

PEKTOS AG

Code of Business Conduct

OVERVIEW

At Pektos AG, honesty, integrity, accountability, and legal compliance are fundamental values integral to our culture, identity and products.

We strive to operate our business following the highest ethical standards and applicable rules, laws and regulations.

These principles should guide all directors and employees of Pektos AG in performing their duties

We require that all of our employees conduct themselves according to the highest standards of ethics and integrity in their interactions with our customers, colleagues and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law. If you are ever in doubt about whether activities meet our ethical standards or compromise the Company's reputation, please discuss it with your supervisors or senior management.

OPERATION

This Code of Conduct establishes the standards of behaviour that all employees must meet.

It is not intended to completely list employees' legal and ethical obligations but to provide appropriate guidance.

The following Code of Business Conduct is designed to protect the Company and our customers.

Each person covered under this Code of conduct shall:

1. Conduct all aspects of the Company's businesses honestly, ethically, and legally and obey all laws of Switzerland and other laws applicable to our business.
2. Conduct work on behalf of the Company with clients, the public and fellow covered persons with the highest standards of honesty, integrity and fairness.
3. Respect the rights of all covered persons to fair treatment and equal opportunity without illegal discrimination or harassment of any type.
4. Be responsible for your actions and their consequences. No one will be excused from misconduct because another person has ordered or asked you to participate in wrongdoing.
5. Alert your supervisor or senior manager whenever you observe, learn or suspect any dishonest, destructive or illegal activity.
6. Protect and maintain confidential information that belongs to the Company, its clients, suppliers, and fellow covered persons.
7. Avoid conflicts of interest, both real and perceived. Conflicts of interest are those outside activities or personal interests that could influence objective decisions made in the performance of your responsibilities.
8. Ensure that all financial transactions and other documentation are handled honestly and recorded accurately, fairly, and reasonably detailed. This commitment extends to the reporting and charging of time and business expenses.
9. Comply with applicable anti-bribery and anti-corruption laws and our policies and procedures in all aspects of company business following our zero-tolerance policy on bribery and corruption.
10. Comply with all applicable economic sanctions, export and import controls, anti-money laundering laws, and our policies and procedures in all aspects of company business.

11. Be aware that even the appearance of misconduct or improper behaviour can damage our reputation.
12. Cooperate fully in any investigation of misconduct.
13. Understand that there are consequences for violating this Code. Consequences for violating may include reprimands, demotion, dismissal of engagement or contract, or other actions as the company6 determines to be appropriate.

VI, November 2022

