

# Code of conduct for suppliers/subcontractors

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## 1. PREAMBLE

This Code of Conduct sets out the basic requirements that HEITEC PTS GmbH (hereinafter referred to as HEITEC) must meet with regard to its own organisation and business activities and with regard to its social and environmental responsibility.

This Code of Conduct defines HEITEC's basic requirements with regard to its social and environmental responsibility towards its own organisation and all its suppliers and subcontractors (hereinafter referred to as suppliers).

## 2. General rules of behaviour

### 2.1 Compliance with legal requirements

HEITEC considers it a fundamental principle to respect the law and the legal system.

All of the company's suppliers are obliged to comply with the legal provisions of the legal system in which they operate. Compliance with the law is an essential prerequisite for the fulfilment of their tasks and all company employees must refrain from any unlawful behaviour under all circumstances.

Regardless of the sanctions provided for by law, any violation of the law is considered a breach of professional duties and will in any case lead to disciplinary action against the employee.

### 2.2 Respect, honesty and integrity

We expect our suppliers to respect human dignity, privacy and the rights of all persons; our suppliers do not discriminate against anyone on the basis of race, colour, nationality, ethnic origin, social origin, wealth, disability, sexual orientation, political orientation or belief, religion or belief, gender or age, whether as a condition of employment, in the course of employment or otherwise, and do not tolerate any form of discrimination, harassment or victimisation of any kind.

In its business relationships, HEITEC is a trustworthy company that keeps its promises, honours its agreements and acts openly, honestly and responsibly towards its partners at all times, which is exactly what we expect from our suppliers.

### 2.3 Fundamental rights of employees

The supplier respects the basic rights of its employees and ensures that these are observed:

- a. Promotion of equal opportunities and equal treatment of all employees regardless of their race, skin colour, nationality, ethnic origin, social background, wealth, disability, sexual orientation, political or other convictions, religion or ideology, gender or age;
- b. Respect for human dignity, privacy and the right to privacy of each individual;
- c. No persons are employed or forced to work against their will;
- d. Taking immediate action against unacceptable treatment of employees, such as bullying, sexual harassment or discrimination;
- e. Any behaviour, including gestures, verbal expressions and physical contact, that is sexual, violent, threatening, abusive or exploitative is prohibited;
- f. Fair pay is ensured and the minimum wage stipulated in the applicable national legislation is guaranteed;
- g. the statutory maximum working hours are observed;
- h. We recognise the freedom of association of employees to the extent permitted by applicable law and do not judge members of trade unions or employee organisations either positively or negatively on the basis of their membership.

## 2.4 The ban on child labour

The supplier does not employ workers under the age of 15 or, in a country classified as a developing country under Article 138 of the ILO Convention, workers under the age of 14.

## 3. Expected behaviour towards business partners and third parties

### 3.1 Compliance with the rules of fair competition

The Supplier shall always conduct its activities in accordance with national and international competition law and shall not participate in agreements that restrict or attempt to restrict fair competition, in particular price fixing, market or customer allocation, market sharing or bid rigging with competitors. HEITEC is of the opinion that the need for fair market behaviour also applies to competition for market share.

The supplier respects the intellectual property rights of others. Technology and know-how transfer must be carried out in such a way that the intellectual property rights and customer information are protected.

The rules of fair competition must be observed by all suppliers and their employees.

The laws for import, export, customs and foreign trade transactions must be complied with

### 3.2 Offering and granting benefits

The Supplier shall not directly or indirectly condone, participate or co-operate in any form of corruption or bribery, nor grant, offer or promise any advantage to any public or local official and/or private sector business partner in order to influence official action or gain an improper advantage.

It is prohibited to directly or indirectly offer or grant unjustified advantages to others in the form of cash or in any other form in connection with business activities.

### 3.3 Rules for awarding contracts

HEITEC will examine all contractual offers/quotations from potential supply partners fairly and impartially.

## 4. Avoidance and management of conflicts of interest

The Supplier shall endeavour to avoid conflicts of interest and loyalty of its employees in connection with their work. Such a conflict may arise in particular if the employee works in the interests of another company or has an interest in such a company.

## 5. Dissemination of information

### 5.1 Registers, records and reports

In HEITEC's relationships with authorities, investors, employees, customers, business partners and the public, an appropriate reporting system is required to ensure open and effective cooperation.

Records, reports and communications prepared for internal use only and distributed outside the Company must be complete, accurate and truthful at all times. In accordance with the applicable accounting and bookkeeping principles, the same requirements apply to the company's records and all data and supporting documents, including cost accounts and their content.

### 5.2 Case management of confidential data

All company matters and information that are not intended for the public should be treated confidentially. This includes in particular information about HEITEC's contracts, organisation, equipment, business, organisation, case management, research development and production activities as well as internal

reports. The employee's obligation to case manage confidential data continues even after termination of the employment relationship.

### 5.3 Data protection and data security

Access to the intranet and internet, the global electronic exchange of information and dialogue and electronic business processing are essential for the efficient operation and success of HEITEC's business. However, the benefits of electronic communication are offset by the risks of privacy and data security breaches. The anticipation and prevention of these risks must be an important part of the management and administration of information technology and the behaviour of all employees.

Personal data should only be collected, stored, processed or used in accordance with the requirements of data protection laws where this is necessary for predetermined, explicit and legitimate purposes and where there is an appropriate legal basis for these activities.

High technical standards must be guaranteed and maintained to ensure the quality of the data and effective protection against unauthorised access, deletion, destruction, etc.

It must be ensured that the processing and handling of data takes place within the framework of procedures that are also comprehensible and transparent for the persons concerned and that the rights of the persons concerned to information, correction and, if necessary, objection, blocking and deletion, etc. are exercised appropriately.

## 6. Environment, safety and health

### 6.1 Environment and technical safety

HEITEC expects its suppliers to share its commitment to the environment, which requires consistent compliance with the principles and expectations listed below:

- Protecting the environment and conserving its resources as well as complying with the relevant legislation are our top priorities.
- Minimise pollution and take continuous action to protect the environment, with a particular focus on the following areas:
  - A: Reduce emissions to air at the site by focussing on process efficiency, product substitution, reducing fuel combustion and effective filtering methods.
  - B: Improvement or minimisation of greenhouse gas emissions at the supplier's facilities and throughout the value chain.
  - C: Reducing the supplier's water consumption by implementing water conservation and reuse programmes. Replacement of water-polluting technologies, installation of water filtration and purification systems. Wastewater from operations, manufacturing processes and sanitary facilities shall be standardised, monitored, inspected and treated as necessary prior to discharge or disposal.
  - D: Reduce the amount of waste generated by the supplier by relying on the four pillars of environmental management: Disposal, Reduction, Reuse and Recycling.

When handling materials (raw materials, goods and products) that are considered environmentally hazardous, our suppliers must ensure the safe handling, transport, storage, recycling and/or reuse of such materials.

- We promote the development and dissemination of environmentally friendly, energy-efficient and renewable energy technologies.

## 6.2 Safety in the workplace

Responsibility for the health and safety of employees requires the introduction and implementation of the best possible accident prevention measures. This requirement applies to the technical design of workplaces, work equipment and work processes as well as to safety management and personal behaviour in the workplace during daily work. The working environment must meet the requirements of a health-orientated design.

To achieve this, the supplier continuously assesses and evaluates the hazards and risks in the workplace, takes all necessary measures to prevent accidents at work and occupational illnesses and trains its employees in the area of health and safety in the workplace.

## 7. Complaints and comments

Any employee may submit a personal complaint to their line manager, the Head of Human Resources or any other person or department responsible for handling complaints and report any circumstances that indicate a breach of the Code of Conduct.

All complaints and allegations falling within the above should be thoroughly investigated and if the outcome of the investigation warrants it, appropriate action should be taken.

All documents created in connection with complaint reports should be treated confidentially.

Staff utilise the internal mediation options as far as possible.

## 8. Minerals from war zones (conflict minerals)

The supplier shall take appropriate measures to avoid the use of raw materials in its products that directly or indirectly finance armed groups that violate human rights (see [www.conflictreesourcing.org](http://www.conflictreesourcing.org); [www.eiccoalition.org](http://www.eiccoalition.org)).

## 9. Supply chain

The supplier shall take all reasonable measures to promote compliance by its suppliers with the rules set out in this Code of Conduct. The supplier shall observe the principles of non-discrimination in the selection of suppliers and in its dealings with them.

## 10. Acknowledgement and consent of the supplier

By familiarising itself with this document, the supplier undertakes to act responsibly and to comply with the principles and requirements set out herein. The supplier undertakes to communicate the content of this code to its employees, agents and subcontractors in a manner that is understandable to them and to take all necessary precautions to implement the requirement.