

CORPORATE COMPLIANCE POLICY

STRATEC GROUP



MISSION STATEMENT

As the innovative and technological market leader for automation and instrumentation solutions in In-vitro diagnostics, we seek to offer our worldwide partners first-class solutions and thereby share responsibility toward their customers and patients.

Our success is based on the talents and skills of our employees and their commitment to always perform the extraordinary. Their performance allows for the successful and sustainable development of our company in the interest of all its stakeholders.

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

Since the company was founded 40 years ago, responsible thinking and sustainable action have been one of the cornerstones of STRATEC's growth from a small startup to a globally operating company. By implementing sustainability topics in its corporate strategy, STRATEC takes account of its social responsibility. Core elements of these are: economic action for long-term growth, ecological responsibility for the world of tomorrow, social and societal responsibility towards people.

Details of the company's sustainability activities can be found in the annual report and in the sustainability brochure, which can be downloaded from the company's website at www.strattec.com/financial and www.strattec.com/company/about-us/social-responsibility, respectively.

At the same time, we would like to call on our employees, managers and all members of the STRATEC family to perform their everyday tasks, both big and small, with good sense and in compliance with the law.

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A. COMPLIANCE OBJECTIVES

The task of compliance is to pursue the objective of complying with all relevant national and international laws and regulations, whether as a group, an individual company or an individual employee. In addition to this, the observance of and compliance with the respective local provisions in force at each of the group subsidiaries must also be ensured. This leads to the overarching aim of establishing and monitoring compliance policies, of identifying risks at an early stage and of creating transparency and trust in this matter. In line with the **UN Global Compact Principals**, we also attach considerable importance to the overall observance of human rights, the creation and maintenance of occupational safety, job security, respect for the environment and the fight against and prevention of corruption.

The objectives outlined above are mapped and met by a compliance structure (**compliance management system – CMS**) at each subsidiary. These compliance structures result in a **compliance culture** that STRATEC aims to embrace and put into practice across the group.

In accordance with the **PREVENT RECOGNISE RESPOND** guiding principle, every employee is therefore requested to report threats to these goals or actual violations either via the whistleblowing system or to the responsible department listed below.

B. COMPLIANCE OBJECTIVES AT STRATEC

Our aim is to strike a balance between the existing policies in individual areas and their interconnection together with all relevant and applicable rules and regulations. We believe that doing so will make compliance viable, transparent and comprehensible. Amongst others, this includes the following aspects:

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

C. KEY ELEMENTS AND PRINCIPLES OF OUR COMPLIANCE UNDERSTANDING

It is important for us to adhere to corresponding principles in order to be able to pursue STRATEC's goals and to comply with its understanding of compliance. These principles can be derived from our objectives. These principles must be observed and implemented under all circumstances.

The items listed below form the STRATEC principles and result in the understanding of compliance at STRATEC:

I. OBSERVANCE OF LAWS, BINDING REGULATIONS AND INTERNAL GUIDELINES

We expect all of our employees in working for the STRATEC Group to strictly comply with the laws, other binding regulations and internal guidelines. Violations of the law can entail fines, blocks on public and private contracts, other regulatory sanctions, claims for damages and reputational damage. Any 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 personnel consequences and claims for damages against the employees involved. Regulatory probes and internal investigations in suspected cases can significantly impair business operations and unproductively tie up internal resources. We actively pursue information and tips about potential violations within the group. If necessary, we involve the responsible authorities and cooperate with them.

2. STRUCTURE AND ORGANISATION

The Compliance organisation handles all compliance-related processes within the group. They include in particular the drafting and implementation of the internal guidelines from this corporate policy, training on these specifications, and dealing with individual compliance cases. The Compliance organisation works closely together with the Board of Management, the managing directors and executives, 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 involved in the implementation of the compliance system. All employees are called on to support the Compliance organisation's work unconditionally. A Compliance Board established in 2020, further assists the Compliance organisation by being an independent and objective board reflecting goals, making risk assessments and judging measures put into place.

D.SELECTED AREAS OF THE CMS AT STRATEC

I. PREVENTION OF CORRUPTION

Common features of corrupt practices primarily include the misuse of a role or position at the company for obtaining (or attempting to obtain) personal benefits or advantages in business without being legally entitled thereto, while concealing this conduct (concealment) at the same time. As this is one of the main areas of compliance, we strive to prevent any forms of corruption.

2. COMPLIANCE WITH CAPITAL MARKET

The provisions of German and European antitrust law apply to all market players. Even small and medium-sized enterprises must meet certain minimum standards to be able to prevent violations of antitrust law to the greatest possible extent. If there are shortcomings in meeting these standards, managing directors and other executives may also be held personally liable if employees are involved in violations of antitrust law. Fines and claims for damages may jeopardise the very existence of the companies involved. Examples are to be mentioned here:

I. INSIDER TRADING

In principle, all employees are permitted to trade in STRATEC SE shares. However, this right is subject to restrictions. Thus, all employees are 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 concrete information about circumstances which are not publicly known, which relate to a company, its securities or other financial instruments and which, if they become known, are likely to have a significant influence on the stock market price of the company. This may include, for example, information on business figures, planned acquisitions or important contracts.

II. FINANCIAL REPORTING

Company employees and representatives must follow the provisions for financial reporting and accounting as defined in the laws and other legal regulations of the location where they work for the company. In this regard, the corresponding employees responsible must prepare correct financial statements and reports on the results of operations, financial position and cash flow of the company, submit the financial statements and reports for the respective reporting period on time and, if necessary, as part of corresponding declarations.

3. ANTITRUST

Antitrust laws are designed to promote competition within the industry and to prohibit conduct that limits competition. 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 steep fines.

The key antitrust taboos are as follows:

- price agreements
- agreements on market share
- capacity agreements
- division of regional markets
- customer allocation
- price maintenance

The Legal Department should be contacted before taking any action that may have antitrust implications.

4. FAIR AND RESPECTFUL BEHAVIOR

PRINCIPLES FOR THE WORKPLACE ENVIRONMENT

As an overriding principle, all Employees at STRATEC are required to behave in a fair and respectful manner towards each other at all times.

In addition, the following explicit principles must be adhered to:

I. EQUAL OPPORTUNITY

We are committed to providing all employees with equal professional opportunities, regardless of age, background, race or ethnical origin, skin colour, marital status, health, mental or physical disabilities, nationality, religion or belief, gender, sexual orientation or other discriminatory factors. We do not tolerate any form of discrimination or harassment of any kind.

II. HEALTH AND SAFETY

We are committed to a healthy and safe working environment. Our environmental, health and safety program reflect this commitment. Employees shall ensure that decisions taken on behalf of the Company express the Company's commitment to safety and health. Our goal is an injury and disease-free working environment that benefits all employees, suppliers, customers and the public.

III. DATA PROTECTION

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

IV. PRINCIPLES FOR CONFLICTS OF INTEREST

We expect our employees to perform their work in the best interest of the company and in accordance with the company's legal requirements. A conflict of interest is any activity or interest that interferes with or actually or allegedly opposes the interests of the Company. Employees who have concerns about an actual or potential conflict of interest always have the opportunity to seek advice from their supervisor or the Legal Department. The employee should avoid any situation where there may be a conflict between private interests and the interests of the Company. This applies in particular with regard to financial interests, activities outside the STRATEC Group, family relationships as well as the acceptance of gifts and invitations or the distribution of gifts and the discussion of invitations.

V. REPORTING OBLIGATIONS

Employees are encouraged to contact their supervisor immediately if the principles listed here are endangered or not observed, which in turn are obliged to forward all reports received to the compliance department.

5. ENVIRONMENTAL PROTECTION

We will ensure that our business activities are as environmentally friendly as possible and that wherever we do business, the impact of our actions on the environment is kept to a minimum. Our environmental, health and safety program reflect this commitment. Employees also ensure that the decisions taken on behalf of the Company express the Company's commitment to environmental protection and compliance with environmental laws.

6. 4-EYE-PRINCIPLE

The so-called "four-eyes principle" is an important component within STRATEC's value system. It is also to be explicitly applied where it is stipulated by regulations. Important decisions should not be made by a single employee or critical activities should not be carried out by a single person. The aim is to reduce the risk of errors and misuse.

7. HOW CAN I AVOID CONFLICTS? SHOWN ON THE EXAMPLE OF GIFTS

As a general rule, gifts and gratuities involve **non-cash benefits** which may meet the definition of corruption (see Point C. 2.), especially when the donor expects a service in return.

Benefits in kind can also include **performance incentives** that are awarded for the provision of a certain service, such as the achievement of certain sales figures or a sales threshold. Therefore, performance incentives may also be subject to acts of corruption, especially if the performance incentive was only offered to certain customer employees or without the employer's knowledge. From the recipient's point of view, however, further problems arise here, since such benefits also qualify as taxable income and are also subject to social security contributions. Such benefits therefore not only pose a problem of corruption, but also affect tax law.

Employees should therefore always exercise caution, and especially when the gift is (more or less obviously) linked to the expectation of a service in return. In general, the legally relevant threshold is already crossed when, viewed objectively, the gift may restrict the commercial judgement and professional autonomy of its recipient. In this respect, the boundaries of what is "permissible" are more generous when dealing with private companies than with holders of public office and the authorities.

The following considerations may help with correctly assessing the gratuity of an offer or gift:

- Will the recipient be exposed to a potential conflict of interest by accepting the gift, or will he or she personally benefit in an illegitimate way by doing so?
- 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 an unfair influence?

STRATEC employees must therefore never attempt to unlawfully influence business partners or customers or unlawfully gain advantages - neither through gifts nor through favours or the granting of other advantages - in any country of the world. This applies in particular to cooperation with authorities or public institutions but also amongst STRATEC employees.

E. ETHICAL EMPLOYER

STRATEC strives to be an ethical employer. This includes but is not limited to the following fundamental rights for our Employees and a clear commitment to how we do business and structure our organization.

1. FREEDOM OF ASSOCIATION / COLLECTIVE BARGAINING

All STRATEC Employees have the right of Freedom of Association and are free to organize and to form and participate in groups, either formally or informally as long as these are not illegal in the employing country. Examples of such groups include political parties, professional or sporting clubs, non-governmental organisations and trade unions. Equally all STRATEC employees have the right to participate in Collective Bargaining as applicable to the region where they work. STRATEC operates a strict policy of no discrimination or retaliation for those employees who choose to exercise their rights. No employment related decisions, such as promotion, salary level or opportunity will be made on whether employees participate in these groups or not.

2. EQUAL OPPORTUNITIES

At STRATEC we believe in the principles of equal employment and creating a diverse work environment. We are committed to complying with applicable laws providing equal employment opportunities, and all other employment laws and regulations. It is our intent to maintain a work environment that is free of harassment, discrimination, or retaliation because of age, race, colour, national origin, ancestry, religion, sex (including sexual orientation and gender identity), pregnancy, physical or mental disability or any other status/characteristics protected by laws. The Company is dedicated to the fulfilment of this policy in regard to all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment.

It is critical that all employees behave in a manner that encourages respect for the dignity of each individual. We require all managers to undertake regular mandatory anti-discrimination training. All Employees are responsible for upholding this policy and any breaches will be dealt with swiftly in line with the local policy. Any questions should be discussed with the local HR Representative.

3. WORKPLACE COMPLAINTS

All Employees are entitled to raise a grievance if they feel they have been unfairly treated or discriminated against. Each Business Unit is aware of formal structures and informal cultural issues that can prevent employees from raising concerns and grievances and gives trainings accordingly. Any grievance or complaint will be dealt with in a timely and appropriate manner with absolute discretion and sensitivity. Each Business Unit has its own grievance / complaints process appropriate to local legislative guidelines. Details of policies can be gained from the local HR Representative.

4. FLEXIBILITY AND RESPONSIBILITY OUTSIDE OF THE WORKPLACE

STRATEC recognize that Employees have varying degrees of commitments and responsibilities outside of the workplace (for example caring for dependent children, parents or relatives or managing health or other issues). Whilst it is our expectation that during working time all Employees commit their full time and energy to the task in hand, we recognise that Employees will sometimes require additional flexibility.

In each Business Unit we offer various methods of flexible working in line with local legislation. This includes flexible working times or reduced working hours. We also offer other flexible working options on a case-by-case basis such as paid or unpaid leaves of absence or changes to working pattern etc. Details can be gained from the local HR Representative.

5. EMPLOYMENT SECURITY

STRATEC recognises that our Employees are a key part of our competitive advantage. We believe in offering secure, long term employment as far as this is possible and hire the vast majority of our workforce directly. We strictly adhere to any minimum wage requirements in the countries we operate and ensure that workplaces practises, remuneration levels and benefits are appropriate to the local market. Where it is necessary to restructure and reduce headcount, we commit to doing this in a responsible manner and offer affected Employees appropriate support.

6. TRAINING AND EDUCATION

All STRATEC Employees have access to the training they need in order to carry-out their duties at work. Training offered includes formal classroom, online and on-the-job training. Training needs are discussed individually during the annual Employee appraisal and also at the departmental level. STRATEC also sponsors selected Employees to carry-out higher education or vocational training during working time if this is relevant and appropriate to the role.

F. IMPLEMENTATION AT STRATEC

I. EVERY INDIVIDUAL

Every employee is called upon to familiarize himself or herself with these standards, to review his or her own conduct against the standards of this Group Policy and to ensure that these standards are met through fair, responsible and honest work.

It should be noted that specific statutory and in-house requirements are responsible for fleshing out the content of the topics addressed here. Every employee must become sufficiently familiar with the statutory requirements and internal regulations relevant to their area of business activity and to observe them in their day-to-day work.

Every supervisor must organise the area they oversee in such a way that compliance with the rules set forth in the corporate policy as well as the statutory requirements is guaranteed. This includes in particular the communication, monitoring and enforcement of the rules relevant to their area of responsibility. Deficiencies and irregularities must be actively addressed and corrected. Every supervisor is obliged to serve as a role model in their area through personal integrity and, in doing so, ensure that corporate compliance is truly put into practice as a key part of our corporate culture.

2. WHO CAN I ASK IN CASE OF UNCERTAINTY?

The first step should always be to challenge any situation which might lead to a conflict of interest in the sense of this Corporate Compliance Policy by questioning your or the third parties intended action. If you are still unsure of the right or wrong of the situation your first point of contact should be your supervisor or your local compliance officer.

3. WHISTLEBLOWER 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 approach is understood to be a whistleblower system.

The use of such a whistleblower system at STRATEC is possible as follows:

- Reports via the internal local postboxes of either the legal or the compliance department
or
- Reporting via the Compliance Online mailbox (at headquarter site only) located on the Intranet
or
- Reports via external mail to the address of the Compliance Officer:
Carissa Bagaric-Klein
Osterbronnstr. 54
70565 Stuttgart

All anonymous reports received will be reviewed by the Legal / Compliance Department and followed up.

All whistleblowers are protected against dismissal, demotion and other discrimination.

G.SUMMARY

To conclude, every employee should ask him-/herself the following important questions that are fundamental to STRATEC with regard to their day-to-day work:

- 1. Is my act or decision legal?**
- 2. Is my action free of personal interests?**
- 3. Would a neutral person judge my action to be legally flawless?**
- 4. Does it meet the requirements of the STRATEC corporate policy?**
- 5. Would my actions harm STRATEC as a Group? (financial loss, image, ...)**