

## Code of Conduct of Actronic-Solutions GmbH

Actronic-Solutions GmbH is a trading and service company and therefore we are highly dependent on trust. To prevent misunderstandings about our business practices and ethical principles - which are often caused unconsciously - clear rules of conduct are required for all employees, business partners and suppliers of Actronic-Solutions GmbH.

Actronic-Solutions GmbH is committed to responsible corporate governance based on internationally recognized standards, in particular within the framework of the Universal Declaration of Human Rights of the United Nations (UN), the ten principles of the UN Global Compact, the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD) and the labor and social standards of the International Labor Organization (ILO). The principles described below represent minimum standards. This does not restrict any further country-specific arrangements in accordance with the respective cultural conditions.

Accordingly, we as Actronic-Solutions GmbH also expect that our employees, business partners and suppliers with whom we maintain business relationships comply with the principles laid down in this Code of Conduct and also demand this compliance in the supply chain.

For better readability, only the shorter, masculine spelling has been used in this Code of Conduct. At this point, we expressly point out that all employees are addressed equally.

### 1. Human Rights

Social responsibility is an indispensable part of value-oriented corporate management and an essential factor for sustainable corporate success.

Actronic-Solutions GmbH supports the contents of the "Universal Declaration of Human Rights" of the UN General Assembly and commits itself to respect and protect them as far as we can influence them. Decisive for the protection of the interests of each individual employee, we recognize the core labor standards of the ILO ("International Labour Organization" of the United Nations) as a maxim for orientation and action. The following areas are included, among others: Prohibition of forced or compulsory labor; Prohibition of child labor; Freedom of association and right to collective bargaining within the framework of the law; Equality of pay for male, female and other workers for work of equal value; prohibition of discrimination in employment and occupation.

## Equal opportunities and discrimination

Any form of discrimination and harassment based on gender, skin color, religion, age, marital status, ethnic origin, disability or sexual identity as defined by the AGG will not be tolerated. Actronic-Solutions GmbH values equal opportunities in all aspects without exception. Employees are selected and treated solely on the basis of their abilities and performance.

## 2. Labor Standard

### Remuneration and working hours

We recognize the right of our employees to appropriate remuneration and comply with all provisions of the law regulating a general minimum wage in Germany. Actronic-Solutions GmbH complies with the applicable regulations on working hours.

### Health protection and occupational safety

Actronic-Solutions GmbH has set itself the goal of creating a safe and healthy working environment by applying high standards in occupational health and safety. With suitable measures we want to prevent workplace-related injuries and occupational diseases. For this purpose, a specialist for occupational safety and the advice of the Employer's Liability Insurance Association are available. Each employee is responsible for complying with safety regulations and for reporting any deficiencies with regard to safety regulations.

The use of drugs and alcohol at work and working under the influence of drugs or alcohol is prohibited. Any misuse of drugs, alcohol or medication can affect the safety and well-being of Actronic- Solutions GmbH employees and business partners, damage Actronic- Solutions GmbH's reputation or adversely affect company operations. Moderate consumption of alcohol is permitted on special occasions (e.g. celebrations) if the supervisor has approved this in advance.

### Employee development

We regard the development of our employees as an essential investment in the future of our company and job security. In addition to the development of professional skills, we also pay attention to the development of social and methodical competencies. Employee appraisals and periodic feedback meetings are firmly established in our company.

## **Innovation and development of internal processes**

Actronic-Solutions GmbH supports and promotes the innovation of its employees in all areas of activity. In particular, all suggestions for the improvement of internal company processes are welcome at any time.

## **3. Competition and Corruption Prevention**

### **Competition and Antitrust Law**

Actronic-Solutions GmbH respects the rules of an open and fair competition. Anti-competitive agreements with our business partners and agreements that violate antitrust law will not be tolerated.

### **Foreign Trade and Export Control**

National and international laws apply to the trade of goods, products and services. Actronic-Solutions GmbH complies with all applicable foreign trade and customs regulations when selling or purchasing goods, products or services across borders. All imports and exports are to be cleared properly and transparently.

### **Bribery and Money Laundering**

Actronic-Solutions GmbH will not engage in or tolerate corruption, extortion, embezzlement or bribery in any form at any time and expects the same from all business partners and third parties. Actronic-Solutions GmbH also expects its business partners to comply with all applicable laws to prevent money laundering and not to participate in any money laundering activities.

### **Conflicts of Interest, Handling of Gifts and Invitations**

We undertake not to accept or make any gifts that could lead to a conflict of interest. Gifts and gratuities that grant or promise unwarranted benefits may not be accepted or offered by any employee at any time. Benefits of any kind to civil servants or other public officials as well as to agents of government institutions, even indirectly via third parties, are prohibited, regardless of their value.

## **4. Handling Information and Data Protection**

Intellectual property is one of the most valuable assets. It is in the economic interest of Actronic-Solutions GmbH that patents, trademarks, brands, copyrights, company-specific knowledge, company-internal data and information, trade secrets and confidential information of Actronic-Solutions GmbH and our business partners and be protected. We therefore oblige our employees and business partners to

comply with the data secrecy according to the German law (DSGVO in addition to the general secrecy regulations (e.g. § 17 UWG)). In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for a purpose other than that which is part of the respective lawful performance of the task. This obligation to maintain data secrecy shall continue to apply even after the employee leaves the company.

## 5. Environmental Responsibility and other laws

Sustainability, environmental and climate protection as well as resource efficiency are important company goals for Actronic-Solutions GmbH.

Actronic-Solutions GmbH is committed to comply with existing national and international environmental laws and regulations as well as official regulations. Beyond the requirements of existing environmental laws and regulations, we are continuously working to reduce the negative environmental impact of our products and business activities. When it comes to consumables and purchases, we rely on regional products wherever possible under similar conditions and without increased expense, in order to maintain value creation and prosperity here. The continuous improvement in our environmental footprint and resource efficiency is the result of responsible handling and careful use of energy, water and other resources. High-quality products, technologically sophisticated solutions and a close personal relationship between our company and business partners contribute to the satisfaction of all parties involved.

### REACH, RoHS und Conflict Materials

Actronic-Solutions GmbH pays special attention to the compliance of its products with laws, regulations, directives and standards. Therefore, it is important for Actronic-Solutions GmbH that suppliers are aware of the applicable legal requirements regarding conflict minerals as well as REACH, RoHS, and ensure their compliance. In order to be able to provide complete information regarding compliance, we are dependent on our suppliers.

## 6. Implementation

The Code of Conduct represents binding rules that must be observed by every employee of Actronic-Solutions GmbH. In particular, the members of the management and all executives must act as role models in every respect. The code is the basis and guideline for coping with ethical and legal challenges in daily work.

Our suppliers and business partners are important links in the entire value chain of our companies' products and services. They are expected to conduct business according to the same high legal and ethical requirements and business practices as we do.

Questions regarding interpretation of or compliance with this Code of Conduct should be addressed to the management of Actronic-Solutions GmbH.

## Reporting Violations

Any employee with questions or concerns regarding this Code of Conduct may to his or her supervisor or the management. Actronic-Solutions GmbH assures that all reports of violations of this Code of Conduct will be handled discreetly and that no employee who reports a violation by another will suffer any disadvantage within the company.