related activity.

Minitube employees will not request, agree to accept, or accept benefits promised or offered, and will not accept benefits if it appears to the benefactor that employees may be influenced in business decisions.

3 INTEGRITY OF OUR BUSINESS PRACTICE



GIFTS

Gifts are only allowed if they are common in the business, are of reasonable value and conform to accepted ethical business practice.

Employees may not accept or offer gifts if the gifts appear to have the purpose of influencing business decisions or if the gifts conflict with any law, regulation or guideline regarding ethical business practice. Employees shall not demand gifts from customers, suppliers or other business partners.

TRADE CONTROLS

Minitube has international business relations. Thus, it is actively involved in the international exchange of goods and supports free world trade. Minitube complies with relevant trade controls and the applicable regulations on import and export controls and embargoes.

CONFLICTS OF INTEREST

We expect our employees to maintain a clear separation between personal and company interests. Employees are prohibited from partaking in any activity or association that creates or appears to create a conflict between the employee's personal interests and Minitube's business interests. In addition, an employee must not allow any situation or personal interests to interfere with the exercise of independent judgment or with that employee's ability to act in the best interests of Minitube.

Examples of a potential conflict of interest include when an employee has a relationship to another person working, consulting, or applying for a position at Minitube. The relationship could involve a friend, a spouse or other family member, or a business acquaintance. Actual or potential conflicts of interest must be immediately disclosed to management.

3 INTEGRITY OF OUR BUSINESS PRACTICE



PRIVACY AND DATA PROTECTION

We adhere to applicable data security regulations. All employees must comply with the applicable laws, regulations, and company policies regarding the usage and handling of personal data, stored electronically, or otherwise, by the company.

GENERAL SECRECY

In addition to technical and organizational measures for data protection, every employee at Minitube is obliged to protect the Company's operational interests. For this reason, information from and about Minitube is only communicated to authorized recipients.

FRAUD AND UNFAITHFULNESS

No business partner of Minitube may be deceived in legal transactions about facts that are relevant for economic or commercial decisions. If Minitube employees make statements about facts to customers, these must be correct.

Minitube Management and employees shall represent the economic interests of Minitube in the best possible way. They are therefore not permitted to dispose of Minitube's assets or to commit Minitube to third parties if there is no economically equivalent performance by the business partner. The granting of discounts, bonuses and other rebates to customers therefore only takes place within the scope granted by the management. Further rebates or other benefits to customer businesses are to be agreed with the respective superior in each individual case.

Our CORPORATE RESPONSIBILITY

Minitube wants to make a positive contribution to both society and the environment and assumes the corresponding corporate responsibility. In particular regarding animal protection, Minitube takes its responsibility and makes sure that all products and services that are used with animals are developed, manufactured and tested under consistent consideration of the applicable animal protection standards.

As a globally active company, our actions have an impact on the society we work in and the world we live in. Our responsibility is reflected by the adherence to generally valid values, laws and guidelines.

We are aware that we are also judged by how we behave outside our immediate working environment. Therefore, we kindly request that all employees show respect and consideration for the specific culture of the country in which they are doing business.

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