

EKF ELEKTRONIK GmbH

# Code of Conduct



## 1. Introduction

*The corporate culture of EKF Elektronik GmbH is characterized by its family nature. The family business has been based in Hamm for more than 50 years and is a leading manufacturer of modular industrial microcomputers. Joachim Jansen founded the company to improve the world of electronics and make reliable computers.*

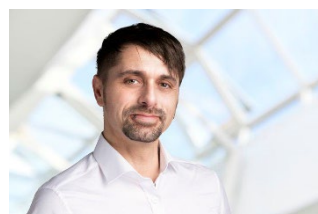
We ensure our entrepreneurial success by complying with legal and internal company regulations. In addition to the value-oriented actions of our company and our employees, the responsible and lawful behavior of our business partners and customers is of great importance to us.

It is our responsibility to act sustainably. For example, since the installation of our solar systems, we have covered our energy requirements completely ourselves. We produce more solar energy than we need and are constantly implementing measures to be even more sustainable. Our goal is nothing less than becoming climate neutral.

To fulfill our sense of duty towards the environment, our employees and business partners, we consider our Code of Conduct as a guideline for our behavior and thus create the foundation for mutual trust and sustainable, ethical action.



Bernd Kleeberg  
Managing Director



Jan Jansen  
Managing Director/Owner

## 2. Principals

### a. General

EKF ELEKTRONIK GmbH (hereinafter referred to as EKF) understands itself as part of an internationally integrated economy and, as a company at its locations, is part of the countries and their companies in which EKF is active. EKF follows the basic understanding of the "honorable businessman" and acknowledges its responsibility as a company.

- EKF monitors the direct and indirect effects of its business activities on the environment and society and endeavors to achieve an appropriate balance between economic, ecological and social interests.
- EKF acts in accordance with generally accepted values and principles, complies with the law and observes internationally recognized human rights and labour standards as set out below.
- EKF stands for the objectives and contents of the Code of Conduct and will make all appropriate and reasonable efforts within the scope of its respective legal and actual possibilities to comply with the voluntary commitment on an ongoing basis at all its company locations in Germany and abroad.

If existing national regulations contradict the contents of the Code of Conduct or if the national context makes it impossible to comply with them without restriction, EKF will look for ways to comply with the requirements of the Code of Conduct as far as possible.

### i. Compliance with applicable law

EKF complies with all laws, rules and regulations at local, national and international level in which EKF operates. Furthermore, EKF does not maintain business relationships with companies or individuals who violate sanctions.

Any violation may result in legal consequences, labor law consequences or claims for damages for both the company and its employees. EKF investigates all indications of violations and takes appropriate action.

If there are individual countries with stricter regulations than those described here, the stricter regulations will be applied.

### ii. Open debate

EKF encourages its employees to raise concerns to prevent misconduct or correct it at an early stage. Managers support employees and investigate concerns raised fairly and without prejudice.

### iii. Mutual respect and trust

Everyone has the right to be treated with respect. EKF stands for a working environment characterized by respect and tolerance and is particularly committed to diversity, inclusion and equal opportunities. Discrimination, racism, bullying, abuse of power, intimidation, threats or sexual harassment and other forms of harassment are not tolerated. Discriminatory behavior on the grounds of ethnic origin, nationality, gender, sexual orientation and identity, pregnancy or parenthood, age, religion, ideology, disability or other grounds covered by a discrimination act will also not be tolerated.

### iv. Conflicts of interest

If business decisions are made in day-to-day business situations where the interests of the company conflict with personal interests, employees are obliged to inform their managers to ensure rapid clarification. In this way, EKF ensures that decisions are made impartially and in the interests of the company.

### v. Protection of company assets

Employees treat all company assets responsibly. Company assets are used for the intended business purposes and not for personal purposes that are inappropriate or impermissible. Any form of fraud, disloyalty, theft, embezzlement and tax evasion is prohibited, regardless of the damage to company assets or the assets of third parties.

## b. Responsibility

### i. Human rights

EKF respects the dignity of its employees and all third parties and is committed to the principles of the Universal Declaration of Human and People's Rights and the United Nations Global Compact. In all its business activities, EKF endeavors to neither cause nor contribute to human rights violations. EKF expects the same from its business partners. Where necessary and possible, EKF supports its suppliers in this respect. EKF does not tolerate child labor and observes the legal minimum age for employment. Internships are organized in accordance with legal requirements. EKF also rejects any form of forced or compulsory labor. This also applies to any form of debt bondage, serfdom, slavery or slavery-like practices, human smuggling and extends to all forms of involuntary labour and services that are not compatible with internationally recognized labour and social standards.

### ii. Fair and healthy work environment

Fair working conditions and healthy and safe working conditions are an integral part of our corporate culture. EKF complies with the laws and regulations on occupational safety and health in the workplace, thereby ensuring a healthy and hazard-free working environment for its employees.

### iii. Environmental and climate protection

EKF conducts its business activities in an environmentally responsible manner with the aim of achieving a carbon-neutral future. In doing so, EKF applies the applicable law and takes appropriate measures based on legal and internationally recognized standards.

EKF procures and uses resources responsibly and sustainability is an integral part of corporate responsibility.

## c. Business partners and third parties

### i. Relation to business partners

EKF's business partners (including customers and suppliers) expect EKF to be a legally compliant partner. In turn, this requires that EKF is also familiar with the contractual obligations of its business partners.

EKF checks the identity and integrity of potential business partners and takes appropriate measures to verify that suppliers comply with the basic principles of this Code of Conduct. Purchasing decisions are made based on fair and objective criteria. EKF acts in accordance with the applicable import and export control regulations and complies with the legal requirements for the prevention of money laundering.

### ii. Protection against corruption and bribery

EKF rejects and condemns all forms of bribery and corruption. Donations are only permitted under certain conditions if they serve the purpose of promoting business relationships or presenting products/services. These may only be accepted if they do not constitute consideration for an unlawful advantage.

### iii. Fair competition

EKF represents free and fair competition and does not tolerate any anti-competitive agreements. EKF acts in accordance with national and international competition laws. There is no participation in price fixing, market or customer sharing or other agreements. Violations are stopped immediately. EKF maintains a legally impeccable relationship with all government and supervisory authorities.

### iv. Product safety

EKF aims to offer customers a safe and high-quality product in excellent condition. Therefore, EKF products undergo quality controls to ensure a safe and non-hazardous use. Furthermore, products are only sourced from qualified suppliers or otherwise subjected to strict tests to ensure the high quality of our products.

EKF's business partners shall implement appropriate methods and processes to eliminate the risk of delivery of counterfeit components and/or materials. If something is nevertheless discovered or suspected, the business partner must notify the recipient immediately.

## d. Handling of personal data, protection of confidential information and intellectual property

EKF respects the personal rights of its employees, business partners and customers and complies with the applicable legal and regulatory requirements for the processing of personal data and information security when handling personal information. EKF also protects business secrets entrusted to it and any other confidential information of its business partners and customers from unauthorized acquisition, use and disclosure, at least in accordance with the relevant statutory provisions for the protection of business secrets. The intellectual property of its business partners, customers and other third parties is respected and attention is paid to ensuring that sufficient precautions are taken to protect intellectual property rights in the exchange of know-how and technologies.

### i. Use and security of IT systems

EKF regularly uses IT systems in its day-to-day business. Appropriate security procedures are in place to ensure the protection of intellectual property and personal data. Any violation of this will be prosecuted and will have appropriate consequences.