

1. VTS AND THE COMPANY

A. COMMUNICATION

1. EXTERNAL COMMUNICATION

Open communication and honesty towards our customers and business partners is very important for successful cooperation and thus for us. For this reason, we communicate our financial, social and environmental results in an honest and transparent manner. All requests for information or interviews are therefore forwarded to the marketing department.

In social media channels, we treat VTS, our products and our colleagues as well as our customers and business partners with respect and formulate public expressions of opinion in such a way that it is recognizable that they are private opinions and not the opinion of the company.

2. HANDLING OF RECORDS

With regard to our documentation, we undertake to ensure that information, data and documents are always complete and that the documentation corresponds to the truth. In particular, our business records must meet the highest standards of accuracy and reliability and always comply with applicable regulations.

B. SOCIAL RESPONSIBILITY

In our view, every company has a social responsibility towards people and nature. For us at VTS, this is of fundamental importance. Our aim is to take a leading position in the area of corporate responsibility towards society.

1. TOWARDS PEOPLE

With this in mind, it is very important to us to provide a safe and healthy working environment in which family members do not have to fear injury or illness.

For this reason, we reject any form of exploitation or discrimination and ensure strict compliance with the relevant laws. We comply with legal regulations to ensure fair working conditions, including regulations on remuneration, working hours and privacy. Furthermore, we are committed to acting in accordance with human rights and in compliance with the rules against child labor.

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In the interests of the health and safety of all our employees and visitors, every employee must comply with the applicable laws, regulations and standards on occupational safety in their workplace. In particular, it is the responsibility of managers to ensure that appropriate procedures and protective measures are in place to ensure health and safety in the workplace.

It is important to us that these instructions are also implemented and followed in our own supply chain; we expect the same from our employees, customers, suppliers and other business partners.

2. TOWARDS OUR ENVIRONMENT

We also take our social responsibility with regard to nature and our environment very seriously and act sustainably. In the manufacture and sale of our products and services, we make every effort to maintain the ecological balance, avoid environmental pollution and conserve scarce natural resources (water, energy, materials and soil). We also make a contribution to reducing CO2 emissions.

Every employee is jointly responsible for environmental protection in their area of work and undertakes to comply with the laws, regulations and standards relating to environmental protection.

2.VTS AND OUR EXTERNAL PARTNERS

A. COMBATING CORRUPTION AND BRIBERY

Corruption is the abuse of one's own position, of whatever kind, for one's own benefit or for the benefit of another person. Corruption is not in line with our corporate values. It harms competition, hinders fair play and exposes VTS and every employee to an unnecessary risk of liability.

For this reason, we have a zero-tolerance policy towards bribery and corruption in any form. We do not accept bribes from anyone and we do not bribe anyone else, which means that we must not give or receive anything of value if it could give the impression that we are giving or receiving improper benefits.

This prohibition applies not only to government officials, employees of regulatory authorities and other public servants, but also to employees of business partners in Germany and abroad, as well as to our colleagues.

Preventing corruption is the duty of every employee. We reject all forms of corruption and ensure that applicable anti-corruption laws are complied with at all times and wherever we do business. We promote anti-bribery and anti-corruption practices to everyone who works for our company. We do not knowingly allow, nor do we ignore evidence that someone is acting on our behalf and paying or receiving bribes or kickbacks.

B. INVITATIONS, GIFTS & BENEFITS

In many countries, it is normal business practice and a sign of respect to exchange gifts.

However, the granting and acceptance of invitations, gifts and other benefits can also give rise to suspicion of corruption. In this context, it is necessary to prevent the appearance and suspicion of such an offense.

We are confident that our employees are guided by common sense and judgment when giving or receiving gifts or invitations and that they never give gifts with the aim of gaining a competitive advantage.

C. DONATIONS, CONTRIBUTIONS AND SPONSORING

As a responsible member of society, we do not shy away from assuming social responsibility. That is why the promotion of education, science, environmental protection, art, culture, social issues and sport is an important concern for us. This support takes the form of monetary donations and donations in kind for non-commercial and charitable purposes. VTS also acts as a sponsor of events and projects for the above-mentioned purposes.

However, we never give donations or other benefits to obtain business or other improper advantages for VTS, i.e. advantages that cannot be obtained honestly or legally, or if they create the appearance of bribery. Sponsorship and donations will only be provided in accordance with applicable laws and regulations to prevent corruption and conflicts of interest.

D. COMPLIANCE WITH COMPETITION LAW REGULATIONS

1. FAIR COMPETITION AND ANTITRUST LAW

We attach great importance to free and fair competition and contribute to combating practices prohibited under competition and antitrust law. We strive to compete fairly and ethically under all applicable competition laws because anti-competitive practices can damage the business and reputation of the company. Accordingly, we never discuss prices or price components such as discounts or payment terms with competitors.

2. FOREIGN TRADE AND EXPORT CONTROL

The VTS Group engages in foreign trade and exports. As an international company, we comply with the relevant national and international legal standards for export control. We also ensure compliance with embargo regulations.

Export and assistance bans are complied with and the applicable customs regulations are observed both when exporting and importing goods.

We check customers and business partners with regard to applicable sanctions lists.

3. SUBSIDY FRAUD AND INCITEMENT TO SUBSIDY FRAUD

In order to ensure free and fair competition, it is also necessary for us to take strict action against fraudulent practices, in particular subsidy fraud, as part of our contribution to combating prohibited practices under competition law.

Subsidy fraud includes the misrepresentation of subsidy-relevant facts to the subsidy provider through false information or certifications or the use of material or monetary subsidies in contradiction to subsidy conditions.

4. PREVENTION OF MONEY LAUNDERING

As already mentioned, the cross-border exchange of services is an important part of our success as an internationally active company. We comply with all legal requirements in this regard without exception. In addition to the aforementioned rules for import, export, domestic trade, international sanctions and trade restrictions, we ensure that we also comply with the legal requirements for the prevention of money laundering.

Money laundering occurs when assets of criminal origin are disguised (i.e. "laundered") through legitimate transactions and business activities or when legitimate funds are used to support criminal activities.

Every employee must comply with money laundering laws and immediately report any suspicion of money laundering (by employees, customers and business partners) to the respective Head of Accounting and the Compliance Officer.

The VTS Group only works with reputable business partners who act in accordance with the law and do not use illegal financial means.

5. INSIDER TRADING

We comply with the regulations on insider trading.

It is prohibited to use insider information, including information from other companies, when trading in securities or other tradable financial instruments and to pass on insider information to others for such purposes. Insider information is specific information about circumstances that are not publicly known and which, if they were made public, could have a significant impact on the price of securities or similar financial instruments. Examples of such circumstances are profit increases and decreases, major orders, plans to merge or acquire a company, significant new products or changes in management.

3. HANDLING OF DATA

A. PRIVACY, CONFIDENTIALITY, DATA PROTECTION AND DATA SECURITY

As an international company, the VTS Group considers the use of modern information and communication technology to be an essential part of our business processes. We protect the right of employees and other persons to privacy and data protection and maintain the confidentiality of all information worthy of protection, regardless of whether it concerns our colleagues, customers, business partners or other parties involved.

We treat company-related and personal data in a confidential and professional manner in accordance with national and international data protection laws. Personal data may only be collected, used and stored in accordance with the applicable laws. This means that we exercise great care and strict confidentiality when collecting, storing, processing or transmitting personal data of employees, customers, suppliers, competitors or other third parties. Confidential information also includes all non-public strategic, financial, technical or business information as well as all business or trade secrets of our business partners.

B. INFORMATION TECHNOLOGY AND INTERNET USE

In connection with our use of modern information and communication technology, we regularly use IT systems in our day-to-day business.

For this reason, our employees are expected to support the company in protecting the entire infrastructure and data of the computer system against deliberate malicious acts by persons inside or outside the company. We take great care with the content of emails, attachments, downloaded files and stored linguistic resources. We ensure the security of our passwords and do not share them with other employees or third parties under any circumstances. We are also careful when using our communication media and social media channels.

4. VTS AND OUR EMPLOYEES

OUR RESPONSIBILITIES

1. ANTI-DISCRIMINATION

We respect differences and treat every employee with respect. We prioritize diversity, equal opportunities and tolerance, and we respect the personal dignity, privacy and personal rights of each individual. Each of us is entitled to fair, dignified and respectful treatment.

For this reason, we do not tolerate discrimination in the workplace and want to ensure that no one at VTS is discriminated against.

This applies to interactions with colleagues, customers and business partners as well as to personnel-related decisions such as hiring, promoting or firing employees.

2. ANTI-BULLYING

We are an attractive employer and offer a pleasant working environment. We treat all employees, customers, business partners and other stakeholders fairly and with dignity and respect at all times.

Based on the above, any form of bullying, including physical, sexual, verbal or other harassment, is prohibited and will not be tolerated. VTS has a zero-tolerance policy towards bullying.

3. CONFLICTS OF INTEREST

We are expected to act in the best interests of the Company, which means that business decisions should be made free from any conflict of interest. This is because even the appearance of a conflict can damage the reputation of the individual and/or the company.

To achieve this, there are processes that may only be carried out if they have been approved in advance by the responsible managing director.

4. PROTECTION AND PROPER USE OF COMPANY ASSETS

We respect the property of the company and the property of third parties such as our customers and business partners. For this reason, we treat all property with care. Everyone in the company is personally responsible for protecting our company assets from loss, destruction, misuse, theft, waste or other damage. It should be noted that the protection of property refers not only to tangible assets, but also to intellectual property such as copyrights and trade secrets, which we also use in accordance with applicable law and within the scope of permissible use.

In principle, we only use the company's property for business purposes. Company assets may not be used for private or illegal purposes.

In addition, the purchase and sale of company assets must be transparent, understandable, cost-effective and in line with market conditions. The personal interests of individual employees must not influence decisions and business transactions.

5. REPORTING AND WHISTLEBLOWING PROCEDURES

A. REPORTING AND PROTECTION FROM RETALIATION

At VTS, we live the "speak-up" culture. Questions can be asked and concerns about possible misconduct can be raised at any time. Our interactions should be characterized by mutual respect and trust so that we can discuss misconduct in an open and constructive dialogue.

To ensure that this "speak-up" culture and the conduct of all employees comply with this Code of Conduct, the applicable laws and regulations as well as our internal guidelines and organizational directives, we rely on the support of every employee. Violations can be reported in person through direct contact with a line manager, the Compliance Officer, by e-mail or by telephone (anonymously).

To the Integrity Line

On the other hand, VTS ensures protection against retaliation for reporting concerns of any kind. It is ensured that family members who report possible violations in good faith and without malicious intent do not suffer any disadvantages as a result. In addition, no one who participates or cooperates honestly in our company's investigation will be subject to retaliation. Any actual or threatened retaliation will be considered a serious violation of this Code of Conduct and will result in consequences.

B. CONTACT PERSON AND COMPLIANCE OFFICER

If you have any concerns or questions about this Code of Conduct, you can speak to people in your immediate working environment, such as your line manager. You can also contact the relevant specialist department, for example the HR department if you have questions about employment contracts.

If it is not possible to clarify the matter with your line manager or the relevant specialist department, or if you still have concerns, you can contact the management.