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# Legal Notice: Code of Business Conduct and Ethics

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## 1. INTRODUCTION

At Obscape we are committed to social responsibility within the framework of our entrepreneurial activities worldwide. This binding Code of Business Conduct and Ethics ("Code") is a guideline to what this means with regards to working conditions, social and environmental compatibility as well as transparency. The content of this Code is an expression of our common basis of values as it is defined in our vision and mission.

## 2. LAWFUL AND ETHICAL BEHAVIOUR

Lawful and ethical behaviour is critical to our continued success. We must comply with laws and regulations relating to our business conduct. In addition, we must avoid and report any activity that involves, or could lead to the involvement of, Obscape in any potentially unlawful practice. Accordingly, we must understand the laws and regulations relevant to our work and comply with the legal requirements of the countries where we operate. Some laws affect everyone, such as those concerning equal employment opportunity and occupational health and safety. Other laws primarily affect employees and contractors in specific roles, such as those concerning manufacturing and financial reporting. Employees and contractors are encouraged to seek advice from their managers or the company's legal department, for clarity on those laws or regulations relating to one's work.

In addition to complying with the law, we must adhere to the ethical and other standards set forth in this Code. Obscape strives to conduct all its business activities in a manner consistent with the highest standards of integrity and ethical behaviour.

We must ensure that we always act lawfully and ethically, even if it costs us business or profits in the short term. Lawful and ethical behaviour is in our long-term best interest, as it maintains our excellent reputation for trustworthiness and reliability. Proper business conduct encourages loyalty from our team members, suppliers and customers and fosters a mutually beneficial relationship between Obscape and the communities in which we operate. We are expected to exercise sound judgment and demonstrate

an uncompromising degree of integrity, responsibility and professional conduct in the performance of our responsibilities. We should be open, honest and sincere in our dealings with, and must respect the rights of, customers, government officials, the public, suppliers, competitors, fellow employees and Contractors. We must never take unfair advantage of anyone through manipulation, deception, concealment, abuse of privileged information, misrepresentation of material facts or any other such intentional practice. Nor should we participate in or facilitate any illegal conduct by others. We should always err on the side of doing what is lawful and ethical, exhibiting the values of honesty, fairness, reliability, respect and trustworthiness. Integrity and compliance are the responsibility of each team member and are key elements in all managerial duties.

### 3. HEALTH, SAFETY AND ENVIRONMENT

#### HEALTH

We are committed to providing a safe, healthy and alcohol- and drug-free workplace.

#### SAFETY

All forms of threatening or intimidating behaviour, bullying, assaults or violence of any kind are prohibited. All employees are responsible for reporting unsafe work conditions, threats, actions and situations (including those relating to contractors, suppliers or customers) that have the potential for workplace violence.

#### ENVIRONMENT

We must understand and comply with the safety, health and environmental laws and regulations that affect our business activities. We are committed to avoiding adverse impacts to the environment and communities where we do business. We use natural resources responsibly.

We also insist that contractors, suppliers and others who work with us adhere to and follow applicable laws and regulations.

We protect the environment, conserve energy and natural resources, and prevent pollution by applying appropriate management practices and technology.

We comply with global and local regulatory requirements relating to the use, storage, discharge, and disposal of hazardous chemicals used during our manufacturing processes.

## 4. INTEGRITY IN GLOBAL COMMUNITIES

### BRIBES & KICKBACKS

We comply with the Nederlandse Wetboek van Strafrecht (Dutch Criminal Code), the U.K. Bribery Act 2010 and the applicable anti-bribery and anticorruption laws in the countries in which we operate.

We do not offer, promise, or give anything of value (such as cash or cash equivalents, gifts, non-business travel, or entertainment) to anyone, including to any government official, to improperly secure or keep business, or to improperly influence any decision regarding Obscape; and we do not use any third-party (such as a consultant, agent, or business partner) to do so on our behalf.

We do not make business decisions with any supplier, vendor, customer, or other business partner based on any personal benefit that is either offered or given to us, directly or indirectly. We do not ask for, demand, or accept bribes or kickbacks.

Obscape does not offer or give bribes, kickbacks, or anything of value, including a gift or entertainment, to a supplier, customer, or business partner to improperly control the recipient's actions or decisions; and we do not use any third party intermediary (such as an agent, consultant, distributor, or business partner) to do so for us.

### MONEY LAUNDERING & TERRORISM

We are committed to avoiding the use of Obscape's resources for the purpose of money laundering, which is the attempt to hide the proceeds of a crime to make the proceeds appear appropriate or lawful.

Obscape does not use its assets to aid terrorism or terrorist related activities.

### POLITICAL CONTRIBUTIONS

Obscape does not use its funds for political contributions of any kind to any political party or candidate, or any person who holds a government office, without prior written approval of the Board of Directors. "Political contributions" include direct and indirect payments, loans, advances, deposits, or gifts of money, or any service. It also includes subscriptions, memberships, tickets, and the purchase of advertising space, payment of expenses, or compensation of employees for a political organization, candidate, or public official.

Employees may make any political contribution of their choosing with their own money and time.

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### INTERNATIONAL TRADE

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As an importer, Obscape complies with the laws and regulations of the countries in which we receive goods, including customs regulations, classification and valuation.

As an exporter, Obscape complies with the laws of the countries from which we ship our finished products, components or technology as well as the export laws of the European Union, regardless of the shipping country.

## 5. WORKING CONDITIONS

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### CHILD LABOUR

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Child labour is prohibited at Obscape. i.e. the employment of persons younger than 15, insofar as the local legal provisions do not define a higher age limit and insofar as no exceptions are permitted, is not allowed.

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### FORCED LABOUR

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Obscape prohibits any kind of forced labour.

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### EMPLOYEE RIGHTS

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Respect for the right of employees to freedom of association and freedom of assembly as well as to collective pay negotiations, as far as such are legally possible in the respective country.

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### WORKING HOURS

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We comply with the labour laws and standards governing the maximum number of hours that may be worked.

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## SOCIAL COMMITMENT

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Obscape contributes to the social and economic development of the countries and regions in which it is active and supports the voluntary community activities of its employees there.

## 6. IMPLEMENTATION OF THE CODE

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### SEEKING GUIDANCE

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This Code cannot and is not intended to answer all legal questions and expound all instances of ethical behaviour. Situations may arise in which guidance must be sought to navigate a legal and an ethical course of action. Obscape employees and contractors are encouraged to seek the advice of their supervisor, the Compliance Officer, the human resources department or the legal department if they have any questions.

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### REPORT VIOLATIONS

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Obscape strongly encourages every employee who knows of or suspects a violation of applicable laws or regulations, the Code or the company's related policies, including those relating to accounting, internal controls and auditing matters, to report that information immediately to their supervisor or the Compliance Officer.

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### PROTECTION OF EMPLOYEES / INFORMANTS

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Obscape will not tolerate any kind of retaliatory actions against any employee who, in good faith, reports suspected wrongdoing, or complaints about violations of this code or our policies, unless the individual makes a false report with the intention to harm the reputation of somebody else.

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### INVESTIGATION OF SUSPECTED VIOLATIONS

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All reported violations will be promptly investigated and treated confidentially to the extent reasonably possible. Employees who have reported a violation should not conduct their own preliminary investigations. Investigations of alleged violations may involve complex legal issues. Employees acting on their own may compromise the integrity of an investigation and adversely affect both themselves

and the company. Any such unauthorized investigation, as well as failure to cooperate with an authorized investigation, is a violation of this Code.

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### DISCIPLINE FOR VIOLATIONS

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Obscape intends to make every reasonable effort to prevent behaviour that breaches this Code and to stop such behaviour as soon as reasonably possible after its discovery. Subject to applicable law and agreements, employees who violate this Code and related company policies and procedures may be subject to disciplinary action, up to and including termination of employment.

## 7. QUESTIONS OR CONCERNS WITH THIS POLICY

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### DEPARTMENT RESPONSIBLE

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Compliance Officer.

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### CONTACT

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All questions, requests for clarification or concerns regarding this Policy should be directed to the Compliance Officer at [compliance@obscape.com](mailto:compliance@obscape.com).