

CODE OF CONDUCT

OF

Hekatron Technik GmbH

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CODE OF CONDUCT ON SOCIAL RESPONSIBILITY

Hekatron Technik GmbH is committed to its social responsibility within the framework of its entrepreneurial activity worldwide (usually referred to internationally as "CSR"). This "Code of Conduct on Social Responsibility" specifies what this means, in particular with regard to working conditions, social and environmental compatibility as well as transparency, trusting cooperation and dialogue. The contents of this Code of Conduct are an expression of our common set of core values.

The Code of Conduct is based on a common basic understanding of socially responsible corporate management. For us, this means assuming responsibility by considering the consequences of our entrepreneurial decisions and actions in economic and technological as well as social and environmental terms and achieving an appropriate balance of interests. We voluntarily contribute to the well-being and sustainable development of global society within the scope of our respective possibilities and areas of action. We are guided by universal ethical values and principles, in particular integrity, honesty and respect for human dignity.

I. SCOPE

This Code of Conduct applies to all branches, offices and the headquarters of Hekatron Technik GmbH.

The Code of Conduct is aimed at all employees, including the management. Individuals are expected to consistently adhere to this Code of Conduct and any other internal policies relevant to their area of responsibility.

The Code of Conduct must also be complied with if the applicable laws or regulations are less far-reaching. Should more stringent laws and regulations apply than those contained in this Code of Conduct, these more stringent laws and regulations will take precedence.

II. COMPLIANCE WITH THE LAW

We comply with applicable laws and regulations of the countries in which we operate. For countries with a weak institutional framework, we carefully consider which good corporate practices from our own country should be used to support responsible corporate management.

III. FAIR OPERATING PRACTICES

We have taken appropriate compliance measures, so that the following topics are adequately covered:

1. Corruption and Bribery

We reject corruption and bribery in line with the relevant UN Convention. We promote transparency, integrity and responsible management as well as control in the company in an appropriate way.

2. Fair Competition

We pursue clean and accepted business practices as well as fair competition. We compete by focusing on professional behaviour and high quality work. Our interaction with the supervisory authorities is characterised by a spirit of partnership and trust.

3. Sanctions

The applicable foreign trade regulations and the thus standardised protection of the security interests of the Federal Republic of Germany and the European Union are a further concern for us. Therefore, we attach great importance to compliance with the applicable foreign trade regulations.

At the same time, we ensure that terrorist financing is not facilitated, i.e. that the applicable personal and country-specific sanction provisions and embargos are complied with in business transactions. We strictly reject business transactions and the conclusion of contracts with sanctioned persons or countries in which funds or economic resources are made available to sanctioned persons or which otherwise contradict the applicable legal provisions.

4. Protection of Information and Intellectual Property

We protect confidential information and respect intellectual property; technology and know-how transfers must be carried out in a manner that protects intellectual property rights, customer data, trade secrets and non-public information. We comply with the applicable laws for the protection of trade secrets and treat confidential information of our business partners accordingly.

5. Anti-Money Laundering

Money laundering refers to the process of smuggling illegally obtained money or assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in any transactions that serve for the concealment or integration of criminally or illegally acquired assets.

6. Data Privacy

We process, store and protect personal data in compliance with the legal regulations. Personal data is thus collected confidentially, only for legitimate, previously determined purposes and in a transparent manner. We only process personal data if it is protected against loss, alteration and unauthorised use or disclosure by appropriate technical and organisational measures.

7. Avoidance of Conflicts of Interest

We avoid internal and external conflicts of interest that could affect business relationships illegitimately. If we fail to do so, we will expose these conflicts.

IV. WORKING HOURS

We respect labour standards with regard to the maximum permissible working hours.

V. HUMAN RIGHTS

We are committed to ensure that human rights are respected. In doing so, we are guided by the International Charter of Human Rights, consisting of the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, the ILO (International Labour Organisation) core labour standards and the protected legal positions of the Supply Chain Due Diligence Act (LkSG). In particular, we are committed to protecting the following rights:

1. Privacy

Protection of privacy.

2. Harassment

Protection of employees from physical punishment and physical, sexual, psychological or verbal harassment or abuse.

3. Freedom of Opinion

Protection and granting of the right to freedom of opinion and expression.

4. Abolition of Child Labour

We respect the ban on the employment of children below the age at which compulsory education ends under the law of the place of employment, whereby the age of employment may not be less than 15 years. Children who are no longer subject to full-time compulsory education may be employed as early as the age of 14 in a vocational training relationship. Exceptions exist - within the limits of the JArbSchG (Jugendarbeitsschutzgesetz [Youth Employment Protection Act]) - also for children who complete an internship during full-time compulsory education.

Children under the age of 18 must never be employed in the worst forms of child labour. This shall include, in particular, work likely to be harmful to the health, safety or morality of children by the nature of the work or due to the circumstances in which it is carried out. Examples include night work, work in hazardous conditions, or work that conflicts with school attendance.

5. Elimination of Forced Labour

We respect the prohibition of the employment of persons in forced labour and the prohibition of all forms of slavery, slave-like practices, servitude or other forms of domination or oppression in the workplace environment. Forced labour includes any work or service that is demanded by a person under threat of punishment and for which he has not volunteered, such as in the case of debt bondage or human trafficking.

6. Occupational Safety and Health

We comply with the legal requirements of relevant labour protection laws (e.g., ArbSchG (Arbeitsschutzgesetz [Labour Protection Act]), ArbZG (Arbeitszeitgesetz [Working Hours Act]), ASiG (Arbeitssicherheitsgesetz [Occupational Safety Act]), ArbStättV (Arbeitsstättenverordnung [Workplace Ordinance]), GefStoffgesetz (Gefahrstoffgesetz [Hazardous Materials Ordinance]) In particular, we provide for adequate safety standards in the provision and maintenance of workplaces, work stations and work equipment, appropriate protective measures to prevent exposure to chemical, physical or biological substances, measures to prevent excessive physical and mental fatigue, in particular appropriate work organisation with regard to working hours and rest periods, and adequate training and instruction for employees.

7. Freedom of Association

We respect the right of freedom of association, by means of which:

- employees are free to form or join trade unions,
- employees must not be discriminated or face retaliation on the grounds of the establishment, entry to or membership in a trade union; and

- trade unions are allowed to operate freely and in accordance with the law of the place of employment, including the right to strike and the right to collective bargaining.

8. Prohibition of Unequal Treatment in Employment

We respect the prohibition of unequal treatment in employment. Inequality of treatment is a situation in which a person is treated less favourably only or mainly on the basis of certain characteristics, such as national or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. Unequal treatment includes, in particular, the payment of unequal pay for work of equivalent value.

9. Remuneration

We respect the ban on withholding an appropriate wage. An appropriate wage is at least the minimum wage set by the applicable law and is otherwise measured by the law of the place of employment. Wages are appropriate when they enable employees to participate in the other rights, in particular the rights to social security, healthcare, education and an appropriate standard of living, including food, water and sanitary facilities, housing, clothing, etc.

10. Protection of Natural Resources

We respect the prohibition of harmful soil alterations, water pollution, air pollution, harmful noise emissions or excessive water consumption which violate protected rights such as the right to life, health, water, food and sanitary facilities.

We respect the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests or waters in the acquisition, construction or other use of land, forests or waters, the use of which secures the livelihood of a person.

11. Use of Security Forces

By means of training and monitoring, we commit ourselves to ensuring that, when commissioning or using private or public security personnel, their use will not violate the prohibition of torture or cruel, inhuman or degrading treatment, harm life or limb, and will not hinder freedom of association.

VI. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

We comply with environmental regulations and standards that affect our respective businesses and act in an environmentally conscious manner at all locations. We also deal responsibly with natural resources, in accordance with the principles of the Rio Declaration.

All employees are sensitised to environmental protection, and necessary training measures and training sessions are offered.

We have implemented appropriate environmental measures (e.g., implementation of an operational environmental management system) that adequately address the following topics:

- Objective, definition and implementation of measures and their continuous improvement;
- Environmental aspects such as reducing CO2 emissions, increasing energy efficiency and the use of renewable energy, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and its proper disposal, and responsible handling of hazardous substances for people and the environment.

The following environmental regulations are of particular importance to us:

1. Minamata Convention on Mercury

We comply with the requirements of the Mercury Regulation (Regulation (EU) 2017/852) and the Minamata Convention on Mercury.

2. Stockholm Convention on Persistent Organic Pollutants (POPs)

We comply with the provisions of the Regulation on Persistent Organic Pollutants (Regulation (EU) 2019/1021) and the Stockholm Convention on Persistent Organic Pollutants.

3. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

We comply with the requirements of the Waste Shipment Regulation (Regulation (EC) 1013/2006) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

VII. RESPONSIBLE PROCUREMENT OF MINERALS

We take measures to avoid the use of conflict minerals in our products to prevent human rights violations, corruption and financing of armed groups or the like while exercising due diligence in doing so.

VIII. CONSUMER INTERESTS

As far as consumer interests are concerned, we adhere to consumer protection regulations as well as appropriate sales, marketing and information practices. Particular attention is paid to vulnerable groups (e.g. youth protection).

IX. CIVIL ENGAGEMENT

We contribute to the social and economic development of the country and the region in which we operate and promote corresponding voluntary activities of our employees.

X. IMPLEMENTATION AND ENFORCEMENT

We will make all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this Code of Conduct. The aim is to report on the essential measures to the contracting parties on request and within the framework of reciprocity, so that it is comprehensible how compliance with them is generally guaranteed. There is no claim to the disclosure of company and business secrets, information related to competition or information otherwise worthy of protection.

All employees are sensitised to the contents of the Code of Conduct and trained on relevant topics as required.

Violations of the Code of Conduct are not tolerated and may lead to consequences under labour law.

1. Communication

We communicate openly and in a dialogue-oriented manner about the requirements of this CoC and its implementation to employees, customers and other stakeholders. All documents and records shall be compiled in accordance with the obligation and shall not be unfairly altered or destroyed and stored in an appropriate manner.

2. Information on Infringements

We provide our employees, business partners, and others with access to a protected mechanism to confidentially report possible violations of the principles of this Code of Conduct.

We have implemented a complaint and reporting procedure for this. If you have any information, please contact us directly or anonymously via our homepage.

02/05/2024

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