



Elektro-Automatik

# CODE OF CONDUCT

Basic rules and principles  
of the company

# PREAMBLE

This Code of Conduct reflects the key fundamental rules and principles that govern our actions. It represents binding rules that must be observed by management, executives and employees.

Similarly, we also expect all of our business partners (both suppliers and customers) and their employees to act in a way that is in line with our Code of Conduct. We will gladly support them in their efforts to meet this expectation. However, we will also take appropriate steps if we believe that our business partners do not fulfil this expectation. We also expect our business partners to do the same with respect to their own supply chains.



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# 1.

## Conduct in the context of business activities

- 1.1. Compliance with applicable law
- 1.2. Conflicts of interest
- 1.3. Relationships with business partners
- 1.4. Protection against corruption  
and bribery
- 1.5. Fair competition
- 1.6. Interaction with political institutions  
and public authorities





## 1.1. COMPLIANCE WITH APPLICABLE LAW

- We regard compliance with all applicable laws and regulations as standard practice. This is the only way to ensure the global success of our business. Any violation of applicable laws or regulations can result in severe consequences for both the company and employees, such as criminal prosecution, consequences under employment law, damages or damage to our reputation.
- We will act on all information received concerning violations. All violations will be stopped and appropriate action will be taken.
- Executives in particular have a duty to know the basic laws, regulations and internal company rules that are relevant to their area of responsibility.
- Stricter regulations than those described in this Code of Conduct may apply in individual countries, business segments or markets and/or vis-à-vis business partners. In these cases we must always apply the stricter regulations.





## 1.2. CONFLICTS OF INTEREST

- In our day-to-day work we may be faced with situations in which we need to make business decisions where the interests of the company conflict with our personal interests. Whenever there are conflicts of interest, we may no longer be able to make decisions impartially in the interest of the company.
- Employees with a potential or actual conflict of interest have a duty to notify their manager or the management of the conflict without undue delay in order to resolve this as soon as possible.



## 1.3. RELATIONSHIPS WITH BUSINESS PARTNERS

- Our business partners (e.g. customers, suppliers, sales representatives and consulting companies) expect to be able to rely on EA Elektro-Automatik as a business partner that acts in accordance with applicable law. This also requires that we are aware of the contractual duties we owe our business partners.
- We make our purchasing decisions fairly and with integrity based on objective criteria such as quality, price, service, reliability, availability, technical performance, satisfactory performance of contracts, efficiency of resources and energy as well as environmental compatibility.
- We implement appropriate measures to ensure that we do not engage in any transactions with third parties that violate applicable economic embargoes, sanctions lists, or trade, import or export control regulations or regulations to combat the financing of terrorism.
- We comply with our obligations to prevent money laundering and minimise the general risk of money laundering by carrying out due diligence on third parties.





## 1.4. PROTECTION AGAINST CORRUPTION AND BRIBERY

- We do not tolerate any form of bribery or corruption, neither of public officials nor in our interaction with business partners.
- Gratuities in the form of invitations or gifts are only allowed where they do not represent consideration for any undue advantage. Gratuities are not allowed if their value is excessive or if they disproportionately exceed the limits of usual business practice or the normal standard of living of the recipient. The acceptance or provision of gifts or invitations is subject to compliance with internal regulations and specifically the approval requirements.
- Both donations and sponsoring activities are allowed in general, but may not be used to unlawfully obtain business advantages. We do not engage in any kind of concealment of gratuities that could give rise to risks of corruption.





## 1.5. FAIR COMPETITION

- Almost all countries have laws that prohibit relationships and agreements with competitors, suppliers and distribution or trading companies that interfere with fair competition. This includes agreements on prices, the allocation of customers or sales territories between competitors, anti-competitive boycotts and other unfair methods of competition. Any violations we become aware of will be stopped immediately.



## 1.6. INTERACTION WITH POLITICAL INSTITUTIONS AND PUBLIC AUTHORITIES

- Business relationships with government entities are often subject to very strict requirements. In our interaction with governments and public authorities we always act honestly and transparently and in accordance with applicable law and our internal guidelines. This applies, for example, to interactions with public authorities in day-to-day operations (for required licenses, permits or the execution of contracts), to the representation of political interests or to inquiries from public authorities (requests for information, regulatory investigations, legal proceedings).
- We do not provide non-monetary gifts to public officials, we limit invitations extended by public officials to entertainment of a low value and consider all requirements for obtaining advice or approvals in advance.
- Where the company or employees require regulatory approvals, we will only engage in activities in the relevant business area after we have obtained such approvals. Where an approval is revoked or expires (including any transition periods), we suspend the relevant activity until we have obtained another or new approval.



# 2.

## Conduct in the context of cooperation

- 2.1. Speaking up
- 2.2. Mutual respect and trust







## 2.1. SPEAKING UP

- Speaking up whenever we have concerns is vital for ensuring that misconduct does not occur as frequently and/or is recognised early and corrected. We encourage all employees to engage in free and critical thinking and we value a working environment where employees can openly address critical situations with their managers or the management without worries. Executives shall encourage employees to speak up, support them and investigate concerns brought to their attention fairly and without prejudice.
- We do not tolerate any attempts to intimidate or retaliation against employees who report actual or suspected misconduct in good faith. "In good faith" means that the person is convinced that the representation of the facts is true, regardless of whether or not this is confirmed by a subsequent investigation.
- However, any report made by a person against their better judgement with the aim of falsely accusing another person constitutes a compliance violation that will entail the appropriate consequences.





## 2.2. MUTUAL RESPECT AND TRUST

- Everybody has the right to be treated fairly and with respect and dignity. We are committed to diversity, inclusion and equal opportunities and stand for a working environment characterised by respect and tolerance in which everybody is valued. We do not tolerate sexual harassment, discrimination, racism, bullying, the abuse of power, intimidation or threats or other forms of harassment.
- We do not tolerate any discriminating behaviour based on someone's ethnicity, nationality, gender, sexual orientation or identity, pregnancy or parental status, marital status, age, religion, philosophical beliefs or based on a disability or for other reasons subject to a prohibition of discrimination.





# 3.

## Corporate responsibility

- 3.1. Human rights
- 3.2. Policies relating to occupational health and safety
- 3.3. Environmental and climate protection





## 3.1. HUMAN RIGHTS

- We respect human rights, personal rights and the dignity of our employees and all third parties.
- We respect the freedom of association and the right to collective bargaining in accordance with applicable rights and regulations.
- Forced labour, child labour, all forms of modern slavery and human trafficking, as well as any form of exploitation, are prohibited at EA Elektro-Automatik and we ensure strict compliance with the related laws.
- We pay attention to fair working conditions for all employees. This includes compliance with the respective national regulations on working hours as well as the right to appropriate remuneration, which is at least based on the respective statutory minimum wage or applicable collective bargaining agreement. Likewise, all salaries, benefits and nationally prescribed social benefits agreed in the employment contract are paid or deducted.





## 3.2. POLICIES RELATING TO OCCUPATIONAL HEALTH AND SAFETY

- The responsibility for occupational health and safety is also an integral part of our corporate philosophy. Consequently, we aim to prevent anything that could be detrimental to the health of our employees.
- We are committed to protecting the health and safety of our employees and strive to continuously improve this. We ensure compliance with these principles through our internal safety and prevention system.
- We think and act in an environmentally responsible manner and make every effort to protect our employees against anything that could be detrimental to their health. When designing workplaces and work processes, we implement safeguards to prevent accidents and reduce adverse impacts on the environment.
- In our daily work we comply with all applicable laws, policies and standards relating to fire protection and occupational health and safety.
- We provide the necessary resources for training and supervision to ensure the occupational health and safety of our employees.
- We regularly monitor and evaluate the business activities that affect occupational health and safety and, where necessary, take steps to improve them.
- Everybody who works for our company is responsible for correct health and safety-related behaviour. This allows us to recognise potential risks to ourselves and all other people early and to mitigate or immediately eliminate these risks.





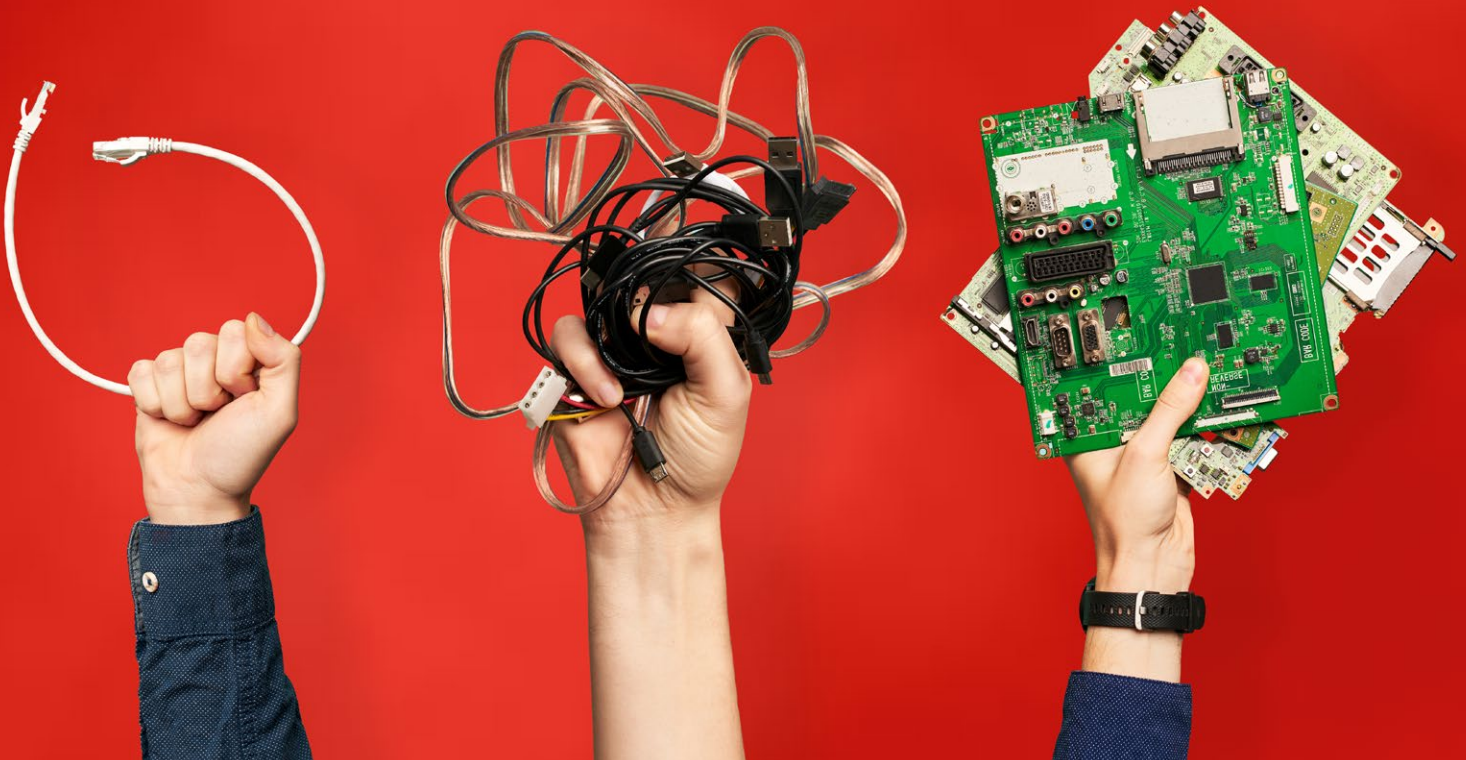
### 3.3. ENVIRONMENTAL AND CLIMATE PROTECTION

- We comply with the applicable national laws, regulations and standards for the limitation and prevention of adverse impacts on the environment. With respect to risks relating to the pollution of water, soil and air, we will implement appropriate measures to reduce and prevent these.
- Sustainability is important to us. Our products help in the development of green technologies. That is why we already use electricity from renewable sources (photovoltaic system) for our own consumption and thus actively support the reduction of greenhouse gases.
- Emissions are air contaminations, noises, vibrations, light, heat or radiation and similar impacts on the environment originating from facilities the type, extent or duration of which are likely to cause risks or a significant impairment or nuisance to humans, animals, plants, soil, water, the atmosphere as well as cultural and other material assets. Such emissions, in particular those of volatile organic chemicals, aerosols, corrosives, particles, chemicals destroying the ozone layer and by-products from service runs caused by incineration, are typified, reviewed and treated in a way to render the emissions harmless. We ensure that the noise caused by our company does not exceed the legal limits.
- The impeccable quality and the availability of the water in bodies of water and in the groundwater is the basis of life for humans, animals and plants and must not be impaired. For all processes we are very economical with respect to our use of water and, wherever possible, use circulation systems that allow us to use it multiple times.





- Wastewater is water whose properties are changed due to use for domestic, commercial, agricultural or other purposes. We ensure that wastewater from our operational processes, production processes and sanitary installations is treated as required before it is introduced into groundwater. The concentration of hazardous substances in the water, such as salts, heavy metals and their compounds, oxidisable substances, nitrogen, phosphorus and organic halogen compounds, as well as other chemicals, must be sufficiently low as to ensure that the wastewater does not produce any adverse impacts on humans or the ecosystem.
- We take actions to prevent and reduce waste. In this context we make sure that the handling, storage, transport and disposal of waste do not have any harmful impact on the air, soil, water or the health of our employees and are carried out by qualified persons. We make every effort to prevent explosions, ignitions and other sudden dangerous events.
- Where hazardous waste is produced, we clearly label it, store it separately from non-hazardous waste and properly dispose of it. We make sure that the persons carrying out these tasks wear sufficient protective equipment.





- Where possible, we recycle the waste and we give preference to the recycling of materials compared to energy recovery from waste (incineration).
- We strive to ensure and improve the transparency and traceability of the raw materials incorporated into the product within the supply chain. In particular, this aims to ensure that the raw materials used originate from responsible sources. In this context we pay specific attention to ores, concentrates and metals containing tantalum, tin, tungsten, cassiterite, coltan and gold and originating from conflict regions and high-risk areas. In particular, these are mining areas that are the site of armed conflicts, that are in a fragile situation after a conflict or where state leadership and state security are weak or non-existent and where peoples' and human rights are systematically violated. The procurement of raw materials must not entail a violation of human rights or the financing of armed groups. To ensure this, we will apply the due diligence set out in the OECD guideline for complying with the due diligence obligation to promote responsible supply chains for minerals from conflict and risk areas with respect to the origin and the chain of custody of these minerals and/or request appropriate proof from our suppliers. This also applies if the above enumeration of critical product components is expanded in the future. We will not use any raw materials extracted from nature reserves in order to protect the ecological systems and biodiversity.





# 4.

## Security and information management

- 4.1. Company property
- 4.2. Product safety
- 4.3. IT security
- 4.4. Data protection
- 4.5. Financial integrity





## 4.1. COMPANY PROPERTY

- We treat all kinds of company assets, e.g. products, work equipment or IT equipment, responsibly.
- Protecting intellectual property against unauthorised use and the unauthorised disclosure to third parties is very important to us. This includes trade secrets, confidential information, copyrights, trademark, patent and design protection rights, as well as customer lists, business opportunities and product specifications.
- Company assets are used for the intended business purposes and not for any personal purposes that are inappropriate or improper.
- Any form of fraud, breach of trust, theft, embezzlement and tax evasion is prohibited, regardless of whether the damage caused by it affects assets of the company or of third parties.



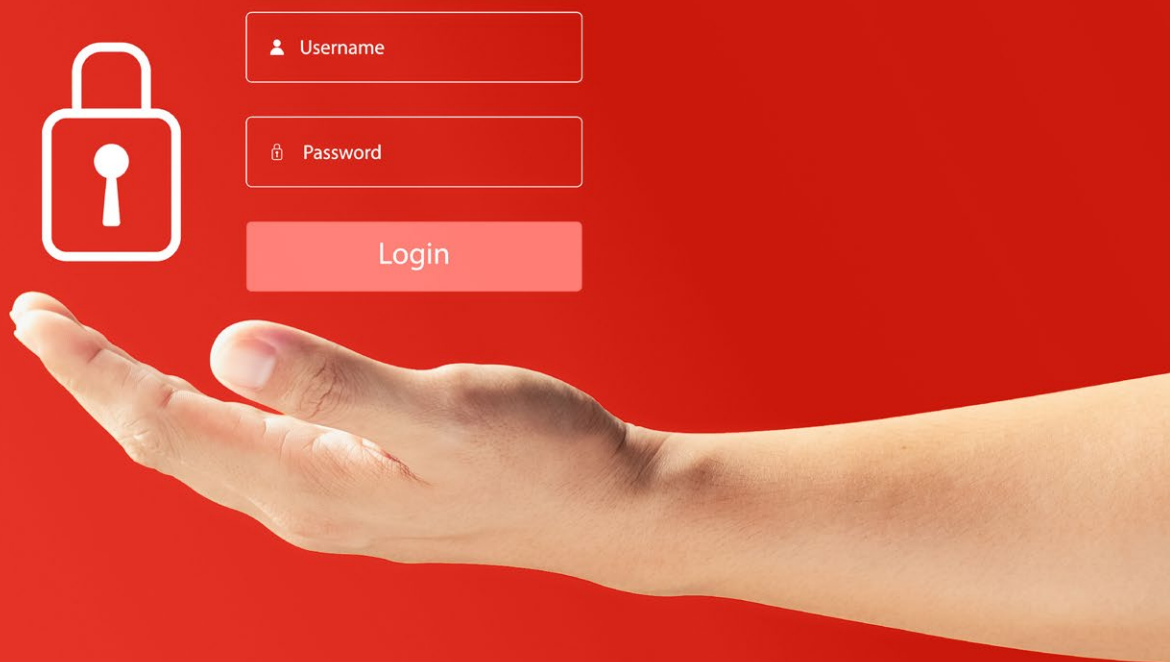
## 4.2. PRODUCT SAFETY

- We strive to offer our customers safe and valuable products of impeccable quality.
- Products must not have any defects or dangerous properties that could harm someone's health or damage someone's property.



## 4.3. IT SECURITY

- We regularly use IT systems and process data in our daily business operations. This requires appropriate precautions (passwords, approved technologies and licensed software) that ensure the protection of intellectual property and personal data. Any non compliance with necessary precautions can have serious consequences, such as the loss of data, the theft of personal data or the infringement of copyrights.
- Given that digital information can be distributed quickly, can easily be reproduced and is basically indestructible, we carefully examine the content of emails, attachments, downloaded files and stored voicemails.
- We undertake to use the IT systems provided by the company for business purposes and not for personal purposes that are inappropriate or improper.







## 4.4. DATA PROTECTION

- In the collection, storage, processing or transmission of personal data (e.g. name, address, telephone number, date of birth, health-related information) of employees, customers or other third parties we apply the highest level of diligence and strict confidentiality and we ensure compliance with applicable laws and regulations.
- Employees handling personal data are advised and supported by the data protection officer appointed by us.



## 4.5. FINANCIAL INTEGRITY

- Business transactions and documents of our company must be correct and proper. We record and document all business transactions, assets and liabilities in accordance with the legal requirements.
- The proper documentation and retention of documents requires the highest level of accuracy and completeness, as well as a sense of responsibility, in all business processes.
- Employees must not intentionally create entries that are false or misleading in documents that are relevant to financial accounting.
- We comply with tax regulations and fulfil our tax obligations.

# 5.

## Implementation and contacts



## IMPLEMENTATION AND CONTACTS

EA Elektro-Automatik ensures that all employees are familiar with this Code of Conduct. The management takes all necessary steps to implement the fundamental values and guidelines contained in this Code of Conduct through appropriate organisational measures, as well as adequate policies and processes, in all business segments. Compliance with the Code is monitored on a regular basis.

We encourage everybody to promptly report any violations of laws, of internal regulations and of this Code of Conduct which are observed by them. Please contact a managing director or the human resources department for this purpose. Reports of a violation of this Code of Conduct are treated as strictly confidential and will not have any negative consequences for the reporting employee unless they consciously reported false information.

Please note: Information regarding the identity of employees who reported a potential violation may be disclosed to individuals or public authorities involved in the investigation or subsequent legal proceedings where this is required by applicable law.

For all questions relating to the Code of Conduct, all employees and also third parties may contact the management or the human resources department.



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