Principles for responsible compliance in procurement

at Neumüller Elektronik GmbH

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Introduction

Neumüller Elektronik GmbH is committed to the principles of human rights, working standards, environment and anti-corruption. It is important to Neumüller Elektronik GmbH to live up to its role as an economic and social player and to distinguish itself through thoughtful, responsible and honest behavior.

This code defines the high standards that Neumüller Elektronik GmbH sets for itself and which Neumüller Elektronik GmbH also requires its suppliers to comply with. The business relationships of Neumüller Elektronik GmbH are based on mutual respect and trust as well as on the principles of this Code.

The Code of Conduct for Suppliers is based on:

- The Neumüller Elektronik GmbH Code of Conduct
- The principles of the United Nations (UN) Global Compact
- The agreements of the International Labor Organization (ILO)

This code applies to all suppliers of Neumüller Elektronik GmbH worldwide.

It is within the responsibility of the suppliers of Neumüller Elektronik GmbH to develop their own code of conduct in order to convey and promote the listed principles in their own supply chain in the best possible way and to promote them.

1. Technical progress and environmental friendliness

By successfully tapping into new markets, we are demonstrating that technical progress and environmental compatibility are not mutually exclusive but complement each other perfectly. Rising prices and the need to protect the climate make the careful use of energy more important than ever in the past.

Increasing energy efficiency also plays an important role. All manufacturers of electrical and electronic devices are confronted with the necessity to reduce the power consumption of their products during operation and the energy losses during stand-by mode.

LEDs are far superior to most other light sources in terms of energy efficiency, service life and maintenance requirements. They offer immense energy-saving potential for lighting. As one of the

first distributors, we positioned ourselves as an LED specialist at an early stage and successfully implemented numerous projects.

Environmental protection is nothing half measures

Our environmental protection management system is based on the ISO14001 standard. An extra certification is not necessary, Neumüller acts as a wholesaler only with paper packaging, Euro pallets, i.e. materials made of wood and various filling materials for packaging. We do not have any hazardous substances, materials or products. We have set ourselves demanding goals. Reducing the environmental impact to a minimum is one of them. This also includes supporting our customers with their environmental goals. We are also leading by example: we are equipping our offices with energy-saving, healthy sunlight LED lighting and have converted our server room to the state-of-the-art energy-efficient servers. We have also installed a solar system at our HQ and we recycle waste materials. The vehicle pool has been equipped with electric cars for many years, which are charged using the local PV system.

2. Safety knows no limitations

Among other things, the health and safety system analyses the hazard and risk potential, takes precautionary measures and facilities to prevent accidents and takes care of preventive health care. Our aim is not only the fulfilment of legal obligations, but to exceed them. Our fire prevention and occupational safety representatives take on important prevention tasks on site and provide assistance in emergencies.

3. Human rights and employment law

NEUMÜLLER continuously endeavors to identify potential and actual negative impacts on human rights in connection with its activities and business relationships and, if necessary, to implement appropriate corrective measures to ensure that NEUMÜLLER's activities do not contribute to human rights violations: Prohibition of forced labor NEUMÜLLER strictly rejects any kind of forced labor, bonded labor, slavery or human trafficking. Equal opportunities NEUMÜLLER is committed to respecting and protecting human rights. The company rejects any form of discrimination based on race, skin color, gender, religion or other characteristics (e.g. nationality, age). Equal opportunities for all are a matter of course and all business decisions are free from any form of discrimination.

NEUMÜLLER bases its actions on generally accepted ethical values and principles, in particular integrity, honesty, respect for human dignity, open-mindedness and non-discrimination based on religion, ideology, gender or ethnicity. Harassment NEUMÜLLER does not tolerate harassment of any kind under any circumstances and in any form. In addition to psychological and verbal harassment of any kind, this also includes physical harassment, especially sexual harassment. By this we are referring to obvious advances, condescending comments, offensive gestures or the showing of harmful images and video material in the company and company environment. Behavior that was not originally intended as such by the person acting is also to be classified as harassment and no intent can be assumed.

Health and safety of employees NEUMÜLLER is aware that health, safety and the environment are key factors for the success of the company. Everyone who works for NEUMÜLLER is required to treat health, safety and the environment with a responsible attitude.

NEUMÜLLER does not tolerate any compromises in health protection and the safety of employees in the workplace. No NEUMÜLLER employee may expose themselves or other employees to risky situations that could harm their physical and mental health.

Providing a good working environment is also part of promoting health. Management and employees must take all necessary steps to create a harmonious working environment. Company health management contributes to the promotion of good health.

We reject any form of exploitation or discrimination and ensure strict compliance with relevant laws. We comply with all applicable legal regulations to ensure fair working conditions, including regulations on payment, working hours and the protection of privacy.

Prohibition of child labor NEUMÜLLER expects its suppliers to employ only workers who are at least 15 years old. This minimum age for employment is based on the conventions of the International Labor Organization (ILO) and the UN Convention on the Rights of the Child. These conventions regulate internationally applicable lower limits. No person may be employed who is younger than 15 years of age (or 14 years of age in countries where this is permitted by law) or younger than the legally prescribed minimum working age in countries where this is higher than 15 years of age. Furthermore, all legal restrictions regarding the employment of persons under the age of 18 must be complied with. We would like to point out that according to the UN Convention on the Rights of the Child, a person who has not yet reached the age of 18 is considered a child.

We recognize the right of every child to be protected from economic exploitation, the performance of work that is dangerous, interferes with the child's education and may endanger the child's health or physical, mental, spiritual, moral or social development.

4. Sexual harassment or mobbing

All employees have the right to work in a positive environment free from unlawful harassment in accordance with the laws and regulations of the country in which Neumüller operates. In particular, Neumüller prohibits any unlawful behavior that constitutes sexual harassment or mobbing, even if there is no superior/subordinate relationship between the parties.

Any conduct that is considered sexual harassment or mobbing is unlawful and illegal, in particular if - the acceptance of such conduct is implicitly or explicitly stated as a condition for hiring a person, - a decision regarding a person's position is based on the acceptance or rejection of such conduct, or - such conduct has the purpose or effect of substantially interfering with a person's work performance or creating an intimidating, hostile or unpleasant work environment.

All complaints of harassment or mobbing are treated with the strictest confidence. Any employee who believes that he/she has been harassed must immediately report such suspected behavior either to his/her supervisor or directly to the Head of Human Resources of the Neumüller Group or the management. Immediate steps

will be taken to investigate and process complaints of behavior contrary to this policy. If a complaint is justified, appropriate disciplinary action will be taken against offending parties.

5. Corruption and bribery

NEUMÜLLER strictly rejects corruption and bribery. NEUMÜLLER promotes transparency, acting with integrity and responsible management and control within the company in an appropriate manner. All NEUMÜLLER employees, partners and contractual partners are committed to the highest levels of integrity, honesty and fairness in all internal and external relationships. No one may directly or indirectly accept, solicit, offer or grant bribes or payments, other "fringe benefits" (including gifts and gratuities, apart from business items that are generally accepted in the international environment) or other advantages, even in response to unlawful pressure. Against this background, it is prohibited to offer business material, gifts or other benefits that could violate laws or regulations, that are contrary to this Code of Conduct or that could cause (image) harm to NEUMÜLLER if they become known.

6. Privacy policy

The protection of personal data is an important concern for us.

We therefore process the personal data of our employees, customers, interested parties and business partners in accordance with the applicable legal provisions on the protection of personal data and data security. NEUMÜLLER describes in its own data protection policy what types of personal data are collected, how these data are used, to whom they are transmitted and what choices and rights data subjects have in connection with our processing of the data. We also describe the measures we take to ensure data security and how affected persons can contact us if they have any questions about our data protection practices. This policy regulates data privacy-compliant information processing and the existing responsibilities at NEUMÜLLER. All employees are obliged to comply with the policy.

Further information can be found under Privacy Statement | Neumüller Elektronik - Distributor for electronic components

Our data protection representative can be reached at: ds@neumueller.com

7. Responsible use of resources

The aim of a sustainable supply chain is to create long-term ecological, social and economic benefits for all those involved in production, distribution or marketing. We use the following tools in particular to ensure that we achieve our goals:

- Auditing our suppliers
- Commitment of existing suppliers to continuous improvement

Taking sustainability considerations into account when making purchasing decisions (for example, when bundling purchasing processes or reducing product groups) NEUMÜLLER carries out a comprehensive due diligence review of the supply chain in cooperation with the respective manufacturers, within the scope of the possibilities available to us. We require our suppliers not to use materials from conflict minerals that directly or indirectly finance or favour armed groups in conflict and high-risk areas. NEUMÜLLER expects its suppliers along the supply chain to have adequate hazardous substance management and to work continuously to avoid hazardous substances in their products and to reduce negative environmental impacts.

8. Implementation

The management of NEUMÜLLER shall ensure in an appropriate manner that employees are made aware of this Code of Conduct and observe it. The management must be informed of any violation of the Code of Conduct as soon as it becomes known. Reprisals against employees who have reported a breach of the Code of Conduct in good faith will not be tolerated. Violation of this Code of Conduct by employees may result in labour law sanctions up to and including termination of employment and other legal measures.

9. Management

Legitimate use of Neumüller's funds, services and assets

Basic rule: The use of Neumüller funds, services or assets for any illegal or improper purpose is strictly prohibited. No person or company may acquire privileges in the form of purchasing advantages or special benefits on behalf of Neumüller with the help of bribes, gifts or other favours in cash or in any other form. Likewise, no company or person (in Germany or abroad) may accept money or benefits in kind in contravention of statutory provisions or other regulations.

Donations to political parties or representatives Neumüller does not pay any money or provide any services to political parties, elected representatives or candidates for political office, regardless of the legality of such donations under the legislation of those countries in which such donations may be made.

Unauthorised payments to government or administrative authorities or their employees Payments for the purpose of receiving preferential treatment from a government or administrative authority are prohibited. Gifts, services or excessive hospitality or entertainment offered to government or administrative employees are prohibited, as they could be construed as an attempt to influence decisions concerning Neumüller's affairs.

Complying with the Code of Ethics

All Neumüller employees are required to read, know and comply with this Code of Ethics and, where appropriate, to communicate its provisions and guidelines to others in connection with their duties in the workplace. In particular, the management must ensure that Neumüller employees are introduced to this Code and that they comply with it.

Exceptions: All exceptions to the guidelines defined in this Code and the rules arising from it require the prior written consent of Neumüller's management, unless expressly stated otherwise in this Code.

Offences: If a Neumüller employee is in doubt as to whether his/her actions infringe this Code, it is strongly recommended that he/she discuss this with his/her supervisor or the management in order to obtain more detailed information about the area and conditions of application of the Code of Ethics.

Interpretation: All questions regarding the interpretation, scope and application of the Code of Ethics should be directed to management, who will consult with Neumüller's attorneys to reach a decision.

Sanctions: Any infringement of this Code of Ethics may be sanctioned by Neumüller. Depending on the severity of the infringement of this Code and the applicable national legal provisions, various sanctions are possible, including a warning or the dismissal of the employee.

Managing Director:

Uwe Fischer

Members of the Management Board:

Tanja Hollfelder René Wrede Klaus Konnerth Oliver Kafka

Klaus Kubon Marko Konjevic Matthias Prochnow