



Code of Conduct

Preamble

Our company motif, HOME OF VALUES, encapsulates everything that defines our actions and our mindset. Our four core values – curiosity, simplicity, humanity and connectedness – form the foundation of our corporate culture. They shape our daily collaboration, our respectful interaction with one another and our relationships with customers, business partners and society as a whole.

We foster curiosity by being open to new ideas and challenges and by continuously learning and developing our skills. We strive for simplicity in our processes and communication in order to work more efficiently and provide our customers with the best possible support. We practice humanity by treating every individual with respect and dignity, regardless of their position or role within the company. We demonstrate connectedness by working together as a team and supporting one another to achieve common goals.

“We create value to make life easier and more secure.” Our vision is the benchmark for everything we do and every decision we make, reminding us to act responsibly towards our employees, business partners and society in general. At the same time, our mission drives us to put this vision into practice: “With innovative technologies and services we develop solutions that excite and inspire. Our sense of simplicity and focus on people propels us as we head, always curious, into the future. Locally rooted and globally connected, together we give values – measurement values as well as human values – a home. VEGA is the HOME OF VALUES.”

In addition to our core values, our work and our decisions are guided by our corporate goals of healthy growth, sustainability and social responsibility, which form the basis for our long-term success.

These fundamentals are not mere guiding principles, but a lived reality and part of our identity. This Code of Conduct translates our values into concrete expectations and rules, enabling us to act as a true HOME OF VALUES and make responsible decisions. It is regularly reviewed and updated to ensure clarity and guidance on compliance issues. All employees are encouraged to report concerns or possible misconduct confidentially and without fear of adverse consequences. Violations of this Code of Conduct are not tolerated and will be dealt with vigorously to ensure that our values and principles remain evident in every aspect of our conduct.

Isabel Grieshaber
Managing Partner

Markus Kniesel
Managing Director

Compliance with the Law

For us, compliance with all applicable laws, regulations, official rules and internal guidelines is a core principle of responsible conduct. We continuously strive to understand and comply with legal requirements and to take them into account in our daily decisions.

All employees are responsible for familiarising themselves with and complying with the legal requirements and internal guidelines relevant to their work. Since legal frameworks can vary depending on the country or business area, we promote an environment where questions or uncertainties regarding compliance can be addressed openly at any time.

Violations of applicable law or internal regulations are not tolerated and may result in employment or liability related consequences.



Corruption and Fraud Prevention

Corruption means the abuse of entrusted power for one's own or another's benefit while simultaneously harming third parties or the common good. We consider both active bribery, i.e. offering, promising or granting advantages to influence decisions, and passive bribery, i.e. demanding, accepting promises of or accepting

advantages, to be unacceptable. We also strictly reject any form of fraud, embezzlement or unfair influence.

Our organisation pursues a clear zero-tolerance policy in this regard. When dealing with public officials, authorities and public sector entities, we adhere to particularly strict standards; so-called "facilitation payments" are expressly prohibited. Commission agreements or payments must be comprehensible and proportionate to the services rendered by a business partner, and are carefully reviewed and fully documented.

We promote transparency and raise awareness among our employees through open communication and targeted information campaigns. Any suspicions or indications of corruption or fraud must be reported immediately to the responsible internal departments. Violations are carefully investigated and result in appropriate disciplinary actions, which could include labour law-related consequences or even criminal charges.

Invitations and Gifts

The exchange of small gifts and mutual invitations between business partners, within the scope of normal relationship maintenance, is permitted and in accordance with the customary practices of the respective country. Gifts can include tangible as well as intangible benefits, such as commissions, discounts or price reductions on privately purchased goods and services. Cash gifts are strictly prohibited.

We make sure that invitations or gifts are demonstrably business-related, do not violate applicable laws or regulations, are of reasonable value (e.g. pens, calendars, or other promotional items), do not create any obligation to give something in return and do not influence business decisions.

Inappropriate offers of gifts or invitations are reported to the respective supervisor immediately. If, in a particular case, we are not sure, we consult with the relevant manager or the compliance department in advance.

Conflicts of Interest

Conflicts of interest arise when private interests conflict with the business interests of our organization, or when such a conflict appears to exist, possibly impairing objective and responsible decision-making.

All actual or potential conflicts of interest must be brought to light immediately. Full transparency is required in such cases. Business decisions must never be influenced by private interests or give the impression of such influence.

Secondary employment or external business commitments must be disclosed and approved in advance.

All employees are obliged to promptly report any potential conflicts of interest to the HR department, the respective supervisor or the Compliance department. Violation of these rules may result in appropriate disciplinary action or legal consequences.

Prevention of Money Laundering and Terrorist Financing

Money laundering occurs when funds or other assets derived from criminal activities are introduced into the legitimate economy in order to conceal their origin. Terrorist financing refers to the provision of funds or other resources to support terrorist activities or organisations. Even unintentional involvement can be punishable by law.

To prevent money laundering and terrorist financing, we conduct risk-based due diligence on our business partners to ensure they operate reliably, comply with applicable laws, and that their funds originate from legal sources. We are committed to working exclusively with trustworthy and law-abiding companies.

We guarantee transparent and traceable cash flows. Incoming payments are promptly recorded and clearly allocated to the corresponding services. Cash payments for settling invoices are not accepted.

Our goal is to minimise risks and ensure that transactions with VEGA are not misused for money laundering or terrorist financing.

International Trade Law and Sanctions

We are an internationally active company and comply with all applicable foreign trade regulations and sanctions, because for us, free trade in accordance with applicable law is a fundamental principle.

Within the context of our business activities, we observe embargoes against countries, individuals and organisations, as well as export-related product restrictions. Through appropriate technical and organisational measures, we support compliance with these regulations and thereby help to prevent violations.

We also expect our business partners to comply with all relevant regulations and restrictions and to act in a manner that is lawful and compliant.

Tax and Customs Compliance

As a global company, we are aware of our responsibilities with respect to taxes and customs law. We are committed to complying with all national and international tax laws as well as recognised standards and principles.

We refrain from aggressive tax and customs avoidance strategies as well as any form of abuse of the system, and pay taxes where the actual economic value is created. Our internal structures and processes support the complete, accurate and timely determination, declaration and payment of all taxes and customs duties.

We take appropriate measures to identify tax and customs risks early on and to prevent or rectify violations. This includes close cooperation with the relevant authorities and compliance with legal reporting obligations. Violations are prosecuted rigorously and may result in legal or organisational consequences.

Fair Working Conditions

Our commitment to respecting human rights also includes the eight core labour standards of the International Labour Organisation (ILO). We are committed to its principles in order to ensure fair and humane working conditions for all VEGA employees.

Equality and Inclusion

Our organisation is committed to the principles of equality, equal opportunity and diversity (Diversity, Equity & Inclusion - DEI). We respect and promote the rights of all employees, regardless of gender, origin, skin colour, religion, ideology, age, sexual orientation, disability or other personal characteristics.



Our locations in Germany are subject to the provisions of the General Equal Treatment Act (AGG), which is based on European anti-discrimination directives. And our international companies adhere, at a minimum, to the applicable national laws and internationally recognised principles of equal treatment and non-discrimination.

We create general conditions that guarantee equal development opportunities for all employees and support the promotion of women to leadership positions. In addition to our measures for the targeted development of individual potential, flexible working time models also contribute to strengthening the compatibility of family and career.

We understand inclusion to mean the equal participation of all people in working life. We foster an environment in which differences are seen as an enrichment and no one is disadvantaged because of a disability, health impairment or other personal issues.

Discrimination, harassment and disadvantage of any kind are not tolerated and, indeed, are expressly repudiated. We take appropriate measures to prevent violations and ensure a respectful and appreciative work environment.

Prohibition of Child Labour, Forced Labour and Modern-Day Slavery

VEGA pursues a clear zero-tolerance policy and is committed to complying with internationally recognised standards in the fight against forced labour, child labour and human trafficking. Any form of modern-day slavery is unacceptable.

We strictly reject any form of child labour and comply with the international conventions of the International Labour Organisation (ILO No. 138 and No. 182) and the UN Convention on the Rights of the Child. Children below the legal minimum age may not be employed. Young people over the minimum age are not permitted to perform dangerous or health-impairing work.

Furthermore, we strictly reject any form of forced or compulsory labour and are committed to complying with ILO Conventions No. 29 on forced labour and No. 105 on the abolition of forced labour. No one can be forced to work, whether through threats, violence, debt bondage, human trafficking, intimidation or the deprivation of identity documents or wages. Any employment relationship must be based on a voluntary decision and include the right to terminate it by giving reasonable notice.

VEGA is also committed to taking appropriate measures to prevent and combat forced labour and modern-day slavery in its supply chain. To this end, VEGA conducts regular risk analyses to identify potential human rights risks at an early stage and initiates appropriate remedial measures if there are signs of violations.

Working Hours and Remuneration

Our organisation is committed to complying with all applicable legal provisions relating to working hours, remuneration and employee rights. We make sure that the maximum permissible working hours, rest periods and breaks are observed and overtime is transparently regulated.

For us, fair and appropriate remuneration is essential. In accordance with ILO Convention No. 100 of 1951, we are committed to the principle of equal pay for equal work. We ensure that wages meet at least the statutory or collectively agreed minimum standards and consider transparent and comprehensible payslips, i.e. pay statements, extremely important.

What is more, we offer social benefits and auxiliary services that promote the well-being and social security of our employees. Protecting employee rights is our top priority, and we are actively committed to fair, safe and respectful working conditions.

Occupational Safety and Health

We comply with all applicable legal and regulatory requirements for occupational health and safety to ensure a safe and healthy work environment. Our safety concept is based on preventive measures, regular training and heightened awareness among all employees. Personal protective equipment (PPE) is provided as needed and looked after to ensure that it is used properly. In addition, we actively promote the physical and mental health of our employees.

Managers and supervisors act as role models in this regard: They set standards, ensure their implementation and foster a safety culture in which all employees take responsibility. We encourage all employees to openly address safety risks and contribute to the continuous improvement of occupational safety and health.

Sustainability

Sustainability is a key objective for us, one which we are continuously developing and gradually embedding in all business areas and processes. We undertake to consistently integrate environmental, social and ethical aspects into all decisions and processes within the company and

along the entire value and supply chain. In doing so, we place particular emphasis on the responsible use of natural resources, climate protection and the promotion of sustainable innovations. We see sustainable business practices as a key factor for long-term corporate success and added value for society.

Sustainability in the Supply Chain

Sustainability is also an integral part of our procurement processes and serves as a guiding principle in our collaboration with suppliers and business partners. We expect them to adhere to ethical, social and environmental standards comparable to our own, which are enshrined in this Code of Conduct.



We pursue a risk-based due diligence approach all along the supply chain and adapt our measures to the type, severity and probability of risks.

To ensure that these principles are upheld, we regularly review our partners' compliance with our demands and adherence to the relevant specifications, all in accordance with the applicable laws and internationally recognised standards.

Responsible Sourcing of Raw Materials

Our organisation is committed to responsible sourcing of raw materials, especially with the aim of avoiding conflict minerals and raw materials

from high-risk regions. Transparency in the supply chain is crucial to ensuring compliance with human rights and social and environmental standards.

Together with our suppliers, we work to promote sustainable procurement processes and minimise environmental and social risks. Regular assessments and audits support the continuous improvement of our processes and adherence to high ethical standards.

Environment and Resource Protection

We undertake to comply with all environmental laws, guidelines and internationally recognised standards that apply to us, and are guided by the principles of sustainable development enshrined in the Rio Declaration on Environment and Development (1992).

We strive to use resources sustainably and implement measures that systematically reduce water consumption, emissions and waste. The use of renewable energies is actively promoted. In our procurement activities, we pay attention to ecological criteria in order to establish sustainable supplier relationships and take responsibility for the protection of biodiversity and ecosystems.

Through regular training, instruction and awareness-raising measures, we promote environmentally conscious behaviour among all employees.

Contingent on the extent of company-specific risks, targeted measures to reduce negative environmental impacts are defined within the context of our environmental management system and their implementation is monitored. We systematically measure our environmental performance using key performance indicators, report on it transparently in our Environmental Statement and have our processes regularly validated by independent external bodies to ensure continuous improvement.

Handling of Resources and Company Property

We use and treat resources and company property, such as work equipment, furniture, IT equipment and intellectual property, carefully and responsibly. We protect these assets from misuse and employ them exclusively for lawful purposes and in the promotion of company interests. We use consumables sparingly and efficiently.



Social responsibility

As an internationally active company with regional roots, we are committed to our social responsibilities, especially in the regions where we operate. Within transparent structures and clear responsibilities, we support projects that align with our corporate values without expecting anything in return.

All donations are made in accordance with clear internal rules that reflect our ethical standards and applicable legal regulations.

VEGA adheres to the principle of political neutrality and restraint. We therefore do not support political parties, organisations or institutions with a clearly political agenda, nor do we promote candidates for public office, either directly or indirectly.

When employees participate in political or democratic activities, they must not give the impression that they are acting on behalf of VEGA. Also, work time or company resources

may not be used for this purpose.

Fair Competition and Compliance with Antitrust Law

We are committed to fair and responsible competition and to compliance with all national and international antitrust laws as well as competition rules and regulations. To this end, we foster a corporate culture based on integrity and fairness in the market.

We staunchly reject anti-competitive practices like price fixing, customer allocation or unfair terms and conditions, especially those targeting vulnerable groups. Misleading or fraudulent business practices are also unacceptable.

We investigate possible violations transparently and take appropriate measures to ensure fair competition for the long term.

Transparency

Our business practices are transparent and guided by clear ethical principles. In order to strengthen the trust of our business partners and employees, we communicate decisions openly and comprehensibly. We value communication on equal terms and promote open, respectful collaboration.

Data Protection and Information Security

Our organisation undertakes to comprehensively protect personal data and to comply with all relevant data protection laws and guidelines, including the GDPR as well as national and international regulations, where applicable.

To ensure data security, we implement appropriate organisational and technical

measures. Our employees receive regular support through targeted training and awareness-raising programs.



Protecting against cyberattacks and ensuring IT security are top priorities. We also promote the ethical use of new technologies and digitalisation, in order to handle information responsibly, confidentially and with integrity.

We expect our business partners to adhere to similarly high standards.

Confidentiality

Our organisation undertakes to fully protect confidential information. Confidentiality agreements and internal regulations form the basis for the careful handling of sensitive data. We ensure the confidentiality, accuracy and integrity of all information and records.

For us, ethical handling of knowledge and intellectual property is as much a matter of course as guaranteeing the confidentiality of business, customer and personal data.

If we discover non-compliance with these requirements, decisive action will be taken to ensure long-lasting protection of our information.

Artificial Intelligence (AI)

We recognise the potential of artificial intelligence (AI) and want to use it in a targeted and responsible manner. We're aware of the risks and recognise the need for an ethical approach to new technologies.

We ensure transparent and comprehensible use of AI systems and make sure that the data used is of high quality and carefully reviewed, and that the rights of affected individuals are respected at all times.

We conduct risk-based assessments of key AI applications to identify potential impacts and document evaluations relevant to decision-making.

Security Incidents and Continuous Improvement

Our organisation is committed to identifying security incidents in a timely manner and documenting them carefully. Clear escalation and communication channels ensure that every incident is analysed and evaluated immediately so that preventive measures can be derived.

Through regular training and awareness-raising measures, we promote awareness among all employees of the need to handle security risks responsibly. Our goal is to continuously improve our security management.

Reporting of Violations

All employees, as well as external partners and other third parties, are encouraged and requested to report any identified or suspected violations of this Code of Conduct, applicable laws or internal guidelines.

In addition to internal options, such as contacting managers, the HR department or the compliance

department directly, information can be submitted by email to ethics.vega@vega.com or via the following portal, which also allows anonymous reporting:

Whistleblowing

(<https://grieshaber.crefowhistle.de/>)

For partners in our supply chain, there is also a separate portal through which human rights abuses and environmental risks or violations relating to our corporate due diligence obligations can be reported. Anonymous reports can also be submitted via this portal:

Human rights and environmental issues

(<https://grieshaber.crefosupply.de/>)

All of our reporting channels guarantee confidentiality and protection for whistleblowers. We usually acknowledge receipt within seven days and provide within three months feedback on the follow-up actions taken, all the while maintaining strict confidentiality.

All incoming reports are carefully reviewed and, if necessary, addressed with appropriate measures. VEGA guarantees that reports made in good faith will not result in reprisals or disadvantages. Misuse of the systems is not tolerated.

Responsibility and Consequences of Violations

Our organisation undertakes to comply with this Code of Conduct and all associated internal guidelines and legal requirements.

In the event of an identified violation, we take forceful action and, if necessary, impose sanctions in accordance with our internal guidelines and regulations.

We attach great importance to fair and transparent procedures, as we want to ensure that investigation and clarification are comprehensible and facilitate continuous improvement.

All employees are obligated to comply with this Code of Conduct. Managers and supervisors bear a special responsibility here, actively promoting the company's values and principles together with their employees and setting a good example themselves.

Our goal is to foster a culture of integrity where accountability and trust form the basis of our actions.

Final provisions

This Code of Conduct is binding for all employees and, if contractually agreed to, also for our business partners.

This Code of Conduct shall enter into force on the date of its publication. It is available in several languages and can be accessed on the internal company portal or at www.vega.com.

If anything in this document is unclear, the Compliance department, the HR department or your respective supervisor stand ready to clarify or explain in more detail.

Each and every individual has the responsibility to comply with and implement this Code of Conduct. To strengthen our shared understanding of and commitment to our values, this Code of Conduct is communicated transparently to all employees and business partners, and revised or extended if necessary.

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Publication date: November 2025

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