

Code of Conduct
of
Spitzenberger & Spies GmbH & Co. KG
and their suppliers

Table of Contents

1.	Introduction	2
2.	Human rights and labor standards	3
2.1	Respect for human rights	3
2.2	Free choice of employment	3
2.3	Avoid child labor	3
2.4	Non-discrimination	3
2.5	Harassment	3
2.6	Fairness in wages, working hours and social benefits	3
2.7	Health and safety at work	3
2.8	Freedom of association and right to collective bargaining	3
3.	Business ethics and compliance	3
3.1	Compliance with laws	3
3.2	Protection of business secrets / data protection	3
3.3	Corruption / bribery / conflicts of interest	3
3.4	Whistleblowing, protection against retaliation	3
3.5	Fair competition	4
3.6	Financial responsibility	4
3.7	Counterfeit Parts, Intellectual Property	4
3.8	Export Controls, Economic Sanctions	4
4	Environmental protection and security	4
4.1	Environmental responsibility	4
4.2	Environmentally friendly products	4
4.3	Environmentally friendly production	4
5	Conflict minerals	4
6.	Dealing with this guideline	4

1. **Introduction**

Sustainability and corporate social responsibility have always been an important factor for Spitzenberger & Spies GmbH & Co. KG.

With this sustainability guideline for Spitzenberger & Spies GmbH & Co. KG and their suppliers, we define the standards for this.

The suppliers are requested to pass on these requirements to their employees and to their own suppliers and to ensure compliance.

The frame of reference is the Declaration of Human Rights and the United Nations Global Compact and the conventions of the International Labor Organization (ILO).

2. Human rights and labor standards

2.1 Respect for human rights

All business partners are required to respect internationally recognized human rights and to promote their observance. In all business activities in their own sphere of influence, suppliers should ensure that they, their business partners and their suppliers do not commit or are involved in any human rights violations.

2.2 Free choice of employment

Forced or compulsory labor is not permitted.

2.3 Avoid child labor

Child labor may not be used in any phase of production or processing. Suppliers are encouraged to at least follow the ILO conventions on the minimum age for admission to employment and the ban on child labor. Children must not be inhibited in their development. Their safety and health must not be compromised.

2.4 Non-discrimination

All business partners are obliged to maintain equal opportunities in employment and to refrain from any kind of discrimination. Discrimination against employees, e.g. due to descent, origin, nationality, skin color, gender, age, religion, disability, illness, pregnancy, sexual orientation, world view, or political and trade union activity may not take place.

2.5 Harassment

Employees must be protected against harassment at the workplace, especially of a sexual nature.

2.6 Fairness in wages, working hours and social benefits

Remuneration and social benefits must comply with the basic principles regarding minimum wages, applicable overtime arrangements and statutory social benefits. The working hours and non-working hours must at least comply with the applicable laws, industry standards or the relevant ILO conventions.

2.7 Health and safety at work

As an employer, all business partners guarantee health and safety at work, at least within the framework of the applicable national regulations, and support constant further development to improve the working environment.

2.8 Freedom of association and right to collective bargaining

All business partners should uphold freedom of association and the effective recognition of the right to collective bargaining. The right of workers to associate, join a union, appoint a representative and be elected is respected. It must be ensured that employees can communicate openly with the company management about working conditions without fear of disadvantages.

3. Business ethics and compliance

3.1 Compliance with laws

The supplier is obliged to comply with all laws and regulations applicable to him and the business relationship with us. We expect the highest integrity in all business activities and relationships.

3.2 Protection of business secrets / data protection

All business partners are obliged to treat all non-obvious technical and commercial details that become known to them through the business relationship as a business secret. Personal data must be handled in accordance with applicable law.

3.3 Corruption / bribery / conflicts of interest

All business partners are encouraged to refrain from any form of fraud or breach of trust, bankruptcy crimes, corruption, granting benefits, or bribery. All business partners are asked to make decisions when dealing with one another only on an objective basis and not to be influenced by personal and personal financial interests.

3.4 Whistleblowing, protection against retaliation

All business partners ensure the protection of all employees from retaliation for reporting a case of bribery or corruption.

3.5 Fair competition

Laws, particularly antitrust laws that protect and promote competition, must be complied with. Companies must respect fair competition and abide by prohibiting agreements with competitors and other measures that hinder the free market.

3.6 Financial responsibility

All business partners comply with the respective national legal requirements for financial records.

3.7 Counterfeit Parts, Intellectual Property

All products are traceable in the supply chain. Business partners shall notify each other immediately and take appropriate legal action if they become aware of counterfeit parts in circulation.

The intellectual property of the respective business partners is respected by all.

3.8 Export Controls, Economic Sanctions

Restrictions on the export of goods and trade with countries sanctioned by international laws and regulations are observed.

4 **Environmental protection and security**

4.1 Environmental responsibility

Regarding the environmental problem, suppliers and we must act according to the precautionary principle, take initiatives to promote environmental responsibility and promote the development and dissemination of environmentally friendly technologies.

4.2 Environmentally friendly products

All products manufactured along the supply chain must meet the environmental standards of their respective market segments. This includes all materials and substances used in production. Chemicals and other substances that are dangerous when released into the environment must be identified. Hazardous substances management must be set up for them so that they can be safely handled, transported, stored, reprocessed or reused and disposed of using suitable procedures.

4.3 Environmentally friendly production

Optimal environmental protection must be guaranteed in all phases of production. This includes a proactive approach to avoid or minimize the consequences of accidents that can have a negative impact on the environment. Importance is attached to the application and further development of technologies that save energy, water, and protect air quality, as well as the use of strategies for emission reduction, reuse and recycling.

5 **Conflict minerals**

Conflict minerals are currently the raw materials tin, tungsten, tantalum and gold. These minerals can come from the Democratic Republic of the Congo and its neighbouring countries and the mining can contribute to the financing of armed groups and thereby to extreme violence and human rights violations in these countries. The four so-called conflict minerals are used in many products, especially in electronic components, and are therefore present in our products.

Our aim is that only raw materials are used in our products, the mining, transport, trade, processing or export of which neither directly nor indirectly contributes to the financing of conflicts and human rights violations.

6. **Dealing with this guideline**

We make all suitable and reasonable efforts to continuously implement and apply the principles and values described in this guideline and to remedy any deficits as quickly as possible.

We communicate the policy and the implementation to employees, business partners and other interested parties, e.g. by publicizing it on our own website and by training our employees.

Spitzenberger & Spies GmbH & Co. KG
Schmidstr. 32-34
94234 Viechtach
Tel. +49 9942 956-0
info@spitzenberger.de
www.spitzenberger.de