

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

Responsible and lawful conduct

Responsible and lawful conduct is firmly embedded in the policies of ESG Elektroniksystem- und Logistik-GmbH. ESG acknowledges its social responsibility as part of society, business enterprise and employer. This Code of Conduct defines the principles and guidelines that ESG expects its business partners to comply with.

All suppliers, sales agents, contractors and other

partners are classed as business partners of ESG. The Code of Conduct is based on the UN Universal Declaration of Human Rights as well as the UN Global Compact and the ILO conventions on fundamental labour principles and rights.

ESG reserves the right to adapt and amend this Code of Conduct.

COMPLIANCE CODE OF CONDUCT FÜR GESCHÄFTSPARTNER

I. Social responsibility

1. Human rights

Our business partners shall comply with the international regulations for the protection of human rights. This shall apply, in particular, in terms of the creation and securing of fair, safe and social working conditions.

2. Discrimination

No person shall be disadvantaged, favored, harassed or bullied on the grounds of their race, ethnic origin, color, nationality, gender, religion, ideology, disability, age, sexual orientation or other characteristics. Our business partners shall agree to fight any form of discrimination.

3. Prohibition of child and forced labour

Child and forced labour shall be prohibited at any stage of the supply chain. The principle of freedom of choice of employment shall apply, according to which no person shall be forced against their will into compulsory labour nor shall they be restricted in their freedom of movement. Our business partners shall ensure not to employ any person beneath the minimum age specified in ILO Convention 138. Stricter national regulations shall be complied with accordingly.

4. Fair working conditions and freedom of association

Employees are entitled to receive the minimum wage stated by law for their labor. The agreed weekly working hours may not exceed the working hours stipulated by applicable national laws. Our business partners shall confirm that employees may join employee organisations, which may represent employees' interests, within the scope of applicable law.

5. Occupational health and safety

The applicable occupational health and safety regulations shall be complied with so as to prevent health hazards and measures shall be implemented to prevent accidents and occupational illnesses.

6. Environmental protection

The applicable environmental laws stipulate binding standards that shall be complied with in the respective business processes. Natural resources shall not be contaminated or wasted. An environmental management process which aims to ensure continuous improvements shall be implemented. Any permits required shall be obtained.

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II. Business relationships

1. Prevention of conflicts of interest

Business relationships shall be initiated and maintained exclusively on the basis of facts, i.e. quality, price, technological standard and reliability. They shall not be influenced by personal interests and relationships or promises of any kind. Non-tolerable business relationships are created, for example, if the contracting parties have contractual as well as non-contractual links, relationships or cooperations despite having different interests. Any actual or potential conflicts of interest shall be reported immediately to ESG.

2. Anti-corruption

Corruption and bribery are illegal and shall not be tolerated. This shall apply to our business partners as well as their suppliers, consultants and other partners. The prohibition to take or grant advantages shall apply to direct financial gratuities as well as other, direct or indirect

benefits or promises. When making donations or issuing sponsorship grants, it shall be ensured that these do not constitute an illegal gratuity.

3. Dealing with authorities, previous employees of authorities and procurement laws

Our business partners shall comply with procurement laws and regulations. This shall apply to the lawful treatment of private and/or confidential information. Former or current employees of government bodies shall be employed in compliance with all relevant laws, provisions and legal requirements.

The same shall apply to contracts and negotiations with government employees in terms of their potential employment with the company and their engagement as consultants or subcontractors.

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III. Market conduct

1. Anti-trust law

Our business partners shall comply with the applicable anti-trust laws. No agreements in breach of anti-trust laws shall be entered into with competitors or suppliers, particularly regarding prices, offers, terms and conditions of business, production programmes, sales quotas and markets shares, and with other bidders at public tenders.

2. Export control

The respective foreign trade, tax and customs laws shall be complied with. This shall apply to all imports and exports of goods, services and information as well as the diligent selection of suitable business partners.

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IV. Business secrets

1. Data protection

Our business partners shall comply with the applicable legal requirements. Personal information shall only be collected, processed or used if permitted by law and required under the circumstances. Stored information shall be appropriately protected against unauthorised access.

2. Information security and confidentiality

Data and information disclosed during daily business shall be used exclusively within the permitted scope. Confidential data shall not be transferred without authorisation internally and externally. The transfer of data shall be consistent with contractual terms and conditions.

Access to classified data shall be granted on the basis of its classification level, the measures defined in the security manual and the non-disclosure agreement with the responsible federal ministry. The handling of the data shall be in accordance with these guidelines.

3. Intellectual property

Our business partners shall comply with all third-party and intellectual property rights. Business and company secrets, industrial property rights and patents shall not be violated.

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V. Compliance with the Code of Conduct

Our business partners shall agree to endeavor to enforce the guidelines stated in the Code of Conduct within their companies and ensure compliance with the latter. They should prompt and encourage their suppliers along the supply chain to also comply with the guidelines stated in the Code of Conduct.

Our business partners shall implement and regularly review organizational measures to ensure compliance with the relevant regulations. They shall announce such measures within their companies.

Upon justified written request by ESG, in other words in the case of there being indications of material vio-

lations of the guidelines, our business partners shall provide satisfactory evidence that suitable measures have been implemented in their daily operations to prevent such violations. ESG may otherwise request an audit at the premises of the business partner. A material violation of the obligations stated in the Code of Conduct shall be regarded as a breach of contract by the business partner. ESG shall evaluate each case on its own merits and reserves the right to withdraw from or terminate the agreement and to terminate the business relationship. ESG may, at its discretion, choose not to enforce any of the actions stated above if the business partner implements countermeasures to prevent future violations immediately.