

1 Introduction

At Axess we believe in responsible social and ethical behavior. Corporate responsibility is particularly important and has been actively installed within the company.

Our core values Integrity, Respect and Innovation guide us in our actions and daily business decisions. Furthermore, Axess and its Partners have an obligation to all stakeholders to observe high standards of responsibility and fair dealing.

We consider environmental protection, social responsibility and compliance with legal requirements to be the principal objective of sustainable development. Axess therefore expects all its Partners to take social responsibility seriously and comply with our Code of Conduct.

Axess reserves the right to modify this Code of Conduct at any time to reflect changes in the company, employment trends, economic conditions and legislation. The company's approach will always be consistent with the laws that apply to us. The latest version of this Code of Conduct will be available on our webpage: teamaxess.com

For ease of reading, the masculine form is used for personal references and personal nouns in this manual. Corresponding terms generally apply to all genders in the interests of equal treatment. The abbreviated form of language is for editorial reasons only and does not imply any valuation.

1.1 Who does the Code of Conduct apply to?

The Code of Conduct applies to all our Partners that provide products or services to Axess, or that are engaged or instructed to act for or on behalf of Axess, such as suppliers, subcontractors, consultants, distributors, agents and other representatives.

1.2 Legal compliance

We require all our Partners to operate in accordance with the principles of our Code of Conduct and in full compliance with all applicable laws and regulations. The Code of Conduct does not replace legislation and if the two are in conflict, legislation takes precedence. If the Code of Conduct sets a higher standard than the existing legislation, the reverse applies. The Code of Conduct is valid in the English language. Where there are different language versions of this document, these shall be considered translations only.

Our policies and the Partner Code of Conduct are further based on:

- > UN Universal Declaration of Human Rights and connected UN Conventions
- > ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- > OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data
- > OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- > ILO International Labor Standards

1.3 Raising concerns

Should a Partner believe that the terms of the Code of Conduct are not adhered to or that Axess or any of its employees is not acting in accordance with this Code of Conduct, we encourage to raise these concerns to compliance@teamaxess.com or through any of your contacts within Axess. Any report must safeguard the interests of the Partners as well as the rights of any employees, in particular in terms of data protection and business secrets.

1.4 Implementation and monitoring

The following requirements in this Code of Conduct are obligatory for all Axess Partners. In addition, our Partners must adequately address the provisions of our Code of Conduct along their supply chain. Axess reserves the right to assess its Partners' compliance with the Code of Conduct. If Axess identifies risks, the Partner must be committed to actively cooperating in the development of remedial measures. Partner must provide access to any documents required in order to carry out a check. Violations will be handled immediately, and any violations of the Code of Conduct may jeopardize the Partner's business relationship with Axess, up to and including termination.

2 Our values

Our corporate values are based on lived partnership with our customers, employees and Partners as well as on the future-oriented development of our systems and products. This builds the basis of our success. It is therefore essential that every Axess Partner complies with all national regulations and other relevant laws and regulations that apply in the respective countries of business activity, as well as the principles contained in this Code of Conduct.

2.1 Integrity

We always behave with integrity both inside Axess and outside. We expressly respect human rights and oppose child labor. Within the scope of his or her duties, each employee is responsible for knowing and complying with applicable legal regulations and official requirements and, in particular, local requirements. Axess will take the necessary measures to ensure this.

2.2 Respect

We promote respectful interaction with each other and expect the same from our customers, Partners and competitors. We resolutely oppose any form of bullying, sexual harassment or violence, regardless of whether the act is directed against employees, customers or Partners. Those affected will be granted appropriate protection and all necessary measures will be taken against the perpetrators.

We reject any discrimination, for example on the grounds of nationality, marital status, ethnic origin, skin color, gender, religion, ideology, disability, age or sexual orientation and identity. We treat the dignity of people, their rights and their privacy with respect.

We do not tolerate false and malicious insinuations or similar conduct that harms our customers, Partners, employees or the company itself.

2.3 Innovation - Discretion, Data Protection and Data Security

As market leader and in our endeavor to constantly develop new technologies and improve existing solutions, we are very sensitive in dealing with confidential information. It is part of the spirit of the times that information about a matter is almost as important as the matter itself. Axess takes all preconditions to handle information restrictively and to keep personal as well as secret data appropriately confidential. All Partners and employees are obliged to comply with the requirements of data protection law.

3 Business Ethics

3.1 General

Axess respects the laws and regulations in the countries in which it operates and requires that its Partners do the same. We do not accept any corrupt activities, including but not limited to bribery, conflicts of interest, fraud, extortion, embezzlement, self-enrichment, and unlawful kickbacks. Our Partners shall not engage in, or cause Axess to engage in, any form of corrupt activities. We want to achieve our goals by behaving legally compliant, honestly and in an upright manner. This Code of Conduct therefore contains the rules for ethical and legally impeccable actions and decisions by all Partners. It is based on international agreements and ethical standards.

3.2 Competition and antitrust laws / Fair competition

Axess's Partners shall comply with applicable competition and antitrust laws and regulations. This means, among other things, to not engage in price fixing, market sharing, bid rigging or customer allocation.

The Partner undertakes to refrain from drawing any undue benefit from local or regional conditions, e.g. poverty, in order to achieve an unfair competitive advantage. No Partner will be involved in any engagement, misleading or aggressive business practices to ensure protection for businesses and consumers.

Axess obliges its Partners to avoid any unlawful exchange of sensitive business information or from coordinating offers with fellow competitors.

3.3 Anti-bribery

Axess does not accept bribes or facilitation payments in any form. We have a strict policy against bribery and corruption.

Bribery is defined as "giving someone a financial or other advantage to encourage that person to perform his or her duties or activities improperly, or to reward that person for having already done so."

Axess's Partners undertake to refrain from and not to tolerate any form of corruption, bribery, facilitation payment, coercion or misappropriation. Furthermore, the Partner refrains from offering, promising or granting unlawful benefits, in particular also within dealings with Axess employees.

3.4 Data protection, confidentiality

Axess's Partners shall follow applicable data protection laws and regulations. Partners must comply with all legal requirements of the Data Protection Act, including the requirements of the General Data Protection Regulation (GDPR). It is essential that our Partner is sensitive to data protection and therefore is bound to confidentiality with respect to any sensitive or confidential information.

Any breach of confidentiality will be considered as a violation against this Code of Conduct. Axess reserves the right to take legal action if confidentiality is breached. Furthermore, it may lead to termination of the relationship or other remedies provided for or permitted by applicable law.

3.5 Conflict of interest

Conflict of interest between a Partner and Axess must be avoided. Conflicts of interest may include outside business activities, personal financial interest, inside information, employment of, buying from, or selling to family members and close personal friends. Furthermore, Axess expects the Partner to protect all confidential information provided by Axess and respect the intellectual property of Axess and others.

3.6 Export Control Regulations

It is crucial to Axess that applicable export control regulations are complied with. These regulations often are aimed at limiting activities that Axess does not support, e.g. terrorism.

Partners undertake to comply with all export control regulations and foreign trade laws of the Republic of Austria, the European Union, and the United States of America, as well as any other applicable national and international export control regulations and foreign trade laws. The Partners are obliged to inform Axess immediately and without being asked about existing approval requirements, restrictions, and license exceptions in accordance with the aforementioned regulations and laws. In particular, the Partners must inform Axess if the goods are dual-use products in accordance with the EU Dual-Use Regulation. The Partners undertake to provide Axess with all necessary documents (e.g., export list numbers, ECCN numbers) that Axess may require for export and obtaining an export license.

In the event of changes to the products or licensing requirements, the Partners are obliged to inform Axess immediately.

4 Human Rights & Labor Standards

4.1 Child labor

Axess recognizes the rights of every child to be protected from economic exploitation and from doing work that is likely to be hazardous to their physical, mental or spiritual health, harmful to their moral or social development, or to interfere with their education.

Child labor is prohibited at any stage of the production or manufacturing process. Partners are obliged to comply with the standards of the ILO

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Conventions on the minimum age for admission to employment and on the prohibition of child labor, and to take all necessary measures to prevent the employment of persons below the minimum age. The minimum age for admission to employment shall not be less than the age at which compulsory education ends and in no case less than 15 years of age.

The respective national standards for the protection of children and adolescents in employment must be complied with, taking into account the exceptions of the relevant ILO conventions. Children and adolescents under the age of 18 shall not be exposed to activities which, by their nature or because of the circumstances under which they are performed, are harmful to their health, safety or dignity. Attracting, organizing or offering children and young people to engage in unauthorized activities in any form is prohibited.

4.2 Slavery, forced or bonded labor

Axess does not employ or accept any form of slavery, forced or bonded labor, prisoners or illegal workers, and expects its Partners to do the same. Axess does not accept any means to force people to work including demanding a deposit of payment, identity documentation or other personal belongings, all of which is prohibited. If Partners employ foreign workers on a contract basis, they must not be required to remain in employment against their will, and they shall further have the same rights as the local workers. The employer will pay for commissions and recruitment agency fees in connection with the employment where applicable.

All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.

4.3 Freedom of association and collective bargaining

Axess expects its Partners to respect the rights of its employees to have the freedom to join, or not to join, an association of free choice as well as establish an association of free choice, to organize and to bargain collectively and individually in accordance with local laws and regulations. No employee should risk being harassed or retaliated against for exercising these rights.

4.4 Workers' contracts, working hours and compensation

Axess expects its Partners to comply with local laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the applicable local legislation and the local market situation. Workers should be entitled to a minimum of one day off in seven and to take time off for established national and local holidays. Workers should be granted the stipulated annual leave, sick leave and maternity/paternity leave without any negative repercussions.

4.5 Equal Employment Opportunities

Axess is an equal opportunity employer and makes hiring decisions based on merit. Our company policy prohibits unlawful discrimination on the basis of race, color, creed, sex, religion, marital status, age, national origin or ancestry, disability, medical condition including genetic characteristics, sexual orientation, or any other viewpoint that violates federal, state, or local laws. We expect our Partners to provide a work environment where everybody should be treated with respect and dignity and be given fair and equal opportunities for development. Axess does not tolerate any form of discrimination or harassment in the workplace. We expect our Partners to not discriminate against any worker.

4.6 Alcohol and/or drug abuse

Axess works proactively to remove any workplace hazards. Partners producing products or providing services for Axess should not be on company premises or in the workplace if they are under the influence of, or adversely affected by, alcohol, to the extent this impairs the individual's ability to perform his or her work duties. Axess has zero tolerance on drugs and does not allow individuals producing products or providing services for Axess to be on company premises or in the workplace if they are under the influence of drugs.

5 Environment

5.1 Environment and sustainability

Our Partners shall meet legal environmental requirements and shall obtain, keep current, and comply with all required environmental permits and licenses needed for their operations. Axess encourages the development and diffusion of environmentally friendly technologies. Axess Partners agree to preserve natural resources, structuring their activities to avoid or minimize negative environmental impacts by endeavoring to continuously improve their products and services with the goal of making them more environmentally friendly.

Partners are expected to optimize the resource efficiency of materials used and minimize impact on the environment. They should make reasonable efforts to minimize waste and waste water and strive to recycle materials wherever possible.

Partners must ensure environmentally compatible handling, collection, storage and disposal of waste in accordance with the requirements of the applicable legal system and the Stockholm Convention. Furthermore, Axess Partners must observe the bans on the import and export of hazardous waste defined by the Basel Convention.

Our Partners are expected to take appropriate measures to reduce hazardous air emissions, greenhouse gas emissions and energy consumption to an appropriate minimum. Axess recommends all Partners with significant environmental impact to implement certifiable environmental management systems or similar systems.

5.2 Consumer interest

Axess requires that applicable health and safety requirements are met for its products and services. Our Partners shall take this into account when producing goods or providing services for Axess.

5.3 Responsible sourcing of minerals

Axess is committed to comply with relevant laws and regulations requiring

disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to financing of armed groups, where some groups are believed to be responsible for serious human rights violations. Goods provided to Axess shall be in compliance with relevant laws and regulations regarding conflict minerals.

Axess continuously seeks ways to reduce the consumption of resources. Axess expects its Partners to strive to reduce its consumption of resources, including energy, waste and water, prevent pollution, have noise levels at acceptable levels and improve the overall environmental impact of its operations and products along the value chain. Further, chemicals and hazardous materials shall be labeled properly and safely stored, and recycled, reused and disposed of correctly.

6 Health & Safety

6.1 Work environment

Axess works systematically with health and safety and is committed to provide a safe work environment and expects its Partners to do the same. Risks that can cause accidents or impair the health and well-being of individuals while working for Axess shall be reduced. Therefore, occupational health and safety hazards shall be identified, evaluated and managed through a prioritized process of hazard elimination, engineering controls, and/or administrative controls.

For Axess a safe work environment means, for example, that work areas are kept clean and free from pollution, machines used in production are safe and do not risk the health of the workers, and instructions regarding the use of personal protection and work equipment are adhered to.

Personal protective equipment and work equipment shall be provided to the workers. Further, the work environment shall be well lit and have temperature and noise at acceptable levels. When noise is above acceptable levels, personal protective equipment such as ear protection shall be used. All units should provide adequate and clean changing rooms, washrooms and toilets, separate for men and women. Axess also expects the above from its Partners.

6.2 Building and fire safety

Hazardous material and equipment must be stored according to applicable law. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All workers shall receive information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. An evacuation plan should be displayed on each floor of a building. The fire alarm should be tested and evacuation drills carried out on a regular basis.

6.3 First aid and medical care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. The Partners should cover the costs of medical care for injuries incurred on its premises if they are not covered by social security or insurance, provided safety rules have not been violated.

Confirmation of Receipt

We acknowledge to have received a copy of the Axess Code of Conduct, and we fully understand its contents.

Company

Authorized Person/Position

Place/Date

Corporate Seal/Signature

Please complete and sign this form and return it to
compliance@teamaxess.com or your specific point of contact.