



**CODE OF
CONDUCT**



Hectronic GmbH

Code of Conduct



Preface

Dear employees,

Being a family business, we aim for a corporate culture built on flat hierarchies, a team spirit based on trust as well as a sense of responsibility. Together, we are committed to upholding these principles and maintaining the highest level of professionalism, ethical conduct and integrity in all business relationships.

Each and every one of us makes a significant contribution to the success of Hectronic. By standing up for our values, standards and ethical principles, you protect the company and the reputation it has built over 60 years. A company can only be sustainably successful if there is a high level of trust - both among our employees as well as in the exchange with our customers, partners and all further external stakeholders.

As a locally producing company, we are fully aware that we have a special responsibility towards the generations following us as well as towards society as a whole. Therefore, we must handle energy and raw materials carefully and reduce environmental impact.

For this reason, we have drawn up a Code of Conduct to help us meet our responsibilities and act in an ethical manner. Our behaviour should have a positive influence on the team spirit in the company, our partners and customers, as well as environment and society.

This code is based on the internationally used ESG standards (short for Ecologic, Social and Governance standards) in terms of structure and content.

All employees are asked to read the Code of Conduct carefully and to respect the values set out in it in everything they do for Hectronic. The aim of our Code of Conduct is to help employees make the right decisions when faced with legal or ethical issues in their daily work.

Please take the time to read our Code of Conduct carefully and make sure you follow it for all business activities. This Code of Conduct applies to all employees and companies of the Hectronic Group.

We thank you for your commitment to our values and for your cooperation.

Stefan Forster
Managing Director / Representative of the Owner Family



1 | Corporate Environmental Responsibility

1.1 Environment

We aim to develop our business in a sustainable and environmentally friendly way. Therefore, we protect our environment and comply with environmental laws and regulations.

Whenever possible and economically reasonable, we aim to exceed the existing minimum standards to protect the environment.

1.2 Sustainability

It is our responsibility to use our resources in an economically, ecologically and socially sustainable manner. We aim to act in the most sustainable way possible in all areas. This applies to the manufacturing of our products, to our internal processes and to our social commitment.

In consequence, we always make our business decisions from a perspective of sustainability and work hard to establish this way of thinking along the entire value chain.

2 | Corporate Social Responsibility

2.1 Human Rights and Labour Standards

We act in accordance with the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

2.2 Fair Working Conditions

It is our policy to protect our employees from unfair and unethical working conditions. We do not tolerate forced labour, child labour or other unethical working conditions.

2.3 No Discrimination and No Harassment

Diversity is highly valued and we ensure that all employees feel comfortable working for us. Therefore, we do not discriminate anyone on the basis of gender, age, ethnicity, nationality, religion, sexual orientation, disability or any other characteristic protected by law.

Our employees are hired, work assigned, promoted and compensated on the basis of their skills, performance and ethical conduct. We work together fairly and as equals and do not tolerate any form of bullying, stalking or harassment.



2.4 Health & Safety

A safe and healthy working environment is provided. We comply with applicable country-specific occupational health and safety regulations and ensure that all employees are aware of them and receive appropriate training. Each employee is responsible for health and safety in the workplace according to their duties, skills and experience. We are all encouraged to identify areas for improvement and to express health and safety concerns.

2.5 Social Responsibility

Our social responsibility is something we take seriously. Therefore, we participate in social, ecological, cultural and other charitable projects.

3 | Corporate Governance

3.1 Laws and Regulations

We acknowledge applicable law as a minimum standard and respect laws in all countries where they apply. The Code of Conduct and other Electronic rules and regulations are strictly adhered to.

3.2 Competitiveness and Cartels

We encourage and protect competition.

There is no exchange of information on prices, margins or costs with competitors. Neither do we collude on prices with competitors. Nor do we agree to share markets, territories or customers with them. There is no agreement on or requirement of minimum resale prices. Furthermore, there is no participation in boycotts against customers or suppliers. We fully cooperate with the relevant authorities in the event of an official investigation.

3.3 Fight against Corruption

We reject all forms of corruption and extortion. We do not bribe public officials or private individuals and do not accept bribes.

More specifically, we do not offer or accept unreasonable advantages which are intended to induce the recipient to grant an unjustified economic advantage. An advantage is normally unreasonable if it is not proportionate, not generally accepted or not offered in a clear business context.

Cooperating with representatives or agents must stand up to a third party comparison and must not be used to bypass anti-corruption rules.

3.4 Money Laundering & Terrorist Financing

We reject money laundering and terrorist financing and prevent them through appropriate measures.



3.5 Data Protection

We strictly observe the data protection rights of our customers, employees and other stakeholders and, where applicable, also oblige them to comply with the data protection rights required by law.

We collect, process and store personal data only for specific and legitimate business purposes, in accordance with applicable laws and as described in our Data Protection Management System (DSMS). This means that we protect personal data from unauthorized access.

3.6 Data Security

We protect confidential information of employees, customers, suppliers and other business partners. We comply with confidentiality obligations arising from confidentiality and non-disclosure agreements. We respect intellectual property rights of competitors and third parties.

We have our technical processes regularly audited by an independent external body. Our ISMS (Information Security Management System) team ensures the best possible security in handling data and strives to give cybercrime no chance in our company.

3.7 Fair Business Partner

By acting and conducting our business on the basis of facts, we are reliable. We act professionally in our dealings with suppliers and business partners. Our business actions stand up to third-party comparison.

We do not discriminate against suppliers or customers, especially when they are in competition with each other. Furthermore, we expect our suppliers and business partners to behave responsibly and in accordance with the rules of our Code of Conduct.

If we discover relevant violations at our suppliers or business partners, we decide on appropriate measures.

3.8 Correct Accounting and Bookkeeping

We ensure that our data, information and records are true and fair. Our compliance with applicable laws and accounting standards ensures that our financial information gives a true and fair view.

No false or misleading statements or entries will be made in any report, publication or expense report.

3.9 Export Control

We comply with applicable export control law from national and supranational legislators and organisations, including but not limited to EU and UN embargo resolutions.

We do not use brokers or agents to circumvent embargoes. Sensitive cases are clarified by our internal export experts.

Where necessary, we apply for export licences from the relevant authorities.



3.10 Dealing with violations (whistleblowing)

If you have concerns about following any of the rules in this Code of Conduct, please address them. You are helping to protect the integrity and reputation of Hectronic as well as your own interests and those of your colleagues.

We do not tolerate misconduct or violations of the law in our company. For this purpose, inform your direct superior or another superior about possible irregularities. Of course, you can also contact the works council, the human resources department or someone from the management, the advisory board or any member of the board of directors - anonymously if you wish. The source of information will be treated confidentially. In addition, employees who raise Code of Conduct concerns are protected from the negative consequences of their actions.

In this context, we also implement the provisions of the German Whistleblower Protection Act (HinSchG) via the joint internal reporting office of wvib e.V. (Wirtschaftsverband Industrieller Unternehmen Baden e.V.), thus giving our employees an additional opportunity to report incidents anonymously.

3.11 Conflicts of Interest

Hectronic employees must ensure that their own interests do not conflict with the interests of the company. In case of possible conflicts of interest, the direct superiors or the human resources department must be informed so that these conflicts can be resolved in the best interests of Hectronic.

A conflict of interest exists when personal interests do not coincide with the interests of Hectronic and such a conflict can have a business-relevant influence. „Personal“ interests may also refer to family members, relatives and friends.

3.12 Company Property

At Hectronic, we treat company property with respect and care. We exercise due care in handling Hectronic's intellectual property rights, including trade and business secrets, to prevent loss or theft.

We adhere to the information security regulations set out in the integrated management manual.

3.13 Dual Control Principle

We ensure that at least two employees are involved in all significant business processes or that results of such processes are reviewed by a second employee (dual control principle).

Agreements and other documents that impose material obligations on Hectronic must be signed by two employees who have the required signature authority.

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