

# Spetec GmbH Code of Conduct

**SPETEC is the expert manufacturer of cleanroom technology, laboratory equipment and laser safety.**

## 1. Fundamental Principles

Spetec complies with all applicable laws and regulations in the countries where it operates. Employees are required to be aware of and adhere to the relevant laws and regulations, including data protection laws, fair competition rules, and internal corporate policies.

## 2. Health, Safety, and Environment

We are committed to protecting the environment and complying with local standards that safeguard workplace health and safety. Our operations adhere to these requirements, and we develop products in accordance with industrial standards for safety, health, and environmental sustainability. Spetec actively promotes environmentally friendly business practices and continuously seeks improvements, particularly in the responsible and sustainable use of natural resources.

We advocate for energy efficiency and the use of renewable energy sources. Additionally, we ensure the sustainable use of natural resources by promoting recycling and environmentally friendly practices. Waste is minimized, reused, or properly disposed of to reduce environmental impact.

Implemented measures include:

- Relocation to a new, energy-efficient company building
- Installation of a photovoltaic system with approximately 100 kWp
- Active waste prevention through the reuse of packaging materials
- Employee awareness programs on sustainability through targeted training and workshops

## 3. Relations with Competitors and Business Partners

We conduct fair competition by ensuring reasonable pricing and protecting customers and consumers. This principle guides our relationships with competitors, suppliers, distributors, and customers. We refrain from agreements or actions that fix or coordinate prices, divide markets (except for certain exclusive distribution agreements), or unduly restrict free and open competition. Additionally, we avoid behaviors that involve sharing protected or competitively sensitive information. Fair competition applies to all aspects of business operations.

## 4. Conflicts of Interest

Employees must avoid conflicts of interest that could arise from personal, familial, or financial activities conflicting with their objectivity and loyalty to Spetec GmbH.

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## 5. Corruption and Money Laundering

Spetec condemns all forms of corruption and bribery. Employees must not offer, promise, provide, or accept valuables—whether directly or indirectly—to secure business transactions, maintain existing agreements, or obtain unfair advantages. This includes payments, gifts, hospitality, or services that could reasonably be expected to influence business conduct.

As a responsible corporate citizen, Spetec actively engages in social responsibility efforts, supporting education, science, environmental protection, arts, culture, social initiatives, and sports through monetary and material donations. Spetec also sponsors events and projects in these areas but does not provide financial support to obtain illegitimate business advantages or create the appearance of bribery. All sponsorships and donations comply with applicable anti-corruption laws and regulations.

Spetec adheres to import and export control regulations and complies with legal requirements to prevent money laundering.

## 6. Employment Relations

Employees can expect Spetec to fulfill its responsibilities as an employer in a timely and appropriate manner. In return, the company expects employees to contribute their best efforts and skills. Our guiding principles include:

- Fostering a workplace culture of mutual respect, openness, and individual integrity.
- Complying with local occupational health and safety standards.
- Hiring and promoting staff based on qualifications, skills, and performance rather than gender, race, or other discriminatory factors.
- Encouraging open dialogue between employees and management.
- Prohibiting forced or child labor.
- Not tolerating violence, harassment, intimidation, or similar behavior in the workplace.
- Protecting employee personal data and privacy.
- Regulating working hours in accordance with legal requirements and fairly compensating overtime.
- Respecting employees' rights to freedom of association and collective bargaining.
- Promoting equal opportunities, diversity, and inclusion at all levels of employment.
- Offering regular health screenings for employees.

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## 7. Wages and Benefits

We are committed to providing fair and competitive salaries based on employees' qualifications and performance. Additionally, we offer comprehensive benefits to ensure employee well-being and security.

Spetec also supports professional development through extensive training programs, including internal and external continuing education initiatives, to help employees enhance their skills and competencies. These structured programs ensure that employees are equipped to meet evolving workplace demands effectively.

## 8. Occupational Health and Safety

Our primary goal in occupational health and safety is to minimize risks for employees, external service providers, and third parties. We prioritize safety, health, and well-being in all business decisions, recognizing that a secure and healthy work environment adds value to the company and safeguards jobs.

Workplace conditions and environments meet modern standards, with regular training on workplace ergonomics and health promotion. Our safety training and risk assessment protocols include emergency preparedness measures for workplace accidents, fires, explosions, and environmental incidents. Employees receive annual training on these protocols, and all incidents are promptly reported and investigated.

Fire safety regulations are strictly followed, with regular training sessions and fire drills conducted.

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