



Code of Conduct

Our Mission, Vision und Values

Our Mission is to enhance people's lives through innovation in dynamic light control.

Our Vision is to be the solution of choice for optical systems that need dynamic light control.

Our Values are Pioneership, Positive Mindset, Respect, Profitable Growth, and Ownership.

Our Values and Code of Conduct are the guidelines for our daily work and behavior, and help to determine how we make decisions. They are important because they promote our growth and further development, and allow us to actively shape the future in a sustainable way.

Preamble

Our Code of Conduct is based on our five corporate Values. It defines fundamental standards and sets out expectations for the actions and behavior of all employees and managers in their daily work. It guides us to behave appropriately within the framework of applicable laws and ethical standards. Responsible behavior is of paramount importance for our reputation and to maintain the trust of our business partners and the public.

Expectations

We expect everyone to follow and comply with the Code of Conduct by reading, understanding and living it in their daily lives. We encourage all employees to consider the potential consequences of their actions and, if in doubt, to report suspected breaches of the Code of Conduct to their direct supervisors, Human Resources, or the Ombudsman. Optotune will take the necessary actions to address legitimate concerns, including disciplinary measures.

Employees shall not suffer any disadvantage because of compliance with the Code of Conduct or justified reporting of suspected violations. We will not tolerate retaliation against any person who reports a violation of this Code.

i Retaliatory measures include, for example, negative consequences such as bullying, ostracism, discrimination, termination.

Validity

This version of the Code of Conduct was issued by the Executive Committee and became effective on 14th July 2022.

signed

Dr. Manuel Aschwanden, CEO



Employees

The success of Optotune is based on the knowledge and commitment of our diverse and international employees. We constantly strive to allow our employees to use their talents in the best ways and to foster them. We continuously invest in the personal and professional development of our employees, through leadership training and other further education opportunities. We always follow our Optotune Employee Regulations.



Culture

Our communication is clear, direct and transparent, as well as honest and respectful. We create an atmosphere in which everyone feels comfortable to work. This encourages creativity and innovative ideas, allowing us to perform at our best.

Our flat organizational structure is characterized by an open, respectful and informal culture. We collaborate as a team, to create space for new ideas. We see cultural diversity as a source of enrichment. We do not tolerate discrimination, unfair or disrespectful behavior under any circumstances.



Health and Safety

We protect our people by minimizing and avoiding potential hazards. Legal and company safety regulations must be followed at all times. We do not tolerate physical or psychological violence or other threats that could injure or endanger our employees.



Data and Records

In accordance with our Data Protection Policy and Privacy Policy, we ensure the confidentiality and protection of the data entrusted to us. We collect and use personal data only for legitimate purposes and comply with applicable laws when transferring personal data across borders.

i Common examples of personal data are:

- Name
- Bank account number
- Social security number
- Residential address
- Medical data
- Personnel records

We create and maintain accurate and complete records. Our disclosures are full, fair and timely.



Trade Secrets

Our trade secrets are our company assets. To protect our uniqueness and pioneering role in the industry, we treat trade secrets and intellectual property of Optotune as absolutely confidential. Trade secrets are protected internally by the appropriate measures and are not disclosed externally.

To protect Optotune and our employees, we consistently use information security and classification measures for confidential information. Confidential information is shared only with the necessary key personnel.



Engagement with business partners and third parties

We nurture fair and open relationships with our business partners and third parties. We reject any kind of unfair labor practices, fraud, misappropriation, bribery, corruption and other illegal behavior. We do not do business under such circumstances and will not work with any business partners who employ such practices.



Gifts, Entertainment and Hospitality

We comply with applicable laws and regulations at all times and wherever we do business. We accept gifts, entertainment and hospitality in a business context only if they are reasonable and in accordance with good business practices.

i *Invitations within reasonable limits are permitted up to a value of CHF 100.00. Gifts are collected in a pool and distributed or shared amongst employees.*



Protecting Quality and Assets

We protect the assets of Optotune and our business partners and third parties against loss, damage, theft, misuse and unauthorized acts. We implement the required safety and security measures and processes. We respect the company property and intellectual property of Optotune and our business partners and competitors, within the framework of contracts, anti-competition and other applicable laws.

We are committed to delivering innovative, high quality products and services.



Conflicts of Interest

We avoid situations that are contrary to the interests of Optotune and promptly declare any potential conflicts of interest. Optotune employees, including those in management roles, do not use their positions to unlawfully enrich themselves or others.

i *Recognize a conflict of interest:*

- *Could my personal interests conflict with those of Optotune?*
- *Could third parties suspect a conflict of interest?*



Sustainability

We consider environmental factors in our daily decisions and innovation. We strive to use resources wisely to protect the planet, and consciously avoid waste where possible.

i *When leaving the room or office for the day, we turn off the lights, shut down computers. We minimize and recycle our waste whenever possible.*