

Code of Conduct and Guidelines

Preamble

EUCHNER supplies high-quality, high-value products and services while implementing successful and sustainable business practices in its competitive environment.

We consistently comply with legislation, regulations and ethical principles.

Scope

EUCHNER GmbH + Co. KG and all its companies with management that reports directly or indirectly to EUCHNER (collectively referred to as "EUCHNER" below) have committed themselves to honesty and integrity in all their business processes involving employees, customers, suppliers, competitors and other parties.

Compliance

All employees, customers, suppliers and other business partners are required to report violations of these guidelines to the external compliance officer. The compliance officer can be contacted by email at

compliance@euchner.info or by mail at

Compliance
c/o EUCHNER GmbH + Co. KG
Postfach 10 01 52
70771 Leinfelden-Echterdingen
Germany

Rules

EUCHNER recognizes the ZVEI Code of Conduct published by the Zentralverband Elektrotechnik- und Elektronikindustrie e.V. (the German Electrical and Electronic Manufacturers' Association or ZVEI) and commits itself to strict compliance with the following rules:

I. Human rights, working conditions and the environment

a. Human rights

In accordance with the ZVEI Code of Conduct

b. Child labor and forced labor

In accordance with the ZVEI Code of Conduct

c. Working time, wages and benefits

In accordance with the ZVEI Code of Conduct

d. Diversity, equality, inclusion, ban on discrimination and harassment

In accordance with the ZVEI Code of Conduct

In addition, at EUCHNER applicants are hired based only on their qualifications (ethical recruitment).

- e. The rights of indigenous peoples and land, forest and water rights**
EUCHNER respects the land, forest and water rights and the culture, customs and religion of indigenous peoples. EUCHNER does not take or initiate illegal measures that will deprive someone of their livelihood.
- f. Freedom of association**
In accordance with the ZVEI Code of Conduct
- g. Health, safety and working conditions**
In accordance with the ZVEI Code of Conduct
- h. Environmental protection**
In accordance with the ZVEI Code of Conduct

II. Antitrust law and ban on corruption

EUCHNER is opposed to corruption, bribery and embezzlement of any kind. EUCHNER complies with the corresponding laws.

It also complies with the applicable money laundering and antitrust laws, as well as laws concerning trade practices, unfair competition and other laws regarding restrictions on trade or competition.

EUCHNER also complies with the relevant export control regulations, such as restrictions, embargoes and sanctions, that are applicable to the countries where it does business.

III. Integrity and corporate ethics

In accordance with the EUCHNER Compliance Guideline and the ZVEI Code of Conduct, plus:

- a. Financial responsibility**
EUCHNER is obligated to communicate truthfully with employees, customers, business partners, the public and regulatory authorities. We are aware of our responsibility to maintain complete, accurate and truthful business documents and records, including financial statements, quality reports, time records and expense reports. These are prepared on time and in compliance with applicable laws and generally recognized accounting principles.
- b. Disclosure of information**
Business documents and records from EUCHNER include all relevant data, test certificates and other documents required for financial and non-financial reporting according to applicable regulations and for the fulfillment of disclosure obligations.
- c. Conflicts of interest**
EUCHNER never allows personal interests to affect its business decisions in any way and strictly rejects any influence by these interests. EUCHNER bases its decisions exclusively on objective criteria. This avoids situations where personal or financial conflicts of interest could arise, such as when accepting or giving gifts.

d. Intellectual property and counterfeit products

EUCHNER respects and acknowledges third-party intellectual property. This includes intellectual creations such as inventions and designs and copyrighted works such as third-party image rights. EUCHNER uses intellectual property only if it has acquired the appropriate rights of utilization. Furthermore, EUCHNER keeps any counterfeit products it may discover off the market and reports them to the responsible authorities. The theft of intellectual property is strictly prohibited.

IV. Data protection

Protecting personal data and privacy is a key concern of EUCHNER. The company follows and complies with the corresponding laws. EUCHNER has therefore appointed a data protection officer to ensure compliance with data protection provisions.

V. Company property and principles of security

a. Business and trade secrets

EUCHNER has a wealth of expertise and extensive operational knowledge that must be protected.

Unauthorized disclosure or destruction of this information is therefore prohibited and may result in legal action.

b. Company property

EUCHNER protects company property, including third-party property that has been rented by the company or supplied to it for use or repair etc., against misuse, damage or loss.

c. Principles of security

EUCHNER promotes a strong culture of health, safety and security within the company. Health risks and hazards are assessed to protect employees from illness and accidents. Employees are trained to identify safety risks and unlawful actions and to report them immediately.

Leinfelden, 29. September 2023



Stefan Euchner
Managing Partner