

Siteco Group Code of Conduct for Business Partners (January 2023)

This Code of Conduct defines the principles and requirements of Siteco Group (“SITECO”) for all its suppliers of goods and services, third party intermediaries, subcontractors as well as their group companies (“BUSINESS PARTNER”) regarding their responsibility towards society, the environment and the people taking part in the manufacture of goods and/or the performance of services.

General Commitment

The BUSINESS PARTNER must comply with the laws in all countries in which he operates, procures and/or sells goods and services. In case the local legislation requirements are lower than the standards of this Code of Conduct, the BUSINESS PARTNER is required to follow the Code of Conduct.

The BUSINESS PARTNER must implement due diligence processes in order to identify, prevent and mitigate risks for negative human rights and environmental impacts in his supply chains, including appropriate grievance mechanisms and reporting, based on the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises and respective guidelines.

The BUSINESS PARTNER must implement the requirements of this Code of Conduct into his entire supply chain.

Human Rights & Labor Practices

The BUSINESS PARTNER must respect all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations, heightened attention shall be paid to ensuring respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children, migrant workers, etc.

No Forced Labor

The BUSINESS PARTNER must not use nor contribute to slavery, servitude, forced or compulsory labor and human trafficking.

No Child Labor

The BUSINESS PARTNER must not employ workers under the age as defined in the ILO Conventions.

Anti-Discrimination

The BUSINESS PARTNER must promote equal opportunities and treatment of employees, irrespective of skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, age, etc.

The BUSINESS PARTNER must refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive, exploitative, etc.

Working Hours & Fair Wages

The BUSINESS PARTNER must recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining; neither disadvantage nor prefer members of employee organizations or trade unions.

The BUSINESS PARTNER must adhere to all applicable working-hours regulations globally.

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The BUSINESS PARTNER must pay fair wages for labor and adhere to all applicable wage and compensation laws globally.

The BUSINESS PARTNER must in the event of cross-border personnel deployment adhere to all applicable legal requirements, especially with regard to minimum wages.

Health & Safety of Employees

The BUSINESS PARTNER must act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.

The BUSINESS PARTNER must provide training to ensure employees are educated in health & safety issues.

The BUSINESS PARTNER must establish a reasonable occupational health & safety management system.

Grievance Mechanism

The BUSINESS PARTNER must provide access to a protected mechanism for his employees to report possible violations of the principles of this Code of Conduct.

Environmental Protection

The BUSINESS PARTNER must implement measures contributing to the protection of the environment during the product life cycle; design, development, production, transport, operating and disposal or recycling.

SITECO expects the BUSINESS PARTNER to strive to save valuable resources, consume less energy and generate less waste and emissions through sustainable use. For this reason, the products and services should continue to be extremely environmentally friendly in the future.

The BUSINESS PARTNER shall establish a reasonable environmental management system.

SITECO focuses on providing the market with products that enhance better standards of environmental performance. Consequently, the BUSINESS PARTNER shall commit to adopt a voluntary policy in the field of research in order to develop ecological products.

The BUSINESS PARTNER shall not only consider the environmental impacts of his products during their design phase, but also in his production and procurement processes as well.

The BUSINESS PARTNER must be focused on reducing the use of raw materials and resources as well as to eliminate the waste produced by all its activities, whenever possible.

Fair Operating Practices

Anti-Corruption & Bribery

The BUSINESS PARTNER must not tolerate any form of and must not engage directly or indirectly in any form of corruption or bribery and must not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

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Fair Competition & Intellectual Property Rights

The BUSINESS PARTNER must act in accordance with national and international competition laws and must not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

The BUSINESS PARTNER must respect the intellectual property rights of others.

Conflicts of Interest

The BUSINESS PARTNER must avoid and/or disclose internally and to SITECO all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.

Anti-Money Laundering & Terrorism Financing

The BUSINESS PARTNER must not directly or indirectly facilitate money laundering or terrorism financing.

Data Privacy

The BUSINESS PARTNER must process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

Export Control & Customs

The BUSINESS PARTNER must comply with the applicable export control and customs regulations.

Confidentiality

The BUSINESS PARTNER must maintain confidentiality of confidential or proprietary information during and after termination of the business relationship.

Product Integrity

The BUSINESS PARTNER shall develop, manufacture and supply products complying with the respective requirements regarding state-of-the-art Product Integrity, including but not limited to:

- Product Safety
Products must not lead to any unreasonable risk for people's health and safety and the environment. This applies to both the intended use and foreseeable misuse of the products as well as the usage of restricted materials.
- Product Compliance
Products must comply with the applicable legal and technical regulations in the country of manufacturing, country of assembly and as well in the country of use. This explicitly includes actively prohibiting the usage of any counterfeit parts (plagiarism) or material from unapproved sources along the supply chain.
- Product Cyber Security
Products must be protected against unauthorized manipulation which could potentially affect Product Safety or Product Compliance.

The BUSINESS PARTNER must notify any potential infringement to Product Integrity to SITECO immediately in writing.

Conflict Minerals

The BUSINESS PARTNER must monitor and document the origin, delivery and procurement of conflict minerals (i.e. tin, tantalum, tungsten or gold) contained in any item delivered to SITECO. In case a delivered item contains conflict minerals from conflict-affected and high-risk areas the BUSINESS PARTNER must inform SITECO in writing as soon as possible prior to delivery of the affected items.

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Business Continuity

The BUSINESS PARTNER shall perform constantly comprehensive activities of identifying and assessing risks with regards to the business continuity and supply chain.

The BUSINESS PARTNER shall define mitigation measures as well as backup and continuity plans for identified risks. The measures and plans shall be carried out and tested on a regular basis to minimize the impact of interruptions and disruptions for operations supporting SITECO business.

Audit

Upon request, the BUSINESS PARTNER shall provide SITECO with all necessary and/or requested documents that prove compliance with this Code of Conduct.

The BUSINESS PARTNER must inform SITECO immediately as soon as a breach of any of the principles of this Code of Conduct become known or is anticipated by him, along with providing a corrective action plan to cure such breach acceptable to SITECO.

Moreover, the BUSINESS PARTNER grants to SITECO the right, to the extent permitted under applicable law, to perform individual unannounced due diligence audits in a reasonable scope and when appropriate for the purpose of ascertaining the BUSINESS PARTNER's compliance with this Code of Conduct.

Termination

SITECO regards the provisions of this Code of Conduct, which SITECO may amend from time to time, to be essential for the business relationship between SITECO and the BUSINESS PARTNER.

If SITECO finds or suspects incidents of non-compliance with this Code of Conduct and SITECO informs the BUSINESS PARTNER hereof, SITECO expects the BUSINESS PARTNER to investigate and correct issues of non-compliance as soon as possible and within an agreed timeframe. In case of significant breaches or if the SUPPLIER does not show willingness to correct these issues, SITECO reserves the right to take appropriate legal action, hereunder measures to terminate the business relationship entirely or to promote, trace and enforce corrective actions.

The BUSINESS PARTNER will support SITECO's implementation of legally required and other due diligence processes by actively participating in related initiatives, e. g. self-assessment questionnaires.

Grievance Mechanism

The BUSINESS PARTNER is encouraged to report violations of this Code of Conduct to SITECO at the following addresses:

E-Mail: Compliance@siteco.de

Post: **Siteco GmbH**
Compliance Dept.
Georg-Simon-Ohm-Str. 50, 83301 Traunreut, Germany

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We hereby confirm that we share, respect, adhere to and apply the values as stated in the above Code of Conduct.

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Company Name

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Place & Date

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Signature

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Signature

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Function

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Function