

GEDA®

O R I G I N A L

CODE OF CONDUCT



Preamble

Innovations in our society are not conceivable without the electronics and digital industry (German Electro and Digital Industry Association – ZWEI) and machine and plant engineering (German Mechanical Engineering Industry Association – VDMA). In both these industry sectors, small and medium-sized companies in particular use their products and

applications to create future-proof solutions for protecting the climate, saving resources and securing jobs while contributing to social and economic development worldwide. All actions are in compliance with the applicable legal conditions and a fundamental responsible and ethical understanding that is set out in this joint Code of Conduct.

1. Fundamental understanding

This Code of Conduct is based on a joint fundamental understanding of socially responsible corporate management in accordance with the following guidelines.

We, the undersigned company

GEDA GmbH

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86663

Germany

Asbach-Bäumenheim

within the scope of our respective means, abilities and scopes of action, accept responsibility by taking into account the consequences of our business decisions and actions with respect to legal, economic, technological, social and ecological aspects. This allows us to contribute to the social and economic development of the countries and regions where we are active.

Our actions are in compliance with the applicable legal regulations. We focus on ethical values and principles, in particular on integrity and honesty as well as respect for the dignity of all people, as set out in the principles of the Universal Declaration of Human Rights by the United Nations

(UN), the OECD Guidelines for Multinational Enterprises, the core labour standards of the International Labour Organization (ILO) and the UN Guiding Principles on Business and Human Rights.

This Code of Conduct defines the basic principles of our actions and we require our employees worldwide to adhere to these. The contents apply at all sites and business units of our company.

We expect the same fundamental understanding from our business partners. This does not constitute any rights for the benefit of third parties.

2. Compliance with legislation

Compliance with the applicable legislation and other legal regulations of the countries where we work is a matter of course for us. Where local legislation and regulations are less restrictive, our actions are based on the principles of this Code of Conduct. In the case of a direct contradiction between man-

datory local legislation and the principles in this Code of Conduct, the local legislation takes precedence. We strive, however, to adhere to the contents of this Code of Conduct.

3. Integrity and compliance

We have taken suitable compliance² measures to appropriately cover the following topics:

3.1 Corruption

We tolerate neither corruption, bribery nor blackmail. These practices prevent fair competition. Gifts that are linked to an intention or could give the impression of influencing business decisions or obtaining any other undue advantage are not promised, offered, granted, requested or accepted

in our business relationships and we also accept no such promises. A particularly strict standard has to be applied to interactions with persons to whom special criminal and liability rules (e.g. office holders) apply.

3.2 Fair competition

We act in accordance with national and international competition and antitrust laws and do not participate in price

fixing, in dividing of markets or in customer, market and bid rigging.

3.3 Prevention of money laundering

Money laundering refers to the procedure of infiltrating illegally obtained money or assets into the legal finance and economic cycle. We fulfil our legal obligations for the pre-

vention of money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally obtained assets.

3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property. Technology and know-how transfer must be conducted in such a way that intellectual property, customer information, trade secrets and non-public information are

protected. We adhere to the applicable legislation for protecting trade secrets and treat our business partners' confidential information accordingly.

3.5 Data protection

We process, store and protect personal information in compliance with the legal regulations. This means that personal information is collected only for legal, previously defined purposes and in a transparent manner. We process person-

al information only if suitable technical and organizational measures are in place to protect this information against loss, change and unlawful use or disclosure.

3.6 Export control

We undertake to adhere to the applicable legal standards for export control – in particular approval requirements as well as

export and credit support bans – when moving and exporting our goods.

3.7 Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could have an illegitimate influence on the business relationships.

If this is not successful, we disclose these conflicts.

² Compliance refers to adhering to legal provisions, regulatory standards, voluntary obligations and internal guidelines.

4. Health and safety

We maintain the health of our employees by taking suitable health and safety measures (e.g. implementation of a company health and safety management system) that appropriately cover the following topics:

- compliance with the applicable laws and orientation on international standards with respect to health and safety³
- suitable workplace design, safety regulations and provision of suitable personal protective equipment
- implementation of preventive checks, emergency measures, an accident reporting system and other suitable measures for continuous improvement
- enabling of access to a sufficient volume of drinking water and access to clean sanitary facilities for all employees

We ensure that all our employees have been instructed accordingly.

5. Remuneration and working hours

Remuneration is based on the applicable legislation and any binding collective agreements and is supplemented by the relevant national minimum wage laws. Employees are informed about the components of their work remuneration clearly, regularly and in detail.

We adhere to the applicable legislation and (international) work standards⁴ with respect to the maximum permissible working hours and ensure the following:

- The daily working hours, including overtime, do not exceed the respective legally permissible maximum limits.
- The weekly working hours, including overtime, do not exceed 60 hours even in exceptional cases, if such provisions do not exist.
- Employees have at least one whole day off per calendar week.

6. Compliance with human rights

We adhere to and support compliance with internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual,
- protect and grant the right to freedom of speech and expression and
- do not tolerate any unacceptable treatment of employees, such as physical or psychological hardship, sexual and personal harassment or discrimination.

6.1 Ban on child labour

We do not tolerate any child labour⁵. We do not employ anyone who cannot prove that they are at least 15 years of age and we ask for proof of age. In countries that fall under the exception for developing countries as per ILO Conven-

tion No. 138, the minimum age can be reduced to 14 years. We do not employ anyone for hazardous work who cannot prove that they are 18 years of age as per ILO Convention No. 182.

³ See ILO Work and Social Standards (ILO Guidelines on Occupational Health and Safety), SA 8000 Social Accountability, ISO 45001 Occupational Health and Safety Management Systems, etc.

⁴ ILO Convention No. 1 (Hours of Work (Industry) Convention), 1919) ⁵ ILO Conventions No. 79, 138, 142 and 182

6.2 Ban on forced labour

Forced labour, modern slavery or similar measures of false imprisonment are prohibited.⁶ Any work must be voluntary

and workers must have the opportunity to terminate the employment.

6.3 Freedom of association and collective bargaining

We respect the employees' right to freedom of coalition and freedom of assembly and the right to collective bargaining and wage negotiations⁷, in as far as these are legally per-

missible and possible in the respective country where we are active. If this is not permissible, we search for appropriate compromises for our employees.

6.4 Promotion of diversity and equal opportunities

We support equal opportunities and do not tolerate any discrimination⁸. We treat all people equally, regardless of sex, age, skin colour, ethnic origin, sexual identity and orienta-

tion, disabilities, religious affiliation, world views or other personal characteristics.

7. Environment, energy and climate protection

We act in accordance with the applicable laws and model our actions on international standards⁹ in order to minimise the negative impact on the environment and to continuously improve our activities for environmental and climate protection. We raise awareness for environmental protection and offer the necessary training measures. We have taken suitable environmental protection measures (e.g. implementation of a company environmental protection system) that appropriately cover the following topics:

- objective setting, definition and implementation of measures and their continuous improvement
- environmental aspects such as reducing CO₂ emissions, increasing energy efficiency and using renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, supporting resource efficiency, reducing waste, correct waste disposal and responsible handling of hazardous substances for people and the environment.

8. Handling of conflict minerals

We use due care to take measures for avoiding the use of conflict minerals in our products in order to prevent human

rights violations, corruption and financing of armed groups and the like.

9. Supply chain

We expect our suppliers to adhere to the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce this Code of Conduct in their supply chains.

We reserve the right to verify adherence to this Code of Conduct by our suppliers systematically and as the occasion arises, by means of, for example, questionnaires, assessments or audits.

If there are subsequently doubts regarding adherence to this Code of Conduct, the supplier will be asked to take suitable countermeasures and to report the process to their responsible contact at our company. If necessary, the cooperation will be terminated.

10. Consumer interests

If consumer interests are affected, we adhere to consumer protection regulations and to reasonable sales, marketing and information practices.

Increased attention is paid to groups in need of special protection (e.g. young people or pregnant women).

11. Implementation and enforcement

We make suitable and appropriate efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the content of this Code of Conduct and

are trained in the relevant topics as necessary. Violations of the Code of Conduct are not tolerated and can result in disciplinary action.

11.1 Communication

We use an open and dialogue-focused approach to communicate with employees, customers, suppliers and other

stakeholders regarding the requirements of this Code of Conduct and its implementation.

11.2 Information about violations

We offer our employees and business partner access to a protected mechanism for confidentially reporting potential

violations of the principles of this Code of Conduct.

If you have such information, please contact the following person/office directly or anonymously.

lieferkettengesetz@geda.de

12. Signature

Asbach-Bäumenheim, 19/03/2024

Place, date

Signature



Johann Sailer

Name of the authorised signatory

GEDA GmbH
Mertinger Straße 60
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Germany

Company address / company stamp

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