


<b>CODE OF CONDUCT</b>	
<b>FOR SUPPLIERS OF THE ELEKTRA GROUP</b>	Form: 840 01 17 Page 1 of 8 Rev. 00

## 1 Preamble


The Elektra Group, consisting of Elektra GmbH, Elektra Oberflächentechnik GmbH, Pol-Elektra Sp. z o. o. and FSP-Automations GmbH, as a development supplier and technology provider of electromechanical assemblies, stands for responsible corporate management that acts ecologically and socially. This behaviour is expected not only from employees but also from Elektra's suppliers and subcontractors. The principles of ecological, social and ethical aspects are part of the company's mission statement and must be adhered to. The most important points here are the quality of products and services, environmental protection, occupational safety, health protection, energy management and ongoing compliance with the law and legislation.

In order to comply with these principles, the Elektra Group has drawn up this Supplier Code of Conduct. It is based on the foundations of various ILO conventions, i.e. conventions of the International Labour Organisation, the German Supply Chain Due Diligence Act (LkSG) and other legislation that applies nationally or internationally. All minimum requirements are defined in this Supplier Code of Conduct, and Elektra expects suppliers to comply with them. For Elektra, compliance with and the implementation of this Code of Conduct are a prerequisite for successful cooperation. The Supplier Code of Conduct (abbreviation: "SCoC") applies to suppliers for as long as a business relationship with Elektra exists.

The SCoC must be observed by all suppliers and the requirements must be applied at all times in order to guarantee standardised cooperation that complies with the applicable laws and regulations.

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## **2 Requirements upon suppliers**

### **2.1 Social aspects**

The Elektra Group expects suppliers to respect human rights and to treat all employees with respect and dignity. Suppliers should also help to promote good working conditions and respect social aspects.

The requirement to comply with internationally recognised human rights standards based on the United Nations Universal Declaration of Human Rights, the United Nations International Covenant on Civil and Political Rights and the United Nations International Covenant on Economic, Social and Cultural Rights, the OECD Guidelines for Multinational Enterprises, the OECD Guidelines for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights and the "Implementation of the UN Guiding Principles on Business and Human Rights" National Action Plan applies.

Suppliers must comply with these international human rights provisions and must report violations to help remedy them.

#### **Child labour**


The Elektra Group rejects all forms of child labour, especially the worst forms of child labour, and advocates their abolition. The following prohibitions must be observed:

Prohibition of employment of a child under the age at which compulsory schooling ends under the law of the place of employment, whereby the age of employment may not be less than 15 years; this shall not apply if the law of the place of employment provides otherwise in accordance with Article 2 Para. 4 and Articles 4 to 8 of Convention No. 138 of the International Labour Organisation of the 26th of June 1973 Concerning Minimum Age for Admission to Employment (Federal Law Gazette 1976 II p. 201, 202).

Prohibition of the worst forms of child labour for children under the age of 18; in accordance with Article 3 of Convention No. 182 of the International Labour Organisation of the 17th of June 1999 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Federal Law Gazette 2001 II p. 1290, 1291).

#### **Forced labour**

The Elektra Group does not tolerate forced labour, human trafficking, debt bondage, slavery or any form of domination or oppression. This includes all works and services that are performed involuntarily or under threat of punishment and all forms of slavery.

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### Discrimination

The Elektra Group requires suppliers to treat employees with respect and dignity, and prohibits any form of discrimination based on national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology, unless this is justified by the requirements of employment. This also includes the protection of local communities and indigenous peoples.

### Working hours

Suppliers undertake to comply with statutory regulations such as the relevant ILO conventions, the German Working Hours Act and, if applicable, the provisions of the collective labour agreements on working hours.

### Remuneration

The Elektra Group requires suppliers to offer their employees fair and appropriate remuneration that complies with local laws such as ILO Conventions 26 and 131 and Art. 2 Para. 2 No. 8 LkSG. Wages and remuneration for overtime must comply with or exceed the locally applicable minimum wage laws or the industry-specific minimum standards. The withholding of an appropriate wage (including the minimum wage requirement) is prohibited.

### Freedom of association


It is prohibited to disregard freedom of association, the right to strike and the right to collective bargaining and agreements. Suppliers are instructed to comply with locally applicable statutory provisions.

### Occupational health and safety

Suppliers are obliged to provide employees with a safe and healthy working environment. In this context, it is prohibited to disregard the occupational health and safety obligations applicable under the law of the place of employment. Suppliers must maintain an occupational health and safety management system in accordance with ISO 45001.

## 2.2 Conflict minerals

The Elektra Group is committed to ensuring that no minerals that contribute to the financing of armed groups are used. The avoidance of conflict minerals and rare earths such as scandium, yttrium and lanthanum plays a very important role for the Elektra Group. "Conflict minerals" include tin, tungsten, tantalum, gold and, since the 21st of December 2018, cobalt. The Elektra Group requires its suppliers to ensure that no conflict minerals and rare earths are permitted in the entire supply chain. Used minerals may only come from certified and conflict-free refineries and smelters. This primarily affects refineries and smelters in conflict and high-risk areas such as the DRC and neighbouring regions. Suppliers are obliged to exercise due diligence and provide evidence to ensure that the origin of the minerals used within the supply chain can be traced as transparently as possible. The Elektra Group requires suppliers to document and prove annually that the materials and parts supplied to the Elektra Group are conflict-free. This is done by submitting a complete conflict minerals report (CMRT report) as well as an EMRT report for cobalt and mica.

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### 2.3 Product safety and product quality

As a supplier to the automotive industry, product safety and top quality are at the centre of everything we do. Our suppliers are obliged to strictly comply with applicable standards, customer requirements and internal quality standards. Errors and deviations must be reported and rectified immediately: Quality starts with each individual.

### 2.4 Ecological aspects


Compliance with statutory environmental regulations is also part of the Elektra Group's mission statement. The Elektra Group therefore requires suppliers to ensure that all applicable laws, regulations and standards relating to the environment are complied with. The Elektra Group requires suppliers to maintain an environmental management system based on the ISO 14001 standards or at least ISO 50001 or to introduce one within a period to be agreed, taking the laws customary in the country and industry into account. Suppliers must ensure the most effective possible environmental protection in production, a continuous reduction in environmental impact, the use of energy management systems, and energy efficiency in order to enable reporting in accordance with the EU Reporting Standard ESRS E-1 from 2024.

#### Waste water and water consumption

The Elektra Group expects its suppliers to discharge all types of waste water in accordance with regulations and in an environmentally friendly manner and to categorise, monitor, check and, if necessary, treat it before disposal. This also includes a ban on harmful soil change and water pollution. As a general principle, the amount of waste water should be reduced. Suppliers are obliged to take appropriate measures to reduce water consumption in their companies and, preferably, throughout the entire supply chain.

#### Air emissions

The Elektra Group requires its suppliers to deal appropriately with air emissions. This means that general emissions resulting from work activities and greenhouse gas emissions must be categorised, checked, documented and, if necessary, treated before they are released.

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### **Waste and hazardous substances**

The Elektra Group requires its suppliers to handle waste responsibly in terms of transport, storage and the like. Among other things, this refers to the ban on the export of hazardous waste and other waste in accordance with the Basel Convention and Regulation (EC) No. 1013/2006 on shipments of waste.

Efforts must be made to reduce waste and waste must be disposed of appropriately. This also includes suppliers ensuring that no waste is disposed of illegally and that measures are taken to improve recycling. In the case of substances of very high concern, it may be necessary to apply for authorisation for use. In general, suppliers must pay attention to the handling of chemicals and other materials that pose a risk if released into the environment.

### **Prohibited chemicals and substances**

All suppliers are subject to a ban on the use of POP chemicals (persistent organic pollutants) in accordance with the Stockholm Convention. The list of these substances is updated on an ongoing basis. We also require unconditional compliance with the provisions on banned and declarable substances in accordance with the REACH Regulation and RoHS Directive. There is a general ban on the use of mercury and mercury compounds in manufacturing processes.

### **Reducing resource consumption**

The Elektra Group requires suppliers to use natural resources such as water and raw materials sparingly and to take measures to reduce consumption. This goes hand in hand with the prohibition of unlawful forced eviction and the unlawful seizure of land, forests and water.

### **Reducing energy consumption**

It is important to the Elektra Group that electrical energy is used sparingly. The Elektra Group therefore requires suppliers to monitor and document their energy consumption. Suppliers should find ways to reduce energy consumption and improve energy efficiency. The reduction of greenhouse gas emissions and the increased use of renewable energies must be expedited.


## **2.5 Compliance**

Ethical and moral principles of behaviour are an important part of our company's mission statement. We are committed to acting honestly and in accordance with all applicable regulations, rules and laws. The Elektra Group demands the same from suppliers in order to ensure ethical business behaviour throughout the entire supply chain.

The establishment of processes to monitor compliance with all applicable laws, sanctions, regulations and industry standards and their ongoing review is an important requirement for all suppliers.

### **Bribery**

Suppliers are prohibited from directly or indirectly engaging in any form of bribery, extortion or corruption. The Elektra Group requires suppliers to maintain the highest standards of integrity in all business activities. Suppliers are prohibited from offering, promising, granting or demanding bribes or other unjustified

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benefits in order to obtain or retain an undue advantage. Decisions are to be made exclusively on the basis of objective, business-related criteria that are not influenced by private or financial interests or personal relationships. Suppliers must establish appropriate enforcement and monitoring procedures.

### **Avoidance of conflicts of interest**

Employees may not use their position to gain personal or extraneous advantages. Business decisions must be made objectively and transparently. Relationships with business partners that might concern personal interests must be disclosed and agreed with the responsible office.

### **Reporting channels and whistleblower protection**


The Elektra Group requires suppliers to have an open corporate culture in which indications of misconduct are taken seriously and can be reported without fear of reprisals. Employees can contact their supervisor, the Compliance Office or our internal whistleblower system in confidence. The identity of whistleblowers is protected and any form of retaliation is prohibited.

### **Competition**

The Elektra Group requires that suppliers comply with applicable laws, rules and regulations relating to fair competition as well as with applicable antitrust laws. Agreements with competitors, suppliers, customers and other third parties that violate competition and antitrust law are prohibited. A dominant market position may not be exploited in an undue manner. This also applies to compliance with legal requirements when dealing with governments, authorities and public institutions.

### **Avoidance of conflicts of interest and undue advantage**

We make our decisions in the best interests of the company – regardless of personal gain. Employees may not use their position to gain personal or extraneous advantages. Business decisions must be made objectively and transparently. Relationships with business partners that might concern personal interests must be disclosed and agreed with the responsible office.

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### Legal framework conditions

The Elektra Group insists on compliance with all valid and applicable laws for the import and export of goods, services and information, including the associated directives (foreign trade regulations). Furthermore, suppliers must adhere to the principle of "tax honesty" by strictly complying with applicable tax and duty regulations. The channelling of illegally acquired funds into the economic cycle (money laundering) and the financing of terrorism must be resolutely countered.

### Data protection and intellectual property

All confidential information that suppliers receive directly or indirectly from the Elektra Group must be treated with care. The Elektra Group requires that suppliers protect the personal data of Elektra Group employees, business partners and suppliers. The Elektra Group reserves the right of ownership and copyright to all illustrations, models, drawings, calculations and other documents or software as well as to technology and know-how transfer. This information may not be made accessible to third parties without express written consent. Suppliers must establish processes to protect the Elektra Group's intellectual and industrial property rights and to protect against plagiarism.


Suppliers are obliged to maintain an information security management system in accordance with ISO 27001 or TISAX or to introduce one within a period to be agreed, taking into account country and industry-specific laws.

## 3 Monitoring and implementation of requirements

### 3.1 Complaints mechanism

The Elektra Group requires that suppliers comply with the requirements of the standards set out in our Code of Conduct at all times. Any suspected violations of the SCoC must be reported to the Elektra Group immediately so that suitable measures can be found to eliminate these risks. In the event of suspected non-compliance, the Elektra Group may request information on the relevant facts. Suppliers undertake to cooperate with the Elektra Group in order to prevent, stop or minimise any identified or reported risks or violations of the standards.

Suppliers must ensure compliance with this standard throughout the supply chain in accordance with due diligence. Appropriate measures must be taken to do this, e.g. by agreeing on transfer clauses with direct subcontractors.

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### 3.2 Auditing

The Elektra Group reserves the right to audit the monitoring of compliance with the aforementioned regulations at suppliers' sites. Audits must be carried out during suppliers' normal business hours and must be announced three calendar days in advance. Suppliers are required to grant access to all documents relevant to the audit and to cooperate to the greatest extent possible. Audits can also be carried out by a third-party company subject to the conclusion of appropriate confidentiality agreements.

### 3.3 Legal consequences of violations

Where possible, the Elektra Group will first give the supplier the opportunity to immediately establish a binding schedule to prevent, stop or minimise the violation, risk or danger. If such a schedule is inappropriate or if its implementation fails, the Elektra Group may suspend the business relationship until the supplier has remedied the violation.

In addition, either party may terminate the contractual relationship for cause with immediate effect if the legal requirements for this are met, particularly if it is unreasonable to expect the contract to continue until the next regular termination date.

Suppliers are obliged to indemnify the Elektra Group against all consequences arising from violations of the SCoC. In particular, this applies to fines, penalties and claims by third parties or authorities caused by their behaviour.

## 4 Acknowledgement

This Supplier Code of Conduct reflects the values and expectations of the Elektra Group and serves to ensure shared responsibility by the Elektra Group and its suppliers. It is effective immediately and forms part of the general business documents. It supplements the documents already available on the Elektra Group website and thus forms the basis for business relationships. The supplier accepts the Supplier Code of Conduct and undertakes to comply at all times with the basic principles and regulations mentioned and to observe the requirements and prohibitions. Furthermore, the supplier agrees to report risks and violations. This also involves the introduction of measures that contribute to the elimination of such violations of the requirements.

This Supplier Code of Conduct is available on the Elektra website ([www.elektra-schalkau.de](http://www.elektra-schalkau.de)) in the "Download" area. Suppliers are welcome to contact the Elektra Group if they have questions about the SCoC, wish to report violations or would like to submit feedback.