

Code of Conduct and Guidelines

Preamble

EUCHNER supplies attractive, high-grade products and services while exemplifying successful and sustainable business practices in its competitive environment.
We rigorously follow all laws, regulations and ethical principles.

Scope

EUCHNER and all companies with management directly or indirectly subordinate to EUCHNER (collectively referred to as "EUCHNER" below) have committed themselves to honesty and integrity in all business processes involving employees, customers, suppliers, competitors and other parties.

Compliance

Every employee, customer, supplier or other business associate is encouraged to report violations of this Guideline to the company's compliance officer, who can be reached at <mailto:compliance@euchner.info> or by mail

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 Zentralverband Elektrotechnik- und Elektronikindustrie e.V. (ZVEI) and commits itself to strict compliance with the following rules:

I. Human rights, working conditions and the environment

- 1. Human rights**
In accordance with the ZVEI Code of Conduct
- 2. Child labor and forced labor**
In accordance with the ZVEI Code of Conduct
- 3. Working time, wages and benefits**
In accordance with the ZVEI Code of Conduct
- 4. Discrimination and harassment**
In accordance with the ZVEI Code of Conduct
- 5. Freedom of association**
In accordance with the ZVEI Code of Conduct
- 6. Health, safety and working conditions**
In accordance with the ZVEI Code of Conduct
- 7. Environmental protection**
In accordance with the ZVEI Code of Conduct

II. Antitrust law and ban on corruption

EUCHNER rejects corruption, bribery and embezzlement of any kind. EUCHNER observes the corresponding laws.

It additionally observes and follows the applicable antitrust laws, as well as laws pertaining to trade practices, unfair competition and other laws regarding restrictions on trade or competition.

EUCHNER also follows the relevant export control regulations, such as restrictions, embargoes and sanctions, that are applicable to the countries in which it does business.

III. Integrity and corporate ethics

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

1. Financial responsibility

EUCHNER is obligated to communicate truthfully with employees, customers, business associates, the public and regulatory authorities. We are aware of our responsibility to maintain complete, accurate and true business documentation and records, including financial statements, quality reports, time records and expense reports. These are prepared on time and in compliance with applicable laws and the generally recognized accounting principles.

2. 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.

3. Conflicts of interest

EUCHNER never lets personal interests affect its business decisions in any way, and strictly rejects any influence by such interests. EUCHNER bases its decisions exclusively on objective criteria. This avoids situations in which personal or financial conflicts of interest could arise, such as when accepting or giving gifts.

4. 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 and trade secrets

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 privacy officer to ensure compliance with data privacy protection provisions.

EUCHNER has a wealth of expertise and extensive operational knowledge to protect.

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

Leinfelden, January 15, 2021