



CODE OF CONDUCT

FOR

UNIMACTS GLOBAL LLC



Dear UNIMACTS Employee,

UNIMACTS GLOBAL LLC (hereinafter referred to as "Company" or "UNIMACTS") is a global company, which has continued to grow steadily and successfully since its inception.

We have made, thanks to our mission statement, values such as appreciation, confidence, courage and loyalty, part of our daily activities. Our mission statement "Continuously developing excellent global supply chains" should be our guide when dealing with other employees, customers and business partners.

We need your support and cooperation to ensure that the trust between the Company and its employees and contractors, (hereinafter jointly referred to for simplicity's sake, as "employees") is well founded. To that end, this Code of Conduct has been created to give our employees a common understanding of the expected standards within the Company.

If you have any questions in respect to this Code of Conduct, please do not hesitate to contact your Manager or Supervisor. It is important for you and the Company that you fully understand and live by the provisions of this Code of Conduct.

Best regards

Management



UNIMACTS CODE OF CONDUCT

Table of Contents:

- Code of Conduct for UNIMACTS.
 - Letter of introduction
 - Preface: Purpose and Principals - Every individual is responsible
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1. Business ethics and behavior
 2. Confidentiality and trade secrets
 3. Protection of client information
 4. Conflicts of interest/outside employment
 5. Antitrust and competition laws
 6. Transactions with government clients
 7. Dealing with customers and suppliers
 8. Private use of company resources
 9. Social media network sites
 10. Environmental protection
 11. Equal opportunities
 12. Relationships between employees
 13. Health and safety
 14. Clothing and behavior
 15. In cases of doubt
 16. Implementation



Preface

'Every individual is responsible'

Purpose and Principles

In line with its corporate mission statement, UNIMACTS relies on its core values of respect, trust, courage and loyalty in its business activities. UNIMACTS's success is based on these core values and the trust it instills in our customers, suppliers, employees and the public. However, we also have a responsibility to comply with legal and corporate requirements and the adoption of this Code of Conduct is intended to ensure both that UNIMACTS is compliant and that its employees meet the highest ethical standards.

This Code of Conduct is meant to inform and educate employees in order to protect against misconduct and to ensure legally compliant behavior. Integrity and professionalism in all dealings, which equally on legal requirements, ethical principles and high standards, are the responsibility of every employee.

This Code of Conduct sets standards in business dealings both internally and externally, and applies to all UNIMACTS employees. It is the universal Guide for proper behavior in our day-to-day business dealings. The general Code of Conduct guidelines will be explained with examples from everyday business situations. Failure to comply may lead to the loss of trust and therefore loss of business with customers and suppliers. Remember that your actions could put your position in the company and the company itself at risk.

Many points outlined in this Code of Conduct may appear to be self-evident; however, in order to develop a common understanding and point of reference for UNIMACTS's expectations, and for legal requirements and consequences, they are outlined in this document.

The rules of this Code of Conduct will supersede current law and local practice in some regions of the world. If local laws and customs exceed our requirements, the local regulations are to be complied with as a matter of course and will be considered to be a part of the applicable provisions of the Code of Conduct.



1. Business ethics and behavior

UNIMACTS conducts its business under the applicable laws and regulations of all places where it is in business, and emphasizes openness and honesty in dealing with its business partners.

This means that UNIMACTS does not participate in or condone any illegal or other business practices by which the integrity of the company or its employees could be called into question. Therefore, employees are expressly prohibited from gaining any personal advantage from customers or suppliers. Specifically, employees are forbidden to request or to accept money or valuables, or to offer, promise or to give the impression of preferential treatment in any way. (See also section 5). Employees are required to inform their Manager or the HR Manager of any gift offered (money or other items or services of value).

We encourage a culture of openness and expect and encourage employees to bring legitimate concerns to management's attention promptly, in a responsible way. These may involve any illegal practices or wrongdoing which the employee believes may threaten our interests. Employees disclosing such information will be protected from any unfair treatment. Please note that failure to disclose any information relating to serious or dangerous improprieties will be regarded as a serious matter, which may result in action being taken against the employee.

2. Confidentiality and Trade Secrets

Careful handling of confidential information and internal knowledge protects the interests of UNIMACTS.

In the course of their work for UNIMACTS employees may have access to confidential information. Employees must not disclose or divulge any confidential information to any third party without management approval. In this way UNIMACTS's business interests will be protected. Confidential information is, generally speaking, technical or commercial knowledge, data and information gathered, developed or produced by UNIMACTS, which is not public knowledge. This includes but is not limited to, all "confidential" or for internal use" information, as well as other proprietary business documents and information such as customer and supplier details, trade secrets, inventions, internal reports, strategies or business management decisions (i.e., accounting, marketing, or finance plans), Intranet data, sales data, internal price lists, product information or sensitive business plans, development projects as well as every information shown in any company notice.

Employees may not disclose any confidential or proprietary information, directly or indirectly, orally or in writing without prior written consent of the appropriate manager or the business management. Employees may not use any confidential or proprietary information for any purpose other than perform their jobs at UNIMACTS. These obligations shall survive and continue in full force even after termination of employment.

Certain confidential information may be protected under Data Protection legislation. All employees must fully cooperate with the Company's efforts to ensure that sensitive personal data is strictly controlled, administered and retained in line with relevant legislation.



3 Protection of Client Information

UNIMACTS's customers and clients are among its most valuable assets, and we must respect their confidentiality, too.

UNIMACTS's customers and clients may make available to us their custom software, designs, manuals, computer programs, and customer information for business purposes. This information is confidential and proprietary to the customer or client. It is UNIMACTS's policy to treat all such information received from customers and clients as Confidential Information. No employee shall disclose any customers' or client's information to any person without the express prior approval of Management.

No employee shall use customer and client information for any purpose other than the furtherance of UNIMACTS's business interests and the proper performance of UNIMACTS's contractual obligations to its customers and clients. No employee shall permit any unauthorized person access to customer and client information, whether by means of physical access, computer access, or telephonic or other electronic access.

4. Conflicts of interest/ Outside Employment

Trust and loyalty of UNIMACTS's employees is vital to our reputation and high standards.

Any activity, including, but not limited to, outside employment, which conflicts with the interests of UNIMACTS or its clients is prohibited. Employees may not personally receive any income or material gain from individuals or companies outside UNIMACTS for materials produced or services rendered while performing duties for UNIMACTS.

5. Antitrust and Competition laws

UNIMACTS supports free and fair competition through compliance with applicable antitrust and competition laws.

UNIMACTS expects all employees to comply with applicable competition and anti-trust laws in all countries in which UNIMACTS operates. Violations of these laws may include, for example, agreements between competitors to set and control prices, to boycott certain suppliers or customers, to share customers or markets or to restrict the production or distribution of products.

Failure to comply with antitrust and competition laws can have very serious consequences for the Company and its employees, including fines and exposure to possible legal action from customers and government agencies. Furthermore, individuals could also face director disqualification orders or even criminal sanctions for serious breaches of competition law.

Violations will be reported to the appropriate authorities and may result in civil and criminal fines, including in some cases imprisonment.

6. Transactions with government clients

UNIMACTS deals with governmental clients in an ethical and transparent manner.

There are specific rules and procedures for dealing with government agencies which may vary from those applicable to private companies. Illegal business practices in collaboration with governmental Officials violate both applicable laws and the corporate ethics and contractual obligations of UNIMACTS. Any attempt to bribe, or accept bribes, is strictly prohibited (see also 7. below).



7. Dealing with customers and suppliers

UNIMACTS's business relationships with its customers and suppliers are free of conflicts of interest.

Every employee is obligated to deal responsibly with all business partners in an honest, equal and fair manner, and without actual or apparent conflicts of interest. In order to preserve trust and confidence, and to avoid potential damage to UNIMACTS, employees may neither offer nor receive incentives or bribes.

It is important to maintain a professional relationship with customers, suppliers and service providers, which cannot be influenced by conflicts of interest and gifts. Employees may not make excessive gifts, nor grant any other beneficial advantage to customers, suppliers and service providers. Furthermore, employees may not accept excessive gifts or any other beneficial advantage, whether for themselves, colleagues or loved ones. The giving or accepting of gifts or money is strictly prohibited.

At UNIMACTS, the maximum reasonable gift to a supplier or a gift from a client is € 40, - converted to local currency value. Should the local legislation define a lower value, then that legal limit is to be observed. Gifts above this value must be declined. Gifts received valued up to € 40, - must be turned over to Management and will be raffled off at company parties.

Invitations which go beyond a meal worth € 40,-, are, as a rule, to be refused. If the above rules are broken, the company reserves its right to take action under applicable Company procedures or law.

Genuine hospitality or entertainment of customers, suppliers and service providers is only permissible in the context of the appropriate, legitimate business interests of the company.

Special rules apply to exchange of gifts, travel and entertainment with government employees and public officials. In cases where employees are unsure, Managers or the Management team can provide guidance. The selection of suppliers and service providers is a process based on objective and transparent criteria. Orders will be awarded wherever possible on the basis of competitive solicitation.

Payments for supplies or services are generally made in the country in which the contractor is located. Except for minor amounts, payment in cash is prohibited. Any deviation from customary payment agreements requires management approval.

There can be serious legal consequences for the Company when acts of bribery take place. This Code of Conduct aims to ensure that all employees are aware that we will not tolerate or encourage such acts anywhere in the world

8. Private use of company resources

the use of company resources must be proper and in accordance with internal guidelines.

The use of property and company resources for private or self-serving purposes is prohibited. Any exceptions require permission. Company rules regarding use of Electronic Communication Systems in the workplace, especially in regard to installing third party software, web and email are to be strictly observed.



9. Social Media Network Sites

UNIMACTS aims to protect both their business and employees' reputation. Therefore, the use of Social Media Network Sites outside of work must be appropriate.

Employees must not use their work e-mail address when registering on such sites or provide a link to the Company website, nor must they allow their interaction on these websites or blogs to damage working relationships between employees, clients and suppliers of the Company. No personal information or data about the Company, its employees, clients or suppliers must be given or named, and neither may any derogatory, offensive, discriminatory nor defamatory comments about the Company, its employees, clients or suppliers be made.

Failure to comply with the above could result in serious action being taken by the Company. Employees may also be personally liable for their action under legislation due to breaches of Data Protection and Equality Acts. (See also 2. above, Confidentiality and Trade Secrets).

10. Environmental Protection

UNIMACTS is committed to environmental sustainability.

At UNIMACTS, we carry the idea of environmental protection further and strive to make a contribution to the protection of the environment in our everyday business. This means, among other things, that we encourage employees to protect the environment by avoiding unnecessary waste of resources (e.g. energy, paper and other raw materials).

11. Equal opportunities for employees

UNIMACTS is committed as an employer to provide a work environment that is shaped by respect, fairness and equality.

Employees will work with colleagues and business partners in an open, professional and fair way. Our regard is the same for all employees - regardless of race, nationality, ethnic origin, gender, religion, belief, disability, age or sexual orientation. UNIMACTS is founded on equal opportunities for all employees. This applies to all aspects of employment, recruitment, working conditions, training, business travel, hours of work, vocational training, development, and remuneration. This standard must also be observed by all employees.

In addition, it is the policy of UNIMACTS to provide an environment which is free from unlawful harassment and bullying of any kind, including, but not limited to, that which is related to sex, age or ethnicity. Such behavior will not be tolerated and will result, following investigation, in disciplinary action up to and including dismissal in severe cases. The company reserves the right to report any incidents to the appropriate authorities where applicable.

Employees, who feel discriminated against or harassed, should contact their respective Manager, the HR Manager, or Management.

12. Relationships between staff

Contact between employees is based on the principles of leadership and cooperation.

The company's success depends, among other things, on open and trusting communication, at all corporate levels within the business.



UNIMACTS expects all managers and employees to conduct themselves, whether in person, by phone, in written correspondence, or particularly in e-mail traffic, in a polite, respectful and appreciative way.

13. Health and Safety

UNIMACTS takes responsibility for the health and safety of its employees.

UNIMACTS defines health as a state of complete physical, mental and social well-being and not merely as the absence of disease or infirmity.

UNIMACTS is committed to a healthy and safe working environment for the wellbeing of our employees and to ensure and maintain compliance with health and safety legislation. These efforts include, among other things, the prevention of the misuse of addictive substances, like medication, alcohol and other drugs. UNIMACTS refers to the recommendation of the World Health Organization (WHO). UNIMACTS is committed to the purposes and principles of workplace health promotion and understands health care management as part of its business strategy: UNIMACTS realizes that its employees are an important contributor to its success and thus the most important asset in the company. The health of the employees is a social responsibility, it is therefore important to UNIMACTS to improve the wellbeing of employees in the workplace and to prevent hazards in the workplace, wherever possible.

Employees share a responsibility for Health and Safety by taking reasonable care for their own health and safety and that of others. All Employees must comply with and observe all safety instructions, co-operate with Management in respect of directions and instructions issued, report and co-operate in investigations of accidents or incidents and report any potential risks, hazards, or malfunction of equipment in a timely and appropriate manner.

14. Clothing and behavior

As a representative of the company, all employees are expected to dress appropriately and act professionally.

Every employee of UNIMACTS is a company representative and thus contributes to the perception of the company. Employees are expected to dress appropriately and act professionally at all times. This is especially true for employees with customer and supplier contact.

15. In case of doubt

All employees should speak with their respective Manager or Supervisor in case of doubt about correct legal and contractual behavior or possible violations of this Code of Conduct. The human resources department and management may be contacted for additional guidance as required. Retaliation against any employee who reports a possible violation is prohibited and will not be tolerated.

16. Implementation of the Code of Conduct

UNIMACTS expects all employees to comply with provisions of this Code of Conduct.

UNIMACTS expects all Managers and Executives to comply fully with this code of conduct. It is necessary to lead by example in order to inform and advise one's colleagues.

Employees should discuss any concerns with their immediate supervisor or manager first. Any issues which cannot be resolved should be brought to the attention of management or the human resource department. UNIMACTS is committing to fairly investigating any complaint, and providing the appropriate remedies.

UNIMACTS expects all employees to comply with the provisions of this Code of Conduct. Violation of applicable laws may have negative consequences, may cause damage to UNIMACTS's reputation, and thus have an



adverse impact on the company and its market position. All employees are required to meet these requirements. Any violations of the Code of Conduct will be treated in accordance with applicable laws, collective agreements, company agreements and individual agreements.