

Code of Conduct

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1 Preamble

1.1 Objective of this Code of Conduct

Zeno is committed to uphold universal human rights, ethical behavior, environmental responsibility, and robust company governance in accordance with the Zeno Code.

This Code of Conduct outlines Zeno's position on these fundamental rights and responsibilities.

This Code of Conduct is applicable to all companies within Zeno.

1.2 Laws and Legislation

This Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization's Labor Standards, and the United Nations Global Compact.

1.3 Commitment and Compliance with the Code of Conduct

The Zeno Code of Conduct as well as all other policies, guidelines, and instructions related to compliance are binding for all employees.

Zeno expects all employees to comply with applicable laws as well as ethical and moral standards. All employees should be role models for their colleagues.

In case of uncertainties, employees are encouraged to contact their supervisors or the appropriate department.

2 Organizational Governance

Effective organizational governance is crucial to Zeno's success. Zeno has implemented a governance structure that enables better decision-making processes, improves operational efficiency, and increases trust among stakeholders.

3 Human Rights and Labor Practices

Zeno recognizes that human rights are a fundamental principle of society and is committed to ensuring that all humans, and especially vulnerable groups of human rights holders, are treated fairly.

3.1 Respect of Internationally Recognized Human Rights Standards

Zeno respects internationally recognized human rights standards, including the UN's International Bill of Human Rights and the ILO's Declaration on the Fundamental Principles and Rights at Work.

3.2 Prohibition of Forced Labor

Zeno neither uses, contributes to, nor tolerates any kind of slavery, forced labor, or human trafficking.

This includes the following:

- Zeno prohibits all forms of forced, bonded, or indentured labor, slavery, or slavery-like practices.

- Zeno prohibits charging employees recruitment fees or lodging a deposit prior to employment.
- No salaries, benefits, properties, or original identity papers are withheld by Zeno or any recruiters.
- All employees are allowed to leave Zeno premises during non-working hours and at the end of their shifts.
- All employees are provided with written contracts in a language they understand, and all relevant terms of employment, including wages and working hours, are included in such contracts.

3.3 Prohibition of Child Labor

Zeno neither uses, contributes to, nor tolerates child labor and respects the ILO Conventions on child labor.

Zeno especially prohibits the employment of children under the age of 15.

Zeno ensures that all employees are of adequate age by checking the relevant documents and confirming that all employees are allowed to work in accordance with legal standards and organizational policies.

3.4 Non-Discrimination and Respect

Zeno has a zero-tolerance policy for any kind of discrimination and unequal treatment, including any discrimination or treatment based on gender, race, skin color, ethnic or social origin, nationality, political affiliation, disability, health status, sexual identity and orientation, marital status, religion, pregnancy, or age.

Personal dignity, privacy, and personal rights must always be respected.

Harassment and inappropriate behavior is not tolerated, including mental abuse, sexual harassment or discrimination, language and physical conduct, coercion, threats, abuse, and exploitation.

Zeno promotes equal opportunities and treatment and prohibits any discrimination in hiring, compensation, promotion, or access to training and benefits.

Zeno ensures reasonable accommodation for all employees that require workplace modifications to be able to perform their jobs.

3.5 Fair Working Conditions and Wages

Zeno recognizes and respects the legal rights of its employees and is committed to ensuring fair working conditions.

Zeno adheres to all applicable working regulations, including regulations for working hours, fair wages and compensation, minimum wages, maternity leave, and vacation.

Zeno recognizes the employees' right to freedom of organization, especially their right to form or join trade unions and to engage in collective bargaining in accordance with local laws. Zeno will not discriminate or retaliate against any employees exercising such rights and will ensure that trade unions may operate freely in accordance with local laws.

3.6 Occupational Safety and Health

Employees are entitled to a safe and healthy working environment. Zeno observes all regulations on occupational safety as well as health and environmental protection.

Zeno provides guidance and training to employees to ensure awareness of health and safety issues.

Zeno is committed to implementing an adequate occupational health and safety management system.

4 Environmental Protection

Zeno is committed to minimizing its environmental impact and ensuring the sustainability of its operations. The company adheres to local and international environmental laws, regulations, and standards, aiming to promote environmental responsibility throughout its activities.

Zeno implements practices that reduce resource consumption, waste generation, and emissions, while encouraging sustainable development and responsible resource use.

Zeno takes proactive steps to conserve energy, water, and raw materials. The company also strives to minimize emissions, hazardous waste, and environmental degradation, and seeks to reduce its carbon footprint wherever possible.

4.1 Waste Management and Resource Efficiency

Zeno ensures that waste materials are handled responsibly, prioritizing recycling, reusing, and reducing waste. Zeno maintains a policy of ensuring responsible disposal of waste, including hazardous materials, in accordance with applicable laws and regulations.

5 Fair Business Practices

Zeno adheres to high standards of integrity and fairness in all its business operations. The company operates in a transparent manner, fostering trust among stakeholders and promoting ethical behavior in every aspect of its business.

5.1 Anti-Corruption and Bribery

Zeno has a zero-tolerance policy toward corruption and bribery. Employees, suppliers, and third parties engaged by Zeno must refrain from offering, accepting, or soliciting bribes in any form.

Zeno does not tolerate any form of corrupt behavior and has established systems for preventing corruption and bribery in all its dealings.

5.2 Fair Competition

Zeno is committed to promoting fair competition and adhering to antitrust laws in all the markets in which it operates.

Zeno works to ensure that its business practices do not restrict competition, manipulate markets, or engage in any other unfair practices.

5.3 Intellectual Property Rights

Zeno respects and upholds intellectual property rights. The company ensures that all its employees, partners, and suppliers understand the importance of respecting intellectual property laws.

Any intellectual property created in the course of employment is the property of Zeno unless otherwise specified in a contract.

5.4 Conflicts of Interest

Zeno requires all employees to avoid situations where their personal interests conflict with the interests of the company.

Employees must disclose any actual or potential conflicts of interest to their supervisor and take appropriate measures to resolve them.

5.5 Fraud

Zeno has a strict policy against fraud and deception. Any fraudulent activity, including misrepresentation, misappropriation, or falsification of records, will not be tolerated.

Zeno ensures that all financial transactions are accurately documented and reported in accordance with applicable standards.

5.6 Anti-Money Laundering, Terrorism Financing

Zeno complies with all anti-money laundering (AML) laws and regulations in the jurisdictions where it operates.

The company has established procedures to detect and prevent any form of money laundering or terrorism financing, and ensures that no funds or assets are channeled through illegal activities.

5.7 Gifts, Invitations, and Donations

Zeno establishes clear guidelines regarding the acceptance of gifts, invitations, and donations to ensure that no improper influence is exerted.

Employees should avoid accepting gifts or favors that could be perceived as an attempt to influence business decisions or actions.

5.8 Data Protection and Confidentiality

Zeno is committed to protecting personal and confidential data in compliance with data protection laws, including GDPR and other applicable regulations.

Employees must safeguard confidential information and ensure that it is used only for its intended purpose.

5.9 Export Controls and Customs

Zeno complies with all export control laws and regulations. The company ensures that all goods, services, and technologies are exported in compliance with applicable restrictions and controls.

6 Supply Chain Management

Zeno values transparency and responsibility within its supply chain. The company expects all its suppliers to adhere to the same ethical standards outlined in this Code of Conduct.

Zeno strives to select suppliers who are committed to sustainable practices, ethical behavior, and environmental responsibility.

The company encourages its suppliers to maintain high standards of labor conditions, human rights, and environmental protection.

7 Compliance Organization

Zeno has established a compliance organization to ensure that its Code of Conduct is followed throughout the company and its supply chain. The compliance organization monitors compliance with relevant laws, regulations, and internal policies and ensures that corrective actions are taken when necessary.

7.1 Implementation and Review

Zeno's management is responsible for implementing and overseeing the Code of Conduct. The company regularly reviews and updates the Code to ensure its continued relevance and effectiveness.

Periodic training and awareness programs are conducted to ensure that all employees are familiar with the Code and understand their responsibilities.

7.2 Guidance

Employees are encouraged to seek guidance from their supervisors or the designated compliance officers if they have any doubts or questions about compliance issues. Zeno provides clear channels for employees to report concerns or seek advice.

7.3 Monitoring and Consequences

Zeno monitors compliance with the Code of Conduct and assesses whether employees, suppliers, and other business partners are adhering to the established standards.

Failure to comply with the Code can result in disciplinary action, up to and including termination of employment or business relationships.

7.4 Whistleblowing

Zeno provides a confidential whistleblowing system that allows employees, suppliers, and other stakeholders to report violations of the Code of Conduct without fear of retaliation.

Reports can be made anonymously, and Zeno ensures that all reports are thoroughly investigated and addressed.