

01 Purpose of the Supplier Code of Conduct

Basic understanding

The E-T-A Group supports the United Nations Sustainable Development Goals (SDGs), and helps to ensure a sustainable future through its activities. When further expanding, implementing, and achieving sustainable purchasing procedures, we also align our work to the content and goals of sustainable development. As part of the supply chain, we integrate our suppliers and business partners by applying and requiring the following basic expectations and objectives from our suppliers and business partners as well.

The Code of Conduct is based on the United Nations Global Compact, as well as national and international laws and regulations. These include, for instance, the Supply Chain Due Diligence Act (LkSG), the United Nations Universal Declaration on Human Rights, the Guidelines on Children's Rights and Business Principles, the UN Principles on Business and Human Rights, and the ILO International Labour Standards.

Compliance with the law

In the course of their collaboration with us, we expect that our suppliers and business partners comply with the above laws and regulations. If the legal regulations in the countries where they are active deviate from this, the stricter regulations/requirements must be complied with.

02 Human rights and working conditions

Humane treatment

E-T-A does not tolerate any human rights violations, including discrimination, and works to ensure proper and fair working conditions. Although we do not currently fall under the regulations of the Supply Chain Due Diligence Act, we adhere to its principles. We also require this of our suppliers and business partners.

Our suppliers and business partners undertake:

Respecting human rights

- to respect human rights and ensure humane treatment.
- to prevent all kinds of discrimination and unequal treatment of employees and comply with international laws in this respect.
- to make a positive contribution to protecting and promoting human rights and proper working conditions through their own activities.

Discrimination

Avoiding child & forced labour	- to actively fight any kind of child & forced labour and prevent such labour throughout the entire supply chain.
Diversity & equal opportunity	- to work for diversity and equal opportunity and ensure these values in their companies.
Working hours & wages as well as social benefits	- to not only comply with applicable laws on labour standards and working hours, but also to comply with maximum working hours limits, to compensate work at least according to statutory regulations or applicable collective agreements, and to ensure fair payment.
Freedom of association	- to grant employees the right to found and join organisations of their choice and to engage in collective negotiations, as well as to respect strikes. In cases where freedom of association and the right to collective negotiations are restricted by law, alternative opportunities for free and independent association among employees must be granted for the purpose of collective negotiations.

03 Health protection, workplace safety

Workplace safety	We require our suppliers and business partners to fully accept corporate management obligations for occupational safety and health protection, in order to ensure and continuously promote the safety and health of employees in the workplace. Our suppliers and business partners undertake:
Occupational protection, work-related accidents & illnesses	- to implement and ensure occupational and health protection in accordance with internationally recognised standards, such as ISO 45001 or the ILO conventions.
Drinking water, sanitary facilities	- to ensure access to sufficient quantities of drinking water and clean and sanitary facilities.
Health & safety communication, training	- to inform employees of applicable health and safety regulations and regularly train them on these.
Physically & mentally taxing work	- to prevent excess physical or mental fatigue among workers through suitable measures.

**Safety on machines /
in production**

- to ensure safe operation/work on machines and in production through providing suitable training to affected employees on work instructions for machinery and systems, in order to prevent work-related accidents.

04 Environmental protection, ecological responsibility

**Environmental protection &
responsibility**

E-T-A is committed to protect and maintain a liveable environment. We take protecting the climate very seriously as a multi-generational project, and do our part as a company and as a community. We expect the same of our suppliers and business partners.

Environmental & energy management

We know that many of our suppliers and business partners have already introduced a certified environmental management system, and that they may also have a certified energy management system. We request that they maintain these and actively engage in environmental protection. For suppliers who do not yet have a certified environmental and energy management system, we require that they introduce an adequate environmental and energy management system that takes all environmental and energy aspects into account whenever possible.

Human and nature

In general, we require that our suppliers and business partners halt any harmful soil changes, water or air pollution, noise emissions and excessive water usage, in particular if this harms human health and/or significantly impacts natural systems for food production.

Our suppliers and business partners undertake:

**Consumption
of raw materials**

- to reduce the use and consumption of resources during production and the generation of waste of all kinds, including water and energy, to a minimum.

Energy consumption/efficiency

- to monitor and document energy consumption and to find economical solutions to continuously improve energy efficiency and minimize energy consumption.

Responsible purchasing of materials	<ul style="list-style-type: none">- to design their supply chains in a responsible manner when selecting preliminary materials and suppliers. In particular, to avoid human rights violations and environmental harm related to purchasing, and to fulfil relevant due diligence obligations.
Products, processes	<ul style="list-style-type: none">- to optimise products and processes so as to reduce environmental pollution and impacts, and to avoid them if possible.- to ensure resources are handled carefully and efficiently, thereby avoiding the waste of resources.
Wastewater and water consumption	<ul style="list-style-type: none">- to standardize, monitor, check, and treat wastewater from operating procedures, production processes and sanitary facilities before it is discharged or disposed of and to treat it if necessary. Furthermore, measures should be introduced to reduce the production of wastewater.
Handling waste	<ul style="list-style-type: none">- to establish a systematic approach for identifying, handling, and reducing waste as well as for disposing of or recycling it in a responsible manner, while complying with relevant laws. In particular, chemicals and other materials that would be hazardous if released into the environment must be identified and handled so as to ensure safety when handling, transporting, storing, using, recycling or reusing and disposing of these substances.
Hazardous materials	<ul style="list-style-type: none">- to reduce the use of hazardous materials in products (environmentally compatible products!) and production to a minimum or at least to use less hazardous materials and pollutants through substitution testing.
Prohibited materials/ material restrictions	<ul style="list-style-type: none">- to comply with and fulfil material prohibitions and/or restrictions or any approval and reporting/registration obligations if these are directly applicable to them by law. In addition, our suppliers declare their willingness to also support us and our customers in fulfilling our obligations with respect to material prohibitions and restrictions that do not directly affect them, such as the RoHS and REACH.
Air/noise emissions	<ul style="list-style-type: none">- to standardize and routinely monitor, test, and treat their emissions from operating processes as needed (air and noise emissions) as well as greenhouse gas emissions before they are released.

05 Ethics

Corporate integrity

We require that our suppliers and business partners, as well as their managers and employees engage in proper ethical conduct and ethically appropriate business activities at all times. Ideally, a written Code of Conduct should be prepared and publicly disclosed for this purpose in order to advertise and define regulations and working methods and as a declaration of commitment.

Our suppliers and business partners undertake:

Prohibition against fraud, corruption, extortion & money laundering

- to work to prevent and halt all kinds of fraud, corruption, extortion and money laundering, and to comply with associated laws.

Fair business practices, competition & antitrust law

- to comply with standards for fair business practices, fair advertisement and fair competition. In addition, applicable antitrust laws must be applied which prohibit agreements with competitors as well as other activities that influence prices or conditions. Furthermore, these regulations prohibit agreements between customers and suppliers for the purpose of restricting the freedom of customers to autonomously determine their prices and other conditions for resale.

- to work to prevent any anti-trust law violations in their supply chains.

Protection of intellectual property

- to respect rights to intellectual property, and design technology and knowledge transfers so as to protect intellectual property rights and customer information.

Import & export controlling

- to comply with national and international regulations on import & export controlling and ensure through suitable processes that transactions and activities with third parties and with E-T-A do not violate export controlling and sanction laws, as well as to provide any necessary verifications and information promptly.

Avoiding conflicts of interest

- to ensure that employees on all levels do not make their business decisions dependent on private interests or personal considerations, and that decisions are made in a transparent manner, based on objective considerations.

Data protection/information

- to use special care and appropriate technical and organisational measures to safeguard protected information and data.

Personal data is only collected, processed and used as permitted under relevant laws and as necessary for the collaboration.

Conflict materials

- when using, purchasing or delivering products/materials that contain the conflict materials tin, tungsten, tantalum and gold (3TG) as well as the raw material cobalt, to establish processes to ensure that due diligence obligations to promote responsible supply chains for minerals from conflict and high-risk regions are fulfilled as far as possible, and to transfer this due diligence obligation to its suppliers as well and prepare relevant reports on this matter. Suppliers must prepare reports on their 3TG and cobalt supply chain upon request, while maintaining trade secrecy. The Conflict Minerals Reporting Template (CMRT) and/or Cobalt Reporting Template (CRT) from the Responsible Minerals Initiative must be completed and submitted for this purpose.

As a common goal, smelters and refineries without appropriate, audited due diligence processes should be avoided in the supply chain.

(Based on and in accordance with the principles of the Organisation for Economic Cooperation and Development, OECD).

Whistle-blower portal and non-retaliation

E-T-A has introduced an anonymous whistle-blower portal to allow for reporting anonymous tips and violations of the law, the Code of Conduct, or other guidelines. Because tips are submitted anonymously, this ensures that they will not result in retaliation. This portal is also available to suppliers and business partners (<https://eta.integrityline.com/>).

We expect that our suppliers and business partners take suitable measures to establish their own anonymous whistle-blower portals as well.

Supplier responsibility

We expect that suppliers promote and implement the objectives, requirements, and principles described in this Code of Conduct in their supply chains as well and as far as possible through suitable measures.

Management system/ Risk management

06 Management system

If such a management system is not already in place, we expect that our suppliers and business partners introduce an appropriate management system for the purpose of supporting and promoting compliance with this Code and relevant laws and regulations, among other objectives.

We consider risk assessments, implemented guidelines, processes and pictograms, clearly communicated roles and obligations, training measures and specific instructions, the definition and evaluation of measurable objectives, as well as functional controlling systems as further important content and functions of a comprehensive management system, and as foundational for successfully implementing the Supplier Code of Conduct.

Further information

07 Informational sources/references

Further information is available at www.e-t-a.de/compliance. If you have concerns or questions, you can get in touch with your direct contact person from Purchasing at any time. You can also view further information for you as a supplier at www.e-t-a.de/support/download_center.

Portions of this Code of Conduct are based on excerpts/templates from the "Supplier Code of Conduct" data sheet.
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This data sheet is provided with the friendly approval of the International Chamber of Commerce of Munich and Upper Bavaria. Original author: Umweltpakt Bayern (Bavarian Environmental Pact).

Confirmation of acceptance and declaration of consent

By your signature, you agree that the above principles, requirements, and regulations apply to your future collaboration with E-T-A for a joint Code of Conduct. This agreement and our purchasing conditions are considered the basis for all future deliveries. E-T-A Elektrotechnische Apparate GmbH and the contractual partner hereby undertake to fulfil the principles and requirements of the Code of Conduct, and to work to contractually obligate their subcontractors to comply with the standards and regulations listed in this document. This agreement shall come into force upon signing. A violation of this Code of Conduct may ultimately be a reason for the business relationships with suppliers and business partners to be ended, including all associated delivery contracts.

Supplier confirmation

As a supplier of E-T-A Elektrotechnische Apparate GmbH, we hereby agree to the contents, basic requirements and principles of this Code of Conduct.

Company:
(Stamp) _____

Street &
number: _____

Postal code _____
& city: _____

Name: _____ Position: _____

Date: _____ Signature: _____