

# CODE OF CONDUCT

## FOR SUPPLIERS & BUSINESS PARTNERS



### **Preamble**

PWA Electronic GmbH is a company that does business internationally. As such a company, PWA Electronic GmbH bears corporate responsibility in regard to customers, employees, investors and the public, as well as in regard to the environment. PWA Electronic GmbH sees it as its duty to act in an economically, socially and environmentally conscious manner. PWA Electronic GmbH is committed to complying with applicable law, respecting ethical standards and acting in a sustainable manner in all of its business at all times.

Against this backdrop, we, PWA Electronic GmbH, have prepared this Code of Conduct for Suppliers and Business partners. PWA Electronic GmbH expects its suppliers and business partners, as well as their employees, to act in a responsible manner, to adhere to this Code of Conduct for Suppliers and Business Partners and to work in accordance with the guidelines and principles it contains. In the event that suppliers or business partners engage third parties (e.g. subcontractors) in the context of the business relationship with PWA Electronic GmbH, PWA Electronic GmbH expects that these third parties will likewise undertake to comply with the basic principles set out in this Code of Conduct for Suppliers and Business Partners. PWA Electronic GmbH reserves the right to review suppliers' and business partners' compliance with the defined requirements on-site in individual cases, either itself or through an external partner, subject to prior notice and in the presence of a representative of the supplier or business partner.

### **1.) Social (corporate) responsibility**

- **Human rights**

We expect our suppliers and business partners to observe and defend the internationally applicable regulations on the protection of human rights as generally and universally applicable requirements. In particular, this also includes the requirement that our suppliers and business partners refrain from employing either forced or child labour and comply with the provisions defined in ILO Conventions 138 and 182 on the statutory minimum age for the employment of children. Our suppliers and business partners are responsible for ensuring that no unacceptable treatment of employees, such as psychological hardship, sexual harassment and/or personal harassment, takes place.

- **Equal opportunities and non-discrimination (equal treatment and prohibition of discrimination)**

We expect our suppliers and business partners to refrain from discrimination against anyone on the basis of ethnic affiliation, nationality, skin colour, gender, religion, ideology, age, disability, sexual orientation, political views or other characteristics protected by law.

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- **Freedom of association**

We expect our suppliers and business partners to recognize the fundamental right of all employees to form and join unions and employee representation bodies. In cases where this right is limited as a result of local laws, legitimate alternative opportunities for employee representation must be promoted.

- **Workplace safety and working hours**

We expect our suppliers and business partners to comply with the relevant applicable statutory provisions on occupational health and safety in the interest of protecting the health and safety of their employees. They must support the further development and improvement of working conditions. Working hours must correspond at least to the relevant national statutory provisions / minimum standards for the relevant national economic enterprises.

- **Minimum wage**

We expect our suppliers and business partners to ensure that their employees are paid fair wages which correspond at least to the legally applicable minimum which must be guaranteed. In the absence of statutory or collective bargaining provisions, wages must be oriented in accordance with industry-specific, locally customary standard wages and benefits which will ensure an adequate standard of living for employees and their families.

## 2.) Ecological responsibility

- **Environmental protection**

We expect our suppliers and business partners to adopt measures which ensure responsibility in regard to environmental protection and to comply with the relevant applicable environmental laws, regulations and standards. Our suppliers and business partners must take the minimisation of greenhouse gas emissions, the use of renewable resources and the minimisation of harm to health and the environment into account in the development, manufacture and use of their products and in their other activities.

- **Energy and resource efficiency**

We expect our suppliers and business partners to use natural resources sparingly and to reduce their environmental impact in regard to air, land and water. They must contribute toward the reduction of energy consumption and greenhouse gas emissions.

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- **Waste and recycling**

We expect our suppliers and business partners to take waste avoidance, reuse, recycling and the non-hazardous, environmentally friendly disposal of non-recyclable waste into consideration in their production processes, in the use phases of their products and in their other activities.

- **Conflict minerals**

We expect our suppliers and business partners to refrain from financing or supporting any armed groups which violate human rights in any manner and to guarantee that no raw materials which are produced or mined in conflict regions and/or high-risk areas will be used in their products or processed.

- **Chemicals**

We expect our suppliers and business partners to comply with all applicable environmental laws and regulations and, with their products, to comply with the applicable REACH Regulation (EC) No.1907/2006 and the applicable RoHS Directive 2011/65/EU and corresponding successor regulations.

### 3.) Transparent business relationships

- **Prevention of conflicts of interest**

We expect our suppliers and business partners to make their decisions solely on the basis of objective criteria and not to allow themselves to be influenced by personal interests and relationships.

- **Corruption**

We expect our suppliers and business partners to strictly refuse any form of bribery, corruption, extortion or embezzlement and to respect, support and comply with laws against corruption. They must ensure that their employees, subcontractors and representatives refrain from granting, offering or accepting any bribes, kickbacks, impermissible donations or other impermissible payments or benefits to or from customers, public officials or other third parties.

- **Bribery**

Our suppliers and business partners must not offer PWA employees or third parties undue benefits in the form of gifts, invitations or entertainment in any manner for the purpose of undue influence. Likewise, our suppliers and business partners must neither request nor accept undue benefits of this nature.

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- **Government customers and dealing with authorities**

We expect our suppliers and business partners to comply strictly with the applicable statutory provisions when dealing with governments, authorities and public institutions. When participating in public tenders, they must observe and comply with the relevant statutory provisions as well as the rules of free and fair competition.

- **Consultants and intermediaries**

We expect our suppliers and business partners to engage consultants and intermediaries only in accordance with the applicable laws. Most importantly, they must ensure that the remuneration paid to consultants and intermediaries is paid only for consulting or intermediary services which have actually been performed and is commensurate with the service performed.

#### 4.) Fair market behaviour

- **Free competition**

We expect our suppliers and business partners to comply with applicable antitrust laws and, most importantly, to refrain from making any anticompetitive arrangements with competitors, suppliers or customers. Our suppliers and business partners must not improperly exploit any potentially existing dominant market positions.

- **Import & export control**

We expect our suppliers and business partners to ensure compliance with all relevant applicable laws and regulations on the import and export of goods, services and information and to respect the applicable trade restrictions, embargoes and other restrictions.

- **Money laundering**

We expect our suppliers and business partners to maintain business relationships only with business partners whose integrity they are certain of. They must ensure that the relevant applicable statutory provisions against money laundering are not violated.

- **Business information**

We expect our suppliers and business partners to disclose their business data and to report on their business activities truthfully and in accordance with the relevant applicable laws.

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### 5.) Protection of data, business secrets and company assets

- **Data protection**

We expect our suppliers and business partners to observe and comply with the relevant applicable laws on the protection of the personal data of employees, suppliers, customers and other data subjects.

- **Protection of expertise, patents, trade secrets and business secrets**

We expect our suppliers and business partners to respect the expertise, patents, trade secrets and business secrets of PWA and third parties and to refrain from sharing such information with third parties without prior express written permission from PWA or in any other impermissible manner.

- **Dealing with company assets**

We expect our suppliers and business partners to respect the tangible and intangible assets of PWA and to refrain from using these for illicit or external purposes. They must ensure that their employees as well as any potential third parties they engage in the context of the business relationship (subcontractors or agents) neither harm the assets of PWA nor use these improperly, i.e. in a manner which is contrary to the interests of PWA.

- **Security of international supply chains**

We expect our suppliers and business partners to ensure that the business premises and transshipment locations at which the goods specified for PWA are produced, processed, stored, loaded and transported are protected from unauthorized access by third parties within the framework of a secure supply chain and that the personnel employed are reliable.

### 6.) Consequences in the event of violations

Suppliers and business partners are obligated to report violations of this Code of Conduct to PWA Electronic GmbH. In the event that a supplier or business partner fails to comply with the fundamental principles defined in this Code of Conduct, PWA Electronic GmbH has the right to end the business relationship with that supplier or business partner by means of extraordinary termination.