

Innsbruck, 19 Februar 2024

Code of Conduct

Social & Environmental Corporate Responsibility

As an internationally operating company, we commit to carrying responsibility in ecological, economic, ethical, and social aspects, and have integrated this into our corporate culture. Our Code of Conduct is published as a notice, accessible at all times, and applies to all employees as well as all suppliers worldwide.

The following principles form the basis for all business decisions and actions:

Laws and Regulations

We commit to complying with the laws and regulations of the countries in which we operate. All applicable legal requirements at both national and international levels must be adhered to.

Corruption and Bribery

Any form of corruption or bribery is prohibited, both active and passive. Our business relationships should be based solely on objective and factual criteria.

Forced Labor

Forced labor of any kind is prohibited. This includes forced prison labor, servitude, and similar practices. Work must be voluntary and free from the threat of punishment.

Child Labor

Child labor of any kind is prohibited. If local laws do not establish a higher age limit, no person of compulsory school age or younger than 15 years (exceptions according to ILO Convention No. 138) may be employed. Workers under 18 years of age must not perform hazardous work and must not be employed in work that is harmful to the health, safety, or morals of children. Workers under 18 years of age may only work restricted hours at night, taking into account the requirements of their education.

Harassment

The personal dignity, privacy, and personal rights of each individual must be respected. Employees must not be physically punished or physically, sexually, psychologically, or verbally harassed or abused.

Remuneration

Remuneration, including overtime and special benefits, must comply with or exceed the level of applicable laws and regulations. Equal pay for equal work is important to us.

Working Hours

We commit to complying with the working time laws and the corresponding restrictions of the countries in which we operate.

Health and Safety

We commit to providing a safe and health-promoting working environment. Our operational health management also includes preventive aspects such as a good working atmosphere, healthy nutrition, and an HR vision that promotes self-responsibility and enjoyment of work. A company doctor is available for consultations twice a month.

Prohibition of Discrimination

All employees must be treated strictly according to their abilities and qualifications regardless of, for example, their skin color, race, nationality, social origin, disability, sexual orientation, political or religious beliefs, gender, or age, in all business decisions, particularly in hiring, promotion, remuneration, special benefits, training measures, dismissals, and terminations. Discrimination and bullying will not be tolerated.

Freedom of Assembly and Collective Bargaining

The right of employees to freedom of assembly and collective bargaining is to be acknowledged and respected.

Environment

The use and consumption of resources during production and the generation of any kind of waste, including water and energy, must be reduced or avoided. This can be achieved either directly at the source or through processes and measures, for example, by changing production and maintenance processes or company procedures, by using alternative materials, by savings, by recycling, or by reusing materials. Chemicals or other materials posing a hazard when released into the environment must be identified and handled in such a way that safety is ensured when handling these substances, during transport, storage, use, recycling, or reuse, and during disposal. We commit to complying with the relevant environmental and climate protection regulations and standards for our company in order to minimize burdens and continuously improve environmental protection. An environmental management system according to ISO 14001 has been implemented since 2006. We pay attention to minimizing potential environmental impacts (wastewater, waste, etc.) in our business activities and our supply chain.

Conflict Minerals

We take systematic steps to procure responsibly in order to avoid the use of conflict minerals in our supply chain, which directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo. We expect our suppliers to take due diligence measures in accordance with the OECD Due Diligence Guidance or other nationally or internationally recognized due diligence standards and ensure that the materials directly supplied to us are conflict-free from the DRC. We require suppliers whose products contain tantalum, tin, gold, and tungsten to provide this information using the standardized Conflict Minerals Reporting Template (CMRT) of the Responsible Minerals Initiative (RMI), which traces the metals in the supply chain.

Fair Competition

We adhere to the norms of fair business practices, fair advertising, and fair competition. Applicable antitrust laws apply, which prohibit agreements and other activities with competitors, especially agreements that influence prices or conditions. Agreements between customers and suppliers that are intended to restrict customers' freedom to independently determine their resale prices and other conditions are prohibited.

Money Laundering

Money laundering is not accepted. Therefore, we conduct risk-based checks on the identity of existing as well as potential suppliers. The legal provisions to prevent terrorism financing as well as sanctions, import and export controls must be complied with.

Integrity/Bribery, Extortion

The highest integrity standards underlie all our business activities. We maintain a zero-tolerance policy towards any form of bribery, corruption, extortion, and embezzlement. Our employees are strictly prohibited from offering or promising directly or indirectly anything of value to secure an undue advantage, obtain new business, or maintain existing business, nor are they allowed to accept anything of value themselves. This includes, for example, the acceptance of any cash or comparable benefits (e.g., jewelry/precious metals) or the acceptance of inappropriate invitations (e.g., hunting trips, sports events, etc.). If our employees find themselves in such a situation, they must immediately contact our management. Courtesy gifts up to a value of EUR 30.00 and the acceptance and issuance of invitations to deepen regular business contacts (e.g., dinner invitations) are exempt from this regulation.

Protection of Trade Secrets and Third Party Rights

Confidential information of any kind (e.g., intellectual property, business information, etc.) obtained in the course of cooperation is used exclusively in the interest of our customers and not for the pursuit of our own or others' interests.

Data Protection and IT Security

Compliance with data protection regulations is essential to us. Therefore, we take all necessary steps to ensure that the collection, processing, and use of data is transparent,

purpose-bound, traceable, and careful. We comply with the applicable laws and regulations of the country in which we operate, as well as IT security standards that ensure the integrity, availability, and confidentiality of the data entrusted to us. This includes appropriate measures and employee training on cyber threats such as social engineering or phishing, which target human vulnerabilities. Personal data of our customers, suppliers, and employees is treated strictly confidentially.

Supply Chain

Our suppliers are encouraged to also require their subcontractors to commit to complying with this Code of Conduct. Suppliers must adhere to the aforementioned values. Suppliers consider the above-established principles when selecting their own business partners in the supply chain and take appropriate measures to ensure compliance and, if necessary, provide evidence thereof.

Responsibility for Implementation and Reporting

We are responsible for complying with this Code of Conduct and expect the same from our suppliers. Our employees, customers, and suppliers have the opportunity to report any grievances or violations of rules:

A secure and confidential information exchange is available via the following link on our homepage (<https://www.electroterminal.com/whistleblowing/>). All information will be treated strictly confidentially, while we take appropriate measures to investigate the reported.



Walter Mittermueller

Geschäftsführender Gesellschafter