

CONFLICT OF INTEREST POLICY



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1 Overview

ISCC System GmbH employees are expected to adhere to the highest standards of personal and professional integrity and shall protect the interest of ISCC System GmbH. Personal gain shall not conflict with the interest and duty at ISCC System GmbH.

2 Purpose

The purpose of this document is to prevent the professional and personal interests of ISCC System GmbH employees from influencing the performance of their duties on behalf of ISCC System GmbH. Additionally, by setting up a relevant procedure it has the aim to protect ISCC System GmbH's interest when it is contemplating entering a transaction or arrangement that might benefit the private interest of an employee.

*Preventing
conflicts of
interest*

3 Scope

This policy governs the principles for preventing, detecting and dealing with conflict of interest within ISCC System GmbH.

*Responsibility of
all ISCC
employees*

This document is applicable to all ISCC System GmbH employees, working at all levels and grades, including board members, management, employees (whether permanent, fix term or temporary), consultants, contractors, trainees, volunteers, interns, working students or any other person associated with ISCC System GmbH (in this policy collectively referred to as "employees").

The term "third party" in this document refers to any individual or organization one may encounter during the course of their work for ISCC System GmbH and includes potential clients, customers, suppliers, distributors, business contacts, agents, advisers, non-governmental and international organizations and their representatives, government and public bodies, including their advisers, representatives and officials, politicians and political parties.

4 Definitions

"Conflict of interest" is an interest that might affect, or might reasonably appear to affect, the judgment or conduct of any ISCC System GmbH employee in a manner that is adverse to interests of ISCC System GmbH. It may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine the company and may place it to disadvantage.

*Using a position
for personal gain*

The situation of conflict of interest may take many different forms that include, but are not limited to:

- Using the position within the company to any personal advantage
- Hiring an unqualified relative or failing to disclose that one is related to a job candidate ISCC System GmbH is considering hiring
- Accepting payment from another company for information about ISCC System GmbH
- Making a purchase or a business choice to boost business that an employee has stake in
- Accepting consulting fees and providing advice to another company for personal gain
- Taking advantage of confidential information learned during work for ISCC System GmbH for own personal benefit
- Using company equipment or means to support an external business
- Acting in a way that might compromise ISCC System GmbH's legality (e.g. taking or giving bribes)
- Accepting gifts that are not in accordance with relevant ISCC System GmbH policy (e.g. ISCC Anti-Corruption Policy)

5 Guidelines

- As a general rule, an employee shall abstain or withdraw from taking part in any activities where conflict of interest exists or might arise.
- Employees shall disclose all relevant information that might lead to potential conflict of interest (e.g. report that a relative applied for a job with ISCC System GmbH)
- Employees shall refuse the circumstances creating the conflict of interest (e.g. refuse a gift that is not in accordance with ISCC Anti-Corruption policy)
- If a potential conflict exists due to an employee's personal interest in a matter, the employee shall advise their superior and Head of Compliance (HC) immediately.

Rules and guidelines to avoid conflicts of interest

6 Employee Responsibilities

All employees are obliged to read and comply with this policy.

Individual responsibilities

The prevention, detection and reporting of conflict of interest is the responsibility of all employees, and all employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must report to HC whenever they become aware of any issue or practice that involves a violation or a potential violation of this policy. In case employees are not certain if the activity would breach this policy, they are obliged to seek advice from HC.

7 Sanctions

Any employee who breaches this policy could face disciplinary action, which could result in dismissal for gross misconduct. ISCC System GmbH reserves the right to terminate its contractual relationship with an employee in the case of a breach or breaches of this policy.

*Actions taken if
misconduct is
observed*

Third parties who violate this policy are subject to termination of all commercial relationships with ISCC System GmbH.

8 Compliance Procedures

A copy of this document is distributed to all employees and they are obliged to sign the acknowledgment form. HC shall retain records of all such acknowledgements.

*Training
provided and
rules
acknowledged
by all employees*

Training on this policy forms a part of the induction process for all new employees. All existing employees will receive regular training on how to implement and adhere to this policy. In case of policy amendments, all employees will be asked again to formally accept conformance to the policy's newest version.

When a possible conflict of interest arises, HC will collect all the relevant information including interviewing concerned parties. If it is determined that a conflict exists, steps will be taken to prevent the action.

9 Disclaimer

This policy cannot and is not intended to cover every scenario regarding conflict of interest or provide answers to all questions that might arise. Accordingly, ISCC System GmbH encourages each employee to seek guidance from HC on the appropriate course of conduct regarding issues arising under the policy.

This policy does not form part of any contract of employment and it may be amended at any time.