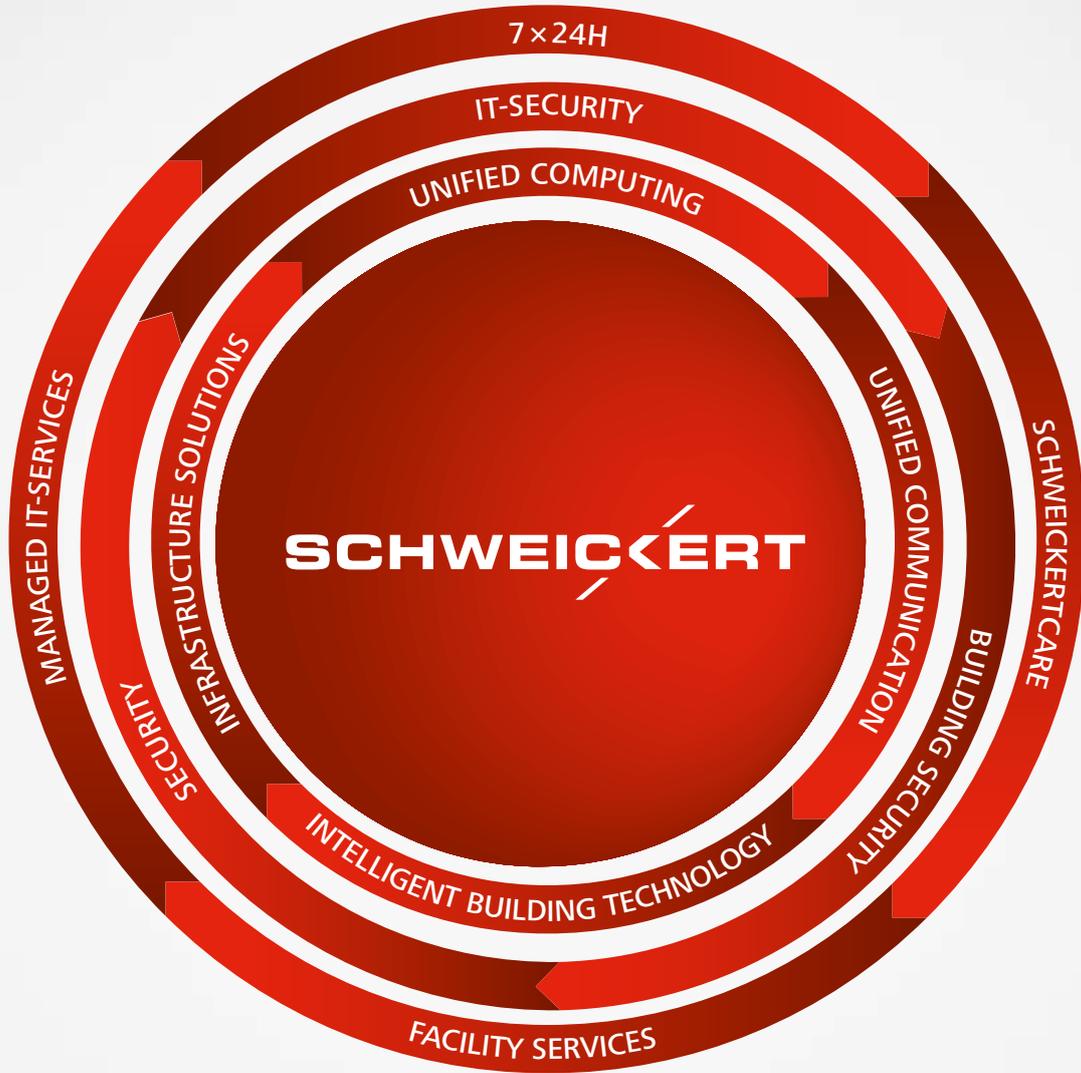


CODE OF CONDUCT





Introduction

Schweickert (The Company) has adopted a company Code of Conduct (The Code) that outlines principles of business ethics. The purpose of The Code is to function as a reliable, normative framework for responsible action on the part of each individual Schweickert employee in fulfillment of legal requirements and standards of ethics and social responsibility. The Code applies to all Schweickert business areas, including executive management and staff on all levels. To the extent that gender-neutral language may be used, both genders are implied.

The Code does not represent a discrete legal basis which gives rise to obligations incumbent upon individual employees, but rather comprises a non-exhaustive group of rules which are to be observed both within and outside of The Company, including laws, regulations, work instructions, employment contract provisions, etc. For all Schweickert employees, compliance with The Code is mandatory.

The Code is of relevance from both a legal and a business standpoint. Schweickert can only remain competitive over the long-term by meeting its responsibilities to its customers, shareholders, competitors, business partners, regulators, and employees. Schweickert's sustained business success and competitiveness depend upon confidence in its reliability and integrity.

Accordingly, integrity and full compliance with all legal requirements form the basis for responsible corporate management at Schweickert. Upholding these values is the responsibility of every Schweickert employee. Proper, ethical, exemplary behavior is required of all Schweickert employees.

The Code outlines the principles, rules, and regulations by which all Schweickert employees are expected to conduct themselves. While The Code is not exhaustive in addressing every conceivable business event or issue, it provides a foundation for company and individual employee conduct. Should any Schweickert employee need clarification regarding any aspect of The Code, it is incumbent upon that employee to consult with their manager.

Rules in certain countries, business lines, markets – or in relation to certain business partners – may be more rigorous than the provisions outlined in this Code of Conduct. In such circumstances, those rules take precedence, without exception. All Schweickert employees are called upon to internalize the importance of The Code and understand its significance as a basis for day-to-day activities. The Code of Conduct is regularly reviewed, updated, and supplemented as necessary.

Walldorf, July 2017

Executive Management



Ralf Schweickert



Matthias Reimann



Joint Action

Integrity

The integrity of each individual Schweickert employee is the basic prerequisite for a working relationship characterized by trust and a spirit of partnership. Schweickert as a company and Schweickert employees comply with applicable laws.

Schweickert ensures that its employees are informed about and in a position to responsibly comply with relevant legal obligations, work instructions, regulations, framework conditions, and local requirements. All employees are required to act in a professional manner which is appropriate vis-à-vis the public in fulfilling their duties for Schweickert and to maintain awareness of the possible consequences for Schweickert that their personal conduct can have, even without relation to their employment duties. Examples of personal conduct include use of/membership in social networks such as Facebook and Twitter and the posting of comments on the Internet. The personal conduct of employees can always reflect upon Schweickert, thus affecting its reputation internally and externally.

Respect and Tolerance

Schweickert subscribes to the principals of Equal Employment Opportunity. The Schweickert work environment is characterized by respect, tolerance, and equal opportunity. The Company values employee interests and rights and does not tolerate discrimination or unequal treatment of employees, customers, business partners, suppliers, or any other parties. This particularly applies regarding discrimination or unequal treatment due to skin color, gender, ethnic background, age, religion, disability, marital status, sexual orientation, or nationality. Cooperation with organizations and/or groups of individuals who engage in discriminatory practices (as outlined above) is strictly prohibited. Schweickert expects its customers and business partners to uphold these values.

Corporate Culture of Responsibility

Responsibility Toward Employees, Society, and Sustainability

Acting as a responsible employer is integral to Schweickert's success as a business. Being a responsible employer involves fostering a corporate culture that emphasizes the values of fairness and mutual respect, trust, and esteem among all staff members.

Because they function as role models, managers are called upon to be aware of their particular responsibilities regarding the upholding of these values. Schweickert offers staff members several options for improving their work-life balance. Compliance with occupational and workplace safety regulations is of primary importance. In assessing business relationships as well as in planning and conducting business transactions, sustainability issues and ethical responsibility are priority considerations for The Company.

Schweickert is aware of its responsibilities in relation to ecological, economic, social, and societal issues in every aspect of its business operations. The Company promotes prudent use of valuable resources through consistent and steadily-optimized compliance with environmental protection regulations and by avoiding negative environmental impact.

Without exception, benefiting from forced labor, bonded labor, indentured servitude, and involuntary prison labor is prohibited. All work is to be performed on a voluntary basis. Any connection with child labor on any production level is prohibited. "Children" are defined as: working persons under age 15 years (or age 14 years, depending on country-specific laws); below the age of completion of compulsory schooling; or the minimum employment age in a given country – whichever is highest. Legal apprenticeship programs that are in compliance with all country-specific laws and regulations are supported. Employees under age 18 years may not perform hazardous work and may be exempted from nightshift work in compliance with apprenticeship requirements.

Schweickert engages in philanthropy via social projects and promoting regional youth and athletic organizations. At Schweickert, all philanthropic efforts – including memberships, donations, and sponsorship activities – are managed separately from business affairs.

Communication and Transparency

Schweickert communication and information policies are designed to ensure reliability and fairness. Information about Schweickert business activities is disclosed in accordance with legal obligations. Mandatory reporting obligations are met in full.

Tip-offs and complaints regarding possible problems within Schweickert are taken seriously and reviewed promptly and without partiality. Corresponding measures are then taken as necessary. Schweickert fully cooperates with regulatory and investigative authorities.





Objective Decision-making

Corruption and Other Crimes

Corruption, bribery, fraud, and any other criminal activities are prohibited for Schweickert and Schweickert employees. Steps must be taken to ensure that such criminal activities are discovered and prosecuted. All employees are expected to contribute to prevention efforts by conducting themselves with integrity.

Business decisions are made independently and exclusively on the basis of objective and transparent factors. Schweickert employees are prohibited from accepting gifts or other compensation from business partners or other parties in a business relationship with The Company unless they are of demonstrably minor value. Schweickert expects its business partners to refrain from offering or providing in-kind services, gifts, or other benefits to Schweickert employees and representatives which in any way could influence the personal conduct of its employees with regard to decision-making and business partner selection. Accordingly, Schweickert warrants the same objectivity and transparency vis-à-vis its business partners. Exceptions from the above are meals and event invitations within reasonable and customary limits in a business context.

Schweickert diligently investigates leads indicating potential corruption-related violations and other criminal activity. In the event that suspected violations and/or criminal activities are proven, disciplinary measures may result, as well as criminal prosecution.

Conflicts of Interest

Schweickert has implemented precautionary organizational structures and policies to properly address the conflicts of interest which can arise in many business situations. Failure to properly address the risk of conflicts of interest can jeopardize the reputation of Schweickert, resulting in contract penalties and loss of customer confidence. Any conflicts of interest which cannot be avoided are disclosed. To the extent conflicts cannot be avoided, Schweickert works to ensure these are addressed in a responsible and appropriate manner in the interests of its business partners.





Confidential Communications

Confidentiality and Privacy

IT systems are regularly utilized and data processed as part of everyday business operations. Adequate security precautions (e.g., passwords, authorized technologies, and licensed software) are essential to protect intellectual property and personal data. Failure to comply with mandatory security measures can have serious consequences, including loss of data, theft of personal data, and copyright infringement. Digital information can be rapidly disseminated and copied and is virtually indestructible. Therefore, Schweickert employees must exercise great care regarding the content of e-mail, attachments, downloaded files, and saved voice messages. Schweickert employees agree to utilize the IT systems provided by The Company for the performance of business tasks and to avoid usage for personal purposes which are inappropriate, unauthorized, or for unethical or illegal activities. All employees must be aware that IT resources made available at the workplace do not belong to them, being instead Company property.

All employees are required to take necessary steps to ensure the security of IT systems against internal and external misuse and threats (e.g., unauthorized use of assigned passwords, downloading inappropriate material from the Internet, etc.). The IT department is to be contacted for any related questions or problems.

Insider Information

Schweickert employees who obtain specific confidential information concerning customers which has not become public information are subject to special confidentiality requirements. Such confidential information ("insider information") is treated with strict discretion within the Schweickert organization. Utilizing insider information improperly can be a punishable offense. Insider information may not be exploited for personal purposes, for the benefit of Schweickert, or for the benefit of third parties.

Ensuring Quality

Competition

Schweickert operates nationally and internationally, providing services in view of market requirements while upholding its responsibilities toward its customers, business partners, and suppliers as well as competitors with regard to fair competition. Adherence with the principles outlined in this Code of Conduct strengthens Schweickert's market positioning, helping it remain competitive over the long-term. This requires Schweickert respecting intellectual property as well as scrupulously handling copyright, licensing, and other rights issues.

Protection of Company Assets

All employees are responsible for protecting Schweickert's tangible and intangible corporate assets. Resources at the disposal of Schweickert employees are to be utilized exclusively for business purposes except as otherwise specified. All employees must be aware that their individual business conduct affects the reputation and image of Schweickert, both inside and outside The Company. Loss of reputation and trust due to improper conduct by employees must be avoided, as the scope of the consequences thereof cannot be gauged and may involve substantial harm to The Company.









~~Power and data traffic security~~

Germany

Schweickert Netzwerktechnik GmbH
Dietmar-Hopp-Allee 19 | 69190 Walldorf
Tel. +49 6227 38 86-00 | Fax -09

Schweickert Elektrotechnik GmbH
Hauptstraße 105 | 69226 Nußloch
Tel. +49 6224 82 77-0 | Fax -50

International

www.schweickertgroup.com
info@schweickertgroup.com

Europe

Cascais, Portugal
Schweickert Portugal, Unipessoal, Lda
Avenida 25 de Abril, 8-2 Esq.;
2750-511 Cascais

Targu Mures, Romania
Schweickert Romania S.R.L.
Gheorghe Doja Nr. 97
540394 Targu Mures

USA

Palo Alto, California
HS Network Technologies, Inc.
3475 Deer Creek Road
Palo Alto, CA 94304
Tel.: +1 650 49452-85 | Fax -83

Denver, Colorado
HS Network Technologies, Inc.
6399 S Fiddler's Green Circle, Suite 400
Greenwood Village, CO 80111

Philadelphia, Pennsylvania
HS Network Technologies, Inc.
3999 West Chester Pike
Newtown Square, PA 19073

Asia

Dalian, China
Schweickert Dalian Network Technologies Co., Ltd.
4/F, DLSP 16, International Information Service Center | No. 269 Wuyi Road Shahekou District Dalian, 116023 China
Tel.: +86 411 84767-133 | Fax -233

Bangalore, India
Schweickert India Pvt. Ltd.
417 Golden Square Prime Serviced Office
Davanam Sarovar Portico Suites
Hosur Main Road
Bangalore – 560068, Karnataka
Tel.: +91 080 65690520
Fax: +91 11 40556110

Singapore
Schweickert Singapore Pte. Ltd.
30 Pasir Panjang Road
#03-32, Mapletree Business City
Singapore 117440
Tel.: +65 6659 12-18 | Fax -19