



brennenstuhl®



CODE OF CONDUCT

VERSION 06/2023

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Preamble

Innovations in our society would be inconceivable without the electrical industry. With their products and applications, small and medium-sized enterprises in this sector in particular create sustainable solutions for climate protection, the conservation of resources, secure jobs and contribute to social and economic development worldwide. Actions are in line with the applicable legal framework and a responsible ethical approach, which are formulated in this Code of Conduct.

1. Basic understanding

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in the sense of the following guidelines. We, the undersigned company

Hugo Brennenstuhl GmbH & Co. KG

assume responsibility within the framework of our respective capabilities and scope for action by taking into account the consequences of our business decisions and actions in legal, economic, technological as well as social and ecological terms. In this way, we contribute to the social and economic development of the countries and regions in which we operate. Responsibility for implementing this Code of Conduct lies with the management. This ensures that each area of our company is aware of its own responsibility for respecting human rights and implementing them on a day-to-day basis.

Our actions are in compliance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity, as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the core labor standards of the International Labor Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights. This Code of Conduct sets out the basic principles of our actions, which we actively demand our employees worldwide to observe. The contents apply in all subsidiaries and business units of our company. We endorse the amfori BSCI Code of Conduct and have signed it. We expect the same basic understanding from our business partners. Rights in favor of third parties shall not be established thereby.

2. Compliance with the laws

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles contained in this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we will endeavor to comply with the contents of this Code of Conduct.

3. Integrity and Compliance¹

3.1 Corruption

We do not tolerate corruption, bribery or extortion; they prevent fair competitive conditions. Benefits which are connected with the intention or could give the appearance of influencing business decisions or procuring any other improper advantage are neither promised, offered, granted, demanded or accepted in our business relationships, nor do we allow ourselves to be promised such benefits. A particularly strict standard must be applied in dealings with persons to whom special criminal and liability regulations apply (e.g. public officials).

3.2 Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or bid rigging.

3.3 Prevention of money laundering

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

¹ Compliance stands for the observance of legal requirements, regulatory standards and voluntary commitments.

3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information, trade secrets and non-public information. We comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

3.5 Data privacy

We process, store and protect personal data in compliance with legal regulations. Thus, personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We only process personal data if they are protected against loss, modification and unauthorized use or disclosure by appropriate technical and organizational measures.

3.6 Export control

We undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and support prohibitions - in the context of the transfer and export of our goods.

3.7 Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose these conflicts.

We ensure that all our employees are appropriately instructed on integrity and compliance topics.

4. Health and safety

We safeguard the health of our employees by taking appropriate health and safety measures based on ISO 45001. The following topics are adequately covered:

- Compliance with applicable laws and orientation to international standards regarding health and occupational safety;
- Appropriate workplace design, safety regulations and provision of appropriate personal protective equipment;
- Implementation of preventive controls, emergency response, an accident reporting system, and other appropriate continuous improvement measures;
- Enabling access to drinking water in sufficient quantity and access to clean sanitary facilities for employees. .

We ensure that all our employees are appropriately instructed.

5. Remuneration and working hours

Remuneration is based on the applicable laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration. We comply with applicable laws regarding maximum permissible working hours and ensure that

- the working hours, including overtime, do not exceed the respective maximum limits permitted by law;
- the weekly working time, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions are absent;
- employees have at least one full day off per calendar week.

6. Respect for human rights

We respect and support the observance of internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination.

Day-to-day management and monitoring of the Human Rights Policy is the responsibility of the Sustainability Team. It coordinates activities, sets priorities and leads our company-wide efforts to respect human rights. Implementation responsibility lies with the Operational Units, in particular the Purchasing department, which ensures the integration of this policy.

6.1 Prohibition of child labor

We do not tolerate child labor². We do not hire employees who do not have a minimum age of 15 years and ask for proof of age.

6.2 Special protection for young employees

We ensure that

- young people do not work at night and are protected from working conditions that are detrimental to their health, safety, morale and development.
- working hours allow them to attend school, training or education programs.

6.3 Prohibition of forced labor

Forced labor as defined in the European Convention for the Protection of Human Rights and Fundamental Freedoms Article 4 is prohibited.³

6.4 Freedom of association and collective bargaining

We respect the right of workers to freedom of association, assembly, collective bargaining and collective bargaining⁴.

6.5 Promoting Diversity and Diversity, Equal Opportunity

We promote equal opportunities and do not tolerate discrimination⁵. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

7. Environment, energy and climate protection

We will act in accordance with applicable laws to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection. We will take appropriate environmental protection measures that adequately cover the following topics:

- Setting goals, defining and implementing measures, and continuously improving them;
- Environmental aspects such as reduction of CO² emissions, increase of energy efficiency and use of renewable energies
- energies, ensuring water quality and reducing water consumption, ensuring air quality,
- promoting resource efficiency, reducing waste and disposing of it properly, and handling hazardous substances responsibly for people and the environment.

² ILO Conventions No. 79, 138, 142 und 182

³ ILO Conventions No. 29 and European Convention for the Protection of Human Rights and Fundamental Freedoms Art. 4

⁴ ILO Conventions No. 87, 135 and 154

⁵ ILO Conventions No. 111

8. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains. We reserve the right to review the application of this Code of Conduct by our suppliers systematically and on an ad hoc basis. This can take the form of questionnaires, assessments or audits, for example. On a risk basis, the focus of our activities is on BSCI (Business Social Compliance Initiative) risk countries.

If doubts persist afterwards regarding compliance with this Code of Conduct, the supplier will be asked to take appropriate countermeasures and report the matter to his responsible contact in our company. If necessary, the cooperation will be terminated.

9. Consumer interests

Where consumer interests are affected, we comply with consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. young people or pregnant women) enjoy heightened attention.

10. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labor law.

10.1 Communication

We communicate the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other stakeholders in an open and dialog-oriented manner.

10.2 Indications of violations

We offer our employees and business partners access to a protected mechanism to confidentially report possible violations of the principles of this Code of Conduct or to confidentially submit tips in accordance with the Supply Chain Due Diligence Act (LkSG) or the Whistleblower Protection Act (HinSchG).

If you have a tip, please contact our Compliance Reporting Office directly or anonymously via the contact form.

<https://brennenstuhl.com/compliance>

11. Signature

Tübingen, 27. June 2023



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