

Code of Conduct Ethics and Good Practice

ESGTI AG
September 2019

ESGTI AG's ("**ESGTI**") core aim is to offer a unique perspective within the investment space, supporting small and medium-sized enterprise companies focused on the development and commercialisation of products and technologies, within the Healthcare, Environmental and AgriTech sectors, including Medical Devices, Digital Health, Diagnostics and Therapeutics, Clean Technologies, AI & Machine Learning and Big Data. In particular, ESGTI focuses on environmental, social and corporate governance (ESG) investing, ensuring these principles are integrated into its investment process, acquiring and investing in companies, which prove to be ethically sound, responsible and sustainable.

ESGTI aims to take a significant equity stake in selected companies and then to grow the value of that equity over time through active participation in the development of such companies if appropriate.

ESGTI is committed to the highest standards of ethical business conduct. ESGTI expects that its employees and associates ("**ESGTI People**") follow the highest standards of integrity in the conduct of ESGTI's business.

This Code of Conduct outlines the high standards of business ethics and integrity required of all ESGTI People when conducting business on behalf of ESGTI. All ESGTI People are responsible and accountable for complying with the provisions of this Code of Conduct as well as with all applicable laws and regulations.

ESGTI's commitment to the highest ethical principles is embodied in its vision and values:

- We aspire to support innovative companies focused on Healthcare, Medical Devices, Wellbeing, Environment, CleanTech and Agribusiness/AgriTech.
- We value innovation, scientific and business integrity, honesty, respect, creativity, hard work, success and reward.
- We care about people's health and the environment.
- We pursue our goals with service-oriented dedication and by accepting responsibility for all of our actions.
- We are committed to doing business in a sustainable and socially and environmentally responsible manner. While conducting our activities, we take into consideration the efficient use of energy and materials and the safe and responsible disposal of residual wastes.

1. VALIDITY

This Code of Conduct is binding for and applies to all ESGTI People, its subsidiaries and any contractors or vendors performing work for the ESGTI or any of its subsidiaries. Certain subjects covered by this Code of Conduct may be further detailed in specific guidelines. Failure by ESGTIU People to follow the Code of Conduct may result in disciplinary action up to and including dismissal.

2. CONFLICTS OF INTEREST

Conflicts of interest may arise when we have an interest in any business or property or an obligation to any person that could affect our judgment in fulfilling our responsibilities to ESGTI or when our position at ESGTI is used for personal advantage. We should avoid any activity or investment that constitutes, or may constitute, a conflict of interest between ESGTI and any third party. ESGTI expects integrity and ethics from all ESGTI People.

3. ACCEPTING OR OFFERING GIFTS AND ENTERTAINMENT

ESGTI's aim is to avoid third parties from seeking or receiving special favours from ESGTI People by the giving of gifts. Accepting any gift or entertainment, which is substantially more than in a social capacity, may appear to be an attempt to influence us into giving preference to a particular customer, vendor, consultant, or the like.

We must not provide or accept gifts or hospitality if it may create a conflict of interest. We should make certain that we provide and accept only gifts and hospitality, which are reasonable, compatible with industry standards and local customs, and in accordance with applicable laws and regulations. We must exercise caution, honesty and good judgment.

4. INTERESTS IN OTHER BUSINESSES

ESGTI acknowledges that ESGTI People are providing similar services to other companies and this Code of Conduct is in no way implied to prevented ESGTI People from providing similar services to other companies from time to time, which may be engaged in the same areas as ESGTI as long as direct competition or exchange of confidential information is prevented. ESGTI expects ESGTI People to act responsibly, ethically and use their professional judgement.

In the event that a conflict of interest arises due to the fact that we or our spouse, or any other member of our immediate family have or suspect we have a direct or indirect financial interest in a competitor, we must inform the company in order to determine whether a conflict exists and how to best resolve the situation fairly and amicably.

5. PROTECTION OF INTELLEGTUAL PROPERTY

Intellectual property is a company asset found in the creative ideas that lead to innovations and advancements in our products, technology and services. We think of it most commonly as our inventions, patents, trademarks and copyrights.

The intellectual property we develop for ESGTI belongs to the company. We must be alert in identifying it, taking appropriate steps to protect it, and making sure it is used only for the benefit of ESGTI.

6. CONFIDENTIAL INFORMATION

ESGTI's proprietary and confidential information are of key importance to the company and as such, we safeguard such information. We must take proper steps to protect this kind of information and may not disclose it to people outside the company, except in approved business transactions. The company will vigorously pursue any unauthorized disclosures of confidential information. Our obligation to protect the confidentiality of information continues even after the employment with ESGTI ends.

7. USE OF COMPANY PROPRIETARY AND OTHER CONFIDENTIAL INFORMATION

ESGTI's proprietary and confidential information must not be used in any way other than as required in performing employment duties or the applicable services.

All files, records, reports or any other documents or data in hard copy or electronic form acquired or created in the course of employment are the property of ESGTI.

Unless otherwise specified, company property may be used for legitimate company business only and not for personal benefit or gain.

8. DATA PROTECTION

We keep data secure and comply with data privacy. We protect confidentiality and integrity of data, including the data of employees and customers, by technical and organizational means. We adhere to the applicable data protection regulations.

9. ADHERENCE TO APPLICABLE LAWS AND BINDING STANDARDS

We adhere strictly to applicable laws and binding standards. We know and follow the law of each relevant market in which ESGTI does business. Adherence to all laws and regulations in the countries in which ESGTI operates, and to this Code of Conduct as well as to all relevant policies and guidelines is a condition of employment for every employee.

10. RELATIONSHIP WITH PUBLIC OFFICIALS

We shall deal in a professional, diligent, accurate, and ethical way with governmental agencies and public officials. All of us engaged in business with governmental agencies must know and abide by the specific rules and regulations covering relations with such agencies. We must also conduct ourselves in a manner that avoids any dealings, which might be perceived as attempts to influence public officials in the performance of their official duties.

11. BRIBERY, FRAUD AND CORRUPTION

ESGTI does not tolerate bribery or corruption. We conduct our business in such a manner that ensures that ESGTI's reputation will not be negatively affected.

12. INSIDER TRADING

We do not buy or sell shares on the basis of material inside information which includes any information which we acquire but which is not available to the public. We do not communicate or relate insider information to other people for the purpose of buying or selling shares.

13. E-MAIL, INTERNET AND SOCIAL MEDIA

We use e-mail, internet and social media appropriately. The use of the business tools of e-mail, internet and social media may have legal implications for the company and the employees personally. The content of the e-mails and documents we create and the data we access over the internet must always be appropriate. E-mail, internet and social media must not be used to access or disseminate illegal, offensive, disruptive or potentially discriminating content such as pornographic or obscene material. Unless otherwise specified, e-mail, internet and social media shall be used for legitimate business purposes only.

14. DISCRIMINATION AND HUMAN INTERACTIONS

ESGTI shall comply with all applicable employment laws in the conduct of its business. We maintain an open, fair, and honest relationship with our colleagues, external advisors and third parties.

We make all related decisions regardless to race, religion, gender, sexual orientation, national origin, age, disability, marital status, or other classification protected by applicable law.

We prevent bullying and sexual harassment by observing relevant rules and consistently punishing violations. Our policy is to provide a work environment free from harassment. Although "harassment" most frequently refers to sexual harassment, workplace harassment may also include harassment based upon a person's ethnic origin, religion, national origin, gender, sexual orientation, gender identity, age, physical disability, or any other inappropriate or illegal action. ESGTI prohibits harassment and discrimination in any form, whether physical, verbal, or non-verbal.

Be sensitive in the way you approach your colleagues and respect individual privacy at all times.

15. HEALTH AND SAFETY

ESGTI is committed to operate in a manner that is environmentally responsible and ensures the protection of the health and safety of ESGTI People and the public.

We conduct business in accordance with applicable health and safety.

This Code of Conduct may be revised at any time by the Board of Directors of ESGTI.

Approved by the Board of Directors on 30 September 2019.

The Chairman

Andreas R Bihrer