

CODE OF ETHICS AND CONDUCT

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For the sake of better readability, either the masculine or feminine form of personal nouns has been chosen in this document. This in no way implies any discrimination against the other gender. Women and men may feel equally addressed by the contents.

PREFACE

PROLICHT commits itself and all those who act on its behalf to uphold and respect internationally recognized human rights. In all our business processes within the company, but also with our business partners, all business practices must be in 100% compliance with the "United Nations Guiding Principles on Business and Human Rights (UNGP)" and must be ensured.

The principles described in the Code of Conduct and Ethics serve as a guide for our employees and those who have business contact points with us to act in a compliant manner and to minimize any risks to people and nature.

In chapter 4 "Addressees of the Code of Ethics" we go into these topics in more detail.

1. OUR VALUES

The graphic below describes the values defined by the top management, which we use to guide our actions within PROLICHT but also in our cooperation with partners, customers and suppliers.

Our values guide our actions as they reflect what we believe in. The contents of the following graphic can be transferred to all business areas but also to the cooperation with customers, partners and suppliers in the environment of the company PROLICHT.

Within our business processes, we thus manage to live our values and also to demand them from our business partners. Within this creative space we can guarantee that

- The safeguarding of and respect for internationally recognized (human) rights,
- compliance with regulations, guidelines, but also
- the values of PROLICHT
- the protection of people and nature and
- all our socially sustainable efforts

are given the greatest possible care.

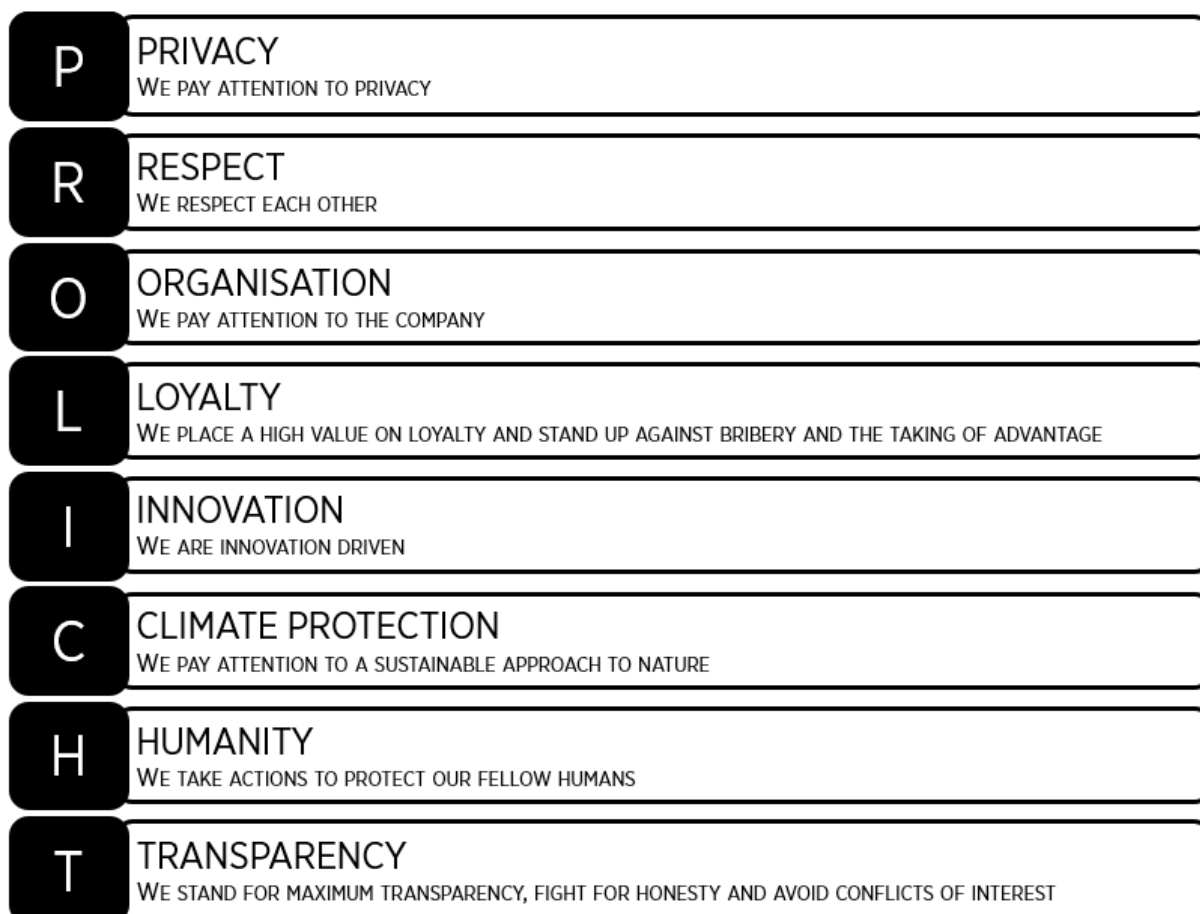


Figure 1: „CODE OF ETHICS AND CONDUCT“

1.1. „P“ AS IN PRIVACY WE PAY ATTENTION TO PRIVACY

We are committed to protecting personal data in accordance with the GDPR guidelines. We are committed to treating personal data with the utmost care and only using it for legitimate business purposes in compliance with all laws and regulations.

While we respect the individual's right to freedom of speech and expression, it is our policy to protect and not disclose any security-related information about PROLICHT, its partners, customers and suppliers. In principle, only a few authorized persons (including Marketing, CEO) are permitted to communicate externally on behalf of our company via social media (Facebook, Instagram, etc.). Any person active on social media must act in accordance with PROLICHT's principles and be aware that published data is accessible to everyone and must not damage PROLICHT's reputation.

In addition, we obligate our business partners, by signing the "PROLICHT CONFIDENTIALITY AGREEMENT" to handle sensitive company data with care.

1.2. „R“ AS IN RESPECT WE RESPECT EACH OTHER

It is very important for us to never lose sight of the principle of respect. We treat each other with respect and dignity, are polite and friendly to each other, show consideration for each other and accept the opinion of each individual, because with these essential and simple tools we can maintain and increase our daily cooperation.

1.3. „O“ AS IN ORGANISATION WE PAY ATTENTION TO THE COMPANY

We expect our employees and business partners to handle confidential and proprietary information (e.g., financial results, projects, new products, contracts, changes in business strategy etc.) with particular care and discretion. Any unauthorized use and resulting damage to the business will be investigated by PROLICHT in accordance with current legislation. We always act in the interest of the company, therefore in case of any fraudulent act, appropriate measures will be taken.

1.4. „L“ AS IN LOYALTY WE PLACE HIGH VALUE ON LOYALTY AND STAND UP AGAINST BRIBERY AND THE TAKING OF ADVANTAGE

PROLICHT supports all activities that serve transparent, honest and fair competition on the world market. We are therefore strict opponents of any form of bribery or other illegal payments. We refuse to take any action that could give us an advantage over other competitors in a non-legal way. Guest gifts or complimentary items that have a low value and are customary in the trade are permitted.

In addition, it is strictly forbidden to accept or offer gifts, payments, material benefits, etc., which could give rise to the suspicion of being considered a bribe.

We therefore conduct our daily activities with fairness and in compliance with all applicable internal as well as external regulations. We do not bribe or offer bribes.

1.5. „I“ AS IN INNOVATION WE ARE INNOVATION DIRVEN

Our way of working is always future-orientated, as innovation is the basis of economic but also personal growth. Through this approach we are well prepared to react quickly to changes or even to be ahead of the times. Innovation runs through all areas of our work. This applies to our product management as well as to the development of unique process structures. Not to forget our employees. Their innovative strength is also a decisive part of our entrepreneurial success.

1.6. „C“ AS IN CLIMATE PROTECTION WE PAY ATTENTION TO A SUSTAINABLE APPROACH TO NATURE

„We all share one planet and are one humanity, there is no escaping this reality“.

In the spirit of the quote from Wangari Maathai, the first African woman to be awarded the Nobel Peace Prize, we see it as our duty to protect our common planet and thus also our future. As a company, with all our colleagues and business partners, we are constantly striving to think and act in terms of our environment. Our measures include the reduction of energy consumption, the expansion of renewable energies, the reduction of any kind of waste, the expansion of recycling measures, the reduction of CO2 emissions, the expansion of electric mobility, the protection of biodiversity, water and the animal and plant world. All our measures can be read in the PROLICHT Environmental Report 2021-2022 and are our contribution to the protection of our environment.

1.7. „H“ AS IN HUMANITY

WE TAKE ACTION TO PROTECT OUR FELLOW HUMANS

Every single one of our employees is close to our hearts and is part of the PROLICHT family. Together we can move great things, this is due to an enormous know-how, but also the team spirit of our unique colleagues.

Only together we can achieve our company goals and grow sustainably. Therefore, it is very important to PROLICHT to always promote and protect the potential of its employees.

1.8. „T“ AS IN TRANSPARENCY

WE STAND FOR MAXIMUM TRANSPARENCY, FIGHT FOR HONESTY AND AVOID CONFLICTS OF INTEREST

Transparency" is firmly anchored in our communications policy. This is practiced both internally and externally. Figures, data, facts are the basis of clear, comprehensible and truthful communication. This is the basis for unambiguous decisions as well as a harmonious and balanced working atmosphere. We are taking a further step toward transparency by publishing our sustainability efforts on our website. Thereby, the sustainability strategy, the environmental statement, the report on labour & human rights, the PROLICHTs policy statement are only an excerpt of the documents that we as a company would like to share with the public in order to motivate also outside our sphere of influence to more sustainability. This is to avoid that employees, partners or ourselves get into conflicts of interest, i.e. we want to prevent that people are confronted with the choice between the duties and requirements of their position and their own private interests. It is our goal to systematically prevent dishonesty on a small and large scale (fraud, corruption, violation of laws, etc.) and to strengthen honesty - we stand for honest and loyal cooperation with all our stakeholders and competitors.

2. ADDRESSEES OF THE CODE OF ETHICS

The Code of Ethics is addressed to all those involved in PROLICHT's business processes. The Code of Ethics serves both us and our business partners as a guideline in the environment of our sustainable cooperation.

By complying with the Code, we also follow and strengthen PROLICHT's values.

Thus, we commit ourselves to act according to these values, to respect them, to implement them and thus try to be a role model to others in the responsible treatment of people and nature.

Within the company, we are constantly striving to build up a clear picture of the contents of the Code of Ethics through constant exchange and to steer our joint actions in the corresponding direction. We therefore expect our colleagues to treat employees and business partners appropriately. In the case of wilful violations, employees are made aware of the misconduct in personal discussions with the division managers to always uphold PROLICHT's values in order to counteract further misconduct. This is supported by various documentations and guidelines that enable a transparent review and verifiability of these values.

We also expect our partners to comply with our ethical principles in the sense of a sustainable and cooperative partnership and reserve the right to react in case of non-compliance within an adequate framework and by taking appropriate measures.

3. 17 „SUSTAINABLE DEVELOPMENT GOALS (UN)“

PROLICHT has also committed to aligning its Code of Ethics with the 17 Sustainable Development Goals (SDGs) of the United Nations. We want to contribute to the achievement of these goals of the UN. PROLICHT's Code of Ethics contributes to the following goals:



Figure 1: "OUR CONTRIBUTION TO THE 17 SDG GOALS OF THE UNITED NATIONS"

3.1. PROTECTION & SAFETY

PROLICHT supports the SDG target within the framework of its Code of Ethics



Goal 3: Health and well-being

The health and well-being of our employees is our top priority. For this reason, we not only orient ourselves to the legal regulations and guidelines, but also permanently evaluate the workplace at the headquarters in Neu-Götzens, supported by external experts. Among other things, these audits focus on

- Workplace safety
- Personal protective equipment (PPE)
- §82b audits (plant & facility permits)
- Training of employees and managers

With these activities, we pursue the preventive approach of preventing workplace accidents. In order to protect and ensure the safety of our employees, we pay attention to the following, among other things:

- Working and rest times
- Healthy and safe working environment
- Avoidance of illegal and dangerous behaviour
- - No toleration of alcohol and/or drug abuse
- Clear instruction of protective measures

In detail, the measures are recorded in the „PROLICHT SUSTAINABILITY GOALS 2030“¹ but also in the document „REPORT ON WORK AND HUMAN RIGHTS“².

¹ „PROLICHT SUSTAINABILITY GOALS 2030“ download link→

<https://prolicht.at/en/company/know-how/quality-and-environmental-standards/>

² „REPORT ON WORK AND HUMAN RIGHTS“ download link→

<https://prolicht.at/en/company/know-how/quality-and-environmental-standards/>

3.2. THE DIGNITY OF THE HUMAN BEING

PROLICHT supports the SDG goals as part of its code of ethics



Goal 5: Gender equality



Goal 8: Decent work and economic growth



Goal 10: Reduce inequality

In the long run, we can only be successful as a company if the effects of our business activities are in harmony with people and the environment. For this reason, PROLICHT has the clear and unambiguous claim to respect all internationally valid human rights. This principle is not only a prescribed path within the company - for all our employees - but also a criterion for the selection of our business partners. We expect them to comply with the applicable laws, guidelines, standards and regulations of the human rights conventions.

In the name of human dignity, we pay attention to the following, among other things:

- Fairness
- Protection against discrimination
- Mutual respect
- Elimination of social inequalities between women and men of any kind
- No coercion
- No mobbing/no harassment
- No involvement in any unlawful acts

Here; our code of ethics refers to the „DECLARATION OF PRINCIPLES FOR THE RESPECT OF HUMAN RIGHTS “³

3.3. ENVIRONMENTAL PROTECTION

At PROLICHT, both the legal and regulatory requirements are strictly adhered to and further measures are regularly developed and implemented in order to minimize the negative impact on our environment. Here, PROLICHT focuses on packages of measures that benefit the SDG goals SDG 7 "Affordable and clean energy", SDG 12 "Sustainable consumption and production" and SDG 13 "Climate protection measures". It is not so much the product itself, but our actions as a company on the topics of energy, waste and emissions that are intended to support the achievement of these goals.

³ „DECLARATION OF PRINCIPLES FOR THE RESPECT OF HUMAN RIGHTS PROLICHT“ download link → <https://prolicht.at/en/company/know-how/quality-and-environmental-standards/>



Goal 7: Affordable and clean energy



Goal 12: Sustainable consumption and production



Goal 13: Climate protection measures

In terms of environmental protection, we pay attention to the following, among other things:

- Reduction of energy consumption and/or expansion of renewable energies
- Reduction of the waste volume at the HQ
- Improvement of the CO2 balance
- Determination and tracking of key figures & derivation of programs and initiatives in the environmental area
- Establishment and expansion of the area of responsibility IMS & sensitization and training of environmentally relevant topics within PROLICHT
- Professional disposal of our products at the customer's site
- Establishment of an energy management system according to ISO 50001

This topic is dealt with in detail in the document „ENVIRONMENTAL STATEMENT PROLICHT“⁴.

4. DISTRIBUTION OF THE CODE OF ETHICS

The code of ethics can be downloaded from the PROLICHT homepage via the following link.
<https://prolicht.at/en/company/know-how/quality-and-environmental-standards/>

5. WHISTLEBLOWER PROCEDURE

If the Code of Ethics is not complied with by addressees or we run the risk of addressees violating it, whistleblowing provides an opportunity to report this. This also guarantees that the values of our Code of Ethics are upheld. "Whistleblowers" should be given the opportunity to point out wrongdoings in the company. PROLICHT is obligated to adhere to the confidentiality requirement with regard to these reports. The identity of the whistleblower will not be disclosed to anyone other than authorized persons without express consent. Details on the PROLICHT Whistleblower Procedure can be requested from the "Human Resource" team.

Chapter 8 "PROLICHT CONTACT PERSONS" lists several access options for the internal whistleblower procedure. Die Thematik „Whistleblowing“ wird im Dokument „WHISTLEBLOWER VERFAHREN PROLICHT“⁵ weiter vertieft und kann auch dort im Detail nachgelesen werden.

⁴ „ENVIRONMENTAL STATEMENT PROLICHT“ download link→
<https://prolicht.at/en/company/know-how/quality-and-environmental-standards/>

⁵ „WHISTLEBLOWER PROCEDURE PROLICHT“ download link→
<https://prolicht.at/en/company/know-how/quality-and-environmental-standards/>

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