

COMPLIANCE POLICY

STRATEC GROUP



MISSION STATEMENT

We are an innovative and technological market leader in automation and instrumentation solutions for in-vitro diagnostics. We seek to offer our global partners first-class solutions, thereby meeting our responsibility to their customers and patients.

Our success is based on the talents and abilities of each individual employee and their commitment to consistently deliver outstanding performance. This interplay enables the STRATEC Group to develop successfully and sustainably in the interests of all its stakeholders.

Our partnerships are based on mutual trust, continuity and professionalism. Together with our partners, we share a common mission to develop safe, innovative and market-leading products that consistently meet our customers' expectations. For STRATEC, partnership means responsibility, passion and commitment, both to our customers and to our products, extending well beyond the duration of the product life cycle.

Since the company was founded 45 years ago, responsible thinking and sustainable action have been one of the cornerstones of STRATEC's growth from a small start-up to a global company. By implementing sustainability topics in our corporate strategy, we ensure our contribution to social responsibility. Core elements of this approach include economic action to promote long-term growth, ecological responsibility for the world of tomorrow and social and societal responsibility towards people.

Details about the company's sustainability activities can be found in the Annual Report and in the sustainability brochure, both of which can be downloaded from the STRATEC website.

At the same time, we are committed as a collective STRATEC Group – whether employee, manager or other person associated with the STRATEC Group – to performing our daily tasks, both large and small, sensibly and in compliance with the law.

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I CORPORATE COMPLIANCE AT STRATEC

Corporate Compliance at STRATEC is committed to ensuring that all relevant national and international laws and regulations are complied with, whether by the group, individual companies, or individual employees. In addition to this, we seek to ensure that the applicable local regulations are observed and complied with in the individual group companies. To accomplish this task, we establish and monitor Compliance guidelines, take measures to identify risks at an early stage, and create transparency and trust. In line with the **UN Global Compact principles**, we as the STRATEC Group also attach great significance to general compliance with human rights, creating and maintaining a safe working environment, safeguarding jobs, protecting the environment, and fighting against and preventing corruption.

The principles outlined above are pursued across the entire STRATEC Group through the creation of a compliance structure (**Compliance Management System - CMS**). This compliance structures gives rise to a **compliance culture** that we at STRATEC aim to anchor and put into practice across the group.

Guided by the principle of **PREVENT – RECOGNISE – RESPOND**, we are therefore required, as a member of the STRATEC Group – in particular as employees – to report any threat to these objectives or actual violations either via the whistle-blowing system or to the responsible offices listed below.

2 COMPLIANCE OBJECTIVES

We are in favour of practical, transparent and comprehensible guidelines which link to all relevant and applicable rules and regulations. These include the following aspects, among others:

1. Laws, regulations and internal guidelines
2. Internal corporate rules
3. Transparency
4. Tone from the top
5. Communication
6. Setting an example

3 KEY ELEMENTS AND PRINCIPLES OF OUR COMPLIANCE UNDERSTANDING

In pursuing our compliance goals, we place particular emphasis on adhering to principles and values. The principles presented below represent the core element of our compliance activities. Our intention is to remain true to them at all times.

3.1 COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS

We, as members of the STRATEC Group, are committed in our work for the group or the local company to strict compliance with all laws, other binding regulations and internal requirements. Violations of the law can result in heavy fines, blocks on public and private contracts, further official sanctions, as well as claims for damages and reputational damage. The resulting economic consequences can harm the group and put employees' jobs in jeopardy. Violations of the law can also lead to prosecution under criminal law. Failure to comply with laws and other binding regulations can entail disciplinary action and claims for damages against the employees involved. Regulatory and internal investigations of suspicious cases can significantly impair business operations and tie up internal resources in a way that is unproductive. Indications of possible violations of the law within the group are actively investigated – if necessary, with the involvement and cooperation of the relevant authorities.

3.2 STRUCTURE AND ORGANISATION OF THE COMPLIANCE MANAGEMENT SYSTEM AT STRATEC

The Compliance organisation handles all compliance-related processes in the group. This includes, in particular, the development and implementation of the internal policies arising from this group policy, training on these policies and the processing of individual compliance cases. The Compliance organisation works closely with the Board of Management of the STRATEC Group, the local managing directors and managers, examines cases where there is doubt and helps all employees to comply with the internal specifications. The Compliance organisation gets involved when there are indications of a compliance issue which have been reported or come to the organisation's attention in another way. Compliance officers in the operational corporate units are directly involved in implementing the compliance system.

All employees are called on to support the Compliance organisation's work unconditionally. A Compliance board provides additional support by acting as an independent and objective body to reflect on objectives, assess risks and evaluate the measures introduced.

4 SELECTED AREAS OF STRATEC'S COMPLIANCE MANAGEMENT SYSTEM

4.1 CORRUPTION PREVENTION

We, as members of the STRATEC Group, strongly reject corruption in all its forms. Common features of corrupt practices include in particular the abuse of a role or position at the company to obtain (or attempt to obtain) personal advantages in business dealings without any legal entitlement to them, while at the same time concealing this behaviour (concealment). The Compliance organisation aims to prevent any form of corruption by taking targeted measures, such as training.

4.1.1 NOTE: HOW CAN I AVOID CONFLICTS WHEN IT COMES TO GIFTS AND BENEFITS?

Gifts and benefits are usually non-cash benefits that may meet the definition of corruption (see point C. 2.), especially if the giver directly or indirectly expects something in return.

Non-cash benefits may also include performance incentives granted for the provision of a particular service, such as reaching a certain sales target or a sales threshold. Therefore, performance incentives may fall under the definition of corruption, especially if they are offered only to certain employees of the customer or without the employer's knowledge. From the recipient's point of view, however, further problems arise here, as such benefits also qualify as taxable income and are also subject to social security contributions. Such donations therefore not only represent a problem of corruption, but also affect tax law.

It is therefore important to act with caution, especially if the gift is (more or less obviously) associated with the expectation of something in return. As a rule, the legally relevant threshold has already been crossed if, when viewed neutrally, the gift could influence the recipient's judgement in favour of the gift giver.

The following considerations can help you to correctly assess whether an offer or gift is in fact gratuitous:

- Is the recipient exposing himself to a potential conflict of interest by accepting the gift, or by doing so is he profiting personally from it in an impermissible way?
- Would the invitation have been issued in the same way if the donor had financed the invitation privately?
- Does the gift appear to have been made with the intention of exerting or creating influence in favour of the gift giver?

It is therefore not permissible to unlawfully influence business partners or customers or to unlawfully obtain advantages, whether in the form of gifts, favours or other benefits. This applies in particular to our dealings with authorities, public institutions or suppliers, but also to all STRATEC employees.

4.2 COMPLIANCE WITH CAPITAL MARKET AND ANTITRUST REGULATIONS

The requirements of German and/or European antitrust law apply to all market participants. Even small and medium-sized companies have to meet certain minimum standards in order to be able to exclude antitrust violations as far as possible. If there are any deficiencies in this regard, then certain executive bodies within the company may also be held personally liable if employees are involved in antitrust violations. Fines and claims for damages can jeopardise the existence of the companies involved. Examples of this are:

4.2.1 INSIDER TRADING

In principle, all employees are permitted to trade in STRATEC SE shares. However, this right is subject to restrictions. All employees are therefore prohibited from using insider information to acquire or sell shares or other securities in STRATEC SE for their own account or for the account of others or on behalf of others. The disclosure of insider information or the recommendation to purchase or sell securities on the basis of insider information is also prohibited.

Insider information is specific information about circumstances that are not publicly known that relate to a company, its securities or other financial instruments and which, should it become known, could significantly influence the company's share price. This may include, for example, information on business figures, planned acquisitions or important contracts.

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4.2.2 FINANCIAL REPORTING

Employees and representatives of the company must comply with the financial reporting and accounting rules as applicable in the jurisdiction in which they operate. In this regard, the corresponding employees responsible must prepare accurate financial statements and reports on the company's operating results, financial position and cash flow, submit the financial statements and reports for the relevant reporting period in a timely manner and, where applicable, within the framework of corresponding declarations.

4.2.3 ANTITRUST LAW REQUIREMENTS

Antitrust laws are designed to promote competition within an industry and to prohibit anti-competitive behaviour. Actions that limit competition or trade, or which dominate a market in another way, may potentially violate antitrust law. Such violations can have consequences for the company or individual employees under criminal and civil law and may result in heavy fines.

The most important topics relevant to competition law are:

- Division of regional markets
- Agreements on market shares
- Customer allocation
- Capacity agreements
- Price fixing
- Price maintenance

The Legal Department or the responsible compliance officer must be contacted before taking any action that could have antitrust implications.

4.3 FAIR AND RESPECTFUL BEHAVIOUR

4.3.1 PRINCIPLES FOR THE WORKPLACE ENVIRONMENT

As a guiding principle, all of us at STRATEC are committed to treating each other fairly and respectfully at all times. This principle applies to our behaviour both within and outside our own teams, behaviour between line managers and employees, and behaviour among colleagues. The principle also applies to cooperation with external contacts (e.g. customers, suppliers, authorities).

In addition, the following principles must be observed at all times:

4.3.2 EQUAL OPPORTUNITIES

We are committed to offering all employees equal career opportunities, regardless of factors such as age, ethnic origin, race, skin colour, marital status, health status, mental or physical disability, nationality, religious affiliation, gender, sexual orientation or any other discriminatory factors. We do not tolerate any form of discrimination or harassment of any kind.

4.3.3 HEALTH AND SAFETY

We are committed to maintaining a healthy and safe working environment. Our environmental, health and safety programme reflects this commitment. As employees, we ensure that the decisions we make on behalf of the company reflect the company's commitment to safety and health. Our goal is to provide an injury and illness-free working environment that benefits all employees, suppliers and customers, as well as the public.

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4.3.4 DATA PROTECTION

STRATEC guarantees the confidentiality of personal information and personal data. Personnel files and personal employee data are always treated confidentially and may only be made accessible to authorised employees of the company if necessary and/or to the extent permitted by law.

4.3.5 PRINCIPLES FOR CONFLICTS OF INTEREST

We are committed to conducting our work in the best interest of our company and in compliance with applicable laws and regulations. A conflict of interest occurs when an employee's personal interests could influence their judgement, decisions or actions at work.

If you have concerns about an actual or potential conflict of interest, you should always seek guidance from your line manager or the Legal Department. We, as the STRATEC Group, seek to avoid any situation in which a conflict could arise between private interests and the interests of the STRATEC Group. This applies in particular to financial interests, activities outside the STRATEC Group, family relationships, and the acceptance of gifts and invitations and/or the distribution of gifts and the discussion of invitations.

4.3.6 REPORTING OBLIGATIONS

As employees we should immediately contact our line managers if the principles set out here are endangered or not adhered to. Various options are available for reporting such matters, including anonymously if desired, to the Compliance department (see F.3).

4.4 ENVIRONMENTAL PROTECTION

We will all endeavour to conduct our business in the most environmentally responsible manner possible and to minimise our environmental impact wherever we operate. Our Environmental, Health and Safety Policy reflects this commitment. Likewise, we will all ensure that the decisions we make on behalf of the company reflect its commitment to environmental protection and compliance with environmental laws.

4.5 DUAL CONTROL PRINCIPLE

The principle of dual control is a key component of the STRATEC value system. Important decisions should not be made by a single person, nor should critical activities be carried out by a single person. The aim is to reduce the risk of errors and misuse.

5 ETHICS AS AN EMPLOYER

STRATEC is committed to being an ethical employer. This includes, among other things, the following fundamental rights for all of us and a clear commitment to the way we do business and structure our organisation.

5.1 FREEDOM OF ASSOCIATION / COLLECTIVE BARGAINING

We all have the right to freedom of association and are free to organise, form and join groups, either formally or informally, as long as they are not illegal in the employer's country. Examples of such groups include political parties, professional or sports associations, non-governmental organisations and trade unions. Equally, we all have the right to participate in collective bargaining that applies to the region in which we work. We have a strict policy of non-discrimination. No employment-related decisions, such as promotion, salary levels or opportunities, are made based on whether employees participate in these groups or not.

5.2 EQUAL OPPORTUNITIES

We, as the STRATEC Group, believe in the principles of equal employment and creating a diverse work environment. We are also all committed to complying with the applicable laws on equal employment opportunities and all other employment laws and regulations. Our intention is to maintain a work environment that is free of harassment, discrimination or retaliation on the basis of age, race, colour, ethnic origin, ancestry, religion, sex (including sexual orientation and gender identity), pregnancy, physical or mental disability or any other legally protected status/characteristic. We are committed to upholding this policy in all aspects of employment, including recruitment, hiring, placement, transfer, training, promotion, rates of pay and other compensation, termination and all other terms, conditions and privileges of employment.

It is essential that we all conduct ourselves in a manner that promotes the respect and dignity of each individual. We require all line managers to complete mandatory compliance training on a regular basis. We are all responsible for complying with this policy, and violations will be dealt with swiftly in accordance with the local guidelines. Local HR representatives are available at each location to answer any questions.

5.3 WORKPLACE COMPLAINTS

Each of us has the right to complain and report any unfair treatment or discrimination. Each business unit is aware of the formal structures and informal cultural aspects that can prevent employees from raising concerns and complaints, so appropriate training is provided. Every complaint is handled promptly and appropriately with absolute discretion and sensitivity. Every business unit has its own reporting/complaint procedure that complies with local legal guidelines. Details of the guidelines can be obtained from the local compliance officer. If a local compliance officer is personally involved in a compliance case, the case will be handled by a compliance officer from a different location.

5.4 FLEXIBILITY AND RESPONSIBILITY OUTSIDE THE WORKPLACE

Because we are a people-focused company, we also recognise that we, as STRATEC employees, have obligations and responsibilities outside the workplace to varying degrees (e.g. caring for children, parents or relatives or dealing with health or other issues). Although we, as employees, devote our full time and energy to the business during working hours, it is understood that we sometimes need additional flexibility.

In each business unit, we offer various methods of flexible work in line with local legislation. These include flexible working hours or reduced working hours. In addition, further flexible working options are offered on a case-by-case basis, such as paid or unpaid leave or changes to the working pattern, etc. Details can be obtained from the local HR representative.

5.5 EMPLOYMENT SECURITY

At the STRATEC Group, we recognise that our employees are a key part of our competitive advantage. We believe in providing secure, long-term jobs where possible and employ the vast majority of our workforce directly. We strictly adhere to minimum wage regulations in the countries in which we operate and ensure that working conditions, pay levels and benefits are appropriate for the local market. If it proves necessary to restructure and reduce our headcount, we are committed to doing so responsibly and offering appropriate support to each affected employee.

5.6 TRAINING AND EDUCATION

As STRATEC employees we have access to the training we need to perform our tasks at work. The training programme includes formal classroom training, online training and on-the-job training. Training needs are discussed individually as part of the annual employee performance review and at the departmental level. In addition, selected employees are encouraged to undertake further training during their working hours if this is relevant and appropriate to their role.

6 IMPLEMENTATION AT STRATEC

6.1 EACH INDIVIDUAL

As STRATEC employees, we are expected to familiarise ourselves with these standards, to review our own conduct based on the criteria set out in this group policy and to ensure that these criteria are also complied with through fair, responsible and honest work.

It should be noted that specific legal and internal company regulations flesh out the contents of the individual topics addressed here. We are all required to familiarise ourselves with the legal and internal regulations that are relevant to our area of work and to observe them in our daily activities.

Each line manager shall organise their area of responsibility in such a way that compliance with the rules of the group policy and the legal regulations is guaranteed at all times. This includes, in particular, communicating, monitoring and enforcing the rules that are relevant for their area of responsibility. Misconduct must be actively addressed and remedied. Every line manager is expected to act as a role model for their area through their personal integrity, and in this way ensure that corporate compliance is truly put into practice as an essential part of our corporate culture.

6.2 WHO CAN I ASK IN CASE OF UNCERTAINTY?

If a situation arises that may be related to compliance, we should actively question it. The first step here should be an independent assessment by colleagues. If you are unsure, your line managers or local compliance officers are always available to provide advice and support.

6.3 WHISTLE-BLOWING SYSTEM

The above-mentioned reports or questions can also be made anonymously. Anonymous means that the identity of the questioning person cannot be traced at any time. This procedure is known as a whistle-blowing system.

Use of a reporting system of this kind is possible at STRATEC via the anonymous whistle blowing system, which can be accessed via the STRATEC website.

In addition, contact with the Compliance Department can also be made via internal communication channels (telephone, internal mailboxes) or via reports to Compliance online mailboxes on the Intranet.

All incoming anonymous reports are reviewed and followed up by the Compliance Department.

All whistle-blowers are protected from retaliation, such as dismissal, demotion and other discrimination.

7 SUMMARY

To ensure that we are on the right track, we as STRATEC members should ask ourselves the following important and fundamental questions in our daily work:

- 1. Is my action or decision legal?**
- 2. Is my action free of personal interests?**
- 3. Would a neutral person judge my action to be legally sound?**
- 4. Does it meet the requirements of the STRATEC Corporate Compliance Policy?**
- 5. Is it impossible that my action might harm STRATEC? (financial loss, image, ...)**

If even a single one of these questions cannot be answered with a clear 'YES', we should contact our line manager or the local compliance officer for further clarification.