

Code of Conduct

for Business Partners

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Code of Conduct for Business Partners

The Compliance Code pursues the goal of sustainable business.

Sustainability is an important principle in the guiding principles of the technotrans Group (hereinafter collectively referred to as „technotrans“). Sustainability encompasses economic, ecological and social responsibility. This includes trusting and long-term partnerships as well as conduct that complies with the law.

technotrans expects its business partners to take account of and implement the defined technotrans principles and policies in their companies. technotrans is convinced that its business partners can gain sustainable development and economic benefits by taking account of the principles. This also increases attractiveness as an employer. Furthermore the image of a socially and ecologically responsible company is reinforced.

The Code of Conduct describes technotrans' principles and its requirements for its business partners. The principles are based on the content of the following conventions and standards:

- Principles of the United Nations (UN) Global Compact;
- Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD);
- Conventions of the International Labour Organisation (ILO);
- Charter for Sustainable Development of the International Chamber of Commerce (ICC);
- SA8000 (Standard of Socially Responsible Corporate Governance).

The Code of Conduct applies to all technotrans business partners worldwide. It is the responsibility of the business partners to integrate, pass on and promote compliance with the principles listed below in their own supply chain.

technotrans expects all its business partners to ensure compliance with the following principles and requirements, in all their business activities and within their own supply chain, by taking appropriate measures:

1. General expectation of compliance with laws and regulations

Business partners shall comply with all laws and regulations applicable to them, including all local laws and regulations in all countries where the business partner is located or where business activities are conducted, or services are provided.

This includes, in particular, compliance with the principles of the United Nations Global Compact, the United Nations International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, and the internationally recognised core labour standards of the International Labour Organisation (ILO).

2. Social responsibility

Prohibition of child labour

All forms of child labour are prohibited. The definition of child labour is based in particular on ILO requirements that the age should not be less than the age at which compulsory education ends under the law of the place of employment and in any case not less than 15 years. If the applicable law at the place of employment prescribes a longer compulsory schooling period or a higher statutory minimum age, the higher age shall prevail. Business partners must respect the minimum age for employees in their own business and along their supply chain and ensure that prohibited child labour is avoided. Persons under the age of 18 are considered to be particularly vulnerable and must not be employed in work that is harmful to the health, safety or morals of children.

Prohibition of forced labour

Any form of forced or compulsory labour, slavery or human trafficking is prohibited. Business partners must take and establish appropriate and reasonable measures to prevent slave labour, slave-like compulsory labour, servitude, debt bondage, human trafficking or other forms of domination or oppression in the workplace environment, in particular through economic or sexual exploitation and humiliation, in their own business and along the supply chain. Any employment relationship is voluntary and is entered into and exercised without threat of penalty. Employees must be free to terminate work or employment at any time at their own will, taking into account the applicable legal requirements. Business partners must not mislead workers about the nature of the work or charge workers recruitment fees or unreasonable transport costs. Practices such as withholding personal property, passports, identity documents or other government-issued documents, employment certificates or other documents are unacceptable and prohibited.

In addition, the protection of physical integrity is of paramount importance and business partners ensure the enforcement of the prohibition of torture, abduction, physical hardship, sexual violence, harassment, intimidation and humiliation in their own business and along their supply chain.

Prohibition of discrimination/Equal opportunities

Unequal treatment of employees in any form is inadmissible, unless it is justified by the requirements of the employment. In particular, unequal treatment on the basis of ethnic or social origin, skin colour, gender, nationality, language, religion, physical or mental limitations, gender identity, sexual orientation, state of health, age, marital status, pregnancy/parenthood, trade union membership or political conviction is prohibited, insofar as it is based on democratic principles and tolerance towards dissenters. Unequal treatment exists in particular when unequal remuneration is paid for work of equal value. The personal dignity, privacy and personal rights of each individual are to be respected.

Fair working conditions

Business partners shall pay their employees an appropriate wage that is at least equal to the national statutory minimum wage or the minimum standards customary in the industry. Each employee shall be able to cover, at minimum, basic needs (living wage). Business partners shall provide employees with the social benefits to which they are entitled by law. Wages are paid regularly, punctually and in full. Unauthorised salary deductions, in particular as punitive measures, are not permitted.

Working hours must comply with the applicable national requirements and/or industry standards and ILO regulations. The business partners assure their employees that they will comply with the maximum working hours stipulated by law or collective agreement. Sufficient break times must be granted.

Freedom of association

Business partners respect the freedom of association and recognise the right of all workers to form and join organisations of their choice and to bargain collectively. It must be ensured that trade unions are free to operate in accordance with the applicable national laws. This includes in particular the right to collective bargaining and the right to strike. In cases where freedom of association and/or the right to collective bargaining are restricted by applicable national laws, alternative and legitimate means of establishing worker representation shall be encouraged. Employees shall not suffer any disadvantage, in particular any form of discrimination or retaliation, as a result of establishing, joining or being a member of such an organisation.

Health & safety at work

The business partners are responsible for a safe and healthy working environment and comply with the respective applicable occupational health and safety and fire protection laws. In connection with the establishment and application of appropriate occupational health and safety management (e.g. in accordance with ISO 45001), preventive measures and processes must be taken to optimally prevent accidents and work-related illnesses. This includes, in particular, the identification, assessment and reduction of actual and potential accident and health risks, the recording and investigation of incidents, the regular training and instruction of employees in a form and language they can understand, the provision of suitable protective equipment and clothing free of charge as well as appropriate emergency preparedness and response measures. Such measures must not involve costs for the employees.

External staff

When using external personnel, e.g. security personnel, business partners must ensure that the respective applicable national law is observed in contractual and labour relations and that the deployment does not lead to human rights violations. The contracted external personnel shall be sensitised by appropriate measures, in particular with regard to human rights risks, occupational health and safety, inhumane treatment and injury to life and limb, and checked regularly.

Preservation of the natural basis of life

Business partners shall respect and comply with the prohibition of causing harmful soil changes, water pollution, air pollution, noise emissions or excessive water consumption that are likely to significantly impair the natural basis for the preservation and production of food, harm the health of a human being or impede the access of persons to drinking water or sanitary facilities.

No eviction

Business partners shall abide by the prohibition of unlawful eviction and the prohibition of unlawful appropriation of land, forests and waters, the use of which secures a person's livelihood.

Dealing with conflict minerals

With regard to the conflict minerals tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt, business partners shall implement and follow appropriate processes that meet the requirements of the OECD Due Diligence Guidance on Promoting Responsible Supply Chains for Minerals from Conflict and High-Risk Areas. Smelters and refineries without adequate, audited due diligence processes should be avoided.

Complaints mechanism

Business partners are themselves responsible at operational level for establishing an effective complaints mechanism. The protection of whistleblowers against retaliation must be ensured while maintaining the confidentiality of their identity.

3. Ecological responsibility

Compliance with applicable environmental regulations

Business partners respect applicable national and international environmental and sustainability standards and take responsibility with regard to environmental protection issues, for example by establishing and applying an appropriate environmental and energy management system.

Careful use of resources

Business partners shall take appropriate measures to ensure efficient and responsible use of resources, in particular energy, water, raw materials and primary materials. The use and consumption of resources during production and the generation of waste of any kind shall be reduced and used sparingly. Energy consumption shall be monitored and documented. The use of renewable energy and resources is to be preferred and promoted.

Handling of hazardous substances and waste, restriction of raw materials

Business partners shall take appropriate and reasonable measures to avoid and reduce their waste volumes and emissions to air, water and soil. Compliance with the respective applicable legal requirements and regulations for disposal must be ensured. The international conventions on cross-border movements of hazardous wastes, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989, shall be observed and complied with.

Substances that pose a risk to people and the environment through release shall be avoided wherever possible. Business partners are required to comply with the requirements of the Minamata Convention on the Handling of Mercury of 10 October 2013 and the Stockholm Convention on Persistent Organic Pollutants of 23 May 2001, as well as the relevant applicable implementing legislation.

Impact on biodiversity, climate change and water scarcity

Business partners respect the protection of natural ecosystems, in particular the protection of endangered wildlife habitats, and the sustainable use of natural resources. In this context, business partners reduce the impact of their activities on biodiversity, climate change and water scarcity.

4. Ethical business conduct

Conflicts of interest

The business partners shall make their decisions solely on the basis of factual considerations and shall not be unduly influenced by personal interests or relationships.

Prohibition of corruption and bribery

Business partners act in accordance with the highest standards of integrity and reject any form of corruption. Business partners shall ensure and monitor that they do not tolerate or engage, directly or indirectly, in any form of bribery or corruption, and that their employees, subcontractors or agents do not give, offer, promise or accept bribes, kickbacks, improper donations, facilitation payments or other improper payments to public officials or other third parties.

Fair competition

The business partners shall behave fairly in competition and comply with the respective applicable statutory competition and antitrust regulations. Anti-competitive agreements or arrangements with other companies which have the purpose or effect of preventing, restricting or distorting competition are prohibited and are not to be tolerated. A dominant position within the market must not be abused.

Protection of intellectual property

The business partners respect the intellectual property rights of third parties and protect corresponding data.

Data protection and confidentiality

The business partners shall comply with the applicable laws and regulations on data protection when collecting, storing and processing personal data. Confidential information and business and trade secrets must be protected against unauthorised access by appropriate measures and must always be kept secret.

Foreign trade law

The respective applicable foreign trade and customs laws for the import and export of goods, services and information shall be complied with and the business partners shall inform immediately if a delivery/service is subject in whole or in part to applicable export restrictions. Business partners shall implement the applicable and relevant sanctions lists and shall not engage in legally inadmissible business activities with sanctioned persons, companies or organisations.

Money laundering and terrorist financing

Relevant laws, regulations and other legal provisions for the prevention of money laundering and financing terrorists must be observed and complied with.

5. Implementation of the requirements

technotrans expects its business partners to take and apply suitable and effective measures to identify risks in their own business operations and along their supply chain and, where applicable, to initiate and implement appropriate preventive and remedial measures. Business partners shall communicate the contents of this Code of Conduct in an appropriate manner to their employees as well as to their own business partners.

As part of its risk management, technotrans regularly analyses its own business operations and its supply chains to determine whether and what potential risks exist, particularly with regard to human rights and environmental protection, and derives the risk classification and appropriate preventive and remedial measures from this. technotrans checks compliance with the expectations defined in this Code of Conduct regularly, on a random basis and/or on an ad hoc basis by means of suitable measures, in particular by means of a self-assessment questionnaire and/or an on-site audit at the business partner's premises. The business partners already hereby agree that technotrans may carry out an audit on site during normal business hours itself and/or by persons commissioned by technotrans after giving reasonable advance notice. In this context, business partners will provide access to all documents and information relevant to the review and conduct of the audit. technotrans will comply with the provisions on data protection and the confidential treatment of disclosed information.

Should a breach of the provisions of this Code of Conduct be identified or should there be a suspicion of non-compliance, the business partner concerned shall inform technotrans of this without delay and provide the necessary information.

In such a case, technotrans reserves the right to agree and initiate appropriate and suitable preventive and remedial measures with a timetable with the business partner. Should the preventive or remedial measures initiated expire fruitlessly or fail to bring about a remedy and no milder remedy is available, technotrans reserves the right, at its own discretion, to temporarily suspend or terminate the business relationship and to terminate individual or all contracts. A statutory right to extraordinary termination without granting a grace period, in particular in the case of violations to be assessed as very serious, shall remain unaffected, as shall the right to compensation for damages.

6. Whistleblowing system

The fundamental objective of a whistleblower system is to accelerate the detection and elimination of violations whilst protecting the whistleblower and, if applicable, third parties who assist in the reporting process so that they do not have to fear any negative civil, criminal or internal consequences / reprisals as a result of the report. Accordingly, any lead given will be treated with the highest level of confidentiality. The information will be processed in a fair, quick, and confidential manner.

If you have any questions about this Code of Conduct or in case of reporting compliance violations or information about suspected violations, please contact us at whistleblower@technotrans.de

Alternatively, to report information regarding actual or suspected compliance violations anonymously, please contact the ombudsman appointed by technotrans:

Lawyer:

Dr. Johannes Dilling

phone: +49 221 933 107 40

mobile: +49 163 3476 111

email: info@ra-dilling.de

RADilling@protonmail.com

whistleblower portal: www.whistleblower24.eu

7. Confirmation

The business partner hereby confirms that it has received and taken note of the Code of Conduct. The business partner undertakes to act responsibly and to comply with the principles and requirements listed.



The business partner also signs and confirms this Code of Conduct in the name of and on behalf of the companies affiliated with it (affiliated company means any person which controls, is controlled by or is under common control with the business partner. A company shall be deemed to control another company if such company possesses, directly or indirectly, the power to direct or cause the direction of the management and policies of the other company, whether through the ownership of voting securities, by contract or otherwise).

Name and full company name of the business partner

Address of the company

Production countries

Place, date

Name/function

Signature

