



exyte

CODE OF CONDUCT





Speak Up!

It's the right way.

CODE OF CONDUCT

TABLE OF CONTENTS

	MESSAGE FROM THE BOARD	05
01	OUR COMPLIANCE CULTURE	06
02	OWNERSHIP FOR COMPLIANCE	08
03	CARE FOR PEOPLE	10
	3.1 HUMAN RIGHTS	12
	3.2 DIVERSITY	12
04	PERSONAL DATA	14
05	CONFLICTS OF INTEREST	16
06	COMPANY RESOURCES	18
	6.1 ASSETS	18
	6.2 DATA	18
07	BRIBERY AND CORRUPTION	20
	7.1 OUR GENERAL STANCE	20
	7.2 BUSINESS PARTNERS	20
	7.3 PUBLIC OFFICIALS	22
	7.4 ENGAGING AGENTS AND CONSULTANTS	24
	7.5 RULES FOR DONATIONS AND SPONSORING	24
08	FRAUD AND INTEGRITY OF FINANCIAL RECORDS	26
09	COMPETE ON FAIR TERMS	28
10	SANCTIONS AND EXPORT CONTROL	30
11	IMPLEMENT THE CODE OF CONDUCT	32
	YOUR CONTACT OPTIONS	35

EXECUTIVE BOARD



Dr. Wolfgang Büchele
Chief Executive Officer



Elena Bashkeeva
Chief Financial Officer



Mark Garvey
Chief Executive Officer
Advanced Technology
Facilities



MESSAGE FROM THE BOARD

Dear Colleagues,

It is our corporate policy to conduct business in accordance with the highest ethical, moral and legal standards throughout all business areas.

This means, first and foremost, that we comply with all applicable laws and regulations – even if that means not to win an important project or missing a business target. However, compliance at Exyte goes further. We act with integrity and respect for business partners and for colleagues. At Exyte, we are explicitly not interested in an increase of revenues and profits at the expense of honesty and fair dealing.

Globalization and increasingly complex regulatory environments make compliance more and more challenging. To help you master these challenges, the Exyte Code of Conduct provides guidance for your day-to-day business. Our Code of Conduct is more than just

a policy. It is the basis and benchmark of all our business conduct. Always keep in mind that a single case of non-compliance can have serious consequences and may damage the high reputation that Exyte has earned in the market. The trust our stakeholders place in our company is our most valuable asset. Protecting this asset is a responsibility that we all share, regardless of our position or role in the company.

My board colleagues and I expect you to understand the Exyte Code of Conduct and live up to it in practice. We encourage you to speak up and to take action whenever needed. Should you witness misconduct or be in doubt, please contact the Exyte Compliance Team.

A handwritten signature in black ink, appearing to read "W. Büchele".

Dr. Wolfgang Büchele
Chief Executive Board

01 | OUR COMPLIANCE CULTURE

Our purpose goes beyond engineering. Through cutting-edge facilities, we enable change in digital innovation and production of life-saving medicines. We take great pride in being a trusted partner with more than a century of expertise in delivering high-quality projects and products while acting with integrity and in compliance with the law.

At Exyte integrity means doing the right thing, even when no one is watching. Our Code of Conduct is applicable to all Exyte affiliates and provides a framework to protect our people and our companies. Controls and processes, communication and training, as well as review and monitoring are the main pillars of our Compliance Management System, which helps embed these concepts into our business.

You can promote this culture by speaking up if you witness misconduct or believe that something is inappropriate. We encourage you to **contact your Compliance Team directly** or reach out to the Corporate Compliance Team **via ethics@exyte.net**. We assure you that all reports made in good faith will be taken seriously, will be treated with the strictest confidentiality and will not carry any risk of retaliation. In addition, our digital reporting site (**www.speak-up.exyte.net**), which is independently operated by a third-party, provides the option of reporting anonymously.



Speak Up!
It's the right way

We expect our business partners to uphold the same high standards we set for ourselves. Since our supply chain is essential to the delivery of our projects, we select partners who understand and share our principles. The Exyte Supply Chain Code of Conduct complements this document and outlines our expectations for ethical business conduct to those we partner with. Their non-compliance may also be reported via our reporting system. Such reports are strongly encouraged and highly appreciated.

COMPLIANCE WITH THE EXYTE CODE OF CONDUCT IS THE RIGHT WAY.

Everyone

For employees of Exyte.
For our business partners.
For all our stakeholders.

Everywhere

At our offices.
At our construction sites.
At our production plants.

Every time

Compliance is an attitude.

02 | OWNERSHIP FOR COMPLIANCE

The Exyte Code of Conduct defines the standard of conduct for everyone at Exyte. It determines how we interact and work internally and provides the basis for relationships with third parties like clients, business partners and other stakeholders.

Everyone working at or on behalf of Exyte is expected to understand, comply with and apply the Exyte Code of Conduct in their day-to-day role. Managers, in particular, play a crucial role in forging a Compliance culture by adhering to our corporate principles, setting the tone from the top, leading by example and ensuring that their teams understand, embrace and promote our Compliance culture.

Taking ownership for Compliance goes beyond adhering to the company rules: above all, it's an attitude. We rely on everyone working at or for Exyte to appreciate our Compliance rules as guidance for the right way of doing business.

Exyte will not tolerate any non-compliance with laws or the Exyte Code of Conduct and will rigorously enforce this stance, for example by disciplinary measures or legal action.

We embrace
» Compliance as an attitude.

Example

As manager on a new project, you believe it is important to clearly communicate your stance on Compliance and integrity. So, you decide to ask your Compliance Officer to highlight the most important Dos and Don'ts for your project team in a live training workshop on site. This is a good way of taking ownership for Compliance and for reaffirming the importance of Compliance at Exyte.



03 | CARE FOR PEOPLE

Exyte is a people business. Human resources are our most important asset, which we are committed to grow and protect.

Caring for people is one of the pillars of our sustainability strategy and a guiding principle in our day-to-day conduct. For Exyte as an employer, this focus on social responsibility covers a wide range of initiatives, from ensuring a safe and healthy work environment with transparent working conditions to promoting the individual development of every employee. These efforts aim to support the fundamental right of all who work at or for Exyte: the right to be treated equally and with respect.

We respect our employees as individuals and care for their opinion. However, freedom of speech ends when rights of others may be impaired. Exyte strives to maintain a neutral position on political and religious matters and expects employees to do the same in the workplace including work-related social media platforms.

Exyte is committed to provide a workplace in compliance with all applicable laws and the Core Labor Standards in the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO), and we expect our business partners to ensure compliance on their part.

We take respectful conduct as
the basis of all relationships
» within Exyte and with business
partners or other stakeholders.



3.1 HUMAN RIGHTS

We protect and safeguard the most fundamental rights that everyone working at or for Exyte have: their Human Rights.

We confirm our commitment to internationally accepted principles of human rights, in particular the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights, which are integrated into our business processes within the framework of our Human Rights Policy and Program.

We strictly oppose to all forms of forced and child labor and exclusively rely upon a workforce that has voluntarily chosen to be part of our community. To that end, we are committed to fair recruiting practices that provide transparency about our working conditions in compliance with all applicable laws and industry standards.

**We take a firm stance against
» child and forced labor.**

3.2 DIVERSITY

Cultural diversity is a strength that creates a richness in our company and is a key factor in our success. We do not discriminate, and we do not tolerate discrimination. All employees are asked to treat each other with respect and fairness. All employment decisions including, for example, decisions regarding recruitment or benefits are based solely on skills, qualification, and experience, without regard to race, ethnic origin, nationality, sex, gender, sexual orientation, color, religion or belief, disability, age, or any other status protected by law. We take pride in our employees, benefit from their differences and promote them individually.

We expect all managers to lead by example and to ensure that their area of responsibility is free of discrimination and harassment.

[»» Read More: Human Rights Policy](#)

**We treat
» everyone equally and with respect.**



Example

You hear a colleague making disrespectful comments about people because of their nationality, gender, sexual orientation, or skin color. Either intervene against this discrimination right away if you feel confident or report it immediately to your manager or use our Speak Up system.

04 | PERSONAL DATA

At Exyte we are convinced that our success, among other things, depends on the trust that our employees, customers, subcontractors, and other business partners have in the processing of their Personal Data. Therefore, Exyte takes the protection of personal data very seriously. We are committed to being transparent about how we collect, use Personal and otherwise process Personal Data and we process Personal Data only in accordance with the applicable laws, including but not limited to the requirements imposed by General Data Protection Regulation.

Exyte has implemented technical and organizational measures to ensure appropriate protection of Personal Data. Our Data Protection Policy sets out the basis upon which Exyte may collect, use, disclose or otherwise process personal data of employees, customers, suppliers and other business partners, and all members of Exyte are expected to implement these measures.

[»» Read More: Data Protection Policy](#)

We protect
»» your personal data.



Example

As project manager at Exyte you receive a list including e-mail addresses of subcontractor employees working on site. You realize that this is personal data and take a minute to decide whether and how to share it internally. Before forwarding it to the authorized personnel, you seek advice from the Data Protection Officer on the most secure way to share it and the legal requirements for processing and storing it.

05 | CONFLICTS OF INTEREST

Our business decisions are exclusively based on objective criteria and shall not be influenced by personal interests. While we respect your private life, we rely on you to separate it from your workplace. In your professional conduct, we expect you to act with honesty and to make decisions in the best interest of Exyte. A conflict of interest arises when your private interests collide with those of Exyte. It is your responsibility to disclose any conflict of interest, whether actual or potential.

Exyte's Conflicts of Interest Policy highlights the scenarios that typically result in conflicts of interest, such as personal relationships at work and relationships with business partners or even secondary employment at a competitor or supplier (all other secondary employment is governed by applicable HR procedures). Conflicts of interest are not wrong or unethical, as long as the situation and the corresponding risk is identified, duly reported and effectively managed.

Familiarize yourself with the terms of our Conflicts of Interest Policy and seek advice from the Compliance Team in case of doubt. If you find yourself in a situation that might result in or may be perceived as a conflict, inform the Compliance Team or your line manager without delay to ensure transparency and to maintain integrity. By proactively managing conflicts of interest, we can preserve the trust and confidence of our colleagues and business partners.

»» [Read More: Conflicts of Interest Policy](#)

We disclose
»» **conflicts of interest.**



Example

You work in procurement and your wife just got a job as sales manager with one of our suppliers. Inform your manager and the Compliance Team of this personal connection as there may be a perception of personal bias. Withdraw from the decision-making process regarding the supplier to avoid any appearance of a conflict of interest.

06 | COMPANY RESOURCES

6.1 ASSETS

Exyte will provide you with all tools and equipment necessary to perform your work. You are responsible for protecting Exyte's tangible assets, intellectual property and data from damage, loss, compromise, and misuse. You may only use company assets for private purposes if this is explicitly permitted either in our internal rules or by authorized personnel.

Employees are expected to be conscious and responsible when using company assets. This includes, for example, using equipment as instructed or avoiding unnecessary travel and expensive accommodation. By doing so, you can directly contribute to Exyte's overall performance.

6.2 DATA

Knowledge and know-how is key for Exyte's success. It goes without saying that the protection of Exyte's trade secrets and other confidential information is of critical importance for the future of our company. The same care and attention are to be exercised with regard to our business partners' data whether provided to us during a project or in advance of the award of a project. All confidential information, whether belonging to Exyte or our business partners, must be handled responsibly. Mark confidential information, store it safely and limit access to authorized personnel with a need to know. You must not disclose to third parties any confidential information which you have obtained during the course of your employment either during or after termination of your employment.

We use company
» resources consciously.



Example

You are an engineer working on an Exyte project. In a conversation with a friend working at another company he shows interest in knowing the details from one of our projects. You politely decline to share any specifics, reminding him that project details are confidential.

07 | BRIBERY AND CORRUPTION

7.1 OUR GENERAL STANCE

Exyte takes a firm position against corruption and bribery, and we expect the same from our business partners. We do not bribe – not anyone – not anywhere.

Bribery may take many forms under the guise of common business or social practices. At Exyte, we pride ourselves on impressing our clients and other business partners with the excellence of our services and products, and not through improper influence. Exyte employees and anyone acting on Exyte's behalf must not offer, promise or give, request, solicit or accept, directly or indirectly, anything of value to improperly influence decision making or an action. In any case of doubt, you should consult with the Exyte Compliance Team.

We do not bribe
» not anyone – not anywhere.

7.2 BUSINESS PARTNERS

Small gifts as a sign of courtesy or an invitation to a business meal after a meeting are common business practice in many regions. Yet, such friendly gestures could be misunderstood as attempts to improperly influence a business partner. To prevent the perception of bias or concerns regarding our integrity, and to safeguard employees and the company, Exyte's Anti-Bribery and Corruption Policy establishes rules for handling such situations.

Please keep in mind that your business partner may have even stricter rules and restrictions in place. Therefore, you should always check their code of conduct before offering anything of value.



WE CONVINCED OUR
BUSINESS PARTNERS
WITH OPERATIONAL
EXCELLENCE AND
INTEGRITY, NOT WITH
GIFTS OR INVITATIONS

CEO Dr. W. Büchele

As a rule, we generally restrain ourselves from gifts and invitations. If, in exceptional cases, we decide to offer or accept something, it must be of reasonable value and appropriate in the specific situation. This general rule is detailed in Exyte's Anti-Bribery and Corruption Policy, which also defines thresholds for gifts and provides a specific approach towards invitations.

Gifts below the threshold may be given or received as a gesture of courtesy if they can in no way be perceived as improperly influencing the recipient.

In contrast, Exyte has not defined thresholds for offering or accepting invitations to business meals and events. While invitations to business meals can be issued or accepted if they are of reasonable value and appropriate in the respective situation, invitations to events require prior approval of our Compliance Team according to the Anti-Bribery and Corruption Policy.

7.3 PUBLIC OFFICIALS

The risk of violating anticorruption laws is significantly higher when dealing with public officials. For this reason, it is strictly prohibited to give or offer anything to public officials.

Be aware that in many countries not only civil servants are regarded as public officials but also executives of state-owned companies, of private companies that have a public function (e.g. energy supplier) or officials and employees of public international organizations. You must always consult the Compliance Team before considering giving anything to a person who is potentially a public official.

 [Read More: Anti-Bribery and Anti-Corruption Policy](#)



Example

The managing director of a subcontractor invites you to an expensive restaurant to celebrate the strong business relationship between the companies over many years. Given that his company is bidding in tender, you decide not to accept the invitation because it could be intended or perceived as improper influence on our decision-making process. You always seek advice from the Compliance Team if you feel unsure.

7.4 ENGAGING AGENTS AND CONSULTANTS

The use of intermediaries to acquire business or to enter new markets has proven particularly vulnerable to abuse. The effectiveness of such consultancy services is usually difficult to measure, and margins are typically not transparent, meaning funds could be potentially misused for bribery. For this reason, engaging consultants to develop or win client projects or business is prohibited at Exyte. This general ban applies regardless of the size of the project, the remuneration scheme or any other circumstances. As a general principle, we aim to limit the use of consultants. We engage consultants only in exceptional cases and always subject to strict compliance with the Exyte Consultancy Policy.

[»» Read More: Consultancy Policy](#)

7.5 RULES FOR DONATIONS AND SPONSORING

As a good corporate citizen, Exyte supports charitable and non-profit organizations and initiatives in our communities. Yet, even if a donation or sponsorship serves a charitable purpose, it could still be bribery. To avoid the perception of taking improper influence to gain competitive advantages, donations and sponsorship may not be made to anyone that is involved in or close to our business. All donations and sponsorship require approval in accordance with the Exyte Anti-Bribery Policy before the expense is made.

[»» Read More: Anti-Bribery and Corruption Policy](#)



08 | FRAUD AND INTEGRITY OF FINANCIAL RECORDS

Fraud can have a devastating effect on our company, leading to financial losses or damaging Exyte's reputation and the trust of our stakeholders. It has many faces, all of which involve intentional misrepresentation of financial statements or business transactions. Be aware that this is wrong even if it does not result in personal advantage or profit for the company. In our commitment to integrity, we prevent fraud through effective controls and take immediate action at the first sign of any potential issue.

One of our most important controls is the four-eyes principle, which is applicable to all business transactions and major decisions. It requires independent assessment and control by two authorized employees involved in the respective transaction. Written external correspondence generally requires two signatures from authorized signatories in accordance with Exyte's internal regulations.

Accuracy and transparency are of utmost importance for our external financial reporting. We publish our periodic financial statements on time and in accordance with national and international accounting regulations. Any irregularities may have serious consequences for the company as well as for the personnel responsible for such irregularities.

The requirement to maintain accurate and transparent financial records extends to all internal financial data that build the basis for Exyte's financial accounts. As such, every member of a project team is responsible for taking care to ensure that the commercial data and project figures are accurate and realistic.

We report with
» accuracy and transparency.



Example

You are a manager and urgently need a laptop for a new member of your team whose IT equipment has not been delivered yet. Since you are worried that the internal procurement process might be too slow, you consider buying it on your credit card and charging the costs to the company as travel expense. Then you realize that this would not be in line with our internal policies and could lead to inaccurate financial reporting. You discuss the situation with your team and find an alternative interim solution.

09 | COMPETE ON FAIR TERMS

At Exyte, we believe in fair, lawful and open competition. The success of Exyte relies on our employees, on the excellent quality of our services and products, and on our client focus. We will always adhere to competition laws, and we will never put the trust of our clients at risk by collusive practices or collaboration with competitors. We do not enter into any kind of anti-competitive agreement with third parties relating to prices or other commercial terms and strategies, by coordinating our conduct in tenders or by collusive price fixing with competitors. This does not only apply to formal agreements, but also to any kind of informal arrangement which might limit competition. Since the mere exchange of commercially sensitive data among competitors is prohibited, even the receipt or disclosure of information can be a violation of competition laws, regardless of any anti-competitive intent.

Should any competitor reach out to you to discuss commercially sensitive data or to make arrangements which might affect prices or terms towards our business partners, you must explicitly refuse to engage in such discussions or arrangements and immediately report the incident to a member of the Exyte Compliance Team.

We compete
» on fair terms.



Example

At a networking event, a competitor casually mentions that avoid bidding against each other on certain types of projects in the future could be mutually beneficial for your companies. You clearly state that Exyte does not engage in any form of anti-competitive agreements. You refuse to discuss the matter further and report the incident to the Compliance Team.

10 | SANCTIONS AND EXPORT CONTROL

At Exyte, we recognize the importance of export control, which involves restrictions on the export or transfer of goods, including tangible items, software, and technology. While such restrictions apply to weapons and military items in any case, particular attention is required for dual-use goods that can serve both civil and military purposes and are part of many high-tech applications. It is crucial to prevent their use in activities contradictory to national and global security objectives.

As a global company with multiple projects and establishments worldwide, Exyte is directly impacted by export control regulations and their associated restrictions and control mechanisms. Exyte's Export Control Policy establishes a robust framework to ensure compliance with all relevant export control laws and regulations, and to safeguard that our operations do not contribute to unauthorized or harmful activities.

We protect the company by
» making ourselves aware
of rules before acting.



Example

Your client asks you to use a new type of valve in equipment that we build for them. While you initially think that a simple valve cannot be relevant, you finally decide to ask your Export Control Officer to take a look at the situation. When you realize that the valve is a dual-use item, you are glad that you thought about seeking advice in time.

11 | IMPLEMENT THE CODE OF CONDUCT

Compliance at Exyte is more than knowing the threshold for gifts or taking a mandatory Compliance training once per year. We are striving for a **Compliance culture** where compliance is an **attitude**, and our rules and procedures are embedded in our business processes.

Everyone working for Exyte is expected to understand the concepts of this Code of Conduct and to apply them as part of their work routine. Seek advice whenever in doubt and speak up if you feel that something is wrong.

Managers have the additional responsibility of emphasizing the importance of Compliance at Exyte and to act as role models in terms of integrity.

Compliance culture is a joint effort that we can only achieve
» by everyone taking ownership.



» All managers are responsible for ensuring compliance in their area of responsibility.



Speak Up!

It's the right way

YOUR CONTACT OPTIONS:

- » **Dr. Steffen Liebendörfer**
Vice President Compliance
Exyte Management GmbH
70376 Stuttgart
Germany
Phone: +49 711 8804-1045
steffen.liebendoerfer@exyte.net
- » ethics@exyte.net
- » www.speak-up.exyte.net



Bringing the future
of technology to life



03/2025 en

exyte.net

