

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

Responsible and lawful conduct

Responsible and lawful conduct is firmly embedded in the policies of ESG Elektroniksystem- und Logistik-GmbH and its subsidiaries ("ESG"). ESG acknowledges its social responsibility as part of society, business enterprise and employer. This Code of Conduct defines the principles and guidelines that ESG expects its business partners to comply with. All suppliers, sales and other partners are classed as business partners of

ESG. The Code of Conduct is based on the UN Universal Declaration of Human Rights and guided by the UN Global Compact, the ILO conventions on fundamental labour principles and rights, and the German Supply Chain Due Diligence Act [Lieferkettensorgfaltspflichtgesetz]. ESG reserves the right to adapt and amend this Code of Conduct.

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

I. Social responsibility

1. Compliance with human rights

Our business partners shall comply with the international regulations for the protection of human rights.

This shall apply, in particular, in terms of the creation and securing of fair, safe and social working conditions.

This also includes the ban on illegal eviction and the illegal dispossession of land whose use forms a person's livelihood.

2. Discrimination

The ESG lives out an open and tolerant culture in which respect, tolerance and fairness are important to us. We firmly reject all forms of discrimination.

We therefore do not tolerate any discrimination based on

- » national, ethnic, geographical or social origin,
- » skin colour, age, gender, sexual identity or sexual orientation,
- » physical and/or mental limitations
- » religion, world view or political opinion
- » mental or physical limitations, in particular age or health status

We also expect our business partners to oppose all forms of discrimination, in particular the examples listed above.

3. Prohibition of child labour and forced labour

The ESG does not tolerate child labour or forced labour; these are prohibited at every stage of the production process. Our business partners ensure that they do not employ any person who has not reached the minimum age prescribed in accordance with the ILO Convention 138. Stricter national regulations must be

adhered to. Children aged under 18 years, regardless of whether they have reached the minimum age of the ILO Convention 138, are not permitted to be involved in prostitution and/or pornography or illicit activities or to conduct other work that is likely to be harmful to the health, safety or morality of children. Free choice of employment must apply. This means that no person may be forced into compulsory labour against their will or limited in their freedom of movement.

4. Fair working conditions and freedom of association

Employees are entitled to receive as a minimum the minimum wage stated by law for their labour; this must not be withheld from them.

The agreed weekly working hours may not exceed the working hours stipulated by applicable national laws.

Our business partners shall confirm that employees may join employee organisations, which may represent employees' interests, within the scope of applicable law. Membership of such an organisation must never, even indirectly, lead to discrimination or retribution against the employee.

5. Occupational health and safety

The ESG values the protection of employees against health risks very highly. We also expect our business partners to adhere to the applicable occupational health and safety provisions in order to prevent health risks and to ensure that accidents and work-related health risks are prevented.

Public or private security forces must not be used to allow or to tolerate through neglect, including due to insufficient instruction or monitoring, torture or other cruel, inhumane or humiliating actions that cause injury to life, limb or freedom of association

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

6. Environmental protection

The applicable environmental laws stipulate binding standards that shall be complied with in the respective business processes. Natural resources shall not be contaminated or wasted. An environmental management process which aims to ensure continuous improvements shall be implemented. Any permits required shall be obtained. In particular, the provisions of the Minamata Convention on Mercury currently applicable in the EU, the provisions of the Stockholm Convention on Persistent Organic Pollutants currently applicable in the EU, and the provisions of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal currently applicable in the EU are to be adhered to.

In particular, measures and omissions that cause a harmful change to the soil, water contamination, air pollution, harmful noise emissions or excessive water consumption must be avoided. Particular attention must be paid to this where the measure threatens to significantly impair the natural basis for the retention and production of food, to prevent a person from accessing clean drinking water, to make it difficult or impossible for a person to access sanitation facilities, or to harm the health of a person.

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

II. Business relationships

1. Prevention of conflicts of interest

The ESG respects the personal interests and private lives of the employees. At a business level, however, ESG and our business partners must initiate or maintain business relationships exclusively based on objective criteria, e.g. quality, price, technological standard and reliability. They shall not be influenced by personal interests and relationships or promises of any kind. Non-tolerable business relationships are created, for example, if the contracting parties have contractual as well as non-contractual links, relationships or cooperations despite having different interests. Conflicts of interest can arise when persons belonging to the company (i) accept, offer or grant invitations and gifts, (ii) are board members of another company or competitor company, or (iii) pursue a sideline occupation. Any actual or potential conflicts of interest shall be reported immediately to ESG.

2. Anti-corruption

Corruption and bribery are illegal and shall not be tolerated. This shall apply to our business partners as well as their suppliers, consultants and other partners. The prohibition to take or grant advantages shall apply to direct financial gratuities as well as other, direct or indirect benefits or promises. When making donations or issuing sponsorship grants, it shall be ensured that these do not constitute an illegal gratuity.

3. Prohibition of fraud

Fraud is illegal and is not tolerated by ESG. This includes all false presentations of circumstances that mislead the opposite number into a decision that they would not have made without these "circumstances" and where this decision enriches the false presenter or a third party.

4. Money laundering

ESG will not tolerate a business relationship that is suitable for money laundering, is begun for money laundering, is used for money laundering, or gives the impression of money laundering in its business transactions or its business partners. A business transaction falls under this definition where it disguises the illegitimate origin of the money used to such an extent that the origin is no longer visible.

5. Dealing with authorities, previous employees of authorities and procurement laws

Our business partners shall comply with procurement laws and regulations. This shall apply to the lawful treatment of private and/or confidential information. Former or current employees of government bodies shall be employed in compliance with all relevant laws, provisions and legal requirements. The same shall apply to contracts and negotiations with government employees in terms of their potential employment with the company and their engagement as consultants or subcontractors.

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

III. Market conduct

1. Anti-trust law

Our social and economic system must be based on fair and unimpeded competition. It therefore goes without saying that our business partners adhere to the applicable anti-trust rules. No agreements in breach of anti-trust laws shall be entered into with competitors or suppliers, particularly regarding prices, offers, terms and conditions of business, production programmes, sales quotas and markets shares, and with other bidders at public tenders.

2. Export control

The respective foreign trade, tax and customs laws shall be complied with. This shall apply to all imports and exports of goods, services and information as well as the diligent selection of suitable business partners.

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

IV. Business secrets

1. Data protection

Anyone who handles personal data bears significant responsibility. This applies above all in our digitalised world. It therefore goes without saying that our business partners adhere to the respective laws on data protection and information security and the official regulations when collecting, saving, processing, transmitting and disclosing personal information. This also applies to data that is subject to confidentiality for other reasons with increased expenditure.

2. Information security and confidentiality

In order to create trust among customers and partners, ESG sets great store by ensuring that data and information of which it becomes aware during operations is used exclusively within the permitted framework. Business partners thus ensure that confidential data is not disclosed within or outside their company without authorisation. The disclosure of confidential data must be in line with statutory requirements and contractual

conditions. Access to and handling of classified information must always be in accordance with the confidentiality level and the measures and rules defined in the confidentiality manual.

3. Intellectual property

Our business partners shall comply with all third-party and intellectual property rights. Business and company secrets, industrial property rights and patents shall not be violated.

4. Cybersecurity

Attacks on companies' IT infrastructures are increasing globally and present a significant risk for ESG, our customers and not least our business partners. It is therefore essential that our business partners take the necessary precautions to protect themselves against cyber attacks as far as possible. Should an attack be successful despite these precautions, our business partners will inform us immediately where there is or could be a risk for us.

COMPLIANCE CODE OF CONDUCT FOR BUSINESS PARTNERS

V. Compliance with the Code of Conduct

Our business partners shall agree to endeavour to enforce the guidelines stated in the Code of Conduct within their companies and ensure compliance with the latter. They should prompt and encourage their suppliers along the supply chain to also comply with the guidelines stated in the Code of Conduct.

Our business partners shall implement and regularly review organisational measures to ensure compliance with the relevant regulations. They shall announce such measures within their companies. Upon justified written request by ESG, in other words in the case of there being indications of material violations of the guidelines, our

business partners shall provide satisfactory evidence that suitable measures have been implemented in their daily operations to prevent such violations. ESG may otherwise request an audit at the premises of the business partner. A material violation of the obligations stated in the Code of Conduct shall be regarded as a breach of contract by the business partner. ESG shall evaluate each case on its own merits and reserves the right to withdraw from or terminate the agreement and to terminate the business relationship. ESG may, at its discretion, choose not to enforce any of the actions stated above if the business partner implements countermeasures to prevent future violations immediately.