



Our Commitment:

As a globally acting company, we affirm our commitment to social responsibility. This is a critical part of the Zollner corporate culture to contribute to sustainable development for our and future generations. Our self-commitment to ecological, social and ethically responsible corporate management regulates our corporate behavior in every matter. In doing so, we remain keenly aware of our corporate responsibility to respect human rights and the respective environmental laws in our company and the supply chain.

Our expectations for responsibility can be seen in our activities regarding Quality, the Environment and Energy, Occupational Safety, Health, Information Security, Business Ethics and Social Engagement. We have described this in our corporate policy.

The Zollner Group of companies is committed to the observance of the rules and regulations listed here. In all of our activities, we act in full compliance with all applicable laws, regulations and directives of the countries in which we are doing business.

As the basis for long-term and trusting collaboration, we also expect adherence to these basic principles of conduct by our partners and that they appropriately address this along the entire supply chain.

Zollner Code of Conduct contents:

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General Information regarding the Zollner Code of Conduct

Our Zollner Code of Conduct was created based on the principles of conduct of the Responsible Business Alliance (RBA), DIN ISO 26000 Guideline to Social Responsibility and the Global Compact of the United Nations.

It imparts the content of our compliance activities to relevant stakeholders (employees and partners).

It describes the basic critical legal and business policy principles to which we orient ourselves in our relationships with our business partners as well as in our internal collaboration.

It describes standards to ensure

- that working conditions in the supply chain are safe,
- that employees are treated with respect and dignity, and
- that manufacturing processes are environmentally sound and show a sense of responsibility.

A. Human Rights and Working Conditions

In accordance with the concepts of the international community, we obligate ourselves to protect the human rights of our employees and to treat them with respect and dignity. This relates to all employees, including part-time employees, student assistants, permanent employees and all other types of employees.

Our working standards are:

1) Freely Chosen Employment

We do not use forced work, servitude (including debt servitude) or indentured labor, involuntary or exploitive prison labor, slavery or labor coming from human trafficking. This includes transport, harboring, employment, placement or acceptance of people to perform work or services using threats, violence, force, abduction or deception. Our employees' freedom of movement in our facilities is in no way limited in an inappropriate way; there is also no inappropriate limitation to entering or leaving the facilities provided by us, including residential and living accommodations where applicable. Within the scope of the hiring process, before the worker leaves his or her country of origin, a written employment contract is delivered in the language of the country of employment and, if needed, in the language of the company, which contains a description of the working conditions. After arrival in the country of employment, no supplementations or changes are made to the employment contract unless it concerns adaptation to local law and that those adaptations ensure equal or improved contract terms. All work is performed voluntarily, and our employees may leave their workplace at any time or end their employment relationship without penalty, if appropriate notice was given in accordance with the employment contract. Neither we nor our placement agencies are permitted to keep, destroy, hide, confiscate or prevent the employee from accessing their documents, such as an employee's entry or immigration documents or documents issued by a government like identification papers, passports or work permits, unless the retaining of such documents is lawfully prescribed in the work permits. Our employees are not asked to pay any placement fee or other fee to us or our placement agencies for their employment. If it turns out that our employees have paid such fees, those fees will be reimbursed accordingly.

2) Prohibition of Child Labor, Young Employees

Use of child labor is forbidden at every stage the manufacturing process. The term „child“ refers to any person under the age of 15 years-old, any person who is obligated to attend school or anyone under the minimum age for employment in the respective country, whereby the highest of these age levels is decisive. Employee age is checked within the scope of the hiring process. If child labor is identified, help in eliminating that is provided. The use of legitimate workplace apprenticeship programs that comply with all laws and regulations is supported. Employees under 18 years of age (young employees) are not permitted to perform dangerous work that could create a hazard to their health and safety, including night shifts and overtime. We ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. We provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3) Working Hours

Local laws and directives regarding maximum working hours and vacation time are respected. Attention is paid in all Zollner Group of companies' plants that weekly working hours do not exceed the applicable maximum hours regulated by law. Exceptions are emergencies or unusual situations. Employees are given at least one day off every seven days. Working times are arranged such that work accidents resulting from physical and intellectual fatigue are avoided and the health of our employees is maintained.

4) Wages and Benefits

Compensation paid to our employees complies with all applicable wage laws, including those relative to minimum wages, overtime hours and legally defined benefits. We strive at all of our locations to pay wages that secure one's livelihood. In doing so, the wage compensation should be adjusted such that it covers basic needs and makes an appropriate living standard possible for our employees and their families. Deduction from wages will not occur as a disciplinary measure. The calculation basis for compensation of employees is provided for each pay period with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatched employees and outsourced labor will be within the limits of local law.

5) Humane Treatment, Deployment of Security Personnel

Employees will not be subjected to harsh or inhumane treatment, including violence, gender-related violence, sexual harassment, sexual abuse, physical punishment (corporal punishment), mental, physical coercion, public exposure or verbal abuse. This also applies to the threat of any such treatment.

We hire no private or public security personnel for the protection of any corporate projects to intimidate, harass or do physical harm to individuals, including employees and members of the community. We ensure that our deployed security personnel adhere to applicable laws and regulations and respect human rights.

6) Prohibition on Discrimination and Unequal Treatment

We are committed to a workforce where harassment, unlawful discrimination and unequal treatment are not tolerated. We do not engage in discrimination against any employee based on the following characteristics: race, color, age, gender, sexual orientation, gender identity and expression of gender identity, ethnicity or national origin, disability, pregnancy, religious or political affiliation, union membership, former military allegiance, protected genetic information or marital status in hiring and employment practices such as promotions, rewards or access to advanced training opportunities. Employees or potential associates are not subjected to medical tests, including pregnancy tests or virginity tests, which could be utilized in a discriminatory manner. Unequal treatment especially encompasses payment of unequal compensation for equivalent work.

7) Freedom of Association and the Right of Collective Bargaining

In compliance with local law, we respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly or to refrain from such activities. All employees and/or their representatives are able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment and to talk about ideas and concerns related to working conditions and management practices. We prevent security personnel from being deployed for the impairment of the freedom of association.



8) Diversity

We are committed to reach a proper balance of males and females in leadership positions. This applies to occupying the Supervisory Board and the Managing Board, but in particular to second tier management positions. Furthermore, the uppermost principle for occupying the Supervisory Board and the Managing Board is the tradition to keep and maintain Zollner as a family company and in the occupation of its institutions.

9) Rights of local communities

We abide by local, national, international and traditional land, water, forest and resource rights, especially the rights of indigenous folks and local communities. We obligate ourselves to not take part in land grabs. We practice no illegal forced evictions and no illegal dispossession of land, forests and waterways during the acquisition, development or other use of the land, forests and waterways, the use of which ensures natural resources for another person.

B. Health and Safety at the Workplace

We recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognize that employee stimuli and continuous further education and training are fundamentally significant for the recognition and solving of health and safety problems at the workplace. Recognized management systems such as ISO 45001 and the ILO Guidelines on Occupational Safety and Health Management Systems were utilized as references in preparing this Code of Conduct. These documents can be a useful source for additional information.

Our health and safety standards are:

1) Workplace Safety

Wherever employees are exposed to potential safety hazards (e.g.: hazard from electrical power and other energy sources, fire, vehicles, and crashes hazards), these are reduced through proper equipment design, administrative controls, preventive maintenance, safe work procedures (including maintenance lockout/tagout systems) and ongoing safety training. If hazards cannot be adequately monitored by such measures, employees will be provided with appropriate, well-maintained personal protective equipment and training materials on the risks they are exposed to from the hazard. Appropriate measures are taken so pregnant women and nursing mothers do not work under conditions with a high level of hazard, and that health and safety risks have been either eliminated or limited at the workplace.

2) Emergency Preparedness

Potential emergency situations and events are identified and assessed. Their impacts are minimized by the introduction of contingency (emergency) plans and notification procedures. These are, among others: emergency reporting, employee notification and evacuation procedures, employee training and emergency drills, suitable fire detection and suppression equipment, clearly structured and unobstructed exit facilities and adequate escape routes and rescue plans. The focus of these plans and procedures is the minimization of damage to life, the environment and tangible assets.

3) Work Accidents and Occupational Illnesses

Procedures and systems are in place to prevent, care for, follow-up on and report workplace accidents and illnesses. The following regulations are part of that: encouraging employee reporting of such incidents; classification and documentation of injuries and illnesses; providing necessary medical treatment; investigating incidents, introduction of corrective actions to eliminate causes and facilitate the return of employees to their place of work.

4) Industrial Hygiene

Employee handling of chemical, biological or physical working materials is systematically determined, assessed and monitored. When potential hazards are identified, we search for possibilities of eliminating and/or reducing them. If elimination or lessening of the hazards is not possible, we try to control them with proper design and construction as well as technical and administrative control mechanisms. Technical and administrative measures are to be implemented to control overexposure. If hazards cannot be adequately monitored with these measures, the health of our employees is secured through suitable personal protective equipment.

5) Physically Stressful Work

If employees are subjected to the hazards of physically stressful work, that work is determined, assessed and monitored. Among these are manual material transport, heavy or repetitive lifting, long periods of standing as well as assembly work that is heavily repetitive or requires a large use of force.

6) Machine Safeguarding

Production systems and other machinery will be evaluated for safety hazards. If machines pose an injury hazard to employees, physically separating protective equipment, locking mechanisms and locks are installed and properly maintained.

7) Sanitary Facilities, Meals and Living Accommodations

Clean sanitary facilities are available to our employees at all times. Clean drinking water as well as sanitary food preparation, storage, and eating facilities are provided. Where applicable, employee accommodations provided by Zollner or an employment agency are maintained, clean and safe. They have suitable emergency exits, hot water for bathing or showering as well as adequate lighting, heating and ventilation systems and individual, secured spaces for keeping personal items. They are also provided adequate personal space. Additionally, full entry and exit privileges are guaranteed.

8) Notifications about Health and Safety

We offer our employees appropriate information and training courses prior to and after taking up their jobs and at regular intervals thereafter regarding health and safety at the workplace in their native languages or in a language that they can understand. This also includes mechanical, electrical, chemical and physical hazards and the hazard of fire. Information regarding health and safety concerns is posted in the facility to be very visible. Employees are encouraged to raise safety concerns without retaliation.





C. Environmental and Climate Protection

We acknowledge that responsible handling of the environment is an inherent part of our company. Negative impacts on the community, the environment and natural resources are continually minimized in our manufacturing processes, and we refrain from causing harmful changes to the soil, pollution of waterways and the atmosphere as well as harmful noise emissions or excessive water consumption. The health and safety of the public are safeguarded at the same time. We adhere to national and international environmental standards and laws valid at our locations. Recognized management systems like ISO 14001, ISO 50001 and the Eco Management and Audit Scheme (EMAS - common environmental management and audit scheme) were used as references in preparing this Code of Conduct. These documents can be a useful source for additional information.

Our environmental standards are:

1) Environmental Permits and Reporting

All required environmental permits (such as monitoring wastewater discharge), approvals and registrations are obtained and regularly updated. Respective operational requirements and reporting obligations are followed.

2) Conserving Resources and Circular Economy

The use of natural resources like water, fossil fuels and raw materials as well as the generation of all types of waste is either reduced or avoided where possible. This occurs either directly at the place of accrual

or through the promotion of closed circulation systems with procedures and measures like changing production and maintenance processes or sequences in the company, the use of alternative materials, reduction, recycling and the reuse of materials. Sustainability of the procedures and measures is constantly being respected in the prevention of contamination and reduction of consumed resources.

3) Hazardous Substances

Chemicals, waste or other materials that represent a hazard to the environment upon their release are ascertained, identified and handled such that safety is guaranteed when handling, transporting, storing, using, recycling, reusing and disposing of these substances.

The specifications from the conventions for the use of hazardous substances are followed, for example:

- the Minamata Convention (use of mercury),
- the Stockholm Convention (persistent, organic pollutants) as well as
- the Basel Convention (cross-border shipment of hazardous waste and its disposal).

4) Waste and Wastewater

We have a systematic approach to ascertain, handle, reduce and responsibly dispose of or recycle (non-hazardous) solid waste. Wastewater generated from manufacturing processes and sanitation facilities is categorized, monitored, controlled and treated as required prior to discharge or disposal. Additionally, measures are being introduced to reduce the generation of wastewater. We routinely monitor our wastewater treatment systems or facilities to guarantee adherence to statutory requirements. Contamination of draining rainwater by the company, such as from discharged liquids or the introduction of environmentally damaging substances, is prevented by preventative measures.

5) Air Emissions

Emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals or combustion by-products generated from operations are categorized, monitored, controlled and treated as required prior to discharge. Ozone-depleting substances are effectively handled in accordance with the Montreal Protocol and applicable regulations. We routinely monitor our exhaust air decontamination systems.

6) Materials Restrictions

We obey all applicable laws, contractual regulations and expressly accepted customer specifications regarding the prohibition or restriction of specific substances. This includes the mandatory labeling for recycling and disposal.

7) Energy Consumption and Greenhouse Gas Emissions

Energy consumption and resulting greenhouse gas emissions in categories 1 and 2 are monitored and documented at operational and corporate levels. We search constantly for economical solutions to improve our energy efficiency and minimize our energy consumption and resulting greenhouse gas emissions. We define corporate-wide emission reduction goals and goals for renewable energies, which coincide with the Paris Agreement (COP21) and communicate these to the public.

8) Animal Protection

Our corporate activities also take the wellbeing of animals into consideration. We respect the five freedoms for animals set forth by the World Organization for Animal Health (WOAH) relative to animal protection. National and internationally applicable regulations on animal protection and animal testing (where applicable) are observed.

9) Biodiversity, Land Use, Deforestation and Soil Quality

We protect the ecosystems affected by our activities, especially the key areas for biological diversity. Within the scope of our land and forest use (where applicable), we use certified, sustainable land and forest management and do not contribute to changes, deforestation or damages to natural forests or other ecosystems. Wherever appropriate, we monitor and control our impact on soil quality to prevent soil erosion, nutrient depletion, subsidence and contamination.

D. Corporate Ethics

We uphold the highest ethical standards to meet our social responsibilities and to achieve successful positioning on the market.

Among these are:

1) Business Integrity

All business activities are based on the highest standards of integrity. We pursue a zero-tolerance policy for bribery, corruption, extortion and embezzlement in any form.

2) Prohibition on Impermissible Acceptance of Advantages and Conflicts of Interest

It is forbidden for all employees to offer or accept bribes or other means of achieving impermissible or inappropriate advantage either directly or indirectly through a third party. This ban refers as well to the promising, offering, approval, granting or acceptance of monetary gratuities directly and indirectly by a third party with the goal of keeping or maintaining business, brokering business for a person or otherwise achieving an impermissible advantage. Situations that have the consequence of conflicts of interest or the appearance of a conflict of interest must be avoided. Monitoring and enforcement processes of the standard are implemented to ensure compliance with anti-corruption laws. See our internal "Anti-Corruption Policy" for further details.

3) Disclosure of Information

All business dealings are transparent and accurately reflected in our business books and records. Information on company procedures in the areas of work, health and safety, as well as the environment, are made public in unison with customary procedures and the common processes of the sector. Falsification of records and misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights are respected, and transfer of technology and know-how is handled in a manner that protects intellectual property rights.

5) Fair Business Transaction, Fair Advertising and Fair Competition

We adhere to the norms of fair business transaction, fair advertising and fair competition. Appropriate means for safeguarding customer information are available (confidentiality agreements).

6) Identity Protection and Prohibition of Retaliatory Measures

Programs are in place to ensure the confidentiality, anonymity and protection of whistleblowers¹ on the part of partners, employees and other stakeholders. Our complaint process makes it possible for all reporting people to report any concerns about behavior in their or our environment that is not compliant with the stated guidelines without the fear of retaliatory measures.

¹ Whistleblower: Any person who provides information about improper conduct by an employee or manager of a company or by a public official or official body.

7) Responsible Sourcing of Minerals

Where applicable, we develop measures and action items, which ensure in an appropriate manner that the tantalum, tin, tungsten and gold in the products we manufacture are sourced in a way consistent with the Organisation for Economic Cooperation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. We exercise due diligence on the source and chain of custody of these minerals and make due diligence measures available to partners upon their request.

8) Privacy and Data Protection

In regard to private information, we obligate ourselves to satisfy appropriate expectations of our partners and employees. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted or shared.

E. Management System

We have implemented a management system whose application is oriented to the content of this Code of Conduct. The conceptual design of the management system ensures that

- a. relevant laws, regulations and customer requirements relative to our operating procedures and products are followed,
- b. the Code of Conduct at hand is adhered to and
- c. risks from operating procedures relative to this Code of Conduct are ascertained and lessened.

The management system facilitates and requires continuous improvement.

The management system encompasses the following elements:

1) Company Commitment

Leadership of the Zollner Group of companies recognizes their social, ecological and economical responsibility in the corporate policy. Furthermore, they obligate themselves to adherence to laws and regulations and to continuous improvement.

2) Management Accountability and Responsibility

The Managing Board has identified management representatives responsible for ensuring implementation of the Zollner management system and associated programs. Auditors review the status of the management system on a regular basis.

3) Statutory Provisions and Customer Requirements

Processes have been established to identify, monitor and better understand applicable laws, regulations and customer requirements including the requirements of this Code of Conduct.

4) Risk Assessment and Risk Management

Procedures have been defined for the ascertainment of risks in the areas of the environment, information security, business continuity management, health and safety² as well as in the areas of work practices and ethical risks associated with our operating procedures. The same applies to the definition of the significance of every risk and control mechanism with which determined risks are monitored or adherence to statutory regulations is ensured; applicable procedures are also defined here. Identified risks are knowingly accepted by management, have been reduced by appropriate means or transferred to third parties. Zollner acts with awareness of risks to ensure business continuity.

5) Improvement Goals

In its planned objectives, leadership devises, among other formulations, performance goals for improvements to social and ecological conduct and routinely monitors these.

6) Training

We conduct training for managers and employees to implement the developed guidelines, procedures and goals for improvements and to meet common statutory and regulatory requirements.

Within the scope of orientation and at regular intervals, employees are informed of the contents of the Zollner Code of Conduct and trained in them.

7) Communication

We have defined how important information, guidelines, business practices, expectations and services are communicated to our employees and business partners. We have established measures based on ISO/IEC 27001 to ensure the availability, confidentiality and integrity of communication.

8) Employee Feedback and Participation

The Managing Board is responsible for establishing, implementing, monitoring and reporting on the Zollner Code of Conduct. The Zollner Code of Conduct is subject to continuous improvement through feedback from employees and stakeholders.

9) Audits and Assessments

Periodic self-assessments and audits ensure conformity to statutory and regulatory requirements, to the content of the Zollner Code of Conduct and to contractual requirements from customers as they relate to social and ecological responsibility.

10) Corrective Action Process

A process is in place for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and examinations.

11) Documentation and Records

Through the creation and updating of documents and records, adherence to regulatory provisions and fulfillment of corporate requirements is ensured. We have defined a document classification system to ensure that all documents and records are secured according to their classification level. Information security measures guarantee the availability, confidentiality and integrity of documents and records.

12) Supplier Responsibility

A process has been defined to communicate Code of Conduct requirements to main suppliers and to monitor supplier compliance.



² Areas to be included in a risk assessment for the assessment of environmental health and safety are production areas, storage and warehouse facilities, auxiliary systems for plants and equipment, laboratories and testing/inspection areas, sanitation facilities (toilets), kitchens/cafeterias as well as employee housing/living quarters.



Reporting Obligation for Violations, Complaint Process

In order to act against improper behavior as quickly as possible, we obligate our employees and encourage our partners and other stakeholders to report potential violations of the Zollner Code of Conduct or the law using one of the following internal reporting paths.

According to our "Open Door Policy", all employees can contact their managers, the Managing Director or the Board of Management with their questions and concerns.

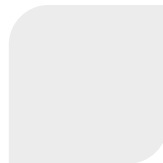
Supplemental to that are the following contacts for employees, partners and other external people:

- The Corporate Compliance Team is available for questions relevant to compliance and can be reached at this email: **speakup@zollner.de**. At the request of the whistleblower, the option exists for a personal meeting.
- The Zollner **SpeakUp** whistleblowing system is available around the clock in all countries of the world in multiple languages for anonymous and non-anonymous reports.

July 2023, Zandt



Ludwig Zollner
Board Spokesman



Our Locations

- Germany ▪ Switzerland ▪ Hungary ▪ Romania ▪ Tunisia ▪ China ▪ Hong Kong ▪ Costa Rica ▪ USA ▪ USA EIT

