# **Code of Conduct**

for suppliers of DESETEC SPANNTECHNIK

DESETEC SPANNTECHNIK is committed to ecologically and socially responsible corporate management. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into the corporate culture. Furthermore, we strive to continuously optimise our entrepreneurial actions, our products and our services in terms of sustainability and ask our suppliers to contribute to this in terms of a holistic approach.

For future cooperation, the contractual partners agree on the validity of the following regulations for a common Code of Conduct. This agreement shall apply as the basis for all future deliveries. The contractual partners undertake to comply with the principles and requirements of the Code of Conduct. Suppliers are requested to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signature. A breach of this Code of Conduct may be reason and cause for the company to terminate the business relationship including all related supply contracts. The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on "Business and Human Rights" and the international labour standards of the International Labour Organization. We expect our suppliers to comply with all relevant laws and regulations as well as the requirements of national and international standards.

#### 1. Compliance with applicable Laws and Regulations

Our suppliers shall comply with all national and international laws and regulations within the scope of their business activities. This also applies to countries from which Desetec Spanntechnik suppliers procure goods or services.

# 2. Treatment of employees

# 2.1 Human and labour rights :

No forced labour, slave labour or work comparable to forced labour may be used. All work must be voluntary and workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychic hardship, sexual and personal harassment.

#### 2.2 Elimination of forced labour :

No forced labour, slave labour or work comparable to forced labour may be used. All work must be voluntary and workers must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychic hardship, sexual and personal harassment.

#### 2.3 Prohibition of child labour :

Child labour must not be used at any stage of production. Suppliers are requested to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory education ends and in any case not less than 15 years.

# 2.4 Prohibition of discrimination :

Discrimination of employees in any form is inadmissible. This concerns, for example, discrimination based on gender, race, caste, skin colour, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

# October 2022

2.5 Freedom of association

The supplier shall respect the right of workers to freedom of association, to join trade unions, to call on labour representation or to join works councils in accordance with local laws. Workers shall be able to communicate openly with management without fear of reprisal or harassment.

# 2.6 Health protection - Safety at work

The supplier is responsible for a safe working environment that takes adequate precautions to protect health. Necessary precautionary measures are taken against accidents and harm to health that may arise in connection with the activity by setting up and applying appropriate systems of work safety. In addition, employees are regularly informed and trained on applicable health and safety standards and related measures. Employees are provided with access to drinking water in sufficient quantities and access to clean sanitary facilities.

# 2.7 Fair remuneration

The remuneration paid to the workers shall comply with all applicable laws on remuneration, including, for example, laws on minimum wage or overtime. If the legal minimum wage is not sufficient to cover the cost of living, the business partner is obliged to pay remuneration that covers basic needs. Wage deductions as a punitive measure are not permitted. The basis on which workers are remunerated shall be made known to the employees on an ongoing basis by means of a wage slip.

# 2.8 Fair working times

The working hours must comply with the applicable laws and industry standards. Overtime is only permit- ted if it is performed on a voluntary basis and does not exceed a total of 12 overtime hours per week. After six consecutive working days, an employee is to be provided with at least one day off. The total weekly working hours cannot regularly exceed 48 hours.

# 2.9 Complaints mechanisms

The supplier is responsible for establishing effective complaints mechanisms at the facility level for individuals and groups who may be affected by negative impacts.

# 3. Environmental protection

# 3.1 Sustainability

The Supplier obligates himself to observe the applicable environmental laws, regulations and standards. In particular, the Supplier strives to minimize environmental impacts and dangers and to observe environmental protection in daily business operations.

# 3.2 Conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in compliance with the Organisation for Economic Cooperation and Development (OECD) Guiding Principles on the Conduct of Responsible Supply Chain Management for Minerals from Conflict and High-Risk Areas and expects its suppliers to do the same. Smelters and refineries without adequate, audited due diligence processes should be avoided.

# 4. Business ethics

# 4.1 Fair competition

The standards of fair business, fair advertising and fair competition shall be complied with. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions in dealings with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to autonomously determine their prices and other conditions when reselling.

# October 2022

#### 4.1 Integrity - Bribery - Acceptance of Benefits

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

#### 4.3 Integrity/corruption, personal gains

The highest standards of integrity are to be applied to all business activities. The supplier must pursue a zerotolerance policy regarding the prohibition of bribery, corruption, extortion and embezzlement. Pro- cesses for monitoring and implementing norms are to be applied in order to ensure compliance with anti- corruption laws.

#### 4.4 Intellectual property

Intellectual property rights are to be respected; transfers of technology and expertise are to be carried out in such a way that intellectual property rights and customer information are protected.

#### 4.5 Privacy/data security

The supplier commits to fulfil the reasonable expectations of the client, subcontractors, customers, consumers and employees concerning the protection of private information. In the collection, storage, pro- cessing, transmission and transfer of personal information, the supplier is to observe the laws on data protection and information security as well as the regulatory requirements.

#### 4.6 Export business

The supplier observes and complies with the statutory export controls, export and trade sanctions as well as the national and international custom regulations.

#### 5. Implementation of the requirements

We expect our suppliers to identify risks within supply chains and to take appropriate measures. In the event of suspicions of violations and to safeguard supply chains with increased risks, the company will demand disclosure of the supply chains. The company verifies compliance with the standards and regulations listed in this document by using self-assessment questionnaires and sustainability audits at the suppliers' facilities. The company reserves the right to take appropriate measures against suppliers who do not meet these requirements, which may ultimately lead to the suspension or termination of a supplier relationship.

#### 6. Acknowledgement and agreement of the supplier

By signing this document, the supplier commits to act responsibly and adhere to the principles and requirements specified herein. The supplier commits to communicate the content of this Code in a comprehensible manner to employees, contractors and subcontractors and to make all necessary arrangements to meet the requirements.

DESETEC SPANNTECHNIK Owner Türker Halimler (Dipl.-Kaufm.)