

ETHICS – INTEGRITY – COMPLIANCE – DATA PROTECTION

MICOS CODE OF CONDUCT (CoC)

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I. PREFACE

Micos aims to be a valuable and important industry and innovation partner of the European Space Market. Micos' purpose is to contribute ensuring that the European space agencies and prime contractors are provided with optical instrumentation components and systems and that their performance requirements are met. Micos develops continuously third-party business appropriately so that it can support the business with the space agencies and main contractors.

For innovative solutions: We work as a team with our customers and partners to ensure innovative technologies for future space applications. This characterises the way we work and our deep-rooted sense of responsibility. We cultivate collaborations with our customers and business partners – based on trust, integrity and mutual respect. In our relations with each other and with all stakeholders, our priority is open communication, fairness and respect towards others and the environment. An integral component of this is compliance with all relevant internal and external policies and regulations.

The Micos Code of Conduct helps us to promote clear values and principles, which we can commit to – in the business itself as well as in our dealings with our customers, business partners and suppliers, and in relation to society, policies, government agencies, as well as our shareholder, the Swiss Confederation. Our credibility is based on our Code. Our public reputation rests on adherence to it, and it contributes to ensuring sustainable economic success.

II. INTERGRITY AT MICOS

We deliver on the trust placed in us, every day. We aim high, act responsibly, keep our word, and adhere to the appropriate external and internal policies.

The 10 Golden Rules:

- (1) We act in a professional, solution-oriented and responsible manner.
- (2) We create trust and justify the trust placed in us.
- (3) We keep our word – we say what we do, and we do what we say.
- (4) We are reliable, act honourably, communicate openly, and are responsible for our own actions.
- (5) We guard the commercial secrets entrusted to us.
- (6) We are honest and open about our mistakes. We learn from our errors in order to grow as a company.
- (7) We communicate openly with our colleagues about mistakes, so that together they can be rectified.
- (8) We achieve competitive success through effort, competency, quality and innovation – always for the long-term and sustainability.
- (9) We comply with the appropriate external and internal policies, even in challenging situations and difficult markets.
- (10) We do not flout or ignore these basic principles for business gain.

III. AID TO DECISION-MAKING

In cases of doubt, Micos employees should ask themselves the following control questions:

- (1) Would I be happy to see my behaviour discussed in the media or in the press?
- (2) Would I be happy to have to explain my actions to management?
- (3) Would there be compliance with regulations, if my colleagues were to act this way?
- (4) Would I be happy to tell family members or my significant others about my actions?
- (5) Would our customers approve of my actions?

If the answer to any one of these questions is 'No', then the employee should think again!

IV. SCOPE OF APPLICATION

This Code of Conduct applies world-wide, wherever and whenever Micos is doing business.

The policies in this Code of Conduct apply to share holders, management and all employees.

A core function for all managers/responsible persons is to ensure compliance with the Code of Conduct within their frame of work & responsibility. This includes setting a good example in terms of compliance issues, making all employees aware of the core policies of the Code of Conduct, and being on hand to instruct and advise them.

Micos expects all business partners to comply with the Code of Conduct and reserves the right to terminate the business relationship in the case of violations of the Code by business partners.

V. ZERO-TOLERANCE OF CORRUPTION

Micos has a zero-tolerance policy with regard to corruption and will therefore decline any form of bribery, corruption or any other corrupt practice.

WHAT WE ARE COMMITTED TO

A gift/benefit must be legal, impartial, appropriate, proportionate and transparent.

Gifts, hospitality or other types of benefit will only be offered, given or accepted, in good faith and only inasmuch as these are commensurate with usual business hospitality practice and Micos internal policies.

Micos does not make any donations to political parties.

WHAT IS NOT PERMISSIBLE

It is not permitted to offer, give or accept a gift/benefit with the intention of, or which has the effect of, influencing the decision-making processes of a business partner or an official.

In the same way, no gift/benefit will be accepted which could influence the company's own decision-making. No gifts/benefits which are inappropriate or of a disproportionately high value will be offered, given or accepted.

In particular, the offering or giving of gifts/benefits to officials to carry out or expedite the performance of their routine official duties of a non-discretionary nature (so-called facilitation payments) is prohibited. Exceptions are possible where there is danger to life or limb or personal safety.

VI. FAIRNESS IN COMPETITION

Micos is convinced that innovation, technological progress and ongoing improvements in quality are driven by a functioning market and competition.

Therefore, Micos operates as a fair and responsible competitor.

WHAT WE ARE COMMITTED TO

Micos employees therefore have contact with competitors, if required for legal business purposes.

All employees ensure that in communications and correspondence with competitors, no information is exchanged which permits inferences to be made regarding the present or future actions of Micos or its competitors.

Micos employees will inform the appropriate management immediately of any attempt by a competitor to exchange competition-relevant information or to coordinate anticompetitive behaviours, in order that the management, together with the relevant compliance officer, can document in writing that no violation took place. The sharing of such information, apart from with the relevant compliance officer, is prohibited.

WHAT IS NOT PERMISSIBLE

Adjusting prices or other conditions with competitors is prohibited.

No marketing-sensitive information is to be exchanged with competitors.

Insofar as Micos might have a leading market position, Micos will not abuse this market position. In particular, it will not discriminate against customers or hinder competition.

VII. CONFLICTS OF INTEREST

Micos employees must avoid situations where private interests are in conflict with Micos' interests as a business, or there is a risk of this.

WHAT WE ARE COMMITTED TO

Employees finding themselves in an actual or potential conflict of interest have a duty to disclose this situation to their manager and report it to the relevant compliance officer. The reported conflict of interest is to be documented in writing. This also applies even if there only appears to be a conflict of interest.

All employees are committed to being careful and cost-conscious in the handling of Micos' business assets, and in particular to ensure that these are not misused for personal ends.

The management must be informed of any voluntary activities and paid additional employment outside of Micos which might adversely impact the employee's work for Micos, in order to ensure that appropriate measures can be put in place to avoid a conflict of interest.

WHAT IS NOT PERMISSIBLE

Unless specifically allowed in special cases, employees' work time and property belonging to Micos must not be used for private purposes.

An employee's position at Micos must not be used for personal gain or to the personal advantage of relatives or friends.

VIII. TRADE COMPLIANCE AND EXPORT CONTROLS

Micos carries out its responsibility as an internationally active company for optical instrumentation / components for space and ground applications.

WHAT WE ARE COMMITTED TO

In the international trade and exchange of goods, Micos complies with the national and international regulations of the customs, tax and export control authorities, as well as with official directives and international agreements.

All Micos applications are supplied only to clearly identified and legitimate business partners and end users, and so makes a contribution to security, autonomy and stability.

All exports of our applications – irrespective of the location they are supplied from – are carried out within the framework of international law, Switzerland's international obligations, and the tenets of Swiss foreign policy. This also includes civil goods, which are not directly subject to export controls, but are subject to sanctions and embargoes.

WHAT IS NOT PERMISSIBLE

Micos employees do not complete customs declarations, tariff values or declarations of origin without prior verification.

Micos employees do not carry out the exporting of controlled goods without first fulfilling the export control requirements.

An export permissible according to the regulations and laws from a specific location is prohibited according to this Code of Conduct, if Swiss export control laws are not followed i.e. in relation to the export of dual use goods and if the legal obligations in relation to private foreign companies are not adhered to.

IX. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

Micos offers all employees the same opportunities and condemns any form of discrimination, harassment or bullying.

WHAT WE ARE COMMITTED TO

Micos expects all employees to treat each other fairly and respectfully, irrespective of any potential differences or varying personal views.

Micos promotes an inclusive culture and does not tolerate any discrimination on the grounds of age, ethnic origin, ideology, religion, skin colour, nationality, political or other beliefs, gender, sexual orientation, physical condition, marital status, or membership of an employee association.

All pay levels reflect the current national legal norms and industry standards. Pay levels acknowledge employee performance and are explained in regular feedback.

WHAT IS NOT PERMISSIBLE

Micos does not tolerate illegal employment of children, forced labour, bonded labour or any other form of compulsory labour. Their recruitment and employment practices shall be free of all discrimination.

X. ENVIRONMENT, HEALTH AND SECURITY

Micos strives to continuously improve its processes, products and services – while taking into consideration the environment, as well as the health and safety of its employees.

WHAT WE ARE COMMITTED TO

Micos is committed to act sustainable. In line with the objectives of the federal government and the cantons, Micos aims to achieve a climate neutral business.

As an employer, Micos ensures a healthy and safe working environment and safeguards its employees from excessive exposure to chemical, biological and physical hazards.

All employees comply with the internal policies on health and safety in the workplace. In this way, they also have a responsibility for their colleagues' health and safety.

All employees actively contribute in their own work environment to the ongoing improvement of the health and safety of the workplace, support economic progress and assume responsibility for their fellow humans and the environment.

XI. DATA PROTECTION AND INFORMATION SECURITY

Micos observes the relevant data protection legislation and is committed to protect and respect confidentiality when handling information entrusted by its business partners and employees.

WHAT WE ARE COMMITTED TO

Micos collects, compiles, stores, processes and uses personal data only insofar as is necessary for permitted business purposes. In doing so, Micos follows the statutory basis or acts with the person(s) concerned. In this way, Micos respects and protects employee privacy.

Micos employees are required to treat as confidential company and other business and trade secrets they are entrusted with as part of their work, or which they become aware of by any other means, and – where mandatory – to keep them secret. This applies in particular to information regarding technologies and manufacturing, research and development processes, as well as to trading and financial data and customer information.

By technical means and through organisational measures, Micos ensures that personal data as well as other business data and information is safeguarded from unauthorised access.

All Micos employees comply with the internal policies when working with computing and communication systems and with regard to the safeguarding of information.

WHAT IS NOT PERMISSIBLE

Confidential business information belonging to Micos or business partners, or personal data from employees or partners, will not be passed to any third party without authorisation.

Micos' company data and information and its computing and communication systems may not be used for improper or unlawful purposes, nor contrary to internal policies.

XII. REPORTING OF VIOLATIONS AND SANCTIONS

Violations of the Code of Conduct or the applicable law will not be tolerated and will be appropriately sanctioned. All employees are encouraged to report information regarding violations without delay.

Micos employees are urged to openly voice their concerns, if they believe in good faith that the behaviour of another employee or a third party is or could be in contravention of this Code of Conduct or an applicable law.

The employee should at the same time have an objective basis for their claim in order to show that the reported information and associated allegations are essentially true.

Any kind of retaliation against employees who report known or suspected violations of the Code of Conduct or applicable law in good faith will not be accepted and will be appropriately sanctioned.

Reports intending to falsely accuse colleagues or management will not be tolerated. Such actions are in any case a violation of the Code of Conduct and will be appropriately sanctioned.

Sanctions can range from cautions and warnings to termination without notice, as well as civil lawsuits and criminal charges, depending on the severity of the violation. It also constitutes a violation of the Code of Conduct to knowingly overlook infringements of the Code by others, or to hinder the reporting of violations.

XIII. CONTACT

To report known or suspected violations of the Code, employees should contact:

- (1) Manager
- (2) HR Contact Person
- (3) Compliance Officer
- (4) General Management