Corporate Guideline CO1000

Code of Conduct

The **Code of Conduct (CoC)** contains the fundamental principles and rules for the conduct of all **ams OSRAM employees**. It defines the ethical and legal framework within which we act. The CoC applies to all employees worldwide, both in their dealings with each other and in their relationships with our external partners and the general public.

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Introduction

The Code of Conduct (CoC) contains the fundamental principles and rules for the conduct of all ams OSRAM[1] employees[2]. It defines the ethical and legal framework within which we act. The Code of Conduct applies to all employees worldwide, both in their dealings with each other and in their relationships to our external partners and the general public.

Legal provisions and international agreements on human rights, anti-corruption and sustainability form the basis for the Code of Conduct. The Code of Conduct is intended to reinforce and strengthen the awareness of the law and ethics as an integral part of ams OSRAM's business activities.

The Code of Conduct is an essential part of our Compliance Management System (CMS). It has been approved by the Management Board of ams-OSRAM AG and serves as the group-wide framework for ensuring compliant business conduct. At ams OSRAM, we understand Compliance as the basis for all business decisions and activities. Especially preventing corruption and other violations of fair competition is a top priority for our company. Compliance is not a program, but the way we do business and live integrity in our everyday business.

A. Basic Behavioral Requirements

A.1 Behavior which Complies with the Law

Observing the law and the legal system in every country where we do business is a fundamental principle for us. We comply with all internal guidelines and applicable laws and regulations of the jurisdictions in which we operate. Violations of the law must be avoided under all circumstances.

[1] The term "ams OSRAM" stands for the ams OSRAM group, i.e., ams-OSRAM AG and all affiliated companies.
[2] The term "employee" refers to employees, managers and members of governing bodies of ams OSRAM and is not gender-specific.

Violations of the law and non-compliance with the Code of Conduct and other internal guidelines can have serious legal consequences both for our company and for the employee involved. Irrespective of the sanctions provided by law, every employee must expect disciplinary consequences in the event of a violation due to the breach of his or her contractual duties.

A.2 Respect for Human and Personal Rights, Mutual Respect, Honesty and Integrity

We respect the human and personal rights of every individual, with particular attention to women, children, and other potentially vulnerable individuals and groups. We respect the personal dignity and privacy of our employees, business partners, and customers. We cooperate with colleagues and business partners of different ethnic backgrounds, cultures, religions, ages, genders, disabilities, skin colors, sexual identities and world views. We promote an inclusive work environment in which everyone is treated with fairness and respect. Consistent with our corporate principles and the labor laws of the countries in which we operate, we do not tolerate any discrimination based on these characteristics, sexual harassment, bullying or other personal attacks on individuals. These principles apply to both internal cooperation and conduct towards external partners. We make decisions about those we work with – including personnel, suppliers, customers and business partners – based only on appropriate considerations, not based on inappropriate considerations such as discrimination or coercion.

We are open, honest and stand by our responsibilities. As reliable partners, we only make promises that we can keep. We expect our employees and business partners to act with integrity.

A.3 Responsibility for the Reputation of ams OSRAM

The reputation of ams OSRAM is essentially shaped by the actions and behavior of each of us. Unlawful or inappropriate behavior by even one employee can cause considerable damage to the company.

Every employee is required to pay attention, maintain and promote the good reputation of ams OSRAM in order to fulfill our social, ecological and societal responsibility as a company.

A.4 Management, Responsibility and Supervision

Integrity and compliance start at the top of the company. All managers must fulfill their duties of organization and supervision. They bear responsibility for all employees entrusted to them. They must earn respect through exemplary personal behavior, performance, openness and social competence. This means, among other things, that managers must always emphasize the importance of ethical behavior and compliance with legal requirements and internal guidelines in day-to-day business, make them regular topics, and promote them through their personal leadership style and open communication. Managers must also set clear, ambitious and realistic goals and lead by example.

Managers should permit their employees to take as much individual responsibility and leeway as possible, while making it clear that compliance is always required as a top priority, under all circumstances. All managers shall also be accessible in case employees wish to raise compliance concerns, ask questions or discuss a professional or personal problem.

It is the responsibility of all managers to ensure that no violations of the law occur in his or her respective area of responsibility that could have been prevented by appropriate supervision. Even if individual tasks are delegated, the manager retains responsibility.

These responsibilities of managers do not relieve employees of their own responsibilities, though. We must all work together to comply with applicable laws and internal guidelines. The following list of specific managers' responsibilities is intended to give employees an idea of the guiding and supporting actions they can expect from a manager.

In particular, the following duties apply to managers:

- Managers must carefully select employees based on their personal and professional qualifications and suitability. The duty of due care increases with the importance of the task that the employee must perform (duty to select);
- Managers must set the tasks precisely, completely and bindingly, in particular with regard to compliance with legal provisions and internal guidelines (duty to instruct);
- Managers must ensure that compliance with statutory provisions and internal guidelines is monitored (duty to monitor);
- Managers must clearly communicate to employees the importance of integrity and compliance in everyday business. He/she must also communicate that violations of the law will not be accepted and will result in disciplinary action (duty to communicate).

B. Treatment of Business Partners and Third Parties

B.1 Fair Competition and Antitrust Laws

Fair competition is a precondition for free market development and the associated social benefits. Antitrust law protects free, undistorted and effective competition for the benefit of consumers, companies and society. Agreements that restrict competition, in particular anti-competitive agreements between competitors, are prohibited.

Every employee is obliged to comply with the rules of fair competition. There are certain types of behavior that can lead to a violation of antitrust law. Employees are therefore not allowed, for example:

- To discuss with competitors prices, production volumes, capacities, sales, bids, profits, profit margins, costs, distribution channels or any other parameters that determine or influence the company's competitive behavior with the aim of inducing the competitor to behave similarly;
- To enter into an agreement with competitors not to compete, to restrict business relations with specific suppliers, to submit token (non-responsive or overpriced) bids ("cover pricing") or to divide up customers, markets or territories;
- To influence our distributors' resale prices, or attempt to cause them to restrict exports or imports of our products; and
- To acquire competitively sensitive information through industrial espionage, bribery, theft or wiretapping, or knowingly disseminate false information about a competitor or its products or services.

Antitrust assessments can be difficult, particularly because the applicable rules may vary from country to country and from case to case. For example, special antitrust requirements apply in many places. If you have any questions or are unclear, the colleagues in the Legal or Compliance departments can help.

B.2 Anti-Corruption: Offering and Granting Benefits

We compete fairly for orders with the quality and the price of our innovative products and services, not by offering improper benefits to others. As a result, no employee may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to a government official to influence official actions or decisions, or to obtain an improper benefit. This prohibition also includes facilitation payments ("grease payments") intended to secure or expedite routine governmental actions. It likewise applies to payments made to a private commercial counterparty in a business transaction in consideration for an improper benefit.

Any offer, promise, grant or gift must comply with applicable laws and internal guidelines and must not raise an appearance of bad faith or unsuitableness. This means that no such offer, promise, grant or gift may be made if it could reasonably be understood as an effort to improperly influence a government official or as a bribe to a commercial counterparty to grant ams OSRAM a business advantage.

The term “government official” is defined broadly to include officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and public international organizations. It also includes candidates for political office, political party officials and employees, as well as political parties.

In addition, employees may not give money or anything of value indirectly (for example, to a consultant, agent, intermediary, business partner or other third party) if the circumstances indicate that all or part of may be directly or indirectly passed on

- to a government official to influence official action or obtain an improper benefit; or
- to a private commercial counterparty in consideration for an unfair advantage in a business transaction.

Employees responsible for engaging consultants, agents, partners in joint ventures or other business partners must appropriately:

- ensure that those third parties understand and will abide by our anti-corruption policies or comparable equivalents;
- evaluate the qualifications and reputation of such third parties; and
- include appropriate provisions in agreements and contracts designed to protect ams OSRAM.

This applies in particular if they have contact with public officials on behalf of ams OSRAM.

Finally, each investment decision made by ams OSRAM – whether it is the purchase of a controlling interest in a company or a minority interest, or a joint venture arrangement – must be based on a prior compliance check.

B.3 Anti-Corruption: Demanding and Accepting Benefits

Employees are not permitted to use their jobs to solicit, demand, accept, obtain or be promised benefits. This does not apply to the acceptance of occasional gifts of purely symbolic value or meals or entertainment reasonable in value that are consistent with local customs and practices and the company’s internal policies. Any other gifts, meals or entertainment must be refused.

B.4 Political Contributions, Charitable Donations and Sponsoring

Our company does not make any direct or indirect donations or other contributions to politicians, political parties or political organizations. It does not maintain any lobbying offices or employ any corresponding agencies. As a responsible member of society, we make monetary or product donations for education and science, art and culture, and social and humanitarian projects. All donations must be transparent. Among other things, this means that the identity of the recipient and planned use of the donation must be known. The reason for and the intended use of the donation must be legally justifiable and documented. Donation-like remuneration, i.e. benefits that appear to be granted as remuneration for a service but significantly exceed the value of the actual service, violate the transparency requirement and are prohibited.

Generally, not permitted are:

- Donations to individuals and for-profit organizations;
- Donations to private accounts;
- Donations to organizations whose objectives are incompatible with our corporate principles; and
- Donations that damage the reputation of ams OSRAM.

Sponsorship agreements that provide us with advertising opportunities, as well as contributions to industry associations or membership fees to organizations that serve business interests, are not considered donations.

Sponsoring means any contribution in cash or in kind by ams OSRAM, for an event organized by a third party, which in return provides the opportunity to promote brands of the company, e.g. by using the company logo, by mentioning the company name in the opening or closing speech, by the participation of a speaker in a panel discussion or by receiving tickets for the event free of charge.

All sponsoring activities must be transparent, set forth in the form of a written agreement, intended for a reputable business purpose, and commensurate with the value offered in return by the organizer.

Sponsoring contributions may not be promised, offered or provided in order to gain unlawful business advantages for ams OSRAM or for other improper purposes. Sponsorship for events held by individuals or organizations whose objectives are incompatible with our corporate principles or for events that damage the reputation of ams OSRAM is generally not permitted.

B.5 Government Procurement

Our company competes for contracts from government entities and state-owned enterprises around the world. In all business dealings and interactions with governments, we act transparently, honestly and correctly.

We comply with all applicable laws and regulations related to government procurement, including legislation prohibiting the undue influence of public officials.

B.6 Anti-Money Laundering

Money laundering is the process of disguising the nature and source of money connected with criminal activity – such as terrorism, drug trafficking or bribery – by integrating “dirty money” into the stream of commerce so that it appears legitimate or its true source or owner cannot be identified.

It is our stated goal to maintain business relationships only with reputable customers, consultants and business partners whose business activities are in compliance with legal regulations and whose financial resources are of legitimate origin. We do not support money laundering.

All employees are required to strictly comply with anti-money laundering laws and to use the company's internal procedures designed to detect and prevent suspicious forms of payment that may indicate money laundering. To avoid problems in this area, the attention of all employees is required to report suspicious behavior by customers, consultants and business partners. In addition, employees are required to comply with all applicable record-keeping and accounting requirements for cash and other transactions and contracts.

B.7 Trade Compliance

We comply with applicable export controls and customs laws and regulations in the countries where we do business. Export controls generally apply to the transfer of goods, services, hardware, software or technology across certain national borders, including by email. Export control laws may be triggered in connection with direct or indirect exports to or imports from sanctioned countries or parties, who, for example, may be designated based on national security grounds or because of participation in criminal activity. Violations of these laws and regulations may lead to serious penalties, including fines and governmental withdrawal of simplified import and export procedures (interruption of seamless supply chain).

Employees involved in the import and export of goods, services, hardware, software or technology as described above must follow applicable economic sanctions, export control and import laws and regulations, as well as all policies and processes required by their business activities.

B.8 Working with Suppliers

We expect our suppliers to share our values and comply with all applicable laws. Furthermore, we expect our suppliers to act in accordance with the following principles, similarly adopted by our company, concerning responsibilities vis-à-vis stakeholders and the environment:

- Compliance with all applicable laws;
- Prohibition of corruption;
- Respect for the human rights of the employees;
- Compliance with laws prohibiting child labor;
- Observance of intellectual property rights;
- Protection of information and data;
- Assumption of responsibility for the health and safety of the employees;
- Compliance with relevant national laws and international standards on environmental protection; and
- Requiring that these values are also implemented and adhered to in the company's own supply chain.

We also expect our suppliers to respect the human rights and legitimate interests of individuals, affected stakeholders and local communities that may be impacted by their business activities, including women, children, indigenous peoples, and other potentially vulnerable individuals and groups.

C. Avoiding Conflicts of Interest

It is the duty of ams OSRAM employees to make business decisions in the best interest of the company and not based on personal interests. Conflicts of interest arise when employees pursue their own activities or personal interests at the expense of the company’s interests.

Employees must declare any personal interest that may exist in connection with the performance of their official duties to the respective line manager and responsible HR department in good time in advance. It is important that all our employees recognize and avoid any conflicts of interest that may arise in the course of their professional activities from the outset. A conflict may also arise if a close relative acts in this way.

No employee may have private orders carried out by companies with which he/she has business dealings in the course of his/her work for ams OSRAM if this could result in advantages for him/her. This applies in particular if the employee has or can have a direct or indirect influence on the commissioning of the company for ams OSRAM.

Further points of conflict may arise from business relationships with or shareholdings in a competitor or customer of ams OSRAM, as well as sideline activities of employees that prevent them from fulfilling their duties for our company in a dutiful manner.

C.1 Competing with ams OSRAM

Employees may not operate or assist a company that competes with ams OSRAM. They must also not engage in any activities that compete with our company.

C.2 Sideline Activities

Employees may not maintain a side job that competes with ams OSRAM. Before employees take a side job for remuneration, they must notify the line manager and seek written permission. Occasional writing activities, lectures, and comparable occasional activities are excluded. Permission will not be granted if it is detrimental to the interests of ams OSRAM. Permission may be refused if employees have dealings in the course of their official duties with the company in question. Previously granted permission may be revoked on these grounds as well.

C.3 Interests in Third-Party Companies

Employees who directly or indirectly hold or acquire a stake in a competitor company must notify the responsible HR department if the interest gives them the opportunity to influence the management of that company. The possibility of influencing the management can generally be assumed if the shareholding exceeds a share of 5% of the total capital. Employees who directly or indirectly hold or acquire an interest in one of our business partners, or in a company in which ams OSRAM holds an interest, must also notify the responsible HR department if they are involved with the company in question on official business or will exercise a mandate in this company. For shareholdings in listed companies, this only applies if the shareholding exceeds a share of 5% of the total capital. After notification of the participation in third-party companies, ams OSRAM may take appropriate measures to eliminate a potential conflict of interest.

D. Handling of Company Property

ams OSRAM has numerous facilities and equipment in its offices and operating rooms, such as telephones, copiers, computers, software, Internet/Intranet, machines and other work equipment such as e-mail and answering systems. These may only be used for company purposes and not for personal benefit. Exceptions and payment, if applicable, may be made on a local basis, provided the use of the facilities:

- is not related to illegal activities;
- does not create a conflict of interest or the appearance of such a conflict;
- does not result in significant additional costs, disruption of business or other negative impact to the company, e.g. due to a conflict of interest with respect to the professional duties of the respective employee or other employees.

In no case may information be retrieved or transmitted that supports or incites racial hatred, glorification of violence or other criminal acts, or has content that is sexually or otherwise offensive against the respective cultural background.

Employees are not permitted to make any recordings, files, images, sounds or reproductions using company equipment without the consent of the respective manager, unless this is directly related to the professional activity.

Property rights are very important to us and are part of our corporate resources. We therefore ensure that our own innovations are protected.

E. Handling of Information

E.1 Records and Financial Integrity

Open and effective communication requires accurate and truthful reporting. This applies equally to the relationship with investors, employees, customers and business partners as well as with the public and all government agencies.

ams OSRAM is also required to ensure, through appropriate processes and controls, that transactions are conducted only as approved by management. ams OSRAM must also take preventive measures against the unauthorized use of its property and ensure that instances of unauthorized use are identified. All employees must ensure that books and records prepared by them in the course of their official duties, or otherwise under their responsibility:

- are complete and accurate;
- honestly reflect each transaction or expense; and
- are prepared in a timely manner and in accordance with applicable rules and standards.

This applies whether or not the information is intended for publication or submission to a government agency. These books and records include all data, audit certificates and other written documents necessary for financial reporting and compliance with disclosure

requirements, as well as records collected for other purposes. This also includes internal accounting records (including expense reports).

E.2 Confidentiality

Internal confidential or proprietary information that is not intended to be made public is subject to the requirement of confidentiality. Non-public information from or about suppliers, customers, employees, agents, consultants and other third parties must also be protected in accordance with legal and contractual requirements. This applies both to communications with competitors and other external third parties, but also to friendly discussions among colleagues in the context of private occasions.

Confidential or proprietary information may include, in particular:

- details of a company's organization and facilities, prices, sales, forecast, profits, markets, customers and other business matters;
- information on manufacturing or research and development; and
- internal reporting figures.

The obligation to maintain confidentiality applies beyond the end of the employment relationship, since the disclosure of confidential information, regardless of when it occurs, may harm the business of ams OSRAM or its business partners.

E.3 Data Protection and Data Security

Access to the Intranet and Internet, worldwide electronic information exchange and dialogue, and electronic business transactions are all crucial to the effectiveness of each of us, and for the success of the business. However, the advantages of electronic communication are associated with risks to personal privacy and data security. Effective precautions against these risks are an important part of information technology management, leadership and also the behavior of each individual employee.

Personal data may only be collected, processed, or used insofar as it is necessary for defined, clear, and lawful purposes. In addition, personal data must be stored securely and may only be transferred using the necessary precautionary measures. A high standard must be ensured regarding data quality and technical protection against unauthorized access. The use of the data must be transparent for the data subjects; their rights to information and, if necessary, to object, block and delete must be safeguarded.

In some jurisdictions (such as the European Union) there are strict laws and regulations pertaining to the collection and use of personal data, including data of third parties, such as customers or business partners. All employees are bound by these applicable laws in order to protect the personal rights of third parties.

E.4 Insider Trading Rules

Persons who have inside information relating to ams-OSRAM AG and/or to OSRAM Licht AG, or another company, e.g. a customer, supplier or joint venture partner, whose securities are admitted to trading on a stock exchange or an organized market, may not trade in securities or financial instruments of such companies whose price depends directly or indirectly on the securities of such companies.

Inside information is any specific information about circumstances not known to the public which relates directly or indirectly to one or more issuers or to one or more financial instruments and which, if it becomes publicly known, is likely to have a significant influence on the stock exchange or market price of these financial instruments ("price relevance"). Such suitability is given if a reasonable investor would be likely (rather than not) to take the information into account in making an investment decision.

Inside information may be obtained as a result of an employee's position and responsibilities or inadvertently, and comprise, among others, information about:

- financial results;
- forecasts, financial plans or budgets;

- dividend changes;
- significant mergers or acquisitions;
- investments, divestiments;
- particularly important contract wins or strategic plans;
- major developments in litigation;
- technical or product developments;
- significant changes in management structure, joint ventures and major business agreements; and
- business relationships.

In order to avoid even the appearance of a violation of insider trading rules, those employees who, due to their job or function, have access to business results or other material information that has not yet been published are generally prohibited from trading in shares or other securities of ams-OSRAM AG and/or OSRAM Licht AG during the period from seven trading days before the end of the relevant quarter or fiscal year until two days after publication of the quarterly, half-yearly, or fiscal year results (blackout period).

A self-imposed, even shorter trading period of three weeks after the end of the blackout period (i.e. two days after publication of the quarterly, half-yearly, or fiscal year results) applies to members of the ams OSRAM Management Team (MT)[3]. The Supervisory Board of ams-OSRAM AG has undertaken to comply with this shorter trading period as well.

In the period after the end of a reporting quarter until the publication of quarterly or fiscal year results, the persons who, due to their activity or function, have access to the business results or other material information that has not yet been published, shall be registered in a separate list that may be submitted upon request by the authorities.

Inside information may not be disclosed or made available to another person without authorization. The disclosure of inside information is unauthorized if it is not made in the normal course of the insider's work or profession or in the performance of the insider's duties for the issuer. This applies both to information disclosed within ams OSRAM and to information disclosed outside our company. This includes journalists, financial analysts, customers, consultants, family members or friends. Furthermore, employees must always make sure that insider-relevant information is secured or kept under lock and key in such a way that unauthorized persons cannot gain access to it.

Persons who have inside information may neither recommend to another person the purchase or sale of securities for which this information is relevant, nor induce another person to do so in any other way.

Managers can be held personally liable for damages in certain cases if an employee violates insider trading rules and this violation could have been prevented by appropriate supervision.

In addition to these rules, further or special insider rules as well as any requirements of local law may have to be observed.

F. Environment and Climate

We consider the protection of the environment and the climate, as well as the preservation of natural resources and biodiversity, as part of our corporate responsibility. . Through appropriate leadership responsibility on the part of management and the commitment of employees, ams OSRAM aims to make its business and products environmentally friendly and is constantly working to improve its eco-balance.

A worldwide environmental management system ensures compliance with the law and sets high standards for this. Accordingly, designing our products to be environmentally and climate friendly is already a fixed target in their development.

[3] An overview of current MT members is available on the Intranet.

We recognize that environmental impacts and climate-related risks may disproportionately affect certain stakeholders and communities, including women, children, indigenous peoples, and other vulnerable groups. Where relevant, we take these perspectives into account in our environmental and sustainability-related activities and decision-making processes.

Each employee must contribute to these goals within his or her sphere of influence and through his or her own behavior.

G. Human Rights, Working Conditions, Occupational Health and Safety

G.1 Human Rights and Working Conditions

ams OSRAM respects the human rights of all individuals who may be affected by its business activities and is committed to treating them with dignity and respect. This includes permanent, temporary and part-time employees and all other types of workers, such as migrant, student, self-employed and agency workers, as well as other individuals, groups and communities who may be affected by our activities, including women, children, indigenous peoples and other potentially vulnerable individuals and groups.

We seek to identify, prevent and mitigate adverse human rights impacts and to support access to effective remediation where we have caused or contributed to such impacts.

To translate these principles into day-to-day practice, ams OSRAM sets out the following minimum requirements for fair and responsible working conditions:

- Any form of forced labor, servitude (including bonded labor) or compulsory labor, involuntary or exploitative prison labor, slave labor or labor based on human trafficking is not permitted;
- The use of child labor is strictly prohibited;
- Working hours shall not exceed the maximum number of hours applicable under local law. In addition, weekly working hours, including overtime, shall generally not exceed 60 hours. Exceptions include emergencies and exceptional circumstances. Our goal is for all overtime to be worked voluntarily. Employees must be granted one day off at least every seven days, provided there are no emergencies or exceptional circumstances;
- Compensation paid to employees shall comply with all relevant laws concerning this matter, including laws on minimum wage, overtime and legally established social benefits;
- In accordance with local laws, the right of all employees to form or join unions of their choice, to bargain collectively and to hold peaceful assemblies shall be respected.

Each employee is expected to uphold these principles through their conduct and within their area of responsibility.

G.2 Occupational Health and Safety

Protecting the health and safety of employees in their workplace is a high priority for ams OSRAM. It is the responsibility of every employee to support our company in its efforts to create safe working conditions. Every employee must devote his or her constant attention to occupational safety.

Our company's responsibility towards employees includes adequate protection and appropriate training and precautions against accident hazards, and applies to:

- the technical planning of workplaces, facilities, machines and processes;
- safety management;
- personal protective equipment; and
- personal behavior in everyday work.

The work environment must meet the requirements of a health-oriented design. Housing accommodations provided for employees must be well-maintained, clean and safe.

Each employee must contribute to these goals within his or her sphere of influence and through his or her own behavior.

H. Quality and Product Safety

ams OSRAM stands for high-quality standards, safety and reliability of its products and solutions. Our global quality management ensures compliance with legal and corresponding external requirements and at the same time sets correspondingly high internal standards. Environmentally and climate-friendly design, technical safety and health protection are therefore already fixed targets in the development of our products.

Every employee must contribute to these goals within his or her sphere of influence and through his or her own behavior.

I. Complaints and Reports

Any employee may raise a complaint to his or her manager, to the responsible Compliance Officer, to the responsible HR manager or other person or office designated for this purpose, or vis-à-vis a company employee representative body.

Circumstances that indicate a violation of the Code of Conduct can be reported to the Head of Compliance, the responsible Compliance Officer, any other employee of the Compliance Organization or via the whistleblowing system “Tell ams OSRAM”.

It is possible to make a confidential and anonymous report; all reports will be followed up. If necessary, appropriate corrective measures will be taken. In line with established procedures, reports are reviewed and investigated by appropriately qualified and independent functions. Confirmed violations may result in corrective actions, disciplinary measures and other appropriate remediation measures.
All documents and other information collected or otherwise obtained while clarifying a report will be kept confidential to the extent permitted by law. Reprisals against whistleblowers of any kind will not be tolerated.

J. Compliance Implementation and Monitoring

In exercising its overall responsibility for the Compliance Management System in the company and fulfilling its management, due diligence and supervisory duties, the Management Board actively promotes the widespread communication of the Code of Conduct worldwide and ensures its implementation and sustainable anchoring in the corporate culture through its exemplary behavior ("tone-from-the-top").The Compliance Organization supports the Management Board in fulfilling its statutory responsibility and its organizational duty of care for ensuring the appropriate and effective management of compliance risks in the group.

Compliance with applicable laws, the Code of Conduct, and all other internal guidelines must be regularly reviewed and ensured in all companies of the ams OSRAM group worldwide. This is done through internal audits, compliance risk assessments and ongoing business-related controls.
To support an effective Compliance Management System and foster a culture of integrity and anti-corruption, ams OSRAM promotes awareness of this Code of Conduct through appropriate training and communication measures.

K. Further Information and Contacts

Integrity is at the heart of our entrepreneurial activities. The Code of Conduct defines what integrity means for our business. But it cannot reflect everything that belongs to this topic, nor can it answer every question. The Compliance Intranet site provides additional information that add content-related details to the Code of Conduct.

If an employee is not sure about the correct behavior in a particular case, there are many sources of information available to help. In particular, he or she can turn to his or her

manager, his or her responsible Compliance Officer or any other employee of the Compliance Organization.

In addition, if an employee has identified a case of possible misconduct, various channels are available to report it. Not only the line manager and the employees of the Compliance Organization are available for this purpose, but also the whistleblowing system “Tell ams OSRAM”.

Appendix

Agreements and Recommendations of International Organizations

In addition to the laws and regulations of individual countries, there are some important agreements and recommendations of international organizations. They are primarily addressed to the member states, not directly to the individual companies. However, they are a very significant guidance for the behavior of the employees of an internationally operating company. ams OSRAM supports the requirements of these agreements and recommendations.

Our company therefore expects its employees, suppliers and business partners worldwide to comply especially with the following guidelines:

- UN Universal Declaration of Human Rights;
- UN Convention Against Corruption;
- ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- OECD Guidelines for Multinational Enterprises;
- UN Global Compact and the fundamental principles it statutes;
- RBA (Responsible Business Alliance) Code of Conduct.

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