

Led by experience. Driven by curiosity.

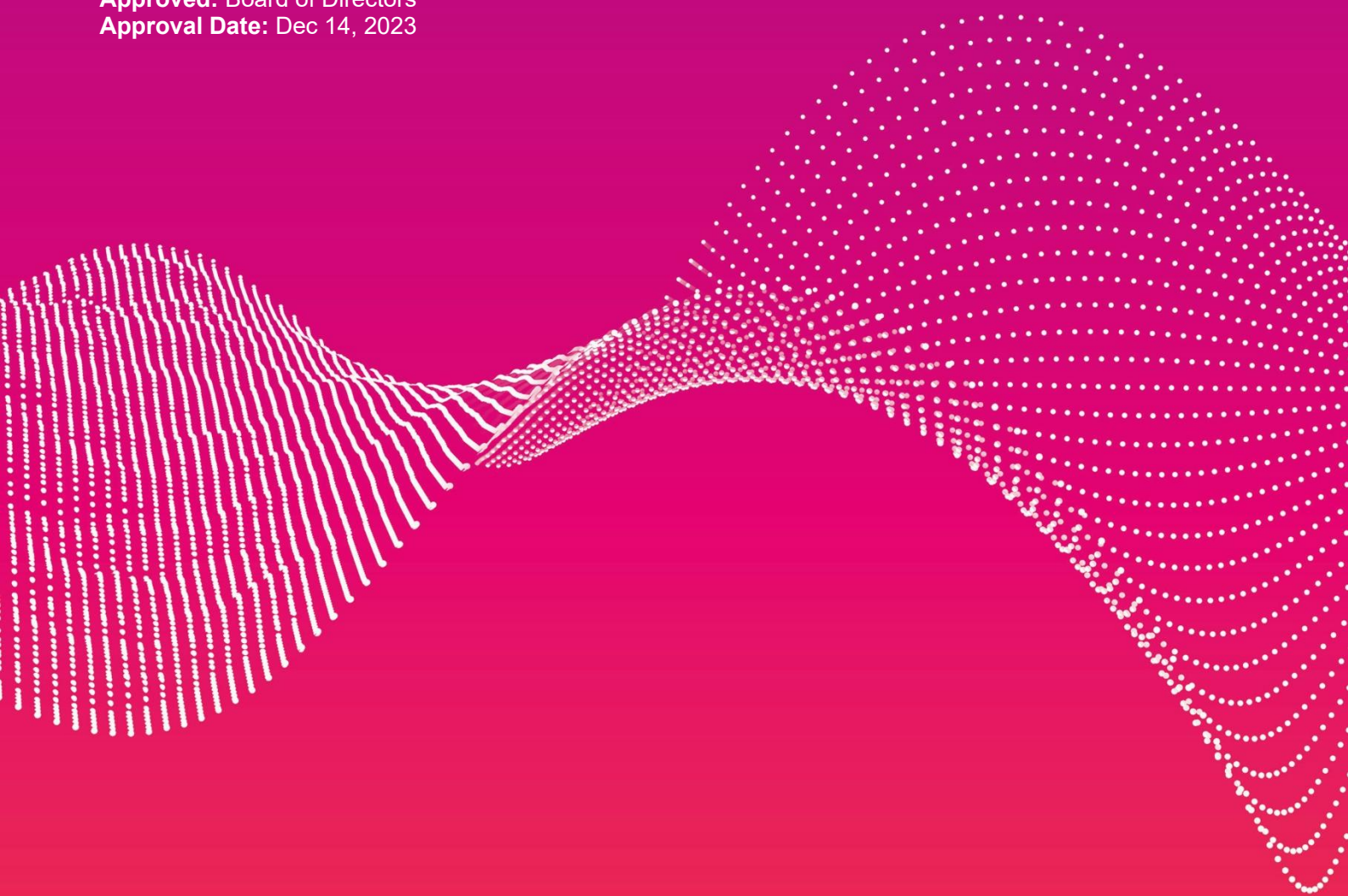
# Code of conduct.

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# What we care about.



## Customer Orientation

**We achieve customer loyalty by fully understanding and meeting their needs.**

**We...**

- ... ask what problem really needs to be solved and why
- ... inspire through our expertise
- ... provide or co-create solutions with a clear benefit and deliver what we promise
- ... say early on when we cannot meet needs and present our solution



## Challenge and Empower

**We build, develop and enable everybody to make decisions and drive success.**

**We...**

- ... empower individuals and teams to make decisions according to their expertise
- ... develop people and recognize success
- ... encourage diverse views
- ... challenge each other with candor and kindness to leave our comfort zones
- ... value team success based on shared goals



## Trustful Collaboration

**We act as one team to realize our full potential and be better together.**

**We...**

- ... meet each other with a positive attitude, striving for win-win solutions
- ... support each other
- ... engage in honest and open dialogue, giving constructive feedback
- ... see mistakes as an opportunity to learn

## Message from the Chairman of the Board of Directors and the CEO

Dear colleagues,

We at Comet live by the principles to act with integrity, sincerity as well as confidence and as a team. Each of us plays a vital role in protecting how our colleagues view us and in fostering the trust of customers and suppliers all around the world.

Our Code of Conduct helps us to achieve these principles by defining and explaining the standards for how we want to conduct business at Comet. It provides guidance and helps us to navigate safely through various business situations and to act according to the values we live by.

We foster a trustful collaboration and harness our pioneering spirit as a team so that we may always remain customer focused in our work. We build, develop, and enable our organization so that we achieve sustainable progress together while improving the safety, wellbeing, and quality for all of us.

Transparency, commitment, and responsibility are essential to our culture of ethics. If you have any concerns about the guidance laid out in this Code of Conduct or how our organization lives up to these principles, please address your reservations through the various speak-up channels we have. Our commitment to ethical behavior is not a mere formality; it guides us towards lasting success.

We have full confidence in our dedication to uphold these values. Together, we will continue the successful future for Comet and all those we serve.

Thank you for your commitment and passion as we continue together on this principled and prosperous journey.

Sincerely,

Benjamin Loh  
Chairman of the Board

Dr. Stephan Haferl  
CEO

## **1 Our values and principles at work**

### **1.1 Fairness and Respect**

We create a work environment where everyone can thrive, be innovative and feel respected. Comet is committed to maintaining a workplace standard where every employee, irrespective of their position, is treated with politeness and fairness. In our jobs, there are numerous opportunities to gain experience and grow, both as a person and in your professional skills. We share our ideas to continuously develop and move forward together as a team.

### **1.2 Adequate Work-life Balance and Compensation**

We adhere to all regulations concerning working hours and support a healthy work-life balance. Comet's pay is fair, aligns with prevailing market rates and is based on performance of the individual and the overall result of the organization. We are strongly committed to providing equal opportunity in every aspect of employment.

### **1.3 No Discrimination and Respect for Human Rights**

Comet respects the human rights and will not accept any type of mistreatment, harassment, or intimidation. We stand against any bias related to ethnicity, appearance, faith, marital status, sexual orientation, gender identity, beliefs, age, gender, abilities, or any unique trait. Comet will never support child labor, human trafficking, slavery, or any form of coerced or forced work. Comet does not purchase any products, which were manufactured using child labor.

Any employee who experiences discrimination or violence against our values and principles should contact HR, the Head Audit, Risk and Compliance or use our Integrity Line.

### **1.4 Health and Safety at work**

Health and safety are emphasized consistently in our training and development programs. Our aim is to ensure a workplace and practice that safeguards our people and the environment. Any situation that could threaten the health and safety of our employees or impact the environment should never be ignored and addressed promptly. Always report potentially hazardous or critical situations so that corrective and preventive measures can be taken.

### **1.5 Working under influence**

At Comet, the safety of all our employees and business associates is of utmost importance. Working while under the influence of drugs, alcohol or any sort of illegal substances is strictly prohibited. Any violations to these rules may result in disciplinary actions that can lead up to and include the termination of employment. Employees are encouraged to report actual or potential misbehavior to HR, the Head Audit, Risk and Compliance or through the Integrity Line.

## **2 Sustainability & Quality**

### **2.1 Corporate Social Responsibility (CSR)**

Comet is a responsible member of society and dedicated to embrace the principles of corporate social responsibility (CSR). We are committed in protecting our ecosystem, and continuously strive to reduce the impact of our business activities on the natural environment and minimize resource consumption.

### **2.2 Quality and Excellence**

Comet is committed to product excellence by employing the best practice manufacturing standards and modern technologies. We develop and manufacture first-class quality products and software that meet the high expectations of our customers and are at the forefront of the respective industry. Every employee is responsible for making sure that their work efforts contribute to the quality and excellence of our products. Our internal quality assessment and assurance processes must be followed and identified weaknesses quickly addressed.

### **2.3 Responsible Procurement**

We only collaborate with suppliers who share our values and principles, have similar commitments to CSR standards as well as quality and excellence. Suppliers must agree to follow the guidelines laid out in the Comet Supplier Code of Conduct. Providing a safe and healthy workplace for their employees and practicing sustainable business methods are essential criteria.

## **3 Compliance with laws and regulations**

### **3.1 Ethical Standards**

Comet is unwaveringly committed to comply with laws and regulations. Our values and principles guide us in maintaining the ethical business conduct standards in all aspects of our activities. When dealing with government bodies, clients, suppliers, and other third parties we adhere to applicable laws, regulations, internal guidelines as well as company agreements. We follow good corporate governance principles and act according to generally accepted business conduct.

### **3.2 Corruption and Bribery**

Comet has issued a Group Anti-Corruption Policy to which all our employees, suppliers and relevant business associates must adhere. We strictly prohibit any form of business conduct that could lead to or represent actual situations of bribery, corruption, or any sort of other fraudulent activities. If such situations occur, they must be reported promptly to the Head Audit, Risk and Compliance, the responsible member of the Executive Committee team or through the Integrity Line.

### **3.3 Gifts and Hospitality**

Comet employees should never give or accept any sort of gifts, participate in hospitality, or provide or receive favors if these actions could be perceived as an attempt to gain unfair business advantages or compromise the integrity of our organization. If such situations occur, they must be reported promptly to the Head Audit, Risk and Compliance, the responsible member of the Executive Committee team or through the Integrity Line.

### **3.4 Compliance with International Trade Regulations**

Comet has issued a Trade Compliance Policy to which all our employees and relevant business associates must adhere. We follow all applicable laws and regulations that govern international trade in relation to export controls and import regulations, for example trade sanctions, embargoes, or government directives and policies. Before we pursue or accept new business opportunities, we will always conduct a thorough counterparty due diligence to ensure full adherence with applicable international trade regulations.

### **3.5 Fair and Free Markets and Cooperation with Authorized Investigations**

We are committed to fair and free markets. We reject price-fixing, cartels and other arrangements that distort competition.

We actively cooperate with authorized investigations. We make sure to inform the General Counsel and supervisors instantly after receiving any inquiry from the authorities or a government investigator. This ensures that measures can be taken to comply fully with legal obligations.

## **4 Conflict of Interest**

### **4.1 Personal Interests or Investments**

A conflict of interest happens when an employee's personal pursuits or associations hinder objectivity and might lead to outcomes that do not align with Comet's best interests. All business dealings with counterparties must be based on objective criteria and not influenced by personal interests or investments. If such conflicts arise, it is crucial to discuss and address them with the supervisors in a timely manner.

Comet has a Group Purchasing Policy – Indirect Materials, Services and Equipment that outlines further how to proceed when contracting with suppliers or related parties.

### **4.2 Political Neutrality**

We maintain political neutrality and do not support, favor, or endorse any political parties or political candidates. Employees who decide to engage in political activities need to do this in their individual capacity and not as representative of Comet. Comet's resources, such as donations or our infrastructure, shall not be used for political purposes.

### **4.3 Charitable Donations and Sponsorships**

We can contribute funds or other support to non-political, non-profit organizations focused on social and environmental causes. All such donations, sponsorships or related contributions made in the name of Comet must be transparent, documented, and approved in accordance with our delegation of authority guidelines.

### **4.4 External Business Engagements**

Before taking on roles outside of Comet, as well as before running for public office, it is important to ensure that these actions align with our employment terms and will not disrupt your duties at Comet. These engagements are subject to a review for potential conflicts of interest with Comet. If you have any questions or concerns you can always reach out to your supervisor, HR or the Head Audit, Risk and Compliance for guidance.

## **5 Protection and use of company assets**

### **5.1 Safeguarding Comet's Assets**

Safeguarding Comet's assets against any potential harm is a priority for every employee. This principle also applies to our reputation, the intellectual property (IP), digital information, goods, and all other assets of Comet. We ensure that Comet's assets are shielded from misuse, loss, theft, and wastage by ensuring they are solely employed for legitimate business purposes. If such incidents occur, they must be reported immediately to the appropriate supervisor or Head Audit, Risk and Compliance.

### **5.2 Protecting Intangible Assets and IP**

We safeguard our investments in intangible assets and IP. This involves acquiring, enforcing, and defending property rights while respecting the rights of others. Any intangible asset or IP generated, developed, or acquired by employees as part of their job belongs to Comet Group. The unauthorized copying, using, sharing, or distributing is prohibited. If you are made aware of such incidents, report them immediately to the appropriate supervisor or the Head Audit, Risk and Compliance.

## **6 Accuracy of Records and Reporting**

### **6.1 Integrity and Accuracy**

Our stakeholders expect us to adhere to the highest standards of integrity regarding the preparation, maintenance, and reporting of company records. We are committed to the timely submission of comprehensive and accurate records, reports, and financial statements in line with all applicable legal and regulatory standards as well as internal guidelines. This commitment extends to both external and internal communications, contributing to a culture of trust and accountability within our organization as well as our external stakeholders.

### **6.2 Accountability and Internal Controls**

All Comet employees who participate in the record-keeping and reporting process are responsible to ensure accuracy and completeness of the information provided. Any potential errors, inaccuracies or inconsistencies should be reported timely to the appropriate supervisor or the Head Audit, Risk and Compliance. Comet uses internal controls and related procedures to ensure the accuracy, completeness, and reliability of operational and financial data. Any control-related or procedural deficiency or ineffectiveness should be reported to the appropriate supervisor or the Head Audit, Risk and Compliance.

## **7 Confidentiality of information**

### **7.1 Data Protection and Privacy**

Maintaining the highest level of confidentiality is fundamental to our business operations. We are entrusted with confidential information, for example customer data, financial records, or intellectual property, which must not be disclosed unless legally required or authorized by management. This commitment extends the conclusion of employment. It is essential that we manage confidential information with utmost care when storing or transmitting it. Any unauthorized access, disclosure, or use of such information is strictly prohibited. We must extend the same level of diligence to sensitive information provided by external parties as we do to our own.

### **7.2 Insider Trading and non-public Information**

As employees, we may gain access to critical non-public information about Comet or other companies, such as mergers or significant contracts. Those within our organization who have access to such knowledge are explicitly prohibited from trading in Comet's or the involved firm's financial instruments or sharing this privileged inside information with any internal or external party. Insider trading breaches confidentiality and can lead to legal consequences both on civil and criminal fronts. If you are made aware of such incidents, report them immediately to the appropriate supervisor or the Head Audit, Risk and Compliance.

## **8 IT, Business Continuity and Social Media**

### **8.1 Information and Data Security**

Comet has issued an IT Security Policy to which all our employees, suppliers and relevant business associates must adhere. We are committed in protecting sensitive and/or confidential information, for example customer data or Comet IP. All electronic information should be only stored, transmitted, or processed in accordance with our defined data protection protocols.

### **8.2 Information Technology and Cyber Security**

We rely on the functionality and availability of IT systems. Considering this, our IT security protocols are designed to minimize the risks associated with data loss, theft, technical failures, and human errors. We use our IT infrastructure exclusively for business objectives that align with Comet's interest, rights, and our policies and guidelines. If you encounter or experience any sort of security incident, including for example data breaches or the use of malicious software (i.e., malware, viruses etc.) report it immediately to the IT department or your designated security officer. The timely reporting of incidents can help us prevent damage to our organization.

### **8.3 Business Continuity**

Maintaining Comet's operations, even in unexpected situations, is essential. We are committed to planning for disruptions like natural disasters or emergencies, ensuring our roles contribute to business continuity. Familiarizing ourselves with relevant plans and following protocols during disruptions, along with effective communication, helps us demonstrate Comet's resilience and commitment to serving customers and colleagues, even in challenging times.

## **8.4 Responsible Use of Social Media**

In the digital era, personal and professional boundaries often blend on social media. Our online actions reflect our identity and can connect to the Comet organization and its reputation. Whether for personal or professional reasons, we uphold integrity, respect, and responsibility as we do at work. Avoid sharing content that could be misunderstood or considered as inappropriate. Do not express views as if they are Comet's, unless authorized by the respective persons in charge of communication. Thoughtful and responsible social media use keeps our commitment to ethics and shields both our and Comet's reputation.

# **9 Compliance with the CoC: Advice, Guidance, and Reporting**

## **9.1 Adherence and Guidance**

We are committed to helping every employee of Comet in understanding the content of this Code of Conduct and to support you in the adherence of its principles. If you require clarification or seek guidance in relations to the principles outlined in this document, please contact your superior, the responsible HR manager or the Head Audit, Risk and Compliance.

## **9.2 Reporting misconduct**

If you encounter or suspect misconduct in relation to the principles outlined in our Code of Conduct, you can report your concerns through the following channels available to you.

- Your Line Manager
- Your HR Manager
- The Global Head HR or the Head Audit, Risk and Compliance (confidential)
- Comet's Integrity Line (confidential and anonymous reporting possible)

Those who report suspected misconduct in good faith or share information about alleged misconduct are safeguarded from any form of retaliation. By adhering to these reporting mechanisms, we collectively ensure our commitment to a culture of transparency, accountability, and ethical conduct at Comet.

## Appendix 1: References to Key Policies, Contacts, and Integrity line

In our commitment to transparency, we provide easy access to our key policies through the intranet's global policies section.

Under the following link on the intranet [<https://confluence.comet-group.com/display/CMS/Policies>] you will find all policies that guide our actions and decisions. These policies, applicable to all employees of Comet, ensure that our conduct aligns with Comet's values and ethical standards.

For any concerns, inquiries, or reporting of suspected misconduct, you can reach out to the following confidential channels:

- Your Line Manager
- Your HR Manager
- Global Head Audit, Risk and Compliance

Additionally, the Comet's Integrity Line offers a confidential and anonymous option for reporting.

**Integrity Line:** <https://cometgroup.integrityline.com/>

Your integrity and well-being matter to us, and we encourage you to make use of these resources to help maintain a culture of integrity and ethical behavior within Comet.

## Appendix 2: Frequently Asked Questions (FAQ)

**Q1: What is the purpose of Comet's Code of Conduct (CoC)?**

**A:** The CoC serves as a guide to ethical behavior for all employees at Comet. It outlines our values, principles, and expectations, ensuring that our actions align with the highest standards of integrity and responsibility.

**Q2: Are these CoC principles mandatory for all employees?**

**A:** Yes, the CoC principles are mandatory for all employees, regardless of their role or position within the organization. They reflect our collective commitment to ethical conduct.

**Q3: How can I access Comet's policies?**

**A:** The latest versions of all key policies can be accessed through the intranet's global policies section. Use the following link [<https://confluence.comet-group.com/display/CMS/Policies>] to find comprehensive information that further guides our behavior and actions.

**Q4: What should I do if I suspect misconduct or a violation of the Code of Conduct?**

**A:** If you suspect misconduct or violations, you should report it in subsequent order to your Line Manager, your local HR contact or utilize Comet's Integrity Line.

**Q5: Can I seek guidance if I am unsure about a situation that might involve a violation of the CoC?**

**A:** Yes. If you have questions or need guidance, it is recommended to discuss it in subsequent order with your Line Manager, your local HR contact, or the Head Audit, Risk and Compliance.

**Q6: How shall I handle offensive jokes from a colleague?**

**A:** Kindly and respectfully address the issue with your colleague, explaining that the jokes are offensive to some. If the behavior continues, escalate the matter in subsequent order to your Line Manager or local HR contact to foster a respectful environment.

**Q7: What can I do if I feel my Line Manager is treating me unfairly?**

**A:** Address concerns openly with your Line Manager. For potential discrimination or harassment issues, reach out to your local HR contact or use Comet's Integrity Line.

**Q8: What if I disagree with a request that goes against Comet's integrity standards?**

**A:** Explain your concerns with your Line Manager and if needed reach out to your local HR contact to address your concerns. Use the Integrity Line for anonymous reporting.