

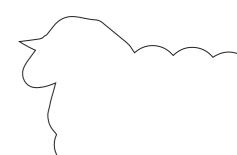


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For ease of reading, references to the male gender and use of third-person plural pronouns shall be deemed references to both genders.

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INTRODUCTION -TONE FROM THE TOP



Dear Colleagues

As human beings, as employees of LiSEC, but also as a general business undertaking, both within our private lives and in the context of our global business operations, we are embedded in a comprehensive social and legal fabric.

This fabric provides us with many opportunities, both as people and as a company. As people, in the context of safeguarding our rights and reputation, we are able to satisfy our need for social contact and pursue our interests. As employees of LiSEC, we can secure the foundation of our existence. Finally, as a company, we can engage in global transactions and thereby not only secure jobs and contribute to economic development, but also generate respectable earnings for our stakeholders.

Thus, within this fabric, we benefit from the interaction with other people, with our colleagues within the company, with our customers and partners, as well as also with higher-ranking institutions and structures.

However, this social and legal fabric can only function in a stable manner if all of its component parts operate in all areas and on all levels in accordance with social norms of behaviour as well as in accordance with applicable rules and regulations. Indeed, only then can all participants, ourselves included, benefit from this structure over the long term and on a sustainable basis.

For this reason, open, fair, objective and respectful engagement with the people around us, with our colleagues within the company, with our customers and business partners and all other partners of the company constitutes our axiomatic contribution to the functioning of this fabric. The observance of all applicable rules and regulations is, for us, equally axiomatic.

For this reason, we, as employees of LiSEC, jointly undertake to actively practise the values expressed in this Code of Conduct. For we are absolutely convinced that the long-term positive performance of our company is only possible based on observance of the rules of conduct compiled in this Code.

INTRODUCTION AND AIM

In order in future to continue our success and to be able to grow, we, the LiSEC Group, must **retain the confidence** which we have gained from our customers, business partners and employees and continue fulfilling unceasingly the need for values such as reliability, respect and appreciation. We are aware that this requires more than merely offering good products and services; it is equally vital that all companies of the LiSEC Group act responsibly. Our aim is to express in this Code of Conduct those values on which LiSEC bases its conduct in daily business on the international market. LiSEC sets these standards not only in relation to itself and all employees, but also in relation to all other business partners and suppliers, since we also consider that we have a commitment in relation to our customers to observe these values.

Our reputation and the trust which we enjoy among our customers, employees and business partners may be seriously damaged over the long term as a result of inappropriate conduct by an individual. Thus, we all jointly bear responsibility for **maintaining our good name** and **protecting** LiSEC **against potential losses**. In this way, we will be able together to position LiSEC as a reliable partner over the long term.

This document is intended to reflect a corporate culture marked by trust and characterised by fair and respectful dealings with one another. It constitutes a binding guideline on impeccable moral, ethical and legally-compliant conduct in relation to our customers and business partners as well as the values lived by LiSEC senior executives and employees in their daily dealings with one another.

Finally, our slogan gets to the heart of our DNA. Our aim is to be "best in glass processing", in every context, in every aspect of our cooperation with customers, partners and employees – an all-embracing standard which we set ourselves as technology leaders in our industry. As a result, we also wish to be "best in compliance".



WHO DOES IT APPLY TO?

"It takes 20 years to build a reputation and five minutes to ruin it. If you think about that, you'll do things differently."

Warren **BUFFET**

"Es dauert zwanzig Jahre, sich eine Reputation aufzubauen und fünf Minuten, sie zu zerstören. Wenn man das im Auge behält, handelt man anders."

Compliance (i.e. compliance with all rules relevant to LiSEC) is the responsibility of each and every employee.

LiSEC employees are individually responsible for observing all laws as well as all recognised social norms and, in the context of business life, must act in an ethical manner.

This Code of Conduct as well as all regulations derived herefrom constitute binding provisions applying to all managing directors, senior executives and employees (permanent and contract workers and agency workers) of the entire LiSEC Group¹ and furthermore apply to all those working in any form whatsoever for LiSEC – this includes in particular commercial agents and authorised dealers, as well as service providers and agencies which have a contract with LiSEC.

LiSEC senior executives actively put into practice the content and values laid down in this Code of Conduct and in this way act as role models. They must instruct their employees in applying the Code of Conduct, monitor compliance and ensure adequate training.

In the event that any issue is unclear, or if questions should arise, employees should first address their direct line manager by way of initial point of contact. Questions of detail related to the LiSEC Code of Conduct and any remarks may be addressed directly to the Legal & Compliance Department, acting as the independent compliance office for the entire LiSEC Group.

When interpreting the rules contained in this Code of Conduct, employees must also be guided by their usual sense of justice and question whether, on the basis of reasonable ethical and moral criteria, a particular action could give rise to criticism. In this context, country-specific criteria and customs must also be taken into account. However, where statutory rules exist, there exists no scope for discretionary judgment.

All employees are required to report via the Transparency Line (also anonymously) contraventions of laws, the Code of Conduct or other directives and regulations (see Section 8). Instructions which clearly contradict this Code shall not be binding and may not justify any action or omission constituting a breach of this Code of Conduct.

Failure to observe our Code of Conduct may entail disciplinary measures for those concerned and possibly also consequences under criminal or civil law.

In so far as required, this Code of Conduct is subject to amendments and additions.

¹ The LiSEC Group consists of all companies in which LISEC Holding GmbH has a direct or indirect holding of over 50%, or over which it exerts control in any other manner. All other companies in which LiSEC has a direct or indirect holding of 25% or more and in respect of which it does not exert (sole) control, shall be notified of the content of this Code of Conduct with a request also to secure the applicability thereof through autonomous recognition within the framework of the relevant company's decision-making powers.



GENERAL RULES OF CONDUCT



4.1 OUR POINTS OF REFERENCE

In the context of undertaking the business tasks assigned to them, the entire management and all employees of companies of the LiSEC Group always adhere to the respectively valid national and international laws, directives and standards as well as the following provisions of the LiSEC Group's Code of Conduct.

LiSEC employees act reliably, objectively and conscientiously. They execute tasks, obligations and functions to the best of their professional knowledge and evaluative abilities and are aware of the consequences thereof. They learn applying a high degree of willingness to develop and a high level of self-motivation. For all employees, it is therefore also essential that they inform themselves as to the rules (both internal and external) applying to their respective areas of responsibility and, in the event of doubt, address any queries to the competent offices (see above).

4.2 APPRECIATION, RESPECT AND INTEGRITY

In the context of all business activities, LiSEC observes basic human rights as well as the personal dignity, privacy and personal rights of the individual.

We observe the culture and customs of the countries in which we have business operations. LiSEC respects in particular the personality and individuality of each employee. Our corporate culture recognises and welcomes the fact that each person is unique and valuable and is to be respected for their individual abilities.

4.3 EQUAL TREATMENT

With the aim of being true to the principles of diversity, LiSEC attaches importance to equal opportunities and the equal treatment of its employees.

As a result, any unacceptable, degrading, harassing or discriminatory treatment based on nationality, race, skin colour, age, political or religious conviction or any disability, or indeed any behaviour in this vein, shall on no account be tolerated. This also applies with regard to sexual harassment based on gender or sexual orientation of any form whatsoever, for instance by way of blatant advances, humiliating remarks, jokes, scurrilous use of language, suggestive gestures or the showing of unacceptable image material within business and production facilities. Such conduct may also be categorised as harassment if it was not intended to be such.



4.4 CORPORATE COMMUNICATION

Our business processes are subject to the principle of honesty, and our actions are carried out in good faith.

External communication

LiSEC employees are active listeners, sociable, and customer-focused. They show appreciation for their business partners and persuade others through strong identification with their own arguments.

We ensure that no information is distributed which could damage LiSEC's good name; we also ensure that we do not share confidential information with persons not employed by LiSEC.

With regard to confidentiality, information security and data protection, see in particular also Section 7.

Internal communication

LiSEC aims to provide its employees on an ongoing basis with all information which they require in order to perform their tasks as well as possible. As a result, the Executive Board provides regular information (e.g. via the intranet, the employee magazine, at large group events) as to internal changes, the status of projects, and also as to external changes which could impact upon our business. In particular, compliance-relevant changes are also proactively communicated.

LiSEC employees communicate in an open, clear and respectful manner. Executives communicate actively and pass on promptly to employees relevant and required information and new developments.

In the case of crisis communication or very sensitive topics, communication takes place exclusively by arrangement with the internal Communications Department.

In order to pay particular attention to what is now the considerable significance of social media, we have published Guidelines (in particular DAW 41), which specify how we should communicate internally and externally using social media. These Guidelines are binding upon all employees of the LiSEC Group.

With regard to IT use, see also Section 7 ("Handling of corporate information").

4.5 HANDLING OF CORPORATE PROPERTY

We handle the corporate property of the LISEC Group and all resources provided to us – whether property, plant and equipment or intangible assets – carefully and in accordance with intended purpose.

We structure our business processes and workflows in a rational and efficient manner and handle the assets of LiSEC in a responsible manner. Unnecessary costs must be avoided. We make business decisions on the basis of a transparent commercial analysis of opportunities and risks.

Corporate property may only be removed from the company's site with the approval of LiSEC. Corporate resources may not be used for private purposes unless expressly otherwise agreed.

Since we are an innovative undertaking, the area of research and development has always held a high status at LiSEC, and for this reason we attach special importance to protecting our intellectual property – this includes our inventions, academic or technical research, product developments, the development of new technologies and self-generated computer software, etc. Depending on requirements, such intellectual property is actively protected through registration/filing for registration of commercial trademarks, patents and designs or the granting of exclusive or non-exclusive licences.

We protect the intellectual property of our business and at the same time observe all property rights of third parties and do not infringe such rights.

4.6 PRODUCT SAFETY, HEALTH AND THE ENVIRONMENT

Our products have always stood for continuity and the highest quality and safety standards, since safety and quality are our top priority. Accordingly, we constantly monitor the performance and quality of our machines and services.

LiSEC develops and supplies products which fully meet with the requirements of our customers in regard to their required use and quality. Working together with our customers in the area of risk prevention also forms an integral part of our service provision.

We provide our employees with a secure and healthy working environment in order to avert any accident or illness which may arise in connection with their occupation.

In all countries where we have business operations, without exception, we observe all applicable (employment) safety laws, rules and regulations.

Taking responsibility for the environment is also of key importance to LiSEC. We use natural resources economically and make every effort to avoid both resource wastage and environmental pollution. LiSEC attaches importance to minimising environmental impact as much as possible, and to continuously improving environmental protection measures.

Every employee makes their own conscious and proactive personal contribution towards achieving this.

We constantly monitor the aforementioned areas of quality assurance, employment safety and environmental protection and, where needed, introduce improved standards.



CONDUCT IN RELATION TO BUSINESS PARTNERS

We aim for long-term cooperative relations with our customers, suppliers and other business partners, and our business operations are therefore always guided by the following principles.

5.1 CORRUPTION – CORRECT HANDLING OF GIFTS OR INVITATIONS

Corruption is the abuse of entrusted power. Bribery, the acceptance of advantages or prohibited intervention all constitute various manifestations of corruption. LiSEC will not tolerate corruption or bribery in any form and does not participate in corruption or bribery in any manner, whether directly or indirectly.

The employees of LiSEC comply without exception with all laws of respectively applicable legal systems. The offering or acceptance of gifts, invitations or other benefits is not permitted if the aim thereby is to influence business operations in an inadmissible and unethical manner, or even if the mere impression of such influence could arise.

Minor-value gifts or invitations (e.g. invitations to business dinners, LiSEC promotional gifts such as pens, calendars, etc.) are permitted within a reasonable and proportionate framework, provided they could not create the appearance of inadmissibly influencing business decisions.

Cash or cash-equivalent benefits (in particular including vouchers) may on no account be accepted or offered, even if they involve small monetary amounts.

5.2 BUSINESS PARTNERS

We carefully check our business partners who are more closely associated with our name, such as, in particular, commercial agents or authorised dealers, before commencing any business relationship.

For it is the case that incorrect conduct on the part of a business partner could also involve the liability of LiSEC and bring our name into disrepute. Not only are economic suitability and performance important, but above all also the ensuring of ethically-correct conduct and compliance with our Code of Conduct. For this reason, we do not enter into any business relations if, during the course of the checking process, it should for instance emerge that:

- there exist negative reports from the past;
- contract processing via third parties or split payment flows are proposed;
- unreasonably high fees or transaction settlement via high-risk countries are requested.



5.3 FAIR COMPETITION

Competition and anti-trust laws serve to protect free competition. LiSEC is committed to a free market as well as to promoting fair competition. We act in accordance with national and international competition laws and engage neither actively nor passively and neither directly nor indirectly in any action which might restrict competition.

Breaches of competition rules may potentially lead to substantial losses for LiSEC, ranging from significant monetary fines to civil litigation and damages claims by customers or competitors.

Such anti-competitive business practices comprise in particular price fixing, market sharing or allocation of customers, suppliers, territories or business areas, establishing production restrictions or quotas, the submission of fictitious offers (bid rigging) ,or other agreements which may suppress or restrict competition.

We are aware that oral arrangements and any form of concerted practice are also relevant and prohibited in the same manner as written agreements. We therefore do not enter into any form of agreement whatsoever with competitors which restricts competition, whether in relation to prices, terms of sale, production quantities, customer sharing, sales territories or product groups, etc.

Our know-how is one of our most important corporate assets (in this regard, see also paragraph 4.5 and Section 7). In the context of discussions and contacts with competitors, employees of the LiSEC Group are therefore prohibited from referring to confidential matters, such as in particular:

- prices and terms of sale;
- costs;
- production capacities or warehouse inventory;
- manufacturing plans;
- market surveys; or
- other confidential information.

We do not enter into any agreements with distributors or customers which would restrict competition, particularly if the customer operates in the retail trade. Neither will LiSEC at any time abuse an existing position of market dominance.

In our involvement in professional associations and in particular when participating in the meetings of such associations, we also observe the principles set out above. If, in this context, we perceive any anti-competitive conduct, we will withdraw immediately as representatives of the LiSEC Group from such committees and associations and notify the relevant line manager accordingly.

5.4 SUPPLIERS

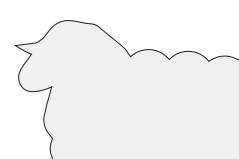
When selecting our providers and suppliers, we undertake a fair and transparent evaluation and assessment against the background of economic reasonableness.

In order to be able to always guarantee our customers the same high quality, we impose the same high standards on our suppliers as those which we set for ourselves. We have indeed set these out in the "LiSEC Code of Conduct for Suppliers and Business Partners".

5.5 FOREIGN TRADE AND EXPORT CONTROL

As a corporate group with worldwide export operations, we are aware both of the framework conditions and the risks of cross-border trade. Naturally we comply with all relevant national and international rules in this regard.

When exporting our machines, plant and technologies, from the time of receiving a customer enquiry until dispatch of our products, we therefore comply with all trade and export-control rules, including all applicable sanctions and embargoes.



AVOIDING CONFLICTS OF INTEREST

LiSEC respects the private life of its employees. However, in the context of business operations, situations may arise in which personal or family interests come into conflict with the interests of LiSEC.

A conflict of interest may exist if business decisions are influenced by personal interests. As employees, we at all times feel ourselves obliged to act in the best interests of the business and in accordance with the principles of this Code, without thereby allowing ourselves to be influenced by personal interests and personal relationships in the context of making professional judgments.

Since such conflicts of interest, or at least the appearance of such conflicts, cannot always be entirely avoided, LiSEC places its employees under a duty to deal transparently with such matters.

All employees are required to disclose current or potential conflicts of interest to their line manager immediately, fully, and without a specific request to do so being required; where appropriate, they must request special approval. This also applies if only the appearance of a conflict of interest could arise.

This could in particular be the case if, for instance, employees:

- engage in secondary professional occupations (in particular on a freelance basis);
- hold shares in a business undertaking which does not form part of the LiSEC Group;
- order/purchase goods and services or any other services (e.g. including the leasing of office premises by employees, relatives, friends, etc.) from themselves or from relatives, friends, etc. or from business undertakings which belong to relatives or friends;
- employ close relatives or friends; or
- work on a private basis in an organisation, the activities of which could have a negative influence on the interests of the company or employees.

Largely, any actual or potential conflict of interest can be resolved in a manner which is acceptable to both parties. In order to achieve this, it is essential and obligatory that potential conflicts of interest are disclosed in due and proper form at an early stage. The activities listed above shall in any event require prior written approval by an employee's line manager, with notification to the HR Department/Legal & Compliance Department.



PROTECTION OF CORPORATE INFORMATION

7.1 CONFIDENTIALITY OF INTERNAL COMPANY INFORMATION

As employees, we are proud of LiSEC's considerable inventive strength. Our know-how constitutes the driving force of our innovation and is therefore one of our most important business assets.

For this reason we consider it an integral part of our operations to actively protect LiSEC's intellectual property and to prevent any inadmissible know-how transfer to competitors or other unauthorised third parties.

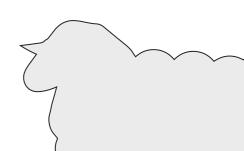
We handle confidential company information particularly carefully both during a contract of employment and thereafter, irrespective of the form or medium by which such information is processed, transferred or stored. This includes in particular information on prices, business ideas, strategies and forecasts, financial data, plans and all personal data of our customers, suppliers or employees.

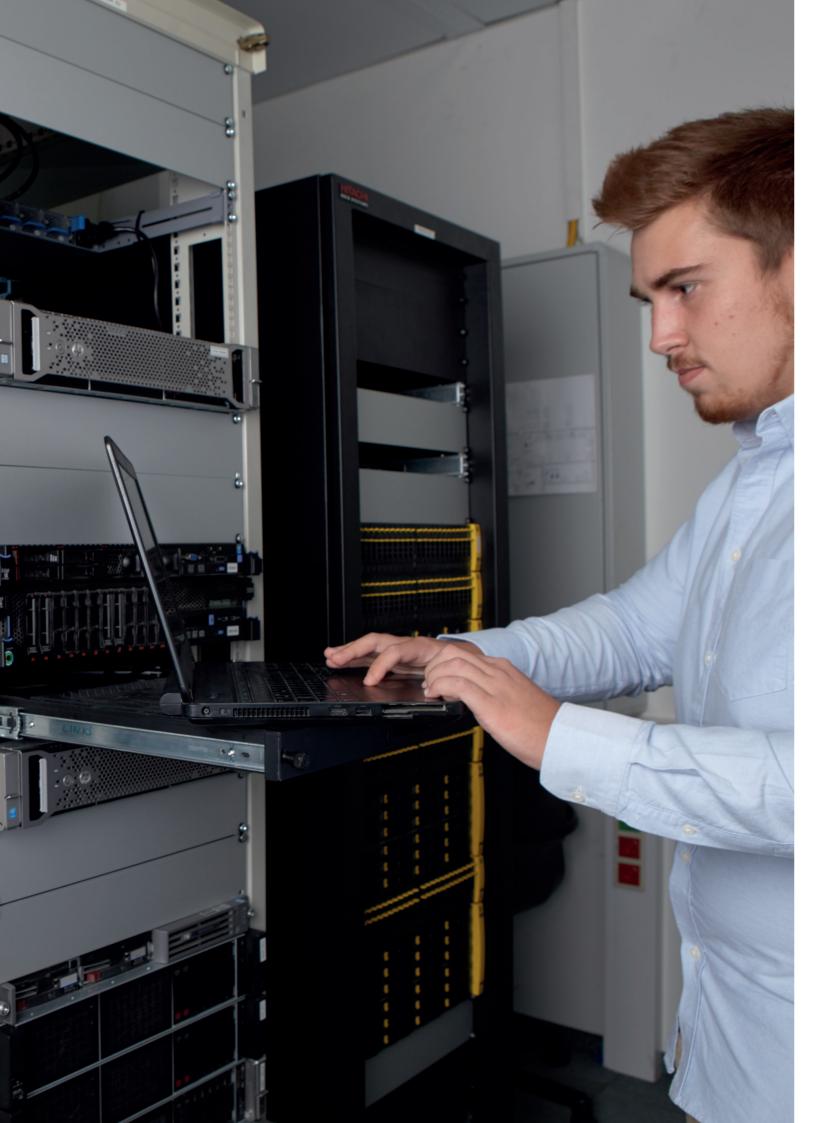
We know that the illicit communication of both technological and commercial secrets of the company (business and trade secrets) would cause serious damage to the company.

We therefore ensure that:

- no information on new products is distributed before patents or other commercial property rights have been registered in respect of such products;
- confidential information is not discussed with customers, suppliers or competitors; and
- confidentiality agreements are signed promptly, before, in exceptional instances, confidential information can be passed on, or negotiations with potential cooperation partners are commenced.

If, due to particular circumstances (e.g. sensitive development projects of customers or corporate acquisitions), exceptional confidentiality is required or instructed, we also maintain such confidentiality in relation to colleagues.





7.2 INFORMATION SECURITY

We use IT systems provided to us by LiSEC for performing our tasks, and we seek to ensure protection of these systems and this equipment against internal and external misuse.

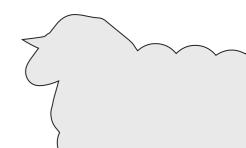
Important business-relevant data requires special care when being transferred via mobile storage media. Data may only be held temporarily on such storage media for transfer purposes. The user himself/herself is responsible for attentive safekeeping and transportation of mobile storage media.

The storage or transfer of business-relevant data using third-party or personal devices or external services (e.g. cloud storage, etc.) is expressly prohibited unless approved by LiSEC in advance. In this connection, Work Instruction DAW 10 must be observed.

7.3 DATA PROTECTION

The protection and security of data of our employees, customers and business partners is very important to us. LiSEC therefore treats all information and data in the strictest confidence and only collects, stores or processes such data if required for specified, clearly-defined and legally-permitted purposes. We also ensure this using sufficient technical and organisational measures and regular information provision to our employees.

Each employee makes their own individual contribution to data protection and information security.



CONTACT INFORMATION & REPORTING MISCONDUCT

If employees of the LiSEC Group identify breaches of internal or external rules or even merely suspect that such breaches have occurred, this must be reported immediately, since such contraventions may cause serious prejudice to business operations and/or the reputation of the LiSEC Group. Even deliberately "looking on" or closing one's eyes would ultimately be deemed a contribution to unethical conduct.

LiSEC operates a "zero-tolerance" policy and does not tolerate any misconduct. Any suggestion of such misconduct will be investigated with the requisite prudence and discretion. We are aware that breaches of legal rules, internal guidelines, regulations and instructions or of terms of this Code of Conduct may entail disciplinary consequences for each employee involved, or even consequences under criminal and civil law.

The first point of contact is normally an employee's direct line manager.

In addition, if you **observe a breach** of the Code of Conduct, you may also make contact in confidence with either the Legal Department, the HR Department or the employee representative body. All reports of misconduct will be treated in strict confidence.

While it is easier to follow up a report if the person making the report is known, we do however encourage particularly also employees or other persons wishing to submit an anonymous report on misconduct to send an e-mail to ethics@lisec.com. Our "Transparency Line" has been set up as our own whistleblowing hotline and is operated in total confidence by the Compliance Officers within the LiSEC Group's internal Legal Department.

In order to promote open communication in a spirit of trust, LiSEC guarantees that no employee will suffer any disadvantage based on a disclosure made, provided information has been supplied to the best of an employee's knowledge and ability. All reports received will be investigated without exception. When investigating facts reported, absolute confidentiality is observed and, if required, the unrestricted support of the entire LiSEC Group may be accessed. In this context, all requisite means and resources are to be provided in order to ensure swift conclusion of an investigation.





COMPLIANCE @ LISEC
MEANS ACTING IN LINE
WITH OUR COMPLIANCE
VALUES AND GUIDING

PRINCIPLES



Loyalty

- ... comply with all internal and external applicable rules.
- ... are committed to the responsible handling of LiSEC's property and avoid any action which could run counter to the interests of LiSEC.

Integrity

- ... reject corruption in all its forms.
- ... are dedicated to fair competition.

Safety & Quality

... put quality first and avoid risks to people and the environment.

Equality

... treat each individual with dignity and respect and value the diversity of personalities and characters among our employees.

Confidence

... handle corporate information and personal data in a responsible manner.

