

# Supplier Code of Conduct

The commitment of Picotronic® to ethics and social responsibility includes Picotronic®-Group and extends to its suppliers. To ensure that suppliers act with a high degree of integrity and in a social and environmentally responsible manner, every Picotronic® supplier must comply with this Code of Conduct.

Picotronic® reserves the right to change this Code of Conduct upon reasonable changes. In this case, Picotronic® expects its suppliers to accept such reasonable changes.

Picotronic® expects its suppliers to comply with applicable national laws in their activities. Furthermore, they are expected to introduce appropriate processes to support compliance with applicable laws in their companies and to promote continuous improvement in the principles and requirements of the Picotronic® Supplier Code of Conduct.

## Human and labor rights

Picotronic® expects its suppliers to comply with the fundamental labor laws under applicable national legislation.

#### Child Labor

Picotronic® expects its suppliers to prohibit and refrain from any kind of child labor in their companies.

### Discrimination

Picotronic® expects its suppliers to promote equal opportunities and equal treatment, to prevent discrimination in recruiting and promoting or in providing education and training. No employee may be discriminated against on grounds of sex, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or beliefs.

#### Forced Labor

Picotronic® expects that its suppliers prohibit any kind of forced labor or human trafficking in their organization and any contribution to it.

### Freedom of Association

Picotronic® expects its suppliers to respect the right of their employees to form a workers council, collective bargaining unit or other employee representations in accordance with applicable national legislation.

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## **Working Time and Compensation**

Picotronic® expects its suppliers to comply with applicable national legislation on working time. Further, it is expected that the employees of our suppliers will receive a compensation which is in accordance with applicable national laws.

## Occupational Health and Safety

Picotronic® expects its suppliers to fully comply with applicable national laws governing health and safety at work. Furthermore, suppliers are expected to establish and maintain an appropriate occupational health and safety management system (e.g.: in accordance with OHSAS 18001 or national equivalent). This includes containment containing actual as well as potential health and safety risks. Suppliers are expected to train their employees for the purpose of preventing accidents and occupational diseases as best as possible.

### **Environmental Protection**

Picotronic® expects its suppliers to comply with all applicable national laws, regulations and standards to protect the environment. Suppliers are also expected to establish and maintain an appropriate environmental management system (e.g., in accordance with ISO 14001 or national equivalent) to minimize environmental impact and hazards, and to improve environmental protection in their day-to-day operations.

## Ban on Corruption and Bribery

Picotronic® expects its suppliers to have zero-tolerance for corruption and to ensure compliance with United Nations (UN) and Organization for Economic Co-operation and Development (OECD) anti-corruption and anti-corruption laws. In particular, they ensure that their employees, subcontractors or agents do not offer, promise or grant advantages to Picotronic® employees or related parties with the aim of securing an order award or any other form of preferential treatment in their business transactions.

### **Invitations and Gifts**

Picotronic® expects its suppliers to refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. Invitations and gifts extended to Picotronic® employees or related parties, if any, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value and reflect ordinary local business custom. We also expect our suppliers to refrain from asking Picotronic® employees or related parties for any inappropriate advantages.

## **Preventing Conflicts of Interest**

Picotronic® expects its suppliers, in their business dealings with us, to make descisions based on objective criteria only. Any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest, must be prevented from the start. The same applies to relatives and other related parties.

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## **Unrestricted Competition**

Picotronic® expects its suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter into agreements with competitors that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

## Money Laundering

Picotronic® expects its suppliers to comply with all applicable statute governing the prevention of money laundering activities.

## **Supplier Relations**

Picotronic® expects its suppliers to communicate the principles set out herein to their subcontractos and subsuppliers and to take these principles into account when selecting subcontractors and subsuppliers. Our suppliers are expected to encourage their subcontactors and subsuppliers to comply with the minimum standards of this Supplier Code of Conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fullfilling their contractual obligations.

Any violation of the principles and requriements set out in this Picotronic® Supplier Code of Conduct will be regarded as a serious violation by the supplier regarding its contractual obligation towards Picotronic®.

In the event that the supplier is suspected of violating any of the principles or requirements set out in this Picotronic® Supplier Code of Conduct (e.g. negative media reports), Picotronic® reserves the right to request from the supplier that all relevant information be disclosed.

In the event that a supplier evidently fails to fulfill any of the principles or requirements set out in this Picotronic® Supplier Code of Conduct, or refuses to pursue and implement measures for improving its sustainability performance, after having been given a reasonable period of time, Picotronic® reserves the right to immediately terminate any or all contracts with the supplier for cause.

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