

Behavioral Guidelines

Code of Conduct

1 Introduction

OMICRON and its employees recognize their social responsibility and are closely guided by the values of integrity, honesty, respect, trust, responsibility and fairness. The Code of Conduct is a binding guideline, which intends to emphasize the importance of a fair, responsible and ethical mode of operation in the interest of OMICRON and its employees. We endeavor to respect and be sensitive to cultural differences, particularly the local customs and culture of more than 140 countries in which we do business.

The outlined ethical guidelines are strongly related to principles of the UN Global Compact (see the attached appendix).

2 Principles, Rights and the Law

OMICRON commits to observing the laws and other governing regulations of the respective countries in which it operates. If you are not familiar with documents or laws in a foreign jurisdiction, consult with management prior to negotiating or consummating any foreign transaction. All business partners are to be treated with fairness.

3 Corruption, Competition Law, Forced and Child Labor

Playing favorites or having conflicts of interest - in practice or in appearance - runs counter to the fair treatment to which we are all entitled. Avoid any relationship, influence or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job.

Corruption

In interactions with business partners (e.g., customers, suppliers) and governmental institutions, corporate and any personal interests of employees will be strictly separated. Actions and decisions (e.g., purchase decisions) will be made free of external or personal considerations.

Management and employees of OMICRON are not permitted to offer, promise, demand, permit or accept gifts, payments, invitations or other services, which have the intention of influencing the business relationship in an illegitimate manner or which run the risk of endangering the professional independence of one of the business partners. This does not include gifts or invitations offered as part of the usual hospitality, customs or courtesy of business interaction.

Conduct with Competitors (Competition Law)

OMICRON respects fair competition and as such encourages compliance with the applicable laws that protect and advocate competition.

Forced and Child Labor

OMICRON observes the United Nations regulations of children's rights (see the attached appendix). Any form of forced or child labor is rejected.

4 Social Responsibility

Human Rights

OMICRON adheres to and supports all internationally recognized human rights.

Discrimination

OMICRON opposes all forms of discrimination. In particular, this is applicable to discrimination against employees or prospective employees on the basis of gender, race, disability, ethnic or cultural background, religious conviction, age, or sexual orientation.

Environmental Protection

OMICRON is committed to protecting the environment for current and future generations. OMICRON employees should adhere to laws governing environmental protection. OMICRON supports environmental awareness of its employees.

Trade Secrets

OMICRON endorses the importance of transparency towards customers and partners, while emphasizing non-disclosure where necessary. All information related to OMICRON's business should be considered proprietary and confidential unless it has been released in documents available to the general public.

Conflict Minerals

OMICRON supports the 2010 Dodd-Frank Act and the related U.S. Securities and Exchange Commission rule that promote transparency and consumer awareness regarding the use of defined conflict minerals and seek to cut direct and indirect funding of armed groups engaged in conflict and human rights abuses in conflict regions.

5 Suppliers and Partners

OMICRON employees should inform suppliers and partners about the Code of Conduct when appropriate and recommend implementing the points covered to the best of their ability.

6 Contact

Breach of any points in the Code of Conduct are to be reported to the respective coach or manager directly. If in doubt, you can send your concern also directly to the compliance team in Klaus/Austria (ethics@omicron.at).

Klaus, September 26, 2014



Manfred Strauß
Managing Director OMICRON electronics GmbH

United Nations Global Compact

The Global Compact demands of the companies, within their areas of influence, to support and practically implement a catalog of basic values in recognition of human rights, labor norms, environmental protection and anti-corruption efforts:

Human Rights

- #1: Organizations shall support and respect the protection of the international human rights within their area of influence and ...
- #2: ensure that they are not complicit in any human rights violations.

Labor Norms

- #3: Organizations shall preserve freedom of association and the effective recognition of the right for collective negotiations, as well as advocating ...
- #4: the removal of all forms of forced labor
- #5: the abolition of child labor and ...
- #6: the removal of discrimination during recruitment and employment.

Environmental Protection

- #7: Organizations shall support a preventative approach in the handling of environmental concerns
- #8: start initiatives to create a greater sense of responsibility for the environment, and ...
- #9: support the development and distribution of environmentally friendly technologies.

Fighting Corruption

- #10: Organizations shall counter all forms of corruption, including black-mail and bribery.

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