

#### E.I.S. Code of Conduct

This Code of Conduct defines the principles of E.I.S. Electronics GmbH regarding its responsibility for mankind and the environment.

Our actions are based on responsible corporate management geared to long-term value creation. For this reason, we integrate suppliers and business partners directly into our sustainability strategy.

E.I.S. Electronics GmbH commits itself to comply with all applicable laws and regulations, to respect human rights and social standards and to protect the environment. This applies to our own companies and subsidiaries as well as to relations with our business partners. In doing so, we also support the principles of the United Nations Global Compact.

We also expect from our suppliers and business partners a proactive approach to the implementation of standards set out and that their activities comply with applicable national laws and this E.I.S. Code of Conduct.

For the sake of simpler language and without any intention of discrimination, only the male form is used in this text. Basically all genders are included.

#### E.I.S. hereby declares:

### Compliance with the law

to comply with the laws of the applicable legal system

# Behavior in the business environment

### Confidentiality and intellectual property rights

- to protect the confidential handling of business, financial and technical data as well as business correspondence
- not to misappropriate any material or copyright property of other companies
- to respect the intellectual property rights of others

# **Conflicts of interest**

to avoid all conflicts of interest that may affect business relationships adversely and to make all
decisions relating to its business activities with E.I.S. exclusively on the basis of objective criteria

### Ban on corruption and bribery

- not to tolerate corruption or bribery in any form and not to participate in any way, directly or indirectly, to influence official actions or to obtain unfair advantage
- to ensure that E.I.S. employees do not offer, promise or grant any benefits to employees of subcontractors or agents or related third parties with the aim of obtaining any order or other preferences in business dealings and that E.I.S. employees are required not to accept any gratuities for such reason
- to take action against corruption in all its forms, including racketeering and bribery

# Invitations and gifts

- not to misuse invitations and gifts to influence others
- to accept invitations and gifts to E.I.S. employees only if occasion and scope are appropriate and can be considered as an expression of generally accepted local business practice



not to claim any inappropriate benefits from employees of other companies

### Fair competition, antitrust law

- to act in accordance with national and international competition laws and not to participate in price fixing, market or customer division, market or offer arrangements
- to behave fairly in the competition and not to misuse a potentially dominant market position

### Supply chain

- to promote compliance with the contents of the Code of Coduct by its suppliers adequately
- to comply with the principles of non-discrimination in supplier selection and dealings with suppliers

# Money laundering

• to comply with the relevant legal obligations to prevent money laundering and not to participate in money laundering activities

# Human rights and social standards

#### Discrimination

 to promote equal opportunities and equal treatment for its employees and to prevent discrimination in recruitment as well as promotion and granting training and further training measures, regardless of skin color, race, nationality, social and ethical origin, any disability, sexual orientation, political and religious conviction, gender or age

### **Dealing with employees**

- to respect the personal dignity, privacy and personal rights of each individual
- not to tolerate unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment or discrimination
- not to tolerate behavior (including gestures, language and physical contact) that is sexual, coercive, threatening, abusive or exploitative

# Remuneration and working hours

- to ensure adequate remuneration and guarantee the national minimum wage set by law
- to comply with the maximum working hours laid down by law in the respective country

#### Freedom of association

• to recognize, as far as legally permissible, the freedom of association of employees and not to favor or disadvantage members of workers' organizations or trade unions

#### Health and safety of employees

- to comply with the applicable national legislation on health and safety at work
- to take responsibility for health and safety towards their employees
- to contain risks and ensure the best possible precautionary measures against accidents and occupational diseases
- to offer training and ensure that all employees are knowledgeable about occupational safety
- to establish and implement an appropriate occupational safety management

### **Compulsory labor**

- not to employ anybody against his will or force anybody to work
- not to tolerate forced labor, including forced prison labor, forced commitment or human trafficking



#### Ban on child labor

to refrain from any kind of child labor in our company

# Protection of the environment

- to comply with environmental protection regulations with regard to legal norms and international standards
- to minimize environmental pollution and to continuously improve environmental protection
- to establish and implement an appropriate environmental management system

### Conflicting raw materials

to take appropriate measures to avoid the use of raw materials in its products that directly or indirectly finance armed groups that violate human rights

### Compliance with the E.I.S. Code of Conduct

To report violations, in particular illegal business practices, suppliers, business partners and our employees may contact the management of E.I.S. Electronics GmbH. Management handles the communication with the whistle blower confidentially and passes on the identity only with the consent of the whistle blower.

The E.I.S. Code of Conduct is part of an internal evaluation of E.I.S. suppliers and business partners. In addition compliance with the principles and requirements of the E.I.S. Code of Conduct can be checked by suppliers, business partners and employees of E.I.S. by means of self-assessment.

Every violation of the mentioned principles and requirements will be considered as a substantial impairment of the contractual relationship. In the event of suspicion of non-compliance, E.I.S. reserves the right to demand information on the relevant facts for the purpose of clarification.

Furthermore, E.I.S. reserves the right to terminate without notice individual or all contractual relationships with suppliers, business partners and E.I.S. employees who provably do not comply with the E.I.S. Code of Conduct or do not strive or implement any improvement measures after a reasonable period of time has been set.

Bremerhaven, January 2019

Managing Director

Managing Director

Thomas Hauschi