



Code of Conduct

for colleagues of the
Etimex Technical Components Group

Preface

The management of the Etimex Group has developed a model for the Group that describes what our corporate group stands for.

It is important to us as a company to clarify what expectations we place on our employees, managers, and executives. Our Code of Conduct therefore defines the principles of

Etimex Technical Components GmbH in Rottenacker as well as its sister companies, including Etimex s.r.o in Hranice na Moravě, Czech Republic (hereinafter collectively referred to as “Etimex”) in the context of dealing responsibly with people, the environment, and security.

Rottenacker, in January 2024



Erhard Krauss

CEO of the Etimex Technical Components Group



I. Mission Statement

1. General information

Etimex bases its business processes, actions, and decisions on legal principles and ethical values, particularly integrity and respect for human dignity, and promotes fairness, transparency, responsible leadership, and a relationship of trust and cooperation in the companies.

We acknowledge our social responsibility to our employees, business partners, and the community. We promote sustainability and conservation of resources.

We comply with laws and corporate guidelines. We act with integrity and do what is right. We always comply with the laws and regulations, our Code of Conduct, and the guidelines and procedures

in the Etimex Technical Components Group. Where these principles are in conflict, the higher standard always applies.

2. Binding character of the Code of Conduct and its implementation

This Code of Conduct is binding on all Etimex personnel worldwide.

Personnel within the meaning of this Code of Conduct includes, without exception, all employees including management employees and senior executives of Etimex, regardless of whether they are employed full-time or part-time, or whether they are employed as independent contractors or



undergraduate student assistants or as interns.

Senior executives have a special responsibility to set an example in and to take responsibility for implementation of and compliance with the guidelines by the employees.

2.1. Guidance

This Code of Conduct represents the principles most important to us for action in conformity with laws and regulations as well as for morally and ethically impeccable behavior externally in business dealings as well as internally in dealing with colleagues. It serves as guidance to us in our daily work dealing with colleagues, suppliers, customers, and competitors, and supports us in acting properly, honestly, and responsibly. We are

jointly responsible for compliant behavior.

2.2. Binding character

It is the duty of each and every manager to clearly inform the employees assigned to them as to the applicability and content of this Code of Conduct, and to expect them to unconditionally comply with all rules.

Since any violation of the Code of Conduct may lead to major economic damage and considerable loss of reputation for Etimex and thus can endanger the sustainable development of the company, the company's management will not tolerate any violation of the principles of this Code of Conduct.

Each employee must therefore accept personal responsibility for complying with all laws, regulations,



and standards of behavior that apply to them. In case of a culpable violation, they must expect disciplinary measures and the assertion of claims for damages, regardless of any proceedings against them by government agencies.

This Code of Conduct is an internal code of behavior that does not establish any third-party claims.

2.3. Supplementation by guidelines

This Code of Conduct is specified and supplemented by internal guidelines on selected topic areas. All guidelines must be consistent with this Code of Conduct. This also applies to guidelines already issued as of the effective date of this Code of Conduct, which continue in force in this respect. These guidelines are binding on all employees in the same way as this Code of Conduct.

II. Fair play in the market

1. Anti-trust law and unfair competition

We respect the rules of fair and open competition and make no arrangements that influence competition in an unlawful way. Prohibited business acts shall not be carried out.

For example, the following acts are prohibited:

- Price, quantity, and terms arrangements with competitors
- Exchange of secret market intelligence with competitors
- Calls for boycotts of market players
- Resale price maintenance agreements
- Territorial and customer restrictions to the detriment of the buyer

Since evaluating circumstances relevant to competition law may be difficult in individual cases, the Compliance Officer should always be consulted in case of doubt.

2. Corruption and bribery

Corrupt practices, including bribery, are illegal, wrong, and prohibited. They distort markets, undermine social justice, and promote many other types of criminality. Offering, promising, or giving someone something of value in order to achieve an undue advantage or to unduly influence someone else is illegal. Demanding or accepting something of value that could endanger the integrity or loyalty of Etimex employees or their



business partners is illegal and prohibited.

Bribes are illegal regardless of whether the recipient is a public official or a private individual. Public officials, however, are subject to a greater risk of corruption and are often subject to stricter laws and regulations. Kickbacks (small bribes) that are paid to accelerate routine government services are likewise illegal and prohibited. Etimex never participates in bribery or other corrupt practices, neither directly nor through third parties.

Every form of criminal or unethical influence on the decisions of customers and other business partners must be opposed. Action will be taken against corruption in the corporate group as well as against any form of personal enrichment to the detriment of the corporate group.

The highest standards of integrity shall be used as the basis for all

business activities. A zero-tolerance policy shall be enforced on the prohibition of all forms of bribery, corruption, extortion, and embezzlement. Procedures for monitoring and enforcing the standards shall be used to ensure compliance with the anti-corruption laws.

Before we offer a customer, public official, or another stakeholder something of value, we review our guidelines and obtain the necessary consents. This is particularly important in case of gifts or entertainment, offers of travel to customers, donations, sponsoring, and similar transactions.

We carefully maintain our business books and documentation so that they correctly, completely, and fairly reflect our transactions and our business situation.

Since evaluating circumstances relevant to criminal law may be difficult in individual cases, the

supervisor should always be consulted in case of doubt.

3. Donations and sponsoring

Donations will only be made by the managing directors and shareholders and only on a voluntary basis without any expectation of any quid pro quo. Donations to political parties, organizations similar to parties, elected and public officials, as well as candidates for elected or public office are not permitted.

Sponsoring payments are contributions made in expectation of a service in return. They require the conclusion of a sponsoring contract and must have a connection to Etimex's core business or its locations.

Donation activities and sponsoring payments are not permitted to be

made with the intent of covertly promoting decisions in the interest of the company.

4. Invitations and gifts

Any appearance that we would be open to personal advantages and corruptible must be avoided, meaning that every offer of gifts and invitations must in principle be rejected as soon as possible, and acceptance must be refused. We consider invitations to business meals or to business events, as well as accepting or providing gifts, particularly gifts of money or items, discounts, rewards, and wedding, birthday, and anniversary gifts that correspond to recognized business practices and are reasonable to be permitted when a limit of EUR 50.00 gross is not exceeded.

5. Export controls, economic sanctions, export, and customs

Export controls and economic sanctions relate to restrictions on the export or re-export of goods, software, services, and technology, as well as to applicable restrictions of trade with specific companies, regions, companies, or organizations and individuals. The purpose of sanctions is to modify the behavior of another nation, for instance in order to protect human rights or to avoid the use of military force.

We respect all national and international regulations that restrict or prohibit importing, exporting, or domestically trading in goods, technologies, or services. We comply with the foreign trade law in force in each case, applicable customs regulations, and resulting approval processes. We also comply

with embargoes and restrictions applicable worldwide issued against countries, such as the restriction on conflict minerals.

We oppose the financing of terrorism or other illegal interests and carry out sanction checks on individuals for this reason. We reject transactions with persons, companies, or groups placed on sanctions lists.

6. Money laundering

We support the international fight against money laundering and take the legal obligations very seriously.



7. Environmental protection / energy efficiency / renewable energies

Etimex strictly complies with applicable laws on environmental protection and internationally recognized environmental standards. We strive to reduce detrimental effects on the environment. We are aware that it is necessary to operate within planetary limits. We also promote sustainability in our production and products, deal sparingly with resources, and minimize environmental burdens in order to continuously improve environmental protection. We therefore achieve compliance with the following principles:

The use and consumption of resources in the management unit and during production, particularly the use and consumption of water

and energy as well as the generation of waste of all kinds shall be kept to a minimum or reduced or avoided.

This occurs either directly at the point of origin or by means of procedures and measures, for instance by changing the production and maintenance processes or changing procedures in the company, by using alternative materials, economization, recycling, or by reusing materials. In the spirit of sustainability, we ensure that, in addition to production development, the products themselves deal sparingly with raw materials and natural resources and are reusable whenever possible. We therefore monitor and document each use of energy and make an effort to improve energy efficiency, minimize energy consumption, and implement renewable energies so that greenhouse gas emissions are reduced.

8. Documentation and reporting

Business transactions must be properly documented and reported. All business transactions to be documented according to internal or external regulations shall be recorded in our company with accurate content, comprehensively, timely, and in the place provided for. Documentation should be

effected electronically and retained in accordance with the legal and internal requirements and time periods.

Within the prescribed framework, all of us are obligated to make truthful and complete oral and written reports.



III. Management culture and employees

1. Management culture

Sustainable business success is based to a special degree on reliable, motivated, and committed employees. Etimex bears significant responsibility for its employees and is aware of this. Our management culture is based on shared values, promotion of performance and empowerment, as well as fair dealing with each other.

In the area of employee development, we focus on position-related education and training that is applicable in the company, as well as developing and supporting future leadership potential. We emphasize the compatibility of work and private life. Performance and commitment receive special support and recognition. At Etimex,

the professional and personal support of women is particularly emphasized.

We foster open and fair dealings with each other. Our employees can openly address problems, conflicts, and undesirable developments.

Our managers should actively support the implementation of these principles and serve as a model by their exemplary personal behavior. They should consistently deal with employees appreciatively and responsibly, and always lend a ready ear to their concerns.

2. Employee health and safety

The safety and well-being of every employee has the highest priority. We therefore create a safe and healthy working environment and never accept compromises when it comes to job safety, even if this results in time pressure, cost pressure, or deadline pressure from customers.

Necessary precautionary measures are taken against risks, accidents, damage to health, and occupational illnesses that may result in connection with the job activity by developing and using reasonable job safety systems. In addition, employees are regularly informed of and trained in applicable health protection and safety standards as well as safety measures in order to exclude or at least minimize the risk of injury.

Any unsafe work that we observe must be stopped.

Our managers are responsible for ensuring that each employee is offered a safe and healthy workplace. The employees are given access to sufficient quantities of drinking water as well as access to clean sanitary facilities.

We expect that our employees comply with our requirements for job safety.

3. Consumption and abuse of alcohol and narcotics

Employees should start their work in a condition in which they can perform their duties without the influence of narcotics or alcohol. The abuse of alcohol, narcotics, or other harmful substances has a negative effect on work performance and represents a risk



to the safety of the employees and third parties. Employees are not permitted to possess, sell, use, distribute, or off any narcotics or other harmful substances during work or on company property. Employees are not permitted to consume alcohol if this hinders them in performing their job duties, endangers others, or damages the reputation of EtimeX or a company employee. Consumption of narcotics at work will not be tolerated.

4. Conflicts of interest

Conflicts of interest should be avoided. They exist when individual private interests and job duties or EtimeX's interests collide in some manner in a way that impairs either the duties and/or the private interests and/or the EtimeX interests.

A conflict of interest may arise, for instance, if (i) an employee is a member of management, the owner, agent, or representative of an EtimeX supplier or customer for which a project is relevant; (ii) an employee is a member of management or owner, agent, or representative of a competitor of EtimeX; (iii) an employee holds a significant investment in a supplier, customer, or competitor of EtimeX, or (iv) an employee has direct business dealings with their spouse or close relative who is employed at a supplier, customer, or competitor.

We make business decisions solely in the interest of the company. Conflicts of interest with private interests or other economic or other activities, also by dependents or other closely related persons or organizations should be avoided from the beginning. Even the appearance of a conflict of interest is problematic when this gives rise to the impression that a person's



objectivity or independence could be impaired.

All employees are prohibited from achieving anything through a family member, representative, broker, trade association, consultant, or any other third party that they are not permitted to do directly due to a conflict of interest.

Since evaluating conflicts of interest may be difficult in individual cases, the Compliance Officer should always be consulted in case of doubt.

5. Interests of outsiders

All employees are expected not to pursue any interests and activities outside of Etimex to the extent possible which could have a detrimental effect on the performance of their work obligations owed to Etimex. Such a commitment may raise questions as to the loyalty of an employee

between Etimex and third-party interests, and therefore bring about a conflict of interest. Employees are not permitted to work for competitors, suppliers, or customers, to provide them with advice or to offer them consulting services, if these activities are in conflict with their responsibility to Etimex, reduce this responsibility, or represent a conflict, even only an apparent conflict, with the company's business or financial interests. Employees are not permitted to accept any financial compensation for services as "industry experts" or for conversations about the company's business.

Employees are not permitted to carry out any "sideline jobs" in their free time that are in competition with Etimex. In addition, no employee is permitted to financially invest in competitors, suppliers, or customers.



6. Confidentiality and data protection

Operational and trade secrets are one of the most valuable assets of our company. We comply with our confidentiality obligation provided in our employment contract to maintain secrecy regarding operational and trade secrets and other internal affairs. Such information is only permitted to be provided to employees who are authorized to receive knowledge thereof due to their assignment.

We also handle all personal information: about employees as well as about customers, business partners, and suppliers with due care and confidentiality. Employees shall unconditionally comply with and adhere to duties of confidentiality; this also applies to separate duties of confidentiality that are imposed on us by our business partners and known to the

corresponding employees on a case-by-case basis.

We guarantee compliance with data protection provisions. Personal data are only permitted to be collected, processed, and used insofar as this is permitted within the framework of the relevant laws. Documents with personal data about employees are handled confidentially and secured against unauthorized access.

All components of information processing are also secured otherwise in such a way that the confidentiality, integrity, availability, and verifiability of the protected information is guaranteed and unauthorized internal and external use is prevented.

The Information Security and Data Protection Guideline provides more detailed regulations.



7. Protection of company property

Each and every one of us is obligated to deal responsibly with company property such as furnishings, systems, equipment, company vehicles, etc., to treat it with care and to protect it from loss, damage, abuse, theft, or destruction. This regulation also relates to intellectual property such as patents, copyrights, and expertise in the same way.

8. Computer use

Employees must use Etimex computer systems and the database in such a way that Etimex's interests are protected at all times.

Employees must securely store and transport laptops and other mobile devices with the necessary care both on and off company property. In particular, employees are only

permitted to download and store confidential data and information protected by a personal access code onto portable storage devices to the extent that is absolutely necessary for carrying out business tasks or orders. Employees must delete such information from the portable devices when they no longer need the information, unless the information would have to be left on the device pursuant to an instruction from the management due to a pending process.

Only software that is licensed or otherwise released for use is permitted to be used on Etimex computer systems. Employees who receive electronic access to documents or materials from other companies or persons must respect their copyrights.

When using the Internet (e.g., blog posts, e-mail, or social media), the following guidelines must be followed.



- Employees must comply with all applicable laws, regulations, and provisions.
- Employees are not permitted to issue any position statements in the name of Etimex or to make statements on the Internet about Etimex products or services unless this is approved in the context of a marketing program released by the company.
- Employees are not permitted to make statements on confidential and company-related financial matters of Etimex. This includes internal financial information such as pricing or contracts, and also publicly accessible financial data about Etimex, information on corporate strategy, on the market situation, or about competitors.
- Employees are not permitted to disseminate, store, or forward any insulting, defamatory, obscene, or threatening statements.
- Employees are not permitted to disseminate any illegally copied material (e.g., music, video files, news articles, publications).
- Employees are not permitted to even attempt to obtain unauthorized access to computer systems by hacking, abusive use, or in any other way.

9. Social responsibility

For Etimex, social responsibility is an indispensable component of corporate management guided by values, and a significant factor for sustainable success. We ensure fair working conditions for the employees. Etimex contributes to the social and economic development of the regions around our locations.



10. Financial responsibility

We adhere to the diverse regulatory responsibilities of our company in the area of finance. This includes, among other things, properly inputting, maintaining, and reporting on the business documentation, including but not limited to financial accounts, quality reports, time recording, expense reporting, and filings to customers or regulatory agencies. Books and record entries are property maintained in conformity with applicable law and generally accepted accounting principles.

11. Respect for human rights

Etimex feels obligated to the principles of respectful, fair, and loyal dealings with each other, respects each person as an

individual, and opposes any and all discrimination of persons in hiring and employment. We respect internationally recognized human rights and support compliance with them. We also comply with the prohibitions on child labor and forced labor in any form and comply with the minimum age for employment.

We expect that no violations of human rights will be committed by us, so that any behavior deviating from compliance with human rights will be banned by us and is prohibited. Tips about actual or suspected violations should be provided to the Compliance Officer.

12. Discrimination, equal opportunity, diversity, and inclusion

We do not tolerate any discrimination, harassment, workplace bullying, or stalking of



employees or third parties. We advocate for equal treatment and equal opportunity for all employees without regard to race, ethnic and social origin and position, gender, skin color, religion or ideology, disability, age, sexual orientation, genetic features, or assets.

Our diversity is decisive for our corporate success as a global player. We endeavor to hire, retain, and support competent employees using fair hiring practices.

Professional advancement in our company is based on professional skills, performance, and equal opportunity.

Etimex creates a work environment where all people feel respected, accepted, supported, and valued, so that they can participate to the full extent in decision-making processes and development opportunities within the company.

13. Employee rights, fair pay

The nationally applicable laws and work standards regarding maximum working hours and fair pay are complied with. Fair pay is based on minimum wages guaranteed by law or collective bargaining agreements, the performance of the employees, and the respective labor market. All employees receive compensation adequate to their job title.

14. Freedom of association

Etimex respects employees' right to freedom of association, to joining unions, to appealing to employee representatives, or to membership in works councils in accordance with locally applicable laws. The employees are empowered to communicate with the company's



management openly and without fear of reprisals or harassment. Employees who exercise these

rights will be neither advantaged nor disadvantaged.



IV. Business partners

1. Selection of business partners

Business partners are carefully selected according to objective criteria. Business partners are obligated to comply with our values using the Code of Conduct for Business Partners.

2. Selection process

Our business partners (e.g., suppliers, service providers, commercial agents, distributors, project partners, consultants) are selected impartially based on tenders that are evaluated using objective criteria specified in advance. Subjective preferential

treatment or discrimination is prohibited.

3. Code of Conduct for Business Partners

We expect of our business partners worldwide that they respect the principles manifested in the Code of Conduct for Business Partners, such as respect for people and the environment, the precept of strict compliance with laws, condemnation of corruption, and integrity in competition, and act accordingly in the context of their business activity.

Etimex’s Code of Conduct for Business Partners provides more detailed regulations.

V. Implementation and interaction with this Code of Conduct


1. Compliance responsibility & implementation

We actively promote the distribution and communication of this Code of Conduct and ensure effective implementation within the company. The individual business units as well as all employees are responsible for acting in accordance with the regulations. The individual business partners will be obligated to act in accordance with the law using the principles of the Code of Conduct for Business Partners.

Special training courses will be offered regularly on specific topic

areas such as product liability, anti-trust law, labor law, or environmental law. In case of questions or uncertainties with regard to correct behavior, employees should speak with their supervisor, their responsible human resources staff member, or their employee representative. If this does not result in clarification, anyone can contact the Compliance Officer. The matter will, of course, be handled confidentially.

Violations of this Code of Conduct will be sanctioned. In addition to consequences under labor law, this may also lead to consequences under civil or criminal law. These are specifically warnings, disciplinary measures up to and including



termination, claims for damages, or criminal charges.

2. Revisions

Etimex is entitled to revise this Code of Conduct at any time.

3. Reports of legal violations

Etimex wishes to continuously improve in its compliance with internal guidelines and currently applicable laws in the course of its business activity, and emphasizes preventive improvement measures. Reports from employees (“whistleblowing”) are a valuable building block for continuous improvement. We encourage our employees to report violations of internal guidelines or currently applicable laws immediately, as soon as they are observed or it is reasonably likely that they will

occur. The reporting employee should not fear any disadvantages insofar as the report was made to the best of their knowledge and with honest intent.

Notices of rule violations as well as reports, questions, and suggestions can be directed to the Compliance Officer by personal report or by e-mail.

4. Additional regulations

The individual companies in the Etimex Corporate Group are free to enact additional regulations going beyond this Code of Conduct insofar as they do not contradict principles set forth here.

The current version of the Code is available on the Etimex website.

The Code is available in several languages. In case of doubt, the German version will govern.



5. Designation of social gender

For better readability, the present Code of Conduct foregoes the

simultaneous use of feminine and masculine language forms. The generic masculine is used, also for designations of titles, whereby all genders are equally meant.



Etimex Technical Components GmbH
Ehinger Strasse 30
89616 Rottenacker
Germany

T +49 7393 52 0
F +49 7393 52 130
hello@etimex.global
www.etimex.global

Chief Executive Officer: **Erhard Krauss**
Headquarters: **89616 Rottenacker**
Local Court: **Ulm HRB 490609**
VAT-ID: **DE813461678**