



4JET Group

Code of Conduct



1 FOREWORD



Since 2006 the 4JET Group is pursuing its mission to create photonic solutions that replace existing or enable new processes and products by providing perfect surfaces in industrial manufacturing.

Our laser process solutions provide quality surfaces by reliable adhesion-, flow-, molding- or electrical properties, as well as high contrast markings or precise and crack-free separation edges in glass.

We enable sustainable, environmentally friendly production by dry, chemical-free laser processing with virtually no residual materials, and low resource consumption and large greenhouse gas savings compared to conventional processes.

We help customers to be economically successful by offering photonic tools with high repeatability and flexibility, low running cost and a high degree of automation and productivity.

We want to be fair and reliable business partners and a good employer and corporate citizen that takes responsibility by living up to our commitments, educating the young, prioritizing people's health over profits and strictly assuring safe and sound business operations.

This Code of Conduct contains the fundamental principles and rules governing the way we act within our company and in relation to our partners and the public. They form the framework within which we make decisions, both as a company and as individual employees.

Every employee of the 4JET Group must therefore be familiar with these principles and rules, and observe them as binding provisions on a worldwide basis. All managers have a duty to ensure their observance, and to serve as role-models in adhering to the code of conduct. To this end they must know the code of conduct, communicate them to their employees and set a good example.

Jörg Jetter

CEO

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3 BASIC BEHAVIORAL REQUIREMENTS

3.1 Mutual Respect, Honesty and Integrity

We respect the personal dignity, privacy, and personal rights of every individual. We work together with individuals of various ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual identity, world view and gender. Consistent with our corporate principles and with the employment laws of numerous countries in which we work, we do not tolerate discrimination against anyone on the basis of any of these characteristics or harassment or offensive behavior, whether sexual or otherwise personal.

These principles apply to both internal cooperation and conduct towards external partners. We make decisions about those we work with – including personnel, suppliers, customers and business partners – based only on appropriate considerations, not on the basis of inappropriate considerations such as discrimination or coercion.

We are open, honest and stand by our responsibilities. We are reliable partners and make no promises we cannot keep. And we expect our employees to act with integrity.

3.2 Behavior which complies with Law

Observing the law and the legal system in every country where we do business is a fundamental principle for 4JET Group. All employees must obey the laws and regulations of the legal systems within which they are operating in addition to applicable 4JET Group policies. Violations of the law must be avoided under all circumstances.

Regardless of the sanctions that could be imposed by law, all employees guilty of a violation will be subject to disciplinary consequences because of the violation of their employment duties.

3.3 Management, Responsibility and Supervision

The culture of integrity and compliance in an organization starts at the top. All managers must fulfill their duties of organization and supervision. All managers bear responsibility for all employees entrusted to them. All managers must earn respect by exemplary personal behavior, performance, openness, and social competence. This means, among other things, that each manager must emphasize the importance of ethical conduct and compliance, make them regular topics of everyday business and promote them through personal leadership. Each manager must also set clear, ambitious and realistic goals and lead by example.

Managers should permit their employees as much individual responsibility and leeway as possible, while making it clear that compliance is required under all circumstances, at all times. All managers shall also be accessible in case employees wish to raise compliance concerns, ask questions or discuss a professional or personal problem.

These responsibilities of managers do not relieve employees of their own responsibilities. We must all work together to comply with applicable laws and 4JET Group policies.

It is the responsibility of all managers to see to it that there are no violations of laws within their area of responsibility that proper supervision could have prevented. They still remain responsible, even if they delegate particular tasks.

3.4 Responsibility for the Reputation of 4JET Group

To a substantial degree, the reputation of 4JET Group is determined by our actions and by the way each and every one of us presents and conducts himself/herself. Illegal or inappropriate behavior on the part of even a single employee can cause the company considerable damage.

Every employee should be concerned with maintaining and promoting the good reputation of 4JET Group in the respective country.

4 TREATMENT OF BUSINESS PARTNERS AND THIRD PARTIES

4.1 Fair Competition and Anti-Trust Laws

Fair competition permits markets to develop freely – with attendant social benefits. Accordingly, the principle of fairness also applies to competition for market share.

Every employee is obliged to abide by the rules of fair competition. Anti-trust evaluation can be difficult, particularly because the rules can differ from country to country and from case to case. For example, in many places special anti-trust law requirements apply to large companies.

Here are examples of the types of behavior that can lead to a violation of anti-trust laws. Employees may not:

- talk to competitors about prices, output, capacities, sales, bids, profits, profit margins, costs, methods of distribution or any other parameter that determines or influences the Company's competitive behavior with the aim to solicit parallel behavior from the competitor,
- enter into an agreement with a competitor not to compete, to restrict dealings with suppliers, to submit bogus offers for bidding or to divide up customers, markets, territories or production programs,
- have any influence on the resale prices charged by our purchasers, or attempt to make them restrict the export or import of goods supplied by 4JET Group.

Moreover, employees may not obtain competitive intelligence by using industrial espionage, bribery, theft or electronic eavesdropping, or communicate knowingly false information about a competitor or its products or services.

4.2 Anti-Corruption

Offering and Granting Advantages

We compete fairly for orders with the quality and the price of our innovative products and services, not by offering improper benefits to others. As a result, no employee may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to external persons to influence official action or obtain an improper advantage.

Any offer, promise, grant or gift must not raise an appearance of bad faith or unsuitableness.

Especially gifts and grants of all kind – except meals – may only be granted up to a value of 10 Euro. The approval by the management of 4JET Group is required for higher values.

Invitations for meals during visits by the customer are allowed to an appropriate extent in terms of the usual hosting in that cultural area. Furthermore, invitations for meals or drinks are allowed for mutual acquaintances and/or the creation and maintenance of mutual trust needed for working together. Meals in the canteen or an occasional business meal amounting to 50 Euro per person can be decided by the account manager himself/herself. Meals exceeding 50 Euro require an approval by the management by 4JET Group.

Demanding and Accepting Advantages

Employees are not permitted to use their jobs to solicit, to demand, accept, obtain or be promised advantages. This does not apply to the acceptance of occasional gifts of purely symbolic value or meals or entertainment reasonable in value that are consistent with local customs and practices.

Gifts of any kind – except meals - exceeding these regulations must be handed over to the management of 4JET Group. They will be raffled among all employees in the christmas tombola.

Invitations to meals to an appropriate extent during visits at the customer are allowed in terms of the usual acceptance of hosting in that cultural area. Furthermore, invitations for meals or drinks are allowed for mutual acquaintances and/or the creation and maintenance of mutual trust needed for working together. Meals in the canteen or an occasional business meal amounting to 50 Euro per person can be decided by the account manager himself/herself. Meals exceeding 50 Euro require an approval by the management of 4JET Group.

4.3 Donations and Sponsoring

Donations

4JET Group does not make political contributions (donations to politicians, political parties or political organizations).

Sponsorships for which 4JET Group receives advertising are not considered donations, nor are contributions to industry associations or fees for memberships in organizations that serve business interests.

Some donations are always prohibited, including donations

1. to individuals and for-profit organizations,
2. paid to private accounts,
3. to organizations whose goals are incompatible with corporate principles of 4JET Group, or
4. that would damage the reputation of 4JET Group.

All donations must be transparent. This means, among other things, that the recipient's identity and planned use of the donation must be clear and the reason and purpose for the donation must be justifiable and documented. Quasi-donations, meaning donations which appear to be compensation for a service but are substantially larger than the value of the service, are prohibited as violating the principles of transparency.

Donations always must be granted without the intention of granting advantages for 4JET Group.

Sponsoring

Sponsoring means any contribution in money or in kind by 4JET Group towards an event organized by a third party in return for the opportunity to advertise the brands of 4JET Group.

All sponsoring contributions must be transparent, pursuant to written agreement, for legitimate business purposes, and commensurate with the consideration offered by the event host.

Sponsoring requires an approval by the management of 4JET Group.

Contributions may not be promised, offered or made to secure unjustified competitive advantages for 4JET Group or for other improper purposes.

4.4 Money Laundering

It is the objective of 4JET Group to conduct business with reputable customers, consultants and business partners who are involved in lawful business activities and whose funds are derived from legitimate sources. We do not facilitate money laundering.

Cash transactions are to be generally avoided. They require in any case an approval by the management of 4JET Group for values exceeding 500 Euro.

4.5 Working with Suppliers

4JET Group as a company expects its suppliers and agents to share the values of 4JET Group and comply with all applicable laws. Furthermore, 4JET Group expects its partners to act in accordance with the following principles, similarly adopted by 4JET Group, concerning responsibilities vis-à-vis the environment:

- Comply with all applicable laws,
- prohibit corruption,
- respect basic human rights of employees,
- comply with laws prohibiting child labor,
- take responsibility for the health and safety of their employees, and
- act in accordance with applicable statutory and international standards regarding environmental protection.

Agents explicitly confirm their compliance with these principles. Suppliers with a permanent annual purchasing volume of more than EUR 100,000 are regularly audited by us with regard to these requirements.

4.6 Trade Controls

4JET Group complies with applicable export controls and customs laws and regulations in the countries where it does business.

Employees involved in the import and export of goods, services, hardware, software or technology as described above must follow applicable economic sanctions, export control and import laws and regulations and any related policies and procedures established by the business in which they work.

4.7 Banned Products and Markets

Arms and Ammunition

We understand that the defense of human rights, democracy or the territorial integrity of a country may require military or police force. At the same time, we want to refrain from directly supporting the production of arms and ammunition because of their mobility and high potential for abuse. In addition to and beyond strict compliance with German dual-use and export control laws, we have therefore defined the following policy:

1. we refrain from any business directly related to the manufacture (including cleaning, marking or other material processing) of firearms, mines, ammunition, rockets, grenades, mortars and other explosives (hereinafter "Excluded Products"), as these are often traded illegally and outside their original area of use due to their mobility. Therefore, we will not develop or offer solutions for handling such products.
2. Our range of standard products for tire manufacturing (STMCS, T-Mark, TCS, LAP), glass processing (PEARL, DIAMOND, TOPAZ) or cleaning (SCANYWHERE, JETLASER) has been developed for civilian use. The products processed on these machines (tires, glass parts, coated surfaces) cannot be used independently as weapons or ammunition after processing on our machines and therefore we do not restrict the sale of such systems. The fact that the products processed on such machines can also be used indirectly in weapon carriers – such as tires for military vehicles – is accepted.
3. In cases of doubt, the management decides on a case basis.

Respect for animals

Animals are creatures that feel pain and have rights. A respectful treatment of animals in industrial meat production is not possible.

We therefore do not pursue any projects that are related to the slaughter and processing of animals or industrial meat processing.

5 AVOIDING CONFLICTS OF INTEREST

It is the duty of 4JET Group employees to make business decisions in the best interest of 4JET Group, not based on their own personal interests. Conflicts of interest arise when employees engage in activities or advance personal interests at the expense of interests of 4JET Group.

Employees must inform their supervisor of any personal interest they could possibly have in connection with the execution of their professional duties.

Employees are not permitted to use, for their own personal contracts or orders, companies with which they have business dealings as part of their activities for 4JET Group if they could derive any advantage from the personal contract or order. This is particularly applicable if the employee exercises or is capable of exercising a direct or indirect influence upon whether that company receives a contract from 4JET Group.

A conflict can take the form of a business relationship with, or an interest in, a competitor or customer of 4JET Group, or participation in sideline activities that prevent employees from being able to fulfill their responsibilities at 4JET Group. It is important that all employees recognize and avoid conflicts of interest, or even the appearance of a conflict of interest, as they conduct their professional activities.

5.1 Competing with 4JET Group

An employee may not operate or assist a company that competes with 4JET Group or engage in any competing activities.

5.2 Sideline Work

Employees may not engage in sideline work that competes with 4JET Group. Before employees may engage in other sideline work for remuneration, they must notify 4JET Group and seek written permission. Occasional writing activities, lectures, and comparable occasional activities are not considered sideline work. Permission will not be granted if it is detrimental to the interests of 4JET Group. Permission may be refused if employees have dealings in the course of their official duties of 4JET Group with the company in question. Previously granted permission may be revoked on these grounds as well.

6 HANDLING OF COMPANY PROPERTY

There are many devices and pieces of equipment in 4JET Group offices and workshops, such as telephones, copying machines, computers, software, Internet/Intranet, machines and other tools, including e-mail and answering machine systems. These may be used for personal gain provided that the use of 4JET Group property does not:

- relate to any illegal activity,
- take place during the working hours,
- cause an actual or perceived conflict of interest, or
- lead to significant added costs, disruption of 4JET Group business or other adverse effects for the company, including by interfering with an employee's assigned duties or the assigned duties of other employees.

In no case may information be retrieved or transmitted that furthers or incites racial hatred, glorification of violence or other criminal acts, or contains material which is sexually offensive within the respective culture.

Employees are not permitted without the consent of their supervisor to make records, files, video or audio recordings, or reproductions using 4JET Group equipment or facilities if the activity is not directly related to Company business.

7 HANDLING OF INFORMATION

7.1 Confidentiality

Confidentiality must be maintained with regard to internal confidential or proprietary information of 4JET Group that has not been made known to the public. Nonpublic information from or concerning suppliers, customers, employees, agents, consultants and other third parties must also be protected in accordance with legal and contractual requirements.

Confidential or proprietary information may include, in particular:

- details concerning a company's organization and equipment, prices, sales, profits, markets, customers and other matters of business,
- information on manufacturing or research and development, and
- internal reporting figures.

The obligation to maintain confidentiality extends beyond the termination of the relevant relationship, since the disclosure of confidential information could cause harm to the business of 4JET Group, clients or customers no matter when it is disclosed.

7.2 Data Protection and Data Security

Access to the Intranet and Internet, worldwide electronic information exchange and dialogue, and electronic business dealings are all crucial to the effectiveness of each and every one of us, and for the success of the business as a whole. However, the advantages of electronic communication are tied to risks in terms of personal privacy protection and data security. Effective foresight with regard to these risks is an important component of information technology management, the leadership function, and also the behavior of each individual.

Personal data may only be collected, processed, or used insofar as it is necessary for pre-determined, clear, and legitimate purposes. In addition, personal data must be maintained in a secure manner and appropriate precautions should be taken when transmitting it. High standards must be ensured with regard to data quality and technical protection against unauthorized access. The use of the data must be transparent for those concerned and the rights of those concerned must be safeguarded with regard to use and correction of information and, if applicable, to objections pertaining to blocking, and deletion of information.

In some jurisdictions (such as the European Union) there are strict laws and regulations pertaining to the collection and use of personal data, including data on others, such as customers or business partners. All employees must abide by such laws, to the extent they are applicable, to protect the privacy of others.

7.3 Property Rights and Patents

The continuous development of our proprietary technology by inventions and improvements of our expert knowledge is of vital importance for maintaining the competitiveness. Therefore, a growing significance attaches to the protection of our technology by industrial property rights.

No employee is allowed to pass new knowledge or company secrets to third parties in any way. Each employee has to respect the valid protection rights of third parties. No employee is allowed to obtain secrets from third parties or make unauthorized use of them.

7.4 Correct Reporting

Employees are obliged to truthful statements in internal and external spoken and written reports. Any manipulation of the contents is not allowed.

The obligation to correct reporting of contents applies to the same extent for marketing and advertising statements.

8 ENVIRONMENT, SAFETY AND HEALTH

8.1 Environment and Technical Safety

Protecting the environment, conserving natural resources and reducing of greenhouse gas emissions are high priorities for our company.

As a plant engineering company with a low depth of added value, the direct consumption of resources in the company is very low compared to the controllable consumption of resources. Especially the sustainability of our machines in operation has a much greater influence on the environment than our direct consumption of resources.

Therefore, we concentrate on optimizing our machines with regard to the consumption of resources and emission and the development of new applications that replace conventional non-laser-based technology by resources saving 4JET systems. More than 80% of the energy consumption can be saved in some applications by replacing a conventional machine by a 4JET laser system.

Moreover, we want to be active in reducing the direct consumption of resources and emissions and in improving the direct ecological balance by the corresponding managerial responsibility of the management and the commitment of the employees.

8.2 Work Safety

Protecting the health and safety of employees in the workplace is a high priority for 4JET Group. It is the responsibility of everyone to foster the efforts of 4JET Group to conduct its operations in a safe manner. The responsibility vis-à-vis employees requires the best possible accident prevention measures, and applies to:

- the technical planning of workplaces, equipment and processes,
- safety management, and
- personal behavior in the everyday workplace.

The work environment must conform to the requirements of health-oriented design.

The hazards for all hazardous materials are analyzed and operating instructions are created.

All employees must constantly be attentive to work safety.

9 COMPLAINTS AND COMMENTS

All employees may lodge a complaint with their supervisor or the compliance officer, Mrs. Kira von Gradowski.

All documentation will be kept confidential to the extent permitted by law. No reprisal of any kind against complainants will be tolerated.

10 CONVENTIONS AND RECOMMENDATIONS OF INTERNATIONAL ORGANIZATIONS

In addition to the laws and regulations of individual countries, there are a number of conventions and recommendations from international organizations which are noteworthy. Although these documents are primarily addressed to member states and not directly to companies, they nevertheless function as important guidelines for the conduct of multinational companies and their employees. 4JET Group supports the requirements of these conventions and recommendations.

4JET Group is also committed to embracing, supporting and enacting, within its further sphere of influence, the set of core values in the areas of human rights, labor standards, the environment, and anticorruption included therein as an integral part of its business strategy and operations.

4JET Group therefore expects its employees, suppliers and business partners around the globe to recognize and apply particularly the standards of the:

- Universal Declaration of Human Rights (1948) and European Convention for the Protection of Human Rights and Fundamental Freedoms (1950)
- ILO (International Labor Organization) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (1977) and ILO Declaration on Fundamental Principles and Rights at work (1998) (specially with following issues: elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association and right to collective bargaining)
- OECD Guidelines for Multinational Enterprises (2000)
- Agenda 21 on Sustainable Development (final document of the basic UN-conference on environment and development, Rio de Janeiro (1992)
- UN Convention Against Corruption (2005)