

## Power .....



# Code of Conduct

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## Foreword

Gender note: For reasons of better readability, the masculine form is used in this document for references to persons and personal nouns. Corresponding terms apply to all genders in the spirit of equal treatment. The abbreviated form of language does not imply any judgement.

All employees and business partners of Deutronic Elektronik GmbH (hereinafter: Deutronic) are bound by this Code of Conduct, which represents the minimum expectations regarding the principles and values of Deutronic. This also applies to employees who are employed through agencies or other intermediaries.

These guidelines are in accordance with applicable local laws, international norms and standards, principles and conventions such as:

- Universal Declaration of Human Rights
- Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)
- Core labour standards and conventions of the International Labour Organisation (ILO)
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination against Women and other applicable conventions
- Dodd-Frank Act
- UN Global Compact

Compliance with all applicable legal provisions is a prerequisite for becoming a business partner of Deutronic. This includes UN embargo measures and restrictive measures to combat terrorism.

## Labour and human rights

### Wages and social benefits

We are committed to pursuing a fair remuneration policy that complies with all national laws on remuneration and ensures an adequate standard of living. We respect the right of employees to fair remuneration and adequate social benefits. Wages and salaries for services rendered are paid regularly, punctually and in full in a legal tender. Deductions are only permitted under the conditions prescribed by law or specified in collective agreements. Partial payment in kind is permitted in accordance with ILO guidelines.

## Working hours

The maximum number of working hours per week specified by the respective country must be observed. Working hours comply with applicable national law, industry standards or relevant ILO conventions. Overtime must be voluntary and remain an exception; it must not lead to increased occupational risks. Employees are entitled to at least one day off after six consecutive working days.

## Harassment and discrimination

### ❖ **Prohibition of discrimination – Equal opportunities – Ethical recruitment**

We do not tolerate discrimination against our employees on the basis of their origin, nationality, gender, age, skin colour, religion or beliefs, sexual identity, disability, illness or pregnancy. We offer equal opportunities both when recruiting new employees and during the employment relationship.

We ensure that the recruitment of employees is based on ethical and fair practices. The selection, hiring and promotion of employees must be based on qualifications and skills.

We do not deceive potential employees or mislead them about the nature of the work. No employee may be subjected to verbal, psychological, physical, sexual or bodily violence, coercion or harassment.

### ❖ **Diversity – Equality – Inclusion**

We are committed to promoting diversity, equality and inclusion in the workplace and strive to ensure that the diversity of our society is reflected in the working environment, valued and understood as an asset.

## Human Rights

### ❖ **Rights of minorities and indigenous peoples**

Internationally recognised human rights are expressly and consistently supported. Even in the event of disciplinary measures, all company employees must be treated with dignity and respect. Such measures may only be taken in accordance with applicable national and international standards and internationally recognised human rights. We respect the rights of local communities, minorities, indigenous peoples and other vulnerable groups and strive to avoid any negative impact on them.

### ❖ **Women's rights**

We treat women fairly and equally in all matters. This applies in particular to recruitment, promotion, working conditions, remuneration and social benefits. We condemn any gender-based discrimination, exclusion or restriction that results in the recognition, enjoyment or exercise of human rights and fundamental freedoms.

❖ **Freedom of assembly – employee rights**

Deutronic and its business partners respect the right of employees to freedom of association, freedom of assembly and collective bargaining, to the extent that this is legally permissible and possible in the respective country.

❖ **Forced labour and human trafficking**

Any form of forced labour, debt bondage, serfdom and slave labour or slavery, as well as similar conditions, is rejected.

Employees must be granted the right to leave their job and terminate their employment relationship with their employer in compliance with the statutory or agreed notice period.

❖ **Child labour and young workers**

We strictly reject child labour and any form of exploitation of children and young people without exception, and we expect the same from our business partners. Children of school age (under 15 years of age) may not be employed even if the legal requirements of our supplier's country would permit this. Children must be protected from any form of exploitation. It must be ensured that young employees do not work at night and are protected from working conditions that endanger their health, development, safety and morals.

Any form of forced labour, debt bondage, serfdom and slave labour or slavery, as well as similar conditions, is rejected.

## Occupational health and safety – occupational safety

### Occupational health and safety

We understand occupational health and safety to mean measures to prevent accidents at work and work-related health hazards, including the humane design of work. It serves to ensure and improve the safety and health protection of employees at work through occupational health and safety measures.

Deutronic Elektronik GmbH distinguishes between:

- General occupational safety: Prevention of accidents at work
- Technical occupational safety: protection against hazardous work equipment and hazardous substances
- Social occupational safety: protection of vulnerable employees
- Medical occupational safety: health care

Measures to prevent work-related health problems and occupational diseases are included in health protection, with the aim of preventing the harmful effects (physical, psychological and social) of work on health.

Every manager is responsible for knowing the safety regulations and instructing their employees accordingly or ensuring that they are instructed by third parties. We and all supervisors and employees are equally responsible for consistent compliance.

All employees must comply with the applicable national and European legal regulations and the accident prevention regulations of the employers' liability insurance association as a minimum standard, as well as the corresponding work instructions. How these regulations are to be implemented in everyday working life is taught in an annual safety training course. Participation is mandatory for all employees.

Furthermore, all legal regulations also apply to external business partners who carry out work on our premises.

## Working conditions and environment

In addition to direct protective measures to prevent health and safety hazards, Deutronic Elektronik GmbH also ensures a healthy working environment and implements preventive measures. Particular attention is paid to:

### ❖ Use of operating resources

Unless private use is expressly permitted, all company equipment may only be used for business purposes and for the purposes for which it is intended. To ensure that all operating resources used comply with the relevant legal requirements, we keep all necessary approvals and tests up to date and train our employees to be extremely vigilant in order to prevent accidents at work.

### ❖ Handling of chemicals

Our employees are trained in the handling of chemicals and have strict instructions on the proper storage and handling of chemicals.

All technical data sheets, operating instructions and safety data sheets are meticulously and completely stored in the merchandise management system.

When chemicals are delivered, it must be checked whether a technical data sheet, safety data sheet and the corresponding operating instructions or a certificate stating that this is not necessary (e.g. email from the manufacturer) are stored in the merchandise management system. If nothing is stored, the purchasing department and, if necessary, the safety officer must be notified.

In order to minimise risks, it is strongly recommended that appropriate protective clothing, such as gloves or safety goggles, be worn. If you are unsure about how to handle or store chemicals, contact your supervisor immediately.

### ❖ Workplace ergonomics

As a further preventive measure against accidents at work and occupational diseases, all workplaces are set up and equipped in accordance with statutory and generally recognised safety and occupational health regulations. Great attention is paid to safety training for office workplaces, which prevents common complaints such as headaches, eye strain and back pain.



❖ **Health promotion**

All workplaces have ergonomic office furniture. We also offer aids and protective equipment as well as prevention programmes and health promotion measures that maintain and promote the health, performance and satisfaction of our employees. These include, for example, the option of bicycle leasing and membership of the neighbouring health centre.

In addition, we also provide clean and sufficient sanitary facilities as well as changing rooms, recreation rooms and break rooms, which are freely accessible to our employees at all times.

❖ **Emergency preparedness/prevention**

Our safety training covers, among other things, the correct use of personal protective equipment, the handling of hazardous substances and chemicals, skin and health protection, the use of technical equipment, behaviour in the event of fire or danger, and first aid measures. Training and compliance with these safety instructions and clear work instructions serve as preventive measures and, above all, protect all employees and anyone who enters the company building and production facility. The implementation of training and compliance is exemplified and monitored by the respective manager.

In addition, regular emergency training as part of the annual occupational safety training and test alarms, which are mandatory for all employees, ensure that procedures run smoothly and that technical equipment is checked.

❖ **Accident reporting**

If, despite all measures taken, an accident at work occurs, it must be reported immediately. This applies in particular to accidents at work that result in an employee or third party being unable to work. These must be reported to the relevant employers' liability insurance association as soon as possible and documented in the first aid log. Furthermore, trained first aiders are appointed who can initiate first aid measures in an emergency.

❖ **Fire protection**

Preventive training courses on fire protection and firefighting are held annually for all employees to teach them how to behave in the event of a fire and to raise awareness of fire prevention. In addition, trained fire safety assistants are appointed to answer any questions. All facilities and equipment are designed to minimise the risk of fire, which is ensured by regular maintenance and inspections (e.g. by the TÜV).

## Compliance with applicable law – export controls and economic sanctions

### Anti-corruption and anti-money laundering – economic sanctions

We do not tolerate any form of corruption and/or bribery.



All business partners are expected to comply with anti-bribery and anti-corruption requirements. If gifts are customary and polite in the respective country, it should be noted that no benefits may be offered or accepted that could impair objective and fair business decisions.

Our employees are prohibited from accepting or granting favours of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (order placement, project award, etc.). Violations will be punished in accordance with labour law.

Our business partners are also required to avoid conflicts of interest that pose a risk of corruption.

### Prevention of money laundering and terrorist financing

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility for compliance with the Code of Conduct. The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions. Deutronic Elektronik GmbH excludes any violation of economic embargoes and sanctions as well as regulations governing trade, import and export control regulations is also excluded by Deutronic Elektronik GmbH, as is the financing of terrorism.

### Antitrust and competition law requirements

We are committed to fair competition and comply with competition protection laws and regulations. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not participate in any anti-competitive boycotts.

## Data protection and data security – information security

The processing of personal data must always be in accordance with the General Data Protection Regulation, the applicable country-specific data protection regulations and information security law. If the processing of personal data is necessary and there is no legal basis for such processing, the consent of the data subject must generally be obtained.

We operate an information security management system (TISAX participant) that ensures that all information is processed securely. We implement effective mechanisms and processes to continuously monitor and improve this information security management system. Our protection goals focus on ensuring the confidentiality, integrity and availability of information. To achieve these goals, we have guidelines in place that regulate how information is handled. We protect ourselves from cyber security threats through targeted measures such as training

our employees and using appropriate technologies. All employees are required to comply with the existing IT regulations.

### Material and intellectual property

We are committed to protecting intellectual property of all kinds, keeping confidential information secret and ensuring that unauthorised third parties do not gain access to this knowledge. We respect the intellectual property of our competitors, customers and other business partners, comply with all requirements and conditions for its use, and adhere to all confidentiality obligations under contract and law. The strict obligation to maintain confidentiality must also be observed after the end of the cooperation with us.

With regard to tangible assets, we use the tools and technical equipment provided exclusively for operational purposes. We must treat these provisions with the same care that we would treat our own property. Use for private purposes must be expressly approved by the relevant authorities.

## Company policy on whistleblowing

### Why should a report be made?

It is about protecting the company from harm. Rule violations and misconduct by individuals damage the company. Integrity and legally compliant behaviour (compliance) form the basis for Deutronic's good reputation and for the trust of our customers and business partners. At the same time, compliance has a significant impact on the well-being of the company's employees and on its long-term economic success.

In order to achieve this and to be able to identify violations of laws and regulations in good time, remedy them immediately and, if necessary, punish them, we need the help of each and every one of you. We rely on your willingness to report any concrete suspicions of possible irregularities and violations. It is essential that our company investigates reports of suspected violations quickly and objectively.

### Who can be a whistleblower?

- Employees, including former employees, job applicants, interns, temporary workers
- Self-employed persons who provide services, freelancers, contractors, subcontractors, suppliers and their employees
- Shareholders and persons in management bodies

In addition, persons who support the whistleblower and persons who do not report the incident themselves but are the subject of the report or otherwise affected by it are also protected.

### Which violations should be reported?

Deutronic regulates the handling of the following violations for internal employees and external interest groups:

- Compliance violations of any kind
- Violations of the code of conduct
- Legal violations
- Violations of the Data Protection Act

This includes, in particular, the following topics:

- Environmental protection
- Human rights and labour rights of employees
- Transparent business relationships
- Fair market behaviour
- Due diligence to promote responsible raw material supply chains

### Process for handling incoming reports

Incoming reports are confirmed within seven working days and then checked for plausibility. If the report is justified, it is followed up accordingly. Within three months of confirmation of receipt of the report, the whistleblower must be informed of any follow-up measures planned or already taken, as well as the reasons for these.

Feedback is provided via the secure reporting channel regarding what will happen with the report, or questions are asked if any details are still unclear – personal data is used solely for the purpose of establishing contact.

The complainant or their representative will be consulted during the remedy/resolution process –unless the report is anonymous.

The effectiveness of the complaint procedure is evaluated at least once every 12 months.

### Whistleblowers – protection of affected parties

Whistleblowers are protected. Statements made by whistleblowers are treated confidentially. Their identity will not be disclosed if they so wish and if this is legally possible.

Discrimination or hostility towards whistleblowers and reprisals against whistleblowers will not be tolerated, but will be investigated and, if necessary, punished. Whistleblowers should disclose their identity to allow for follow-up questions that may be helpful to the investigation.

If the whistleblower requests that their identity not be disclosed to other departments within Deutronic, this will be ensured.

At the same time, however, whistleblowers and, where applicable, third parties who assist in reporting should be better protected. These individuals should not have to fear negative civil,

criminal or administrative consequences following a report. We expect the same approach from our suppliers.

The principle of fairness also applies to those suspected of misconduct, who must be treated with care. Until proven otherwise, the presumption of innocence always applies and circumstances that may exonerate them will also be investigated. However, the punishment of rule violations follows the principle of proportionality and takes into account the severity of the violation as well as the previous merits of the employee, their responsibility at Deutronic and the other circumstances of the individual case.

Anyone who accuses another person of a violation of the rules against their better judgement is committing a violation of the rules, which will be investigated and, if necessary, punished. If the investigation finds that no violation has been committed, the person suspected of the violation will, upon request, be supported in clarifying this in an appropriate and reasonable manner in their work environment in order to prevent damage to their reputation.

We confirm that we have a whistleblowing procedure in place through which employees can report internal misconduct, and we confirm that no consequences will be expected for individuals who report such misconduct within our organisation.

### Contact details for the whistleblower office

- Postal address: Deutronic Elektronik GmbH  
Whistleblower office /Compliance  
- confidential -  
Deutronicstraße 5  
84166 Adlkofen
- E-Mail: [whistleblower@deutronic.eu](mailto:whistleblower@deutronic.eu)
- Ombudsmann: Lawyer Christoph Dyk  
Altstadt 20  
84028 Landshut  
Tel.: 0871 92307-0  
Fax: 0871 92307-24

The ombudsman guarantees the anonymity of whistleblowers.

### **External whistleblower offices**

There are three external reporting offices in total: the Federal Office of Justice, the reporting office of the Federal Financial Supervisory Authority and the reporting office of the Federal Cartel Office. You can find further information on their websites.

[www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes\\_node.html](http://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html)

## Financial responsibility (accurate records)

Deutronic Elektronik GmbH adheres to the highest standards of honesty. It is essential that the internal and external reports and documents we prepare, publish or make available to the authorities are complete, appropriate, accurate, timely and understandable. In addition, accurate records and reports of financial information are necessary to make responsible business decisions. All financial books, records and accounts must accurately reflect transactions and events and comply with generally accepted accounting principles and the internal control system of Deutronic Elektronik GmbH.

## Plagiarism

Deutronic Elektronik GmbH is committed to applying, implementing and maintaining effective methods and processes to identify and minimise the risk of counterfeit parts and materials entering our supply chain. If they are detected, we will implement effective procedures to quarantine the product and notify the recipients of counterfeit products.

## Use of private or public security forces

We do not commission or use private or public security forces to protect a business project if, due to a lack of instruction or control in the deployment of security forces, the prohibition of torture and cruel, inhuman or degrading treatment is disregarded, life or limb is harmed, or freedom of association and coalition is impaired.

## Environmental protection

### Land, forest and water rights and forced eviction

When acquiring, developing or otherwise using land, forests and water resources that provide a livelihood for people, we do not participate in unlawful evictions or the unlawful deprivation of land, forests and water resources.

### Greenhouse gas emissions – air quality – noise emissions

We pursue the goal of reducing air pollution that may be caused by our operational activities.

Raising awareness among our employees, for example on the topics of reducing greenhouse gas emissions and promoting decarbonisation and air quality, is very important to us. The ongoing conversion of our sales vehicles to hybrid and electric vehicles electric vehicles, access

to "Job-Rad" for all employees, and training courses on reducing greenhouse gas emissions in both professional and private environments are measures included in our sustainability plan.

When it comes to noise emissions, we aim to minimise the impact of noise on people, animals and the environment, and we implement appropriate measures to achieve this goal.

### Energy efficiency and renewable energies

Deutronic Elektronik GmbH is committed to reducing energy consumption and using renewable energies to improve sustainability in the provision of the necessary energies.

### Decarbonisation

Through measures for decarbonisation and energy efficiency, Deutronic Elektronik GmbH is striving to achieve climate neutrality. We are convinced that the way in which energy is generated and used has a decisive influence on global climate change.

Raising awareness among our employees represents a potential for reducing energy consumption in our daily working lives.

### Water quality, consumption and management

Water is a finite, albeit renewable, resource that must be carefully managed to meet the basic needs of the population while respecting the needs of the environment.

Most of the effects of climate change, such as unpredictable rainfall, shrinking ice caps, floods and droughts, are related to water, so climate change and water are inextricably linked.

Against this backdrop, we strictly reject and condemn any form of water pollution. Deutronic Elektronik GmbH strives to keep the use and consumption of resources during production and service provision to a minimum. We therefore attach great importance to reducing or, in the best case, avoiding the consumption of raw materials, auxiliary and operating materials, water and energy.

Our quality management system makes a major contribution here by minimising faulty process results through preventive measures.

### Responsible chemical management

Chemical pollution can disrupt the delicate balance of the Earth's ecosystems. Mining, agriculture and waste disposal have led to significant soil contamination. The presence of heavy metals such as cadmium, mercury and lead can impair soil quality and reduce the number of microorganisms that support soil fertility.

We actively pursue the goal of counteracting the potentially negative effects of chemicals management on the environment and employees.

In this regard, legal and labour law requirements such as the REACH-Regulation, RoHS-Regulation and training courses on occupational safety when handling hazardous substances are an absolute prerequisite for safe use.

### Sustainable resource management

We are committed to using natural resources responsibly and contribute to the mindful consumption of energy, water and fuels. We reduce environmental pollution in the air, on land and in water, and use renewable energies as well as energy-efficient and resourcesaving processes.

### Waste prevention – reuse and recycling

The best waste is waste that is not produced in the first place. We are committed to complying with the legal and regulatory framework in the field of waste management and reject any form of improper waste disposal. Our focus is on continuously raising awareness among our employees and working with certified waste disposal companies to ensure professional waste disposal, separation and recycling.

We also sensitise our suppliers to refrain from using non-recyclable packaging materials, such as e.g. polystyrene flakes as filling material.

### Biodiversity, land use, soil quality, species diversity and animal welfare

The goals of species diversity, land use and deforestation are closely linked and should contribute to ensuring the sustainable use of resources and the preservation of **biodiversity**.

Here are some of the goals that are being pursued in relation to these topics:

- Preservation of species diversity
- Sustainable land use
- Halting deforestation
- Preserving soil quality
- Restoring habitats
- Protection of endangered species

In this context, we generally work in accordance with legal requirements and reject any form of illegal deforestation or unlawful damage to ecosystems. To ensure that our partners and suppliers do the same, we conduct appropriate surveys and evaluations.

### **Proactive action is required:**

Without exception, everyone in our company is responsible for implementing the standards set out in the guidelines. If you notice any illegal behaviour or behaviour that contravenes these guidelines, or if you have reasonable grounds for suspicion, you are obliged to report it\* or seek advice.



Examples of cases in which you should take action:

- Disposal of waste or residual materials in an unauthorised manner.
- Operation of facilities in violation of permits.
- Blatant violations of energy saving regulations.
- Imminent contamination of the soil and thus the groundwater due to leaking chemicals.
- Unauthorised discharge of substances into the sewer system or waterways.
- Removal of technical equipment to reduce emissions.
- Poor indoor air quality with potential pollution.

Note: Every manager is primarily responsible for communicating environmental protection regulations to employees and for instructing, training and supervising them. All employees are obliged to comply with environmental protection regulations and to proactively contribute to improvements.

\*In this context, please also note our company policy on the whistleblower office.

### Requirements for Tier 2 and Tier 3 suppliers

To ensure that our sustainability requirements, as a Tier 1 supplier, are met throughout the entire supply chain, we expect our suppliers to define and implement comparable standards. This includes regularly reviewing compliance with these standards and disclosing information about their supply chain.

In order to pursue a holistic sustainability strategy, we expect our suppliers to impose binding requirements on their own suppliers in order to pass on our standards. This ensures continuous improvement in terms of animal welfare, biodiversity, land use and deforestation, soil quality and similar sustainability aspects.

We expect our suppliers to fully support these principles and to continuously improve their business processes in order to meet these requirements.

## Conflicts of interest

Conflicts between the personal interests of our employees and the interests of Deutronic Elektronik GmbH are prohibited. Only objective criteria are relevant in business relationships with third parties.