

Kappa



SAFETY BEYOND

The World's Safest Vision Systems
for Defense Mobility & Autonomous Machines

CODE OF CONDUCT

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1. Preamble

Products and services from Kappa optronics GmbH enjoy an outstanding reputation worldwide, due in no small measure to their high quality and reliability. From this grow great expectations from our services and a far-reaching responsibility with respect to our customers' demands, but also with respect to our employees and to society.

With the Code of Conduct that follows here, we take a logical, further step toward the realization of this responsibility. The central point of this Code of Conduct is this: integrity and responsibility are our core values.

We live these values in our company by:

- honoring our commitments
- accepting social responsibility, and in so doing, the protection of the environment and resources as well as acceptance of cultural differences is of central importance for us.
- acting economically with ecological and social responsibility.
- following laws and regulations as an essential basic principle of economic and responsible action.

2. Who this Code of Conduct applies to

The principles contained in this Code of Conduct are binding for all employees of Kappa optronics GmbH, Kappa optronics Inc. and Kappa optronics S.L. without exception, regardless of their job title or location. Non-compliance with this Code of Conduct may result in disciplinary actions, including written warnings, suspension, or termination of employment, in accordance with applicable labor laws and internal company policies.

This Code of Conduct replaces the Code of Conduct dated in August 2021 and the latest version can be found on our website.

3. General Principles

We respect the principles of free expression of opinion and those of the protection of personal rights.

We direct our actions according to the specifications of relevant laws and regulations. We strictly reject any form of forced labor or child labor.

We are committed to providing equal opportunity and fair treatment regardless of race, ethnic origin, gender, gender identity, sexual orientation, religion or belief, disability, age, social origin, or any other characteristic protected by applicable anti-discrimination laws, insofar as these are based upon democratic principles and tolerance while respecting different viewpoints.

4. Conduct vis-à-vis Customers

Our products and services are designed to completely fulfill the high demands on quality and safety and use in the most varied applications. This is only possible when we know our customers' demands exactly, in order to make them the focal point of our activity.

Therefore, our solutions arise from an intensive dialogue with our customers. In this manner, a basis of trust develops from which both sides profit. Longterm-partnerships with many customers result, and with them comes performance that ensures project success that often exceeds the original concept. We see ourselves as a service provider and advisor and we check before the start of a project whether all aspects have been considered that will allow projects to become successes for our customers — because we view our customers' success as our success as well.

Our customers can rely on the fact that we will not blindly follow just the newest path, but rather the most sensible one — technologically, economically, and qualitatively.

Our doors are open to our customers during the entire course of the project. This transparency is one of our underlying principles. During the entire development process, we adapt flexibly to our customers' requirements. After all, a better solution should not fail due to rigid insistence upon following existing plans.

In the process, quality is our obligation – for our customers' satisfaction.

In relationship to the customer, our employees are obligated to obey the rules of fair competition within the bounds of legal requirements.

5. Conduct vis-à-vis Employees

The most valuable resource in the realization of our success is our employees. With their quality awareness, their commitment, their ability and their accountability they significantly influence the achievement of our goals.

Motivating measures, such as teamwork, transparency, open communication and systematic continuing process of education, are therefore of central importance to us.

We select, hire, and promote our employees strictly based on their qualifications and abilities.

We provide our employees with a healthy and safe work environment by adhering to laws and regulations covering health and workplace safety, including fire protection.

The right to appropriate remuneration is recognized for all employees. Salaries, wages and other benefits correspond at the least to current national legal norms and/or the current national economic sectors.

6. Conflicts of Interest and Corruption

Secondary employment is only allowed with the prior permission of the company.

Our employees are prohibited from exploiting our company's business relationships to their own advantage. Specifically, this means that, in the course of doing business, none of our employees may accept money or in-kind payments that could influence a professional or appropriate decision. Employees who allow themselves to be improperly influenced will be held accountable.

Any employee who is affected by a conflict of interest or who suspects one is required to inform Executive Management.

7. Confidential Information

All employees are required to protect proprietary and confidential information, including but not limited to business strategies, technical data, customer information, and trade secrets. Disclosure to unauthorized parties, whether intentional or unintentional, is strictly prohibited. This obligation remains in effect both during and after the term of employment.

8. Product Safety

Our company's objective is to ensure the highest standards of safety, quality, and service, in compliance with all applicable legal and regulatory requirements.

We are committed to continuous improvement based on systematic risk assessments, customer feedback, and adherence to recognized safety standards, such as ISO 9001, EN9100, ISO26262, DO-178C and DO-254.

Ensuring outstanding safety performance is fundamental to the success and sustainability of our business.

9. Data Protection

The protection of personal data is a top priority for our company. Personal data are collected and processed solely on the basis of legal grounds, such as contractual obligations, legal requirements, legitimate interests, or the consent of the data subject, in accordance with applicable data protections laws. We ensure the protection of privacy and the security of all personal and company data through appropriate technical and organizational measures.

10. Donations and Sponsorships

We support cultural, scientific, and social initiatives through financial or in-kind donations provided voluntarily and without any expectation of commercial benefit or influence. All sponsorship activities are conducted with full transparency, documented thoroughly, and subject to internal compliance reviews.

11. Company Property

All employees are required to handle company property responsibly, including but not limited to confidential information, technologies, and intellectual property. Company assets must be protected against loss, theft, misuse, or unauthorized access and may only be used for legitimate business purposes in accordance with company policies. This obligation extends to the property of customers, suppliers, and other partners.

12. Export control and import obligations

It is of significant importance for us to comply with all applicable export control and import laws, regulations and procedures that apply to our operations globally. All employees shall observe applicable national or international regulations as any violation of these laws may have serious consequences, including civil and criminal liabilities, business disruption and fines.

13. Conduct vis-à-vis the Environment

One of our primary goals is to make the products we develop and manufacture environmentally safe. This process begins early in development when the environmental compatibility and recyclability of the product is reviewed.

These analyses focus on possibly hazardous materials and substances with the aim of avoiding them wherever possible. Another high priority is the energy efficiency of our products, beginning with our low-energy company buildings and production processes.

We act in accordance with our responsibility protect the environment. Our economic actions take sustainable environmental protection into account to preserve our natural resources for future generations.

14. Compliance

Every one of our current and future employees will align his or her actions with the preceding Code of Conduct. Using appropriate measures, Executive Management will ensure that the principles of this Code are communicated and observed.

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