This Code of Conduct defines the fundamental principles and values we adhere to in all interactions with our employees, customers, suppliers, society and the environment as we engage in daily global commerce. We reserve the right to change the requirements of this Code of Conduct due to changes of the LAP Compliance Program.

LAP GmbH Laser Applikationen hereby commits to the following principles:

**Legal Compliance**
- We comply with the laws of the applicable legal system(s).

**Prohibition of corruption and bribery**
- We do not tolerate and will not engage in any form of corruption or bribery, including but not limited to any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

**Fair competition and anti-trust laws**
- We act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

**Respect for the basic human rights of employees**
- We promote equal opportunities for and treatment of our employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- We respect the personal dignity, privacy and personal rights of each individual;
- We refuse to employ or make anyone work against his will;
- We refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual and personal harassment or discrimination;
- We do not tolerate behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- We provide fair remuneration and we warrant the applicable national statutory minimum wage;
- We comply with the maximum number of working hours laid down in the applicable laws. This applies to Federal Republic of Germany and countries where our employees work for us;
- We recognize, as far as legally possible, the right of free association of employees and neither favor nor discriminate against members of employee organizations or trade unions.

**Prohibition of child labor**
- We employ no employees under the age of 15.

**Health and safety of employees**
- We take responsibility for the health and safety in the work environment of our employees;
- We control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- We provide training and ensure that employees are educated in health and safety issues;
- We set up and use an occupational health & safety management system.

**Environmental protection**
- We act in accordance with the applicable statutory and international standards regarding environmental protection;
- We minimize environmental pollution and make continuous improvements in environmental protection;
- We set up and use a reasonable environmental management system.

**Supply Chain**
- We use reasonable efforts to promote among our suppliers compliance with this Code of Conduct;
- We comply with the principles of non discrimination with regard to supplier selection and treatment.

Lueneburg, November 01, 2019
LAP GmbH Laser Applikationen

Uwe Bernhard Wache  
Managing Director

Hans-Peter Werner  
Managing Director

Jens Gauthier  
Managing Director