

## Schaltbau GmbH Group – Code of Conduct for Business Partners

Dear business partners

As a globally operating group of companies, Schaltbau GmbH and its subsidiaries (hereinafter collectively referred to as the "**Schaltbau GmbH Group**") are active in numerous markets and thus faced with a broad range of requirements and challenges. Our corporate activities are governed by the principles of integrity and compliance with the law. In this context, we adhere to globally applicable standards, in particular the ten principles of the United Nations Global Compact Initiative ([www.globalcompact.org](http://www.globalcompact.org)). We expect our business partners to comply with all the laws and regulations relevant to their business activities as well as with the requirements of generally applicable standards and this Code of Conduct. Furthermore, the Schaltbau GmbH Group strives to continuously optimise its corporate activities and its products and services in the interest of sustainability. For this reason, we ask our business partners to contribute to achieving this aim by adopting a holistic approach.

The Code of Conduct for Business Partners is the basic document in which the Schaltbau GmbH Group sets out the minimum requirements that it expects of its business partners in order to procure materials responsibly and in accordance with reliable corporate principles. It is therefore important that business partners are familiar with this Code of Conduct and act accordingly.

We believe that long-term success can only be ensured if we, together with our business partners, live up to our corporate responsibility for human rights and environmental protection both locally and globally.

For this reason, the Schaltbau GmbH Group and the business partner agree that the following rules for a joint Code of Conduct shall apply to their future cooperation. This Code of Conduct shall apply as the basis for all future business relationships. The Schaltbau GmbH Group and the business partner jointly undertake to comply with the principles and requirements of the Code of Conduct. The business partner is required to contractually oblige its subcontractors to comply with the standards and regulations set out in this Code of Conduct.

We thank you for your support in this matter.

Steffen Munz

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### **I. Requirements that the Schaltbau GmbH Group places on its business partners**

#### **1. Respect for human rights**

The Schaltbau GmbH Group expects its business partner to respect the personal dignity, privacy and rights of each individual. No person may be compelled to work against his or her will. Any types of behaviour, including gestures, language and physical contact that are sexual, coercive, threatening, abusive or exploitative are also

expressly prohibited.

Within the scope of legal requirements, the business partner undertakes to comply with labour protection rights and, in addition, to comply with international minimum standards as set out in particular in the ILO core labour standards ([www.ilo.org](http://www.ilo.org)), the UK Modern Slavery Act 2015 and the Supply Chain Due Diligence Act. The Schaltbau GmbH Group considers the regular instruction of employees on human rights and working conditions to be a matter of course. In addition to compliance with the above-mentioned principles, the Schaltbau GmbH Group expects its business partner to pass on these obligations throughout the entire supply chain.

## 2. Prohibition of child labour

Child labour may not be used at any stage of production. The business partner is required to comply with the recommendation of ILO Convention 138 on the minimum age for the employment of children. Thus, the business partner may not hire employees who have not reached the minimum age, with the exception of trainees.

## 3. Prohibition of illegal employment and forced labour

The Schaltbau GmbH Group opposes all forms of illegal employment and forced labour. Thus, no forced labour, slave labour or any such comparable form of labour may be used. All work must be voluntary and employees must be able to quit their work or employment at any time. In addition, there may be no unacceptable treatment of employees, such as mental hardship, sexual or personal harassment. Furthermore, the business partner may not use any involuntary prison labour and/or victims of human trafficking.

## 4. Women's rights, rights of minorities and indigenous peoples

The Schaltbau GmbH Group respects the equal rights of men and women including the relevant legal and regulatory requirements. Furthermore, the Schaltbau GmbH Group observes all the legal and regulatory requirements regarding the equality of employees and expects the same from its business partner. Equality and the protection of minorities and indigenous peoples is also one of the criteria for the cooperation of the business partner with its customers and suppliers.

## 5. Fair working conditions, working time, remuneration and freedom of association

The Schaltbau GmbH Group creates fair working conditions. Working hours must comply with applicable laws and/or industry standards. Overtime is only permitted if performed on a voluntary basis and does not exceed the number of hours per week allowed by law in each case. All employees must be given the opportunity to resign from their jobs again after a reasonable period of time.

The business partner is required to pay its employees fairly and comply with local wage regulations and/or collective bargaining agreements. In the absence of wage regulations and/or collective bargaining agreements, the business partner is required to pay its employees in such a way that they can at least satisfy their basic needs. Payroll deductions as a penalty are not permitted.

The business partner is required to respect the right of employees to freedom of association, to join trade unions, to appeal to labour representation or to join works councils in accordance with locally applicable laws. Employees must be able to communicate openly with the company management without fear of reprisal or harassment.

## 6. Occupational health and safety

The business partner is required to provide a safe and healthy work environment for its employees. By establishing and applying appropriate occupational health and safety systems, necessary precautionary measures are taken against risks, accidents, damage to health and occupational diseases that may arise in connection with the activity. Employees must be provided with access to drinking water in sufficient

quantities and also to clean sanitary facilities.

Furthermore, it must be ensured, in particular through training, that all employees are sufficiently aware of the risks in the workplace.

#### 7. Promoting equality, diversity and inclusion

Discrimination against employees, in particular with regard to their ethnic and national origin, social origin, gender, skin colour, religion or world view, political opinion, disability, age, sexual orientation, genetic characteristics or ability, is inadmissible in any form and will not be tolerated. The personal dignity, privacy and personal rights of each individual must be respected at all times. Equality, diversity and inclusion are of crucial importance to the Schaltbau GmbH Group. The Schaltbau GmbH Group and its business partner create a working environment in which all people feel respected, accepted, supported and valued so that they can participate fully in decision-making processes and development opportunities within the company.

#### 8. Complaint mechanisms

The Schaltbau GmbH Group welcomes its business partner maintaining an effective complaints mechanism. If business partners are required by law to establish a whistle-blowing reporting channel for complainants, it must be set up in accordance with the law in such a way that complainants, persons who are the subject of the report, or other persons affected by the report are protected, in particular against reprisals or retaliatory measures such as dismissal.

### **II. Environmental protection and sustainability requirements in the supply chain**

In addition to complying with the relevant statutory environmental standards, the Schaltbau GmbH Group also promotes the sustainability of production and products in particular, uses resources sparingly and minimises the environmental impact in an effort to continuously improve environmental protection. The Schaltbau GmbH Group also expects this commitment from its business partner and therefore requires compliance with the following principles in particular.

#### 1. Compliance with material regulations and conflict minerals

The business partner is required to ensure that the goods delivered to the Schaltbau GmbH Group comply with the requirements of the statutory material regulations. The supplier is required to declare any substances that are included in the "List of Prohibited or Restricted Substances". The business partner is required to implement a Conflict Minerals Policy, to investigate the origin of these materials and to respond in a timely manner to any requests from the Schaltbau GmbH Group to demonstrate its compliance with these requirements.

With regard to the conflict minerals tin, tungsten, tantalum and gold as well as other raw materials such as cobalt, if the business partner processes conflict minerals in any of its products, it is required to establish processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guiding Principles to promote responsible supply chains for minerals from conflict and high-risk areas. Smelters and refineries without adequate, audited due diligence processes in place should be avoided.

#### 2. Water quality, consumption and management

The business partner is required to conduct its operations in full compliance with all applicable laws, regulations, and industry guidelines regarding water conservation, water use, water quality and wastewater. The business partner is required to endeavour to provide for measures in its operations to sustainably protect and ensure the quality of water.

#### 3. Biodiversity, animal welfare, land use, soil quality and deforestation

The business partner is required to comply with all relevant legal and regulatory requirements regarding biodiversity, animal welfare, land use, soil quality and deforestation in all its business activities.

#### 4. Land, forest, water rights, eviction

Forced evictions and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters must be avoided. All relevant national and international legal and regulatory requirements in this regard must be complied with and implemented.

#### 5. Dealing with air emissions and air quality

Air contaminants and harmful noise emissions from operations must be classified, routinely monitored, reviewed and, if necessary, treated prior to release so as not to adversely affect air quality in the long term. Exhaust gas purification systems must be monitored. The goal is to find economical solutions to minimise any harmful emissions.

#### 6. Handling of waste and hazardous substances and the use of raw materials and natural resources

Within the framework of the laws applicable to it, the business partner is required to handle, collect, store and dispose of waste in an environmentally friendly manner. Any chemicals or other substances that could pose a hazard when released into the environment must be identified and handled in a manner that ensures safety during their handling, transportation, storage, use, recycling, reuse and/or disposal. In the interest of sustainability, the business partner is required to ensure that, in addition to production development, the products themselves also use raw materials and natural resources sparingly and are as reusable as possible.

#### 7. Deployment of qualified security services

The business partner is required to ensure that, in the event that private or public security forces are commissioned or used, that they are sufficiently instructed and supervised to ensure that no violations of human rights, in particular no torture, cruel, inhuman or degrading treatment, injury to life or limb and no violation of freedom of association result from their use.

### III. Ethical business conduct

#### 1. Competition and antitrust laws

The business partner is required to uphold the principle of fair conduct in competition and comply with antitrust regulations. Any unfair price or bid rigging, market sharing agreements or abuse of a dominant market position are prohibited. The Schaltbau GmbH Group strongly disapproves of any such practices.

#### 2. Fighting corruption, including extortion and bribery

The Schaltbau GmbH Group expects its business partner not to promise or grant any benefits to Schaltbau GmbH Group employees.

The business partner may not offer or give bribes, kickbacks, illegal payments, inducements, gifts and/or other benefits of value in the course of business negotiations. Furthermore, the Schaltbau GmbH Group does not tolerate any inducements, offers or promises from business partners to public officials that are of value, likely to influence official action or result in an improper advantage.

The highest standards of integrity must be applied to all business activities. There must be a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards must be implemented to ensure compliance with anti-corruption laws.

#### 3. Anti-money laundering

The business partner is required to prevent money laundering and must take care to avoid any involvement in money laundering. The business partner is prohibited from acquiring, disposing of or transferring property and assets, concealing or disguising the nature of the proceeds and ownership, and possessing or using property and assets with the knowledge that they are derived from criminal activity. The act of moving any such funds or assets, or aiding and abetting in doing so in order to make proceeds appear legitimate is money laundering and strictly prohibited.

#### 4. Export controls and economic sanctions

Export controls and economic sanctions refer to restrictions on the export or re-export of goods, software, services and technology as well as applicable restrictions on trade with specific countries, regions, companies or organisations and individuals. The business partner is required to comply with the respectively applicable foreign trade laws, sanctions, embargo regulations and guidelines, particularly legal and official requirements, regarding export controls and economic sanctions.

#### 5. Conflicts of interest

Conflicts of interest can arise when a person's own interests conflict with the business interests of the company. Even the appearance of a conflict of interest is problematic if it creates the impression that a person's objectivity or independence may be compromised.

In order to avert any adverse consequences for Schaltbau, the Schaltbau GmbH Group expects its business partner to avoid any conflicts of interest that could adversely affect its business relationship with the Schaltbau GmbH Group. The business partner is therefore required to disclose any actual or even apparent conflicts of interest to the Schaltbau GmbH Group without delay and to resolve them as quickly as possible.

#### 6. Data protection, confidentiality and intellectual property

The business partner is required to comply with all applicable data protection regulations.

Any confidential information and personal data relating to employees must be protected. The business partner is required to collaborate with the Schaltbau GmbH Group to conclude appropriate agreements regarding confidentiality and to ensure the adequate protection of any confidential information received.

Confidential business data, particularly confidential information and/or secrets that are the property of the Schaltbau GmbH Group, must be protected from unauthorised access and may not be used or disclosed to third parties without prior consent.

When collecting, storing, processing, transmitting and/or forwarding confidential information, the applicable laws on data protection and information security as well as official regulations must be observed at all times. The intellectual property of the Schaltbau GmbH Group must be protected against misuse and securely stored and may only be used within the scope of business cooperation with the Schaltbau GmbH Group.

### **IV. Implementing the requirements of the Supply Chain Due Diligence Act and the consequences of any violations**

The Schaltbau GmbH Group considers the provisions of this Code of Conduct to be essential for the business relationship with the business partner and is committed to implementing the applicable legal requirements contained in the German Supply Chain Due Diligence Act. In order to safeguard the supply chain with regard to human rights and environmental expectations, compliance with the provisions contained herein is essential for the business relationship between the Schaltbau GmbH Group and its business partner.

If the business partner falls within the scope of the German Supply Chain Due Diligence Act, the following applies:

The Schaltbau GmbH Group expects its business partner to analyse any human rights and environmental risks for themselves and their suppliers to an appropriate extent within the framework of an appropriate risk management system and to define preventive or remedial measures to prevent any violations. The business partner is required to ensure that the human rights and environmental expectations of the applicable Supply Chain Due Diligence Act are met and appropriately addressed along the entire supply chain. The Schaltbau GmbH Group expects its business partner to provide its personnel with appropriate and regular training and further education in accordance with the topics covered by this Code of Conduct.

Compliance with the standards and regulations set out in this Code of Conduct may be verified by the Schaltbau GmbH Group at any time, including by means of audits.

The Schaltbau GmbH Group reserves the right to take appropriate measures against any business partner who fails to comply with the requirements set out in the Code of Conduct and, in particular, with regard to the provisions of the applicable German Supply Chain Due Diligence Act, or who seriously violates such requirements, which may ultimately lead to the suspension or termination of a business relationship.

#### **V. Information on legal violations and contact with the Schaltbau GmbH Group**

The Schaltbau GmbH Group wishes to encourage its business partner to report any legal violations within the Schaltbau GmbH Group's sphere of responsibility without delay as soon as they are either observed or highly likely to occur. The business partner does not have to fear any disadvantages, provided that the respective information was provided to the best of its knowledge and with honest intentions.

Any suspected case or violation can be reported to the Schaltbau GmbH Group via the complaint channels listed on the website.

#### **VI. Modifications**

The Schaltbau GmbH Group reserves the right to modify this Code of Conduct at any time. The business partner is required to examine any modified versions at the request of the Schaltbau GmbH Group and should not unreasonably withhold its consent to the new version.



## VII. Acknowledgement and agreement of the business partner

By signing this Code of Conduct, the business partner undertakes to act responsibly in accordance with the principles set out in the Code of Conduct and in compliance with all laws applicable to the business partner. The business partner confirms that it agrees in a binding manner with its employees, agents, subcontractors and suppliers to the content of this Code of Conduct as a basis for business and ensures compliance with it throughout the supply chain.

Compliance with these principles is hereby expressly confirmed:

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Place, date

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Signature

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Name (in capital letters), function

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Company stamp

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Company name

This document must be signed by an authorised representative of the company and returned to Schaltbau GmbH within 20 working days of receipt.

