

Corporate principles

CODE OF ETHICS

I. Preamble

Niterrra EMEA GmbH (hereinafter referred to as Niterra) is introducing this Code of Ethics to protect the interests of our staff* and business partners, by promoting an ethical and legally compliant business operation. This Code of Ethics represents the requirements of Niterra for morally, ethical and legally compliant conduct, aims to promote the values covered and prevent misconduct. The objective consists of providing clear and transparent guidelines to practise these values within the day-to-day business.

This Code of Ethics is binding for all employees at Niterra.

II. General principles of the business

1. Respectful conduct, discrimination and harassment

We do not tolerate any form of discrimination and promote equality of opportunity, and equal treatment, irrespective of skin colour, nationality, social background, any disabilities, sexual orientation, political or religious conviction, gender or age. The personal dignity, privacy and personal rights of every individual are respected and inviolable. Derogatory treatment of employees or business partners, for example, through mental cruelty, sexual harassment or similar shall not be tolerated.

We treat our opposite number with respect and fairness. We distance ourselves from any such conduct by our employees outside our company.

2. Compliance with laws, regulations, business rules and codes of conduct

The applicable laws, regulations, guidelines and procedural instructions of the country, in which Niterra operates, are always observed and strictly adhered to in all business activities and decisions. Niterra is committed to training and supporting its employees in the interests of a joint understanding and compliance with laws, regulations, guidelines and necessary procedural instructions.

3. No bribery or corruption

Niterrra does not accept or tolerate any form of bribery or corruption by its employees or business partners. As a business, we are committed to preventing and combatting such behaviour.

Every employee is strictly forbidden to promote, accept or promise any benefit for themselves or any third party in return for carrying out or desisting from any business-related actions. Every employee is also forbidden to offer, promise or grant a benefit as a return service.

4. Fair competition

The adherence to transparent and fair conduct in the market is top priority for Niterra. A restriction to free competition and breaches against competition laws are not consistent with the company's philosophy and culture and Niterra's self-image.

5. Protection of assets

We protect the assets and resources of Niterra and our business partners to the best of our knowledge and belief. We ensure that these are used efficiently and only for legitimate business purposes.

We do not accept or tolerate theft, fraud or embezzlement of assets.

6. Invitations and gifts

The acceptance or offer of dinner invitations, hospitality or other free-of-charge incentives for personal enrichment is prohibited. We pay strict attention when handling meals and events offered or taken with business partners to ensure that these take place without influence and always serve a legitimate business purpose or are part of a working agenda.

7. Export control

We strictly adhere to the export regulations in force in our global activities and when developing new markets and abide by the rules and requirements for import and export control, and the applicable economic embargos.

**The text has chosen the masculine form for ease of reading. However, the details apply equally to both sexes.*

8. Safety at work

Niterrra respects the applicable regulations and standards for a safe and healthy working environment and takes the necessary steps to do this. Our staff are obliged in their activity to implement the statutory requirements and internal regulations on work safety and health and safety.

9. Secrecy and confidentiality

To protect the business interests of Niterra and our business partners, we place considerable importance on the protection of personal data and confidential business information. We shall not accept any improper forwarding or disclosure of this data or information. We act in compliance with GDPR at all times.

10. Conflict of interests

Niterrra expects that its staff always act in the best interests of the company and avoid any potential conflict of interest. There is a conflict of interest if the personal interests of the employee conflict with those of Niterra.

A handwritten signature in black ink, appearing to read "Y. Goto", is located below the text of section 10.

Yoshihiro Goto
(Managing Director)