

**Auguste
Cryogenics**

Code of Ethics

Act Honestly Everywhere in the World

Principles of Behavior in Auguste Cryogenics Group

- Act honestly.
- Be honest.
- Comply with laws.
- Follow the Code.
- Be responsible.
- If you see something, say something.

Dear employees,

The Code of Ethics affirms our commitment to promoting an environment of honest behavior in order to preserve the ethical basis that this organization had in mind when it was established in 2016. The information contained in this Policy sets out the expectations of Auguste Cryogenics Slovakia s.r.o. and Auguste Cryogenics Germany GmbH on how the employees should behave on behalf of the organization in the many countries, in which we operate. Although our Policy is an internal guide containing expectations of behavior, the laws set out external boundaries for them - we expect all employees to fully respect both forms. If in doubt, please, consult your supervisor, manager, or executive directors of the Company for instructions.

Please, read the contents of this Policy and ensure that your conduct complies with these guidelines. If you are seeing deviations from the behavior anticipated in the Code of Conduct, contained within you will find the information, on how to inform the company, either anonymously or otherwise, of the possible violations of the Code, so that we can take immediate actions to investigate the matter. Our organization can be successful when it has the workforce focused on doing the right thing. No matter whether employees report a suspected violation based on the Policy or law, both provide protection against retaliation. We, as an organization, are obliged to act appropriately and investigate exceptions in a timely manner so that employees providing this information can help us maintain a favorable position in this regard.

Integrity and high ethical standards are the foundation on which this company has been built; they remain a top priority and will be an integral part of our business while respecting our stakeholders: employees, customers, suppliers, dealers, partners, and board members. All known violations of the policies, procedures, regulatory requirements, and laws will be adequately punished, promptly, disciplinary action may range from internal training to immediate employment termination. Managers and executives may also be personally responsible for failure to report, investigate, or resolve violations. It is in our best interest to report and address behaviors that are beyond good practice.

I proudly declare that I work at Auguste Cryogenics and I want to make sure that you all feel the same way. Remember, we are responsible for our behavior and how we behave creates not only a positive working environment, but brings positive results for all of us.

Sincerely,

Robert Lynn Cushman
President

Contents:

Principles of Behavior in Auguste Cryogenics	Page 2
Speech of the President	Page 3
Act Honestly Around the World.....	Page 5
Our employees	Page 11
Integrity in Company.....	Page 16
Conflict of Interests.....	Page 23
Honest Negotiations with Others	Page 30

Annexes:

Code Management	Page 39
Glossary	Page 41
Resources	Page 44
Ethics and Compliance Committee	Page 45
Local Ethics Officers	Page 46
Confirmation of Employee's Knowledge of the Code of Ethics of Auguste Cryogenics Slovakia s.r.o. and Auguste Cryogenics Germany GmbH	Page 47

Act Honestly Around the World

What is expected of everyone?

For Auguste Cryogenics Slovakia s.r.o. and Auguste Cryogenics Germany GmbH ("Auguste Cryogenics" or "Company" or "ACS" or "ACG"), integrity is essential. Along with our other values, such as leadership, dedication, accountability, cooperation, diversity, and quality, integrity is the foundation of our company's vision. We respect the law; promote universal human rights; protect the environment, and help the communities, in which we operate.

Integrity means doing what is right. By behaving with integrity, we represent the values and reputation of Auguste Cryogenics and its brands in all the countries, in which we operate.

We all want to do the right thing for ourselves and for the Company. The Code of Ethics ("Code") will be a good tool for us. The Code defines how employees should behave as representatives of Auguste Cryogenics; it focuses on our duties towards the Company, to ourselves, and to our customers, suppliers, and government agencies.

Note to Glossary:

There are certain words or phrases throughout the Code, which are highlighted in **green**. For your convenience, the meaning of these terms is given in the Glossary at the end hereof.

Every employee of the Company must abide by the law, act honestly and with integrity in all matters, and be accountable for his/her actions.

Follow the Code and the Law

You must understand and comply with the Code and the law wherever you work. Always use sound judgment and avoid even the slightest indication of inappropriate behavior.

Consider your Actions and Ask for Instructions

If you ever have doubts about behavior, ask yourself the following questions:

- Is it in line with the Code?
- Is it ethical?
- Is it legal?
- Does it throw a good light on me and the Company?
- What would it look like if I or the Company found myself on headlines as a result of my decision?
- Would I expose a member of my family to such behavior?

If you answered “No” to any of the above questions, do not do it.

If you are unsure, ask for advice. The Code seeks to capture many situations that employees may encounter, but cannot address every circumstance. You can request help from any of the following:

- Your superior
- Any Executive Manager of the Company

What is Expected from Managers and Executive Managers?

Promote a culture of high performance, in which ensuring ethics and compliance is a standard behavior

Managers/Executive Managers should always present appropriate behavior. As a manager, you should:

- Always abide by the Code.
- Ensure that those under your control know their roles under the Code and all Company policies.
- Create opportunities to discuss the Code and reinforce the importance of observing ethics and compliance by employees.
- Create an environment, in which employees are free to raise concerns without fear of retaliation.
- Consider behavior in relation to the Code and other Company regulations when assessing employees.
- Never encourage to, or support employees in, achieving business results to the detriment of ethical conduct or non-compliance with the Code or laws.
- Always quickly stop the violation of the Code or the law by subordinated.

Respond to Questions and Concerns

If an employee has contacted you with a question or concern about the Code, please, listen carefully and pay full attention to him/her. Request clarification and other information. Answer his/her questions, if possible, but don't feel compelled to give him/her an immediate response. If necessary, always seek help from your supervisor or the Executive Manager.

If a Written Consent is Required

Some of the measures outlined in the Code, including those on the use of Company assets outside your employment and the conflict of interest situations, require prior written consent from the **Local Ethics Officer**, or **Executive Manager**. If the situation recurs, it is necessary to approve it annually. The **Local Ethics Officer** is a designated human resources representative at your workplace, who has been appointed to take these decisions. You can find contact information for your **Local Ethics Officer** in the Code.

If you are in a situation, where approval is required from the **Local Ethics Officer**, you can contact him/her directly, or you can contact your supervisor or manager to help you get the necessary approval.

Local Ethics Officers are appointed by the **Board of Directors** of the Company.

Who Must Adhere to the Code?

The Code of Conduct applies to all employees of the Company and its suppliers and consultants.

Code and Law

The activities and employees of the Company are subject to the laws of many countries and other jurisdictions around the world. Employees are expected to comply with the Code and all applicable government laws, rules and regulations. If any provision of the Code is in conflict with the applicable legislation, then the law has priority.

Because Auguste Cryogenics is affiliated with US citizens, our employees are also subject to the US law. Other countries may also apply their laws to the activities of the Company and its employees outside their borders. If you are unsure, which laws apply to you, or if you think there may be a conflict between different applicable laws, please, contact one of the Company's Executive Managers before continuing.

Arising Concerns

We all have a duty to adhere to the Company's ethical standards. If you become aware of behavior that is of concern to you or that may constitute a violation of the Code, please, notify the issue immediately. This way, you will give the Company the opportunity to address and correct the problem, preferably before it becomes a violation, or creates a risk to the health, safety, or reputation of the Company.

Resources

You have several options to raise the problem and concern. You can contact:

- Employees at each management level at Auguste Cryogenics;
- Human Resources or General Manger of the Company;
- **Board of Directors;**
- Your **Local Ethics Officer;**
- If a crime is suspected, contact a member of the **Board of Directors** immediately

Anonymity and Confidentiality

When reporting to the **Local Ethics Officer** or to the **Board of Directors**, you can choose to remain anonymous, although it is recommended that you identify yourself to facilitate communication. If you disclose your identity, the **Board of Directors** and investigators will take all reasonable precautions to keep your identity confidential consistently with conducting a thorough and fair investigation. To help maintain confidentiality and ensure the integrity of the investigation, you should not address these issues with other employees. We strive to maintain confidentiality in every investigation and, therefore, may not be able to fully inform you of the specific outcomes of the investigation, but rather that the situation is being resolved, it will not be repeated, or will not become subject to any retaliation.

Investigations

The Company takes all reports of possible misconduct seriously. We will investigate the matter confidentially, decide whether the law or the Code has been violated, and take immediate and appropriate remedial actions. If you participate in the investigation, you must fully cooperate and answer all questions completely and honestly as a duty of your employment.

No Retaliation

We appreciate the help of employees, who identify potential problems that the company has to address. Employees, who report suspected violations of the Code in good faith, are protected by the Company's policy on preventing retaliation. **Any retaliation for such a report should be notified to the Board of Directors or the Company's local Human Resources representative, as retaliation in many places constitutes a violation of the Code and the law.** The fact that an employee has been sincerely concerned or involved in the investigation cannot give rise to any hostile action at work, including, but not limited to, termination of employment, downgrading, suspension, loss of benefits, threats, harassment or discrimination. Proactive reporting of suspected violations promotes a good working environment.

If you are working with someone who has raised concerns or provided information in an investigation, you should continue to treat this person with respect. If you think someone is taking revenge on you, report the matter to the **Board of Directors**, Human Resources, your supervisor, or the **Local Ethics Officer**.

It is important to know that the Company will protect all employees who raise concerns fairly; however, knowingly made false accusations, deceiving investigators or refusing to cooperate in an investigation within the Company, or interfering with an investigation, is a violation of the Code. Sincere reporting of a violation of the Code does not mean that you must be right, when you are concerned, but rather that you simply believe that the information you have provided is accurate and that you are acting in good faith.

Our employees

We value the different views and talents of each individual.

- Diversity
- Equal employment opportunities
- Workplace without alcohol and drugs
- Prevention of violence, mobbing and discrimination in the workplace
- Corporate communication

DIVERSITY

Our employees are our most valuable resource and are essential to our success. A diverse and heterogeneous staffing base helps promote the creative culture and innovation and enables us to operate more efficiently throughout the world. Our values of a culture of ingenuity and high performance would not make sense, if we did not have the highest quality workforce and constantly work to develop our employees.

Auguste Cryogenics values the unique set of skills and talents that every employee brings to work. We embrace diversity by providing an open, complete, and considerate work environment so that all employees can fully participate in, and contribute to, our success.

EQUAL JOB OPPORTUNITIES

Auguste Cryogenics is committed to providing a diverse workforce and a workplace that is free from discrimination or retaliation. It is our policy to ensure the equal employment opportunities for all by recognizing the talents of all employees and promoting an environment that is complete and respectful, regardless of:

- Age
- Citizenship
- Disability
- Gender equality/expression
- Condition
- Nationality
- Race/skin color
- Religion
- Gender, including pregnancy
- Sexual orientation
- Veteran status; or
- Any other breakdown protected by applicable laws and regulations.

We are committed to this Policy and believe in the notion and spirit of the law. This Policy applies to all stages of employment, including recruitment, hiring, placement, promotion, termination, dismissal, notice, transfer, absence, remuneration, and training. The Company and its management will ensure that this Policy is followed without exception, and the Company complies with all applicable laws and regulations that govern non-discrimination in every place we operate. *See Zero Tolerance for Harassment and Discrimination Policy by Auguste Cryogenics.*

Example:

Q: I asked to work in another department with a purely male team. I feel that I was discriminated because the manager finally offered the work to the man.

A: Our selection decisions are based on job qualifications. If you feel that you have been discriminated against, please, notify the **Board of Directors**.

WORKPLACES WITHOUT DRUGS AND ALCOHOL

Auguste Cryogenics strives to provide its employees with a safe, efficient, and rewarding working environment. The Company prohibits the use, possession, distribution, purchase, or sale of drugs or alcohol within its premises and has zero tolerance with respect to the use of drugs or alcohol, or the performance of work under their influence when staying at the workplace. Work under the influence of drugs or alcohol poses serious safety and health risks for users and all those in contact with them. The use, sale, purchase, transfer or possession of illicit drugs in the workplace and the use, possession or working under the influence of alcohol also pose an unacceptable risk to the safe, healthy and efficient performance of individual activities. This includes the misuse and sale of the authorized, prescribed, or over-the-counter medicines on the company's premises. *See Auguste Cryogenics Policy on Drugs and Alcohol.*

If permitted by law, the Company may conduct a search for, and test of, the drug and alcohol use, including random drug testing and post-incident testing.

VIOLENCE, HARASSMENT AND DISCRIMINATION AT WORKPLACE

Auguste Cryogenics is committed to providing a workplace free from harassment, discrimination, and violence. The Company has zero tolerance for any activity that is classified as harassment and discrimination in the workplace and initiates disciplinary proceedings commensurate with the offense. Employees shall not discriminate or harass other employees, whether on or outside the employer's premises, or during or outside the working hours. *See the Auguste Cryogenics' Zero Tolerance Against Harassment And Discrimination Policy.*

If you are confronted with harassment or think you have been discriminated against, you should report your concerns to the Human Resources Department, your supervisor, the **local Ethics Officer** or the **Board of Directors**.

Example:

Q: After confronting one another, my colleague asked me to “go to the parking lot and solve it once and for all”. This is not the first time he made this remark, and I believe he can eventually try to hurt me. What should I do?

A: If you are convinced that you or someone else is in danger of being harmed, or may be harmed, report this event to any manager, Human Resources department or **Executive Manager** without delay. All threats of violence are taken seriously and should be reported immediately. If necessary, the local police department can be contacted to protect you and your co-workers. Employee safety is a primary concern of the Company.

CORPORATE COMMUNICATION

The President or his authorized representative is the designated principal media contact of the Company. The President or his authorized representative shall consider each media question to determine the best way to provide information that has not yet been published. The President or his authorized representative will present the Company's official position on the important issues or situations that are particularly controversial or sensitive in order to raise public awareness and understanding of the Company, the services it provides and our future growth prospects. This representative will support the positive image of the Company and the work we do in the public that is important to the Company, and includes the current and potential customers, employees and suppliers, as well as the government officials, banks, shareholders and our industry competitors.

Depending on the situation, the designated employees may be required to become spokespersons on a specific issue in the light of their knowledge, experience, and expertise, but this will depend on the situation with the explicit knowledge of the persons concerned.

If you are contacted directly by the media, please, refer them to the President or his authorized representative. Do not give any opinion in answering the questions they ask you. It is always best to respond, "Without comment", so to show your intention with the media.

Integrity in Company

Integrity is a priority of Auguste Cryogenics; it includes the way we handle company records, assets and information.

- Business and financial records
- Legal detention
- Company assets
- Use of information

Business and Financial Records

Ensure the accuracy of all business and financial records of the Company. These records include, but are not limited to, financial accounts, production records, quality reports, attendance records, expense statements, and submissions, such as benefit forms and summaries.

Each employee is responsible for ensuring the accurate and complete business and financial records of the Company. Inaccurate or incomplete records lead to potential non-compliance, as well as a range of adverse business consequences. It's not just a task for the accounting and finance department. Accurate record-keeping and reporting is reflected in the Company's reputation and credibility; it allows the Company to fulfill its legal and statutory obligations.

- Avoid any delays or speeding up in the recording of revenue and expenditure for meeting the budgetary targets. Always record/post the transactions in/to the correct accounting period and to the appropriate account and center.
- Always retain the documentation to support any estimate or increment and use your best judgment.
- Always ensure that all regulatory reports are complete, sufficient, accurate, timely, and understandable.
- Never falsify any document or misrepresent the true nature of any transaction.
- Never assist any person in avoiding paying taxes or breaching regulations. For this reason, payments should generally only be made to the person or company that provided the goods or services. Payments should be made in the country, where the supplier conducts business, or where the goods have been sold or services provided, unless the supplier has rightfully transferred the payment or sold its claims to another entity. Any exceptions must be approved by the **Board of Directors**.

Always Strive for Accuracy

Sometimes mistakes without bad motive also occur. Employees must always strive for accuracy when preparing any information for the company. Violations of the Code refer merely to the deliberate attempts to misrepresent or improperly record transactions, or otherwise falsify the Company's business records.

EXAMPLE:

Health Care Costs

The employee has tried to obtain the Company's health care for his ex-wife by submitting a prescribed form stating that she was still married when she had actually already received a divorce decision. The employee deliberately falsified the Company's records.

Posting of Expenditure

Sales Manager estimated that he would not meet his sales goals for the month. To make up for this difference, he made fake orders to meet his sales goals, and then recorded orders to sell. Sales Manager deliberately falsified financial records.

Documentation Management

Business records include the official information, such as financial data, government statements, and other records created as part of Auguste Cryogenics' business. If you have a question about whether or not to keep the record, please, contact the General Manager.

Retention by Law

The Company may issue a notice of retention by law (“retention of record-keeping”) regarding the retention of records in the event of actual or imminent disputes or government investigations. Employees must comply with the instructions contained in these notices; otherwise, this could expose the Company and its employees to the material legal risks. If you have any questions about the responsibility for retention of records, please, contact the General Manager.

Company Assets

Protect the Company assets and use them as intended.

Violation of the Code occurs when the **Company assets** are used for personal benefit or for the benefit of someone other than the Company.

- Occasional personal phone call or email from your workplace is acceptable, but excessive personal phone calls or e-mails constitute a misuse of Company assets.
- Be aware that Company policy may allow additional personal use of certain assets, such as cars or wireless communication devices. Consult with any **Executive Manager** what our Company policies allow;
- Be sure that you are using the **Company assets** only as intended. You are responsible for understanding all Company policies.

Theft of **Company assets**, whether physical theft, such as unauthorized removal of the Company's product, materials, equipment or information, or theft by fraud or intentional

misrepresentation of the time or expense, may result in termination of employment and/or prosecution. The Company treats theft of assets in the workplace that belong to other employees similarly as theft of assets of the Company.

The use of **Company assets** outside the scope of your Company liability, such as the use of your Company product in a non-Company transaction, or the use of corporate materials or devices to promote personal interests, requires the prior approval of the Executive Manager and the **Local Ethics Officer**. If you continue to use assets outside work for an extended period of time, then annual approval is required.

Utilization of Time, Equipment, and Other Assets

- Participation in personal activity during working hours that disrupts or impedes the performance of your duties is a violation of the Code and may result in further disciplinary action.
- The use of Company computers and equipment for the external or illegal or unethical activities, such as gambling, pornography or other harmful activities is a violation of the law and may result in further disciplinary action.
- Taking advantage of an opportunity you have learned through your position in the Company or by using Company assets or information for the personal financial benefit is a violation of the law and may result in further disciplinary action.

Examples of Company Assets

- Work products and employee hours at work, including remote working from outside the Company;
- Company assets, including money, resources and facilities;
- Company product;
- Computer systems and software;
- All communication devices, including telephones and wireless devices;
- Copiers, scanners, faxes, printers;
- Company-owned tickets for concerts and sports events;
- Company vehicles;
- Exclusive information;
- Company trademarks and patents.

EXAMPLES OF ABUSE OF THE COMPANY TIME

Personal Benefit

The employee uses the Company's computers and equipment, as well as the time at work to prepare and print the marketing flyers for his/her personal business. The employee misused the Company assets.

Handling Matters outside the Company

Q: I am a financial manager and I often have to deal with corporate matters outside the Company, such as making a bank deposit or picking up stocks. Since the bank is next to the grocery store, can I pick up a few things for my family after I have been to the bank, even though I am technically at work?

A: If your private matter should last for a minimum amount of time, then it is acceptable to handle it at the same time or almost at the same time as you perform the work-related tasks. However, resist the urge to deal with the excessive personal matters during your working hours, unless it is during regular lunch breaks and you are not paid for the time.

Personal Assistance

The manager repeatedly asked the employee to handle his/her personal affairs or perform his/her personal tasks during working hours. The manager misused the employee's working hours, which is the **Company assets**.

Waste Material

The employee has access to corporate waste materials scheduled for recycling. Without permission, the employee took some waste materials for recycling and agreed to share the revenue with another employee, who was holding the guard. Both employees misused the **Company assets**.

Use of Information

Protect the *non-public Company information that includes, but is not limited to, contracts, pricing information, marketing plans, technical specifications, and employee information.*

Non-Public Information

Never disclose any non-public information to anyone outside the Company, including your family members and/or friends, except when disclosure is required for the business purposes. Even then, take appropriate measures, such as entering into a confidentiality and non-disclosure agreement, to prevent the person from disclosing or misusing this information.

Never disclose any non-public information to employees within the Company, unless they have a business reason to learn such information.

Always maintain confidentiality of the non-public information of the Company, both outside the workplace and after termination of employment. All non-public information of the Company is deemed to be protected and may not be disclosed without entering into a relevant confidentiality agreement.

Always keep or destroy Company records in line with the Company policy on record keeping.

What is Non-Public Information?

Information not disclosed by the company or generally available to the public, including the information concerning:

- Employees
- Inventions
- Use of patents or trademarks
- Knowledge and experience
- Contracts
- Strategic and business plans
- Major organizational changes
- New marketed products
- Mergers, acquisitions and divestments
- Technical specifications
- Prices
- Offers
- Financial data
- Product cost
- Discount information
- Customer data

EXAMPLES

Look what I have

Q: I accidentally received an e-mail with a file containing the upcoming wage increase for several employees. Can I share it with other colleagues?

A: No. You and your coworkers have no business reason to know this information. Disclosure of the information to other employees is a violation of the Code. You should immediately remove the e-mail and notify the sender of making a mistake.

New Product

The Company's engineer was excited about the launch of the new product he was working on. He shared the product details with his family and friends. The engineer inappropriately disclosed the non-public information, thereby undermining security and inducing a competitive advantage.

Privacy

It is of utmost importance for the Company to have the privacy of all its employees, business partners and customers respected. Personal data must be handled responsibly and in line with all applicable privacy laws. Employees handling other people's personal data must:

- Act pursuant to the applicable legislation;
- Comply with all applicable contractual terms and conditions;
- Collect, use and process this information only for legitimate business purposes;
- Restrict access to the information only to those, who reasonably need it to carry out their work; and
- Take all appropriate measures to prevent unauthorized disclosure thereof.

Auguste Cryogenics adheres to all privacy laws that vary from country to country.

Conflict of Interests

This section of the Code sets out the rules for the routine situations of conflicts of interest, but not each potential conflict of interest can be resolved. Use common sense and your moral principles to evaluate situations of the potential conflict of interest. If you have a question about the existence of a conflict of interest, but you are not sure how to handle the situation, ask your immediate supervisor, human resources representative or **Local Ethics Office** or **Executive Manager** for assistance.

- Investments outside the Company
- Employment, speeches and presentations outside the Company
- Provision of external services as an official or director
- Relatives and friends
- Gifts, hospitality and entertainment

CONFLICT OF INTERESTS

A conflict of interest in the workplace often arises if you have a competitive interest or loyalty that either is, or potentially can be, in contradiction, and interferes, or appears to interfere, with your ability to act in the best interests of the Company. In the performance of your duties, be sure to act in the best interests of Auguste Cryogenics.

If you are responsible for selecting, or working with, a **supplier** on behalf of the Company, be careful. It is extremely important that your personal interests and/or relationships do not interfere, or appear to **interfere**, with your ability to make the right decisions in the best interests of the Company. This means that employees should avoid situations that could obscure their judgment or impartiality in the performance of their work. If your personal interests or relationships give you a sense of protectionism, or it may seem that they represent protectionism, then there is a conflict of interest.

Determination of Conflict of Interest

In any possible conflict of interest, ask yourself:

- Could my personal interests be in conflict with those of the Company?
- Could other people inside or outside the Company perceive it this way?

If you are unsure, ask your HR representative or **Executive Manager** for advice.

Investments Outside the Company

Avoid investments that may affect, or appear to affect, your ability to make decisions on behalf of the Company, including a business share in the Company's **customer**, supplier, or a **competitor** of Auguste Cryogenics companies. If you have the authority to negotiate with a company with a freedom to adopt decisions as part of your work, you may not have any financial interests in that company without the prior written consent of the **Board of Directors**. If you do not have the authority to negotiate with a freedom to adopt decisions as part of your work, you may not obtain written approval from the **Board of Directors** but, regardless of whether or not you have such authority to negotiate with that company, you must inform the **Board of Directors** of your ownership interest, and of any changes in this ownership interest, during your employment with Auguste Cryogenics companies. If Auguste Cryogenics companies acquire any part of the business, in which you have ownership, you must inform the **Board of Directors** in order to complete the relevant documentation and the form of waiving of any conflicts.

Mutual Funds

The restrictions on investments outside the Company do not apply to mutual funds or similar investments, in which the employee has no direct control over the specific companies included in the fund.

Employment, Speeches and Statements Outside the Company

You may be employed outside Auguste Cryogenics companies as long as your external employment does not interfere with your ability to perform your work in the Company. However, if you are employed by any customer, supplier, or competitor of the Company, or otherwise provide services to, or receive payments from, it, then you must have a written approval by the **Board of Directors** and this approval must be renewed annually.

If you have been invited by a customer, supplier, or other company that deals with Auguste Cryogenics companies to participate in a speech or to make a statement, whether in your capacity as an employee of the Company or not, then you must have a written approval from your superior and the **Board of Directors** before accepting the invitation to make a statement, or before requesting reimbursement of costs or other payments related thereto, if:

1) You give a speech or make a statement as part of your work in the Company, 2) a speech or statement describes your work in the Company, or 3) you are formally identified in the speech or statement as an employee or representative of the Company.

Acting Outside the Company as an Official or Director

You may act as an officer or a member of the board of another profitable enterprise only with the prior written consent of the **Board of Directors**. This consent must be renewed annually.

The approval of the **Board of Directors** shall not be required for:

- Work as an officer or director of a charity or other non-profit institution or business organization, or work as an officer or director of a family business, unless that business is a **customer, supplier, or competitor** of the Company.

Work as Director at the request of Auguste Cryogenics Companies

If, at the request of **Auguste Cryogenics** companies, you work as a director of another company, you may have ownership interest in that Company without the consent of the **Board of Directors** provided the ownership is a necessary condition for the office of the director. If, at request of Auguste Cryogenics companies, you have to work as a director of another company and

Auguste Cryogenics pays you for your time spent on this work, you must have written approval from the **Board of Directors** in order to retain the salary paid by another company for your services as director. This consent must be renewed each year.

Relatives and Friends

It is not uncommon for an employee to have close **relatives**, who are employed by, or invested into, our **customers** or **suppliers**. These financial interests **do not create** a conflict of interest under the Code, if:

- You have **the authority to take decisions in negotiations with any of these companies** as part of your work; or
- Your closest relatives deal with Auguste Cryogenics for the benefit of the other.

If any of these situations arise, you must have written approval from the **Board of Directors**, which must be renewed annually. The same applies, if your relative is employed by a competitor of Auguste Cryogenics companies. You must have written approval from the **Board of Directors** and renew this approval annually to avoid a potential conflict of interest.

You may also have friends, who are employees or hold an interest in Auguste Cryogenics companies' customers or suppliers. When dealing with such a customer or supplier, be very careful to ensure that your friendship will not affect, or appear to affect, your ability to act in the best interests of the Company. If you are unable to determine, if your friendship is causing a problem, please, contact your direct supervisor, Human Resources representative, or the **Board of Directors**.

In addition, the employment-related decisions should be based on qualifications, performance, skills, and experience. Do not let personal relationships at work affect your ability to act in the best interests of the Company or affect any employment relationship.

According to the Code, an Immediate Relative is...

The spouse, same-sex or opposite-sex partner, parent, sibling, grandparent, child, grandchild, mother-in-law or father-in-law, all these are considered related under the Code. Any member of the family, who lives with you, or who is otherwise financially dependent on you, or who you are financially dependent on, is also considered related under the Code. Always ensure that your relationship with the family members as defined above, or beyond a definition stated above, is in no conflict, or does not appear to be such, with your ability to act in the best interests of the Company.

EXAMPLES

Supplier Selection

Q: As Purchasing Manager, I am responsible for selecting a supplier for the Company. One of the suppliers I am considering is a company owned by my father and I own a small percentage in this Company. Do I need to take any action?

A: Yes. Your stake in your father's business poses a conflict of interest. In addition, the fact that your father owns the company that is under consideration also constitutes a potential contradiction, or at least appears to be in conflict with your responsibility to select the best supplier for Auguste Cryogenics. Consult your direct superior and **Executive Manager**. The best practice will be that you do not participate in the selection process, or your father's company is excluded from the selection process.

My Grandson

Q: My grandson works for ABC company, which is one of our customers, but he does not make any transactions with Auguste Cryogenics companies. I work in sales, but I have no contact with ABC. Now, I have been asked to keep an ABC account. Am I obliged to disclose that my grandson is working for ABC?

A: Yes. In your new role, you will have the power to negotiate with the ABC company with a freedom to adopt decisions. It is important that you tell your manager about your grandson's job. If your manager still insists that you work with an ABC account, ask the **Ethics Officer** or the **Executive Manager** to obtain written consent to avoid any conflict of interest that might violate the Code.

Gifts, Hospitality and Entertainment

Do not accept gifts, hospitality, entertainment or other benefits from customers or suppliers if this could compromise, or appear to compromise, your ability to make objective business decisions in the best interests of Auguste Cryogenics companies. It is normal and common for people to offer and receive hospitality or inexpensive entertainment while performing their work, but exchanging valuable gifts or providing or receiving costly or inappropriate entertainment is unethical and can damage your personal, as well as the Company's, reputation.

The acceptance of gifts, hospitality, or entertainment that exceeds the following limitations must be approved in writing by the **Executive Manager**.

Gifts

- **Do not accept** gifts in exchange for making or promising to do something for the customer or supplier.
- **Do not ask** for gifts from a customer or supplier.
- **Do not accept** gifts in a form of cash or cash equivalents, such as gift cards.
- **Do not accept** gifts of a value higher than a modest value. Examples of acceptable gifts include a logo pen or a t-shirt or a small gift basket.
- Gifts of symbolic value, such as sports awards and statuettes with text that is recognition of a business relationship or special event, are usually acceptable.
- Gifts or discounts offered to a large group of employees as part of an agreement between the Company and a customer or supplier may be accepted and used in accordance with the intent of the customer or supplier.

Hospitality and Entertainment

- **Do not accept** hospitality or entertainment in exchange for doing or promising to do something for the customer or supplier.
- **Do not ask** the customer or supplier for hospitality or entertainment.
- You may receive occasional hospitality and entertainment from customers and suppliers, if the customer or supplier also attends the event, and the associated costs are in line with the local practices referring to the business hospitality and entertainment. For example, ordinary corporate hospitality and participation in the local sports and special events is generally acceptable.

Example

Special Discounts

An employee, who managed the Company's relationship with a catering company, received a meal rebate from that company for a family meeting event that was not available to other employees. By accepting this personal benefit, the employee violated the provisions of the Code on the conflicts of interest.

Travel and Special Events

In some cases, Auguste Cryogenics companies' employees may accept invitations from customers or suppliers to participate in special events that include traveling or staying outside the city, including special events, such as the Football League Final, World Series World Cup, or the Olympic Games. Before accepting the invitation, ask your immediate supervisor whether there is an adequate working reason to participate. Where such a reason exists, Auguste Cryogenics should reimburse travel expenses and employee participation.

Rejection of Gifts, Hospitality and Entertainment

If you are offered a gift, hospitality, or entertainment that crosses the above limits, please, politely decline them and explain the Company policy. If the return of the gift would displease the donor, or the circumstances, in which it was provided, prevent the gift from being returned, you may accept the gift, but you should inform the **Board of Directors**. The **local Ethical Employee** will work with you either to donate the gift to charity, or to distribute it, or donate it to a large group of employees in a raffle.

Gifts, Hospitality and Entertainment for Customers, Suppliers, and Distributors

Gifts, hospitality, and entertainment for customers, suppliers, and distributors must support the Company's legitimate business interests and should be proportionate and appropriate in the given circumstances. Always be sensitive to the policies of our customers, suppliers, and distributors regarding receiving gifts, hospitality and entertainment, and politely accept any negative response.

If a gift is given to, or received from, a customer, supplier, and/or distributor, Auguste Cryogenics companies ask you to 1) take into account the local practices, and 2) do not exceed our instructions by more than 25 Euro for **anything of value** before accepting or giving the gift.

Tickets and Accommodation for Personal Use

If a customer or supplier offers tickets for the sports events or other entertainment events for your own personal use and the customer or supplier does not visit them, then the employee should respectfully refuse them because this is considered a gift. If such an offer is extended to a larger group of employees as a result of an agreement between the Company and a supplier or customer, then this is not a gift and may be accepted by a larger group. The same shall apply to the offers of traveling on a private aircraft, or staying in a holiday home owned by the customer or supplier, if such use is for the personal and non-commercial purposes.

Honest Negotiations with Others

External relations with our customers, suppliers, government agencies, and competitors are critical to our success. Always obey the laws and deal fairly with all those you meet at the negotiations:

- Government agencies
- Customers and suppliers
- Competitors

Honest Negotiations with Others

Negotiations with Government Agencies

As a global company, we often communicate with the representatives of various governments around the world. When conducting transactions with the governments, consult the Company's Legal Department to be aware of/understand the legal standards that regulate the government transactions, and comply with the laws, regulations, and acts.

Do not offer anything, directly or indirectly, to a government official in exchange for favorable treatment. Auguste Cryogenics companies are committed to complying with all European Union anti-corruption laws and the US Foreign Corrupt Practices Act. These laws prohibit payments and offers of payment of any value to the foreign officials, political parties or candidates for a foreign political office in order to acquire, retain or direct business. **You must obtain a prior written approval from the Board of Directors before giving anything of value to a government official.** Make sure all such payments are properly recorded in the appropriate Company account. **NOTE: Claiming that you did not know that it was a violation will not be considered a defense, if circumstances should have warned you accordingly. See Auguste Cryogenics' Anti-Corruption Policy.**

Prohibition of Bribery

Many countries, such as the United States and the United Kingdom, have adopted legislation, which considers bribery of government officials a criminal offense. Penalties for violating these laws can be serious, including the significant personal and corporate fines and, in some cases, even imprisonment.

Bribes are prohibited

A **bribe** gives or offers anything of value to a government official in order to influence his/her own decisions. Examples of bribes include a payment to a government official to support a decision to award, or continue in, a business relationship, influence the outcome of the government control, or affect the tax or other legislation. In some jurisdictions, bribery may also constitute other payments to government officials. Consult the Legal Department of the Company for local bribery laws.

“Anything of Value”

Means anything that could be of value to a government official, including cash, gifts, hospitality, entertainment, business opportunities, the Company's product, employment offers, etc. There is no threshold monetary value – any amount could be interpreted as a bribe.

US Corrupt Practices Act

The US Foreign Corrupt Practices Act, which prohibits bribes to the government officials outside the US, applies to all employees around the world because the Company is established in the United States. Consult the **Board of Directors** of the Company for any other local laws that may apply.

Some Items May Be Acceptable

The problems presented by the US Foreign Corrupt Practices Act are much more complex than it might seem. For example, although you may have the impression that the term "foreign official" does not include employees of foreign-owned enterprises, the law generally considers them to be "foreign officials". To make matters even more complicated, there are some exceptions to the law that, by law, allow a gift to **a government official** in the form of certain valuable items. Consultation with the **Board of Directors** is important to comply with the law. In certain circumstances, the Legal Department may give consent to the certain well-defined contacts with the government officials.

Hiring Government Officials

The Company may engage the government officials to provide services that have a legitimate business purpose and do not contravene a government official's duties, such as hiring a police officer off-duty to provide the security service at a corporate event. Any such hiring decisions must be made in advance by the **Board of Directors**.

Inappropriate Payment by Third Parties

The Company and/or its employees may be held liable for **bribes** provided by an independent, authorized third party or consultant acting on behalf of the Company. Be careful when evaluating a prospective third party that could be in contact with the government on behalf of the Company. **Do not involve** a third party or a consultant if you have reason to believe that the third party or consultant may attempt to bribe a government official and immediately terminate any relationship, in which you find evidence of this behavior. Also, ensure that all third parties and consultants agree to adhere to the Auguste Cryogenics Code of Conduct.

For more specific advice on payments to the government officials and third parties involved, see the Anti-Corruption Policy.

Who Are Government Officials?

- Employees of any government or state-controlled entity anywhere in the world
- Political parties and party officials
- Candidates for political offices
- Employees of the public international organizations, such as the United Nations
- Staff and customs officers at the airport

It is your responsibility to understand whether the person you are dealing with is a government official. If in doubt, contact the Legal Department of the Company.

Facilitating Payments

Facilitating payments, which are small amounts paid to the non-US government officials to speed up or facilitate specified measures or services, such as obtaining a normal license or telephone service, are prohibited.

If you have routinely made such payments to the government officials outside the United States, or have encountered a situation that you believe may require a facilitating payment, please, contact the **Board of Directors** immediately.

EXAMPLES

Act of Goodwill

Q: The Security Controller came to the Company's plant. Can I give the Controller tickets for the next professional football match as a sign of goodwill?

A: No. You should never give a government official **anything of value** without the prior approval of the Company's Legal Department or CFO. Anything of value given to the security officer in these circumstances can be seen as a bribe in order to influence the Controller when inspecting the equipment.

Increase in Commission

Q: The consultant, whom the Company is using to help with government relations, has recently asked us for a big increase of the commission. I suspect that the consultant may intend to hand over this money to local officials. What should I do?

A: Immediately report your suspicion to the Company's Legal Department or CFO. Until the company investigates your concern, the consultant's commission should not be increased. Any increase in commission should be justified on a business basis.

Political Activity

One of the key values of Auguste Cryogenics is to take care of ourselves, our communities, and the environment. The Company encourages personal participation in the political process, whether at local, national, or international level, as long as such participation complies with all applicable laws and guidelines of the Company.

No employee may lobby or seek to influence the activities of government officials without the permission of the **Board of Directors** with respect to legislation or other policy decisions in matters relating to the Company's business.

Personal Political Activity

- The company will not pay the employee for his or her personal political activity.
- Your employment will not be affected by your personal political views or your choice of political support.
- Do not use the Company's reputation or business assets, including your time at work, to support your own political activities or interests.
- If you plan to apply for, or accept, a public office, you must obtain prior approval from the **Board of Directors**.

Political Friend

Q: My friend is applying for a political office and I'd like to help him with the campaign. Is this allowed?

A: Yes. Your personal political activity is your business, but make sure you do not use Company resources to support your campaign, including time, e-mail, or name of the Company.

Employees have the ability to make contributions to a party or candidate on their own behalf, but may not contribute to any political party or committee, candidate for any office in any government or official using the Company's assets, property or services.

Political Contributions of the Company

In Auguste Cryogenics' practice, no corporate policy contributions are made to candidates in any country or region. Any exceptions must be approved by the **Board of Directors**. The Company's political contributions must be:

- Made in accordance with local laws; and
- Properly recorded in the Company's books and records.

Trade Restrictions

The Company must comply with all applicable trade restrictions and boycotts imposed by the US government. Such restrictions prohibit the Company from engaging in the certain business activities in certain countries and with the specific individuals and entities. Such restrictions include, for example, a ban on contact with the designated terrorist organizations or narcotics traffickers. Sanctions for non-compliance can be serious, including fines and imprisonment of responsible individuals, and the Company may be prohibited from continuing to participate in a particular trade.

The Company must also comply with the US anti-boycott laws, which prohibit companies from participating in any international boycott that is not permitted by the US government.

Information on Trade Restrictions and Boycotts

For any questions about your obligations regarding the US trade restrictions or boycotts, including trade restrictions that may be imposed on the governments other than the US Government, please, contact the Company Legal Department.

Dealing with Customers, Suppliers and Distributors

The Company values a partnership with its **customers, suppliers, and distributors**. Always treat these partners in the same way that we expect to be treated by them. **Do not engage** in any unfair, deceptive, or misleading practices. **Always** present the Company's products in an honest and open manner, and **do not provide, promise or offer** anything to the customer, supplier, or distributor in exchange for any inappropriate benefits for the Company.

We expect our suppliers and distributors to take no action contrary to the principles of our Code. Similarly, a participant in any supplier or distributor relationship should ensure that compliance with the Code is a condition of a contract between a supplier and a distributor.

EXAMPLES

Lengthy Report

The customer asked the sales manager to prepare a long and detailed report, including the product information, which might require a lot of effort to obtain. The sales manager filled the report with false data to quickly send something to the customer. The conduct was dishonest and constituted an unfair treatment of the customer.

Meeting with the Customer

Q: I am attending a customer meeting with another employee of the Company, and this other employee is doing something that I think is a deliberately false statement about our capabilities. What should I do?

A: Correct the error during the meeting, if possible. If this is not possible, after the meeting, report a problem with the employee to your supervisor or other responsible employees of the Company and ensure that the Company corrects misunderstanding of the customer. If you are right that the other employee intentionally misled the customer, the employee violated the Code. If this was an unintended mistake, it can be reported as such to the customer.

Negotiating with the Competition

Be careful when dealing with competitors and collecting information about competitors. These sensitive relationships are governed by different laws.

Competition Law

The core values of Auguste Cryogenics companies require fair competition in line with all applicable competition laws worldwide, without exception. Competition laws are complex and vary from one country to another, both within their scope and geographical reach. Admissible action in one country may be illegal in another and may also be subject to more severe penalties for violations.

Employees should consult the **Board of Directors** in order to understand the various competition laws and policies that apply to them.

Obtaining Competition Information

Employees should collect, share, and use the information about our competitors in a legal and ethical manner. Just as the Company values and protects its own non-public information, we respect the non-public information of other companies.

Acceptable Collection of Information

Gathering the competition information is acceptable through the publicly available information and ethical questioning. For example, you can collect and use the information from sources, such as:

- Publicly available submissions to the government agencies
- Public speeches of company executives

- Annual reports
- News and articles and publications from professional journals

It is acceptable to ask a third party about competition, or to accept the competition information offered by a third party only if there is no reason to believe that the third party is subject to a contractual or legal obligation not to disclose such information. You may not solicit or receive information, if you have reason to believe that the information was obtained improperly or illegally, and you may not induce any third party to breach a contractual or legal obligation to another person or organization.

Prohibited Activities

When collecting the competition information, always observe the following basic limitations:

- Never engage in any unlawful or illegal activity to obtain information about your competitors. This may include bribery, misrepresentation, theft, deliberate offense, interception, phone tapping, computer hacking, privacy violations, or garbage search.
- Do not accept, post or use the competition information that you know or have reason to believe has been provided to you in violation of a confidentiality agreement between a third party and one of our competitors.

EXAMPLES

Former Employer

Q: We have just hired an employee, who recently worked for one of our competitors. Can I ask an employee for information about our competitor?

A: Never ask a competitor's former employee for any information, in respect of which he has a legal duty of confidentiality, including, but not limited to, any business secrets or other confidential information. Consult the Company's Legal Department before inquiring about a former employer's business.

Competition Proposal

Q: During a meeting with a customer, the customer offered you a copy of a competitor's proposal for the same transaction, the participation in which the customer is now asking for. Should you accept it?

A: Maybe. First, ask the customer if they are bound by a confidentiality agreement that prohibits them from sharing this information with a third party. If the customer confirms that there is no obligation to protect the information, you can accept the information. If a competitor's proposal is labeled "confidential" or "protected", please, contact the Company's Legal Department before publishing or using the information.

Annexes

XX Code Management

XX Glossary

XX Resources

XX Board of Directors

XX Local Ethics Officers

Code Management

The Code is designed to ensure consistency as to how the employees behave in the Company and in their relationships outside the Company. Procedures have been developed to address potential violations of the Code to ensure consistency across the organization.

These guidelines may be amended as necessary to comply with the local laws and contracts, as no set of rules can cover all circumstances.

Responsibility

Responsibility for the management of the Code rests with the **Board of Directors**.

Investigation of Possible Violations of the Code

The Company views all reports of possible violations of the Code very seriously and is committed to maintaining confidentiality and conducting a full investigation of all allegations. Investigations under the Code will be conducted or managed by the Company's **Ethics and Compliance Committee**. Employees investigated for potential violations of the Code will have the opportunity to be heard before any final decision is taken. The Company complies with the applicable local complaint procedures.

Decisions

The **Board of Directors** shall take all decisions regarding violations of the Code and disciplinary action.

Disciplinary Proceedings

The Company seeks to impose disciplinary action commensurate with the nature and circumstances of any breach of the Code. Violation of a serious nature may result in suspension without remuneration, loss, or less increase in merit, failure to grant bonuses or equity options, and may include termination of employment due to the severity of the event.

If an employee is found to be in violation of the Code, then the record of the final decision and a copy of any disciplinary measure will be placed in the employee's personal file as part of the employee's record.

Report of the Decision and Investigation under the Code

Ethics and Compliance Committee regularly reports any outstanding investigations under the Code and final decisions, including any disciplinary proceedings taken, to the **Board of Directors**.

Signature and Acknowledgement

All new employees must sign a confirmation to indicate that they have read the Code and agree to comply with the provisions thereof. All employees will have to sign such confirmations at regular intervals. Not reading the Code, or not signing the confirmation form, does not justify the employee from violating the Code.

Glossary

The Glossary defines some terms used in the Code of Ethics. If these definitions or other terms or concepts used in the Code are still unclear, please, contact the **Local Ethics Officer** or the **Board of Directors**.

Term	Definition
Anything of value	Anything that could be of value to a government official, including cash, gifts, hospitality, entertainment, business opportunity, company product, job offers, and more. There is no monetary threshold and any amount could be interpreted as a bribe.
Bribe	Giving or offering to give anything of value to a government official in order to influence his own decision. Local laws may provide a broader definition in some jurisdictions.
Company assets	It includes, but is not limited to, Company funds or product, employee time at work, including remote work from locations outside the Company, and work product, computing, systems and software, all communication devices, including telephones and wireless devices, copiers, scanners, fax machines, printers, event tickets, Company vehicles and proprietary information and Company trademarks and patents.
Collection of competition information	Information about our competitors.
Competitor	For the purposes of the provisions on the Conflict of Interest and Competitive Information Gathering only, "Competitor" means any business or entity, in the competition of which we are currently participating, or plan to engage, except the Auguste Cryogenics companies, which manufactures or sells any cryogenic products in wholesale, any parts or accessories; or any undertaking or body actively considering such an activity. The cryogenic industry is defined below.
Customer	Any business or person, to which Auguste Cryogenic companies sell the product that is subject to the Company's trademark. The independent, Company-authorized distributors that sell products with the Company's trademark are considered Customers.

Cryogenic industry	The cryogenic industry includes, but is not limited to, designing, manufacturing and selling all types of cryogenic bulk tanks, micro-bulk tanks, portable liquid bottles, LNG storage tanks, evaporators, vacuum insulated pipes, accessories and application systems, cryogenic trailers and transports, repair and installation of cryogenic equipment, containers filling beverages at very low temperatures, freezers and deep-frozen Dewar containers, and any supply of materials, spare parts, supplements and accessories.
Authorization to negotiate with the company with a freedom to adopt decisions	Power to influence the Company's choice of supplier or to significantly affect the Company's relationship with an existing or potential customer, supplier, or distributor.
Ethics and Compliance Committee	A Commission made up of senior representatives representing management and production functions and the Board of Directors, responsible for managing the Code.
Facilitating payments	Small payments to the government officials made to speed up or facilitate the obtaining of a prescribed measure or service, such as obtaining a standard license or telephone service.
Government officials	Employees of any government anywhere in the world, even low-ranking employees, or employees of the government-controlled entities. This term also includes political parties and party officials, political candidates, airport and customs officials; and employees of international public organizations, such as United Nations Organization.
Immediate relative	A spouse, parent, sibling, grandparent, child, grandchild, mother-in-law or father-in-law or a household partner of the same or opposite sex, as well as any other family member living with you in one household, or otherwise financially dependent on you, or on whom you are financially dependent.
Ethics Officer	Employee of the corporate administration appointed by the Board of Directors of the Company

<p>Essential non-public information</p>	<p>Non-public information that could reasonably affect the investor's decision to buy, sell or retain the Company's securities. Examples include a significant merger or acquisition involving the Company, the Company's profit or loss or results of voting before they were announced, and changes in control of the Company's senior management. Many other issues can also be significant. If you are unsure, whether the non-public information, of which you are aware, is material, contact the Board of Directors of the Company.</p>
<p>Non-public information</p>	<p>Any information not disclosed or made available to the public by the Company, which may include the information regarding employees, inventions, contracts, the strategic and business plans, significant changes in management, new products on the market, mergers and acquisitions, technical specifications, prices, proposals, financial data and product cost.</p>
<p>Supplier</p>	<p>Any reseller of the Company's product or service, including consultants or manufacturers. This definition also includes any supplier that the Company is actively considering using, even if no contract is finally awarded.</p>
<p>US Anti-Corruption Practices Act</p>	<p>The law prohibits payments and payment offers of anything of value to the foreign officials, political parties or candidates for a foreign political office in order to acquire, maintain or direct business.</p>

Policies and Guidelines

The Code does not address all kinds of behavior in all workplaces. The Company has other policies and guidelines that may provide further guidance on matters covered by the Code, or address behavior that is not covered by the Code. Here is a list of some of these policies. All these policies are available on the [HR Portal](#).

- **Anti-Corruption Policy**
- **Drug and Alcohol Use Policy**
- **Anti-Harassment and Discrimination in the Workplace Policy**
- **Complaint Process Policy**
- **Privacy Policy**
- **Progressive Disciplinary Measures Policy**
- **Archiving Policy**
- **Travel and Hospitality Policy**
- **Labor Rights Policy**

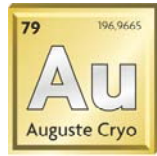
Ethics and Compliance Committee

The Board of Directors will be happy to answer any questions you may have regarding the Code or policies of the Company that refer to the compliance, or discuss any of your concerns you may have about the Code.

Robert Cushman	++ 1 310 710 5639
<i>President</i>	bcushman@augustecryogenics.com
Alexander Soltis	++421 903 725 429
<i>General Manager</i>	asoltis@augustecryogenics.com
Joseph Kuipers	++1 407 719 4123
	joek.augustecryogenics@gmail.com

Ethics Officers

Katarína Müllerová	++421 903 719 429
<i>Finance Manager</i>	kmullerova@augustecryogenics.com



**CONFIRMATION OF EMPLOYEE'S KNOWLEDGE OF THE CODE OF ETHICS OF
Auguste Cryogenics Slovakia s.r.o.**

Each employee of Auguste Cryogenics companies is responsible for confirming our Code of Ethics (hereinafter only the "Code"). You have been given access to the information contained in the Code in a physical or electronic form. The Code is available on the Company's **Human Resources Portal** or on the Internet in the "About Us" section of the Auguste Cryogenics Company homepage at www.augustecryogenics.com.

I confirm that I have received and read the Code of Ethics of Auguste Cryogenics companies and understood my obligations in line with the policies, principles and values set forth in this Code. I understand, which types of behavior violate this Policy. I agree to abide by the terms of the Code now and in the future and I understand that violations of these terms may lead to a disciplinary action and termination of employment. If I need any clarification on the Code, I will contact a representative of the Company to make sure I understand it.

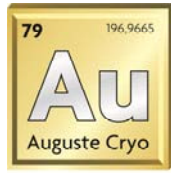
I further understand that my agreement to comply with this Code does not constitute an employment contract.

Date: _____

Employee signature

Printed name Employee

Company name



**CONFIRMATION OF EMPLOYEE'S KNOWLEDGE OF THE CODE OF ETHICS OF
Auguste Cryogenics Germany GmbH**

Each employee of Auguste Cryogenics companies is responsible for confirming our Code of Ethics (hereinafter only the "Code"). You have been given access to the information contained in the Code in a physical or electronic form. The Code is available on the Company's **Human Resources Portal** or on the Internet in the "About Us" section of the Auguste Cryogenics Company homepage at www.augustecryogenics.com.

I confirm that I have received and read the Code of Ethics of Auguste Cryogenics companies and understood my obligations in line with the policies, principles and values set forth in this Code. I understand, which types of behavior violate this Policy. I agree to abide by the terms of the Code now and in the future and I understand that violations of these terms may lead to a disciplinary action and termination of employment. If I need any clarification on the Code, I will contact a representative of the Company to make sure I understand it.

I further understand that my agreement to comply with this Code does not constitute an employment contract.

Date: _____

Employee signature

Printed name Employee

Company name