

COMPANY POLICY GUIDELINES  
**CODE OF CONDUCT**



**NOFFZ**  
TECHNOLOGIES

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# 1. Foreword from the Management

At NOFFZ Technologies GmbH, we strive for sustainable success through our products and services. Our corporate values form the basis for this.

We are committed to maintaining the highest standards of integrity, ethics, and professionalism in all aspects of our business operations. Our reputation and success rely on the trust of our customers, partners, employees, and the institutions in which we operate.

To maintain this trust and ensure a positive working environment, we adhere to the following principles.

These principles establish rules, procedures, and guidelines that are readily accessible to our employees and customers at all times. Strict adherence to these rules is fundamental to our principles of good corporate governance.



Tobias Noffz und Markus Solbach

## 2. Compliance with Laws and Regulations

NOFFZ Technologies adheres to all applicable laws, rules, and regulations in the countries where it operates, and takes measures to comply with and ensure adherence to these laws and regulations. It adheres to applicable law at the local, national, and international levels.

### 2.1. Data Protection

Legal regulations require that personal data be processed in a manner that ensures the rights of the individuals affected by the processing, including confidentiality and integrity of their data. Therefore, it is only permissible to process personal data to the extent and in the manner necessary to fulfill the assigned tasks. Any processing (e.g., collection, storage, compilation, use, provision) of personal data (e.g., addresses, salary information, or photos) of employees, customers, and business partners by us or on our behalf is carried out in accordance with the applicable legal requirements for data protection as well as our privacy policy.

### 2.2. Corruption, Extortion, and Bribery

We pursue a zero-tolerance policy towards all forms of corruption, extortion, and bribery. Any form of corruption or bribery is not to be tolerated. We consider bribery in connection with our employees or our company in any form to be unethical, illegal, and equally risky. At no time should material or immaterial benefits be demanded, promised, or accepted that could give the impression of influencing business decisions. Likewise, we do not tolerate extortionate behavior, such as enriching oneself by threatening a significant harm or other forms of coercion or blackmail.

No gifts or favors should be accepted that could lead to a conflict of interest. In particular, neither bribes nor other illegal payments should be offered, made, or accepted.

### 2.3. Fair Competition

We adhere to and support the principles of fair competition. We advocate for a free and open market both nationally and internationally. Business policies and prices are set independently and are not coordinated with competitors or other independent parties. Customers and suppliers are always treated fairly. Antitrust and competition law regulations must be strictly adhered to.

Specifically prohibited are price-fixing agreements, customer allocation, and coordination of bidding, development, or production strategies. Even the exchange of information with competitors, which could serve as a basis for such coordinated behavior, is prohibited. Violations of these prohibitions are rigorously pursued by antitrust authorities and can lead to sanctions that threaten the existence of the company.

## 2.4. Financial Responsibility

We ensure compliance with the respective applicable legal provisions against money laundering, thereby preventing the infiltration of illegally obtained money or assets into the legal financial and economic cycle. When it comes to accounting, we adhere to applicable laws and recognized standards. By employing a certified ERP system, all steps can be transparently disclosed at any time. Financial records are to be prepared in accordance with applicable law and generally accepted principles of proper accounting (financial accountability).

Additionally, we observe the commercial, tax, and special legal retention periods for documents (in original or electronic form) and structure the corresponding records in a comprehensible manner. Our aim is to provide transparent and accurate information continuously and promptly, and to communicate in accordance with applicable laws and other guidelines.

## 2.5. Export Controls

NOFFZ Technologies GmbH adheres to all prescribed export controls and customs laws, as well as existing economic sanction requirements and embargoes. Decisions regarding imports and exports, including embargoed countries, multiple use, and other issues, are made and coordinated with all business partners.

## 2.6. Dealing with Business Partners and Third Parties

With our corporate policies, we aim for compliant adherence to ethics and compliance principles. In addition to our employees, we also expect compliance with these rules from business partners such as customers, suppliers, independent providers, consultants, and other business partners, as well as third parties. High professionalism and absolute integrity, alongside the high quality of our products and services, are fundamental requirements.

Therefore, it is of paramount importance for us to make business decisions based on objective criteria such as quality, reliability, competitiveness, and consideration of recognized compliance standards, as well as the principles of good corporate governance.

## 2.7. Conflicts of Interest

We expect absolute loyalty from our employees to the company. All employees must avoid situations in which their personal or financial interests conflict with those of the company. Unavoidable personal conflicts of interest must be disclosed to supervisors.



## 3. Employee and Human Rights

At NOFFZ Technologies, the rights of employees and human rights are of paramount importance and take precedence. Therefore, our company fosters a fair and respectful environment among colleagues, and the compliance with the applicable regulations. In accordance with local laws, these include:

- Prohibition of forced labor,
- Human trafficking,
- Maintenance of an inclusive and cooperative environment free from violence and harassment,
- Rejection of any form of discrimination (nationality, ethnic origin, gender, disability, age, sexual identity, religion, etc.),
- Fair compensation (at least the statutory minimum wage),
- Adequate working hours and breaks.

### 3.1. Freely Chosen Employment

At NOFFZ Technologies, we believe in the importance of self-determination and autonomy for our employees. We support our employees' right to freely choose their work and to utilize their skills and interests to the fullest extent.

### 3.2. Child Labor and Young Workers

We explicitly prohibit and do not support the employment of individuals below the legally established minimum age in all areas of our company and among all our business partners.

### 3.3. Flexibility in the Workplace

We offer flexible work models and environments to allow our employees the opportunity to shape their work according to their individual needs and preferences.

### 3.4. Employee Participation

Employee participation is important to us in promoting employee retention and strengthening employee engagement with our company. At NOFFZ, we offer our employees a profit-sharing program to reinvest a portion of any profits made into the employees to share in the success.

### 3.5. Working Hours

Flexibility and employee satisfaction are paramount to us, which is why we offer a flextime model where employees can adjust their working hours to accommodate personal obligations. Additionally, we value the flexibility for our employees to arrange their breaks.

Break guidelines:

For working hours of 6-9 hours, the break time is a minimum of 30 minutes, extendable up to 1 hour. Breaks can also be taken in intervals of at least 15 minutes. Breaks must be taken and cannot be used to shorten working hours. For working hours less than 6 hours, no break is required.

To provide even more flexibility, NOFFZ allows for mobile/home office arrangements, subject to agreement with the supervisor.





## 4. Occupational Health and Safety

At NOFFZ Technologies, occupational health and safety are of paramount importance for the well-being of our employees and the smooth operation of our business. Key aspects for us include:

- Safety Standards and Procedures: Establishing safety standards and procedures that all employees must follow to ensure occupational health and safety.
- Offering training and development opportunities for our employees on topics such as safety awareness, IT security training, safe work practices, as well as emergency procedures and first aid.

### 4.1. Fire Safety

Our company is committed to ensuring a safe working environment for all employees and visitors. As part of this commitment, it is important that every employee understands the importance of fire safety and acts accordingly. This includes compliance with all fire safety policies and procedures, regular participation in fire safety training, and collaboration in the event of a fire. Each employee is responsible for identifying fire hazards and reporting safety deficiencies to the relevant authorities. Through collective efforts, we can ensure that our workplace is free from fire hazards and that effective action is taken in the event of an emergency. Additionally, we pursue a strategy of preventive fire protection, for which our employees are trained.

### 4.2. Handling of Hazardous Substances

For the handling of chemicals, there is a detailed work instruction that is known to every employee. It is distributed and explained during the onboarding process. Furthermore, a safety briefing is conducted for each hazardous substance before initial use, which is also documented. The safety briefing is repeated annually in accordance with legal requirements and documented accordingly. In our ERP system, accessible to every employee, safety data sheets and processing instructions for each hazardous substance are stored in the article card. All hazardous substances are therefore marked with the respective article number of the ERP system.

## 5. Sustainability

NOFFZ is already operating under the principles of sustainability and is setting further goals for CO2 reduction. Over the next few years, NOFFZ aims to significantly improve its CO2 balance or carbon footprint and ultimately achieve carbon neutrality.

The new NOFFZ company building, completed in 2023, is entirely designed with ecological considerations and is powered by renewable energy. The high proportion of self-produced electricity through the installation of solar panels on the entire manufacturing roof area helps us to become carbon neutral with additional measures.

The focus is on three pillars:



Based on these pillars, we have derived the following goals:

### Ecological sustainability:

- Sustainable management of natural resources and consideration of environmental compatibility throughout the entire product lifecycle
- Energy- and resource-efficient behavior in manufacturing processes
- Consideration of efficient use of the machinery deployed
- Selection of supplied products considering their environmental impacts and other aspects of sustainability
- Waste disposal in accordance with the principles of avoidance, reprocessing, reuse, recycling through proper disposal
- Regular collection and evaluation of energy-related metrics

### Social sustainability:

- Incorporating Sustainable Development Goals (SDGs) into supply chain and internal processes: No poverty, zero hunger, good health and well-being, quality education, decent work
- Engagement in social aid programs: "action medeor"
- Promotion of future professionals through scholarships at our partner university
- Securing young talents through technical or commercial training programs
- Continuing education measures for employees

### Economic sustainability:

- Striving for long-term business relationships with employees, partners, customers, and suppliers
- Building long-term financial stability
- Applying risk management to prevent any existential threats



By adhering to these principles and upholding the values of NOFFZ Technologies GmbH, we contribute to the long-term success and sustainability of our company while also gaining the trust and respect of our stakeholders.



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