

Code of Conduct on Social Responsibility

Scope: Worldwide for all locations and organizations of

Murrelektronik GmbH

Creator: Management

Released: Management
19.02.2021



Stefan Grotzke
Managing Director



Dr Ulrich Viethen
Managing Director



Jürgen Zeltwanger
Managing Director

1. Murrelektronik's social responsibility

2. Conduct towards employees

- Human Rights
- Fair working conditions
- Occupational health and safety

3. Conduct as a member of society

- Environmental protection and sustainability
- Social commitment, donations and sponsoring
- Politics
- Appearance and communication in public

4. Conduct in a business environment

- Compliance with applicable laws
- Conflicts of interest
- Fair competition
- Antitrust law
- Relationships with business partners
- Cooperation with business partners
- Product safety

5. Handling information and company property

- Independent and responsible reporting
- Data protection and IT security
- Confidential information
- Protection of intellectual and material property

6. Compliance with the Code of Conduct

- Scope of application
- Obligations of managers
- Contact persons, support and assistance
- Dealing with errors and rule violations



procedures and protective measures, such as ergonomic workplace design, are in place to ensure health and safety in the workplace. In addition, our managers are obligated to instruct and support their employees in meeting this responsibility.

3 Conduct as a member of society

Environmental protection and sustainability

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. We adhere to applicable environmental protection regulations and strive for the responsible use and procurement of natural resources (e.g. water, energy, materials and land) in the production and sale of our products and services.

Every employee is responsible for treating natural resources sparingly and contributing to the protection of the environment and climate through their individual behaviour.

Both in the development of new products and services as well as in the operation of production facilities, we make sure that their impact on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection with our customers.

We avoid the use of non-renewable resources and hazardous substances wherever possible. When handling chemicals, waste or other materials that could pose a risk to the environment or humans, these are marked accordingly and care is taken to ensure that safety is guaranteed, especially during use, storage and disposal.

Social commitment, donations and sponsoring

As a family company, Murrelektronik aims to act reliably and responsibly—not only towards our employees but also towards the region and the people around our branches and facilities around the world. We contribute to the social and economic development of the country and the regions in which we operate and support appropriate voluntary activities by our employees.

When making donations, we make sure that the use and recipient of the donation are clearly traceable. Granting donations to individuals and payments to private accounts are not permitted.

It should be noted that Murrelektronik does not make any donations to parties or political organizations. All donations or local sponsorship measures must be approved by the management.

Politics

Business relationships with government agencies are often subject to particularly strict requirements. In dealing with governments and authorities, we always act honestly and transparently and in accordance with applicable law. This applies e.g. for contacts with authorities in day-to-day business (for necessary licenses, permits or contracts), for political lobbying or official inquiries (requests for information, official investigations, legal proceedings).

Appearance and communication in public

We respect the right to freedom of expression as well as the protection of personal rights and privacy. Every employee should be aware that they can also be perceived as a part and representative of Murrelektronik in their private life and are therefore called upon to protect the reputation of the company through their behaviour and appearance in public. In the case of private expressions of opinion, we ensure that there is no relation between the respective function or activity in the company and the private expression.

When using social media, we pay attention to the reputation of Murrelektronik, do not pass on any confidential or sensitive company information and respect the privacy of our colleagues and business partners. Detailed information on responsible behaviour is set out in our social media guidelines.

1 Murrelektronik's social responsibility

This Code of Conduct is based on a common fundamental understanding of socially responsible corporate management. This means that, as part of Murrelektronik, we consider the consequences of our business decisions and actions in economic, technological as well as social and ecological terms. The contents of this Code of Conduct correspond to our common values, which go beyond generally applicable ethical principles. We actively work towards observance of and sustained compliance with the following principles.

For us, these principles do not just represent compliance with the law. We understand them as a personal willingness to act dutifully and conscientiously. The diversity of our activities, employees¹ and business partners requires responsible behaviour in all areas. Our Code of Conduct stands for a value proposition by Murrelektronik and its Managing Directors and at the same time forms a guideline for company employees. We can only secure long-term, sustainable success if we act with integrity and ethically impeccable behaviour.

2 Conduct towards employees

Human Rights

A culture of mutual trust, equal opportunities and mutual respect is our top priority. We are guided by the principles of the United Nations and comply with Human Rights in accordance with the UN Charter of Human Rights.

We promote equal opportunities and prevent discrimination, in particular when hiring employees, when promoting or granting training and further training measures and when taking disciplinary measures. We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation, ideology or other grounds covered by the prohibition of discrimination. We promote a work environment that is characterized by respect and tolerance, in which the value and dignity of each individual are recognized, and all employees treat one another with courtesy and honesty. Harassment, bullying and intimidation are prohibited and will not be tolerated by us.

Fair working conditions

We respect the principles of the International Labor Organization on fundamental principles and rights at work in accordance with national laws and customs.

We adhere to the legal regulations to ensure fair working conditions, including those on remuneration, working hours and the protection of privacy. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors and regions.

We respect the rights to freedom of association and collective bargaining in accordance with applicable laws and regulations. We reject forced, compulsory and child labour as well as any form of exploitation and ensure strict compliance with the relevant laws.

We recognize the right of all employees to form employee representatives.

Occupational health and safety

In addition to the quality of our products and economic success, the safety and health of our employees are equally important corporate goals. We ensure a healthy and safe working environment for our employees by complying with the laws and regulations relating to health and safety in the workplace. We ensure that processes, production facilities and resources comply with statutory and internal requirements for occupational safety as well as health, fire and environmental protection regulations.

Occupational health and safety are an integral part of all operational processes and are already included in technical, economic and social considerations during the planning phase. With the help of our company health management, we ensure a protective and preventive work environment. In the event of industrial accidents, a standardized procedure ensures that help can be provided quickly. Corresponding emergency plans for disaster control exist.

Each of our employees is committed to promoting safety and health protection in their work area and adheres to the regulations on occupational health and safety. It is the responsibility of managers, in particular, to ensure that appropriate

¹This Code of Conduct does not differentiate according to gender. The use of male pronouns serves only for better readability and should be understood as gender-neutral.

4 Conduct in a business environment

Compliance with applicable laws

Compliance with laws and regulations is a matter of course for us and an essential basic principle of economically responsible action. We observe the applicable legal prohibitions and obligations—both at national and international level. This is the only way to ensure our business success worldwide. All employees are obligated to act within this legal framework.

In individual countries, business fields or markets or with regard to business partners, stricter regulations may apply than those described in this Code of Conduct. In such cases, the stricter rules apply.

Conflicts of interest

At Murrelektronik, business decisions are made independently and based on economic and ethical considerations. Our own profit interests, family or friendly relationships with business partners play no role.

Conflicts of interest with private interests or further economic or other activities, including those of relatives or other related persons or organizations, should be avoided right from the start. Should they nevertheless occur, they must be resolved in accordance with the law. Transparent disclosure of the conflict is a prerequisite for this. Employees who are affected by a possible or actual conflict of interest are obligated to inform their line manager quickly so that a quick resolution can be brought about.

Fair competition

Murrelektronik pursues clean and recognized business practices, in competition, we orientate ourselves towards professional behaviour and quality work. We are convinced that the excellent quality of our products and services is the key to our success. We therefore maintain transparency in dealing with our customers, suppliers and authorities and corresponding international anti-corruption standards, as well as applicable anti-corruption and bribery laws.

Relationships and agreements with competitors, suppliers, distributors and dealers that affect fair competition are prohibited by law. These include e.g. price-fixing, the division of customers or sales territories between competitors, anti-competitive boycotts and other unfair competition methods.

Antitrust law

We are obligated to comply with the applicable antitrust and competition law and seek advice from experts on antitrust and competition law issues. We are committed to fairness in dealing with our business partners. That is why we support fair and undistorted competition in compliance with competition and antitrust law. We therefore do not make any arrangements or agreements with competitors or business partners that could be capable of influencing market behaviour in an impermissible manner.

Relationships with business partners

In competing for orders, we rely on the quality and benefits of our products and services for our customers as well as at reasonable prices. Contributions of any kind by employees to public officials or employees of other companies with the aim of receiving orders or unreasonable advantages for Murrelektronik or other people are not permitted.

Employees are not allowed to use their position or function in the company to demand, accept or obtain personal advantages.

Cooperation with business partners

When selecting business partners, we act carefully and responsibly. We expect our partners as well as our employees to comply with the legal requirements. National and international laws regulate the import, export or domestic trade of goods, technologies or services, the handling of certain products as well as capital and payment transactions. In international trade, we ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls or to combat the financing of terrorism. We strictly adhere to all laws and regulations to combat money laundering.

Product safety

We define ourselves as a close partner of our customers. Long-term customer relationships serve our business success. It is therefore our aim to offer our customers safe and flawless products and services of high quality.

Products and services must not have any defects or dangerous properties that could impair health or damage property.

5 Handling information and company property

Independent and responsible reporting

We value open and truthful reporting and communication on the company's business transactions with investors, employees, customers, business partners, the public in general and government institutions. Our company's business transactions and records must be accurate and orderly. We record and document all business transactions, assets and liabilities in accordance with financial reporting rules and legal requirements. To ensure the proper documentation and storage of documents, the highest accuracy and completeness, as well as a sense of responsibility, are essential in all business processes. Documents relevant to financial accounting must not be deliberately provided with incorrect or misleading entries. Any form of balance sheet manipulation is prohibited.

Each responsible employee ensures that both internal and external reports, records and other company documents are in accordance with the applicable legal rules and standards and are therefore always complete and correct, and made in a timely and system-based manner.

Data protection and IT security

Protecting personal data, especially that of employees, customers and suppliers, is extremely important to Murrelektronik. Any deficiencies found are immediately reported to the responsible data protection officer for clarification. Detailed information can be found in our privacy policy.

IT systems are used, and data processed on a regular basis in day-to-day business. Appropriate security precautions (passwords, approved technologies and licensed software) are required to ensure the protection of intellectual property and personal data. Failure to observe necessary security measures can have serious consequences, such as loss of data, theft of personal data or infringement of copyright. All employees are obligated to take the necessary measures to ensure the security of IT systems against internal and external misuse and threats (e.g. misuse of assigned passwords or the downloading of inappropriate material from the Internet). The IT department is the right contact for questions and problems.

Confidential information

We take the necessary steps to appropriately protect confidential information and business documents from being accessed and viewed by uninvolved colleagues and other third parties.

We comply with insider trading laws and do not divulge inside information about our or any other company.

Protection of intellectual and material property

We use the company's property and resources appropriately and with care and protect them from loss, theft or misuse. Our company's intellectual property represents a competitive advantage for Murrelektronik and thus an asset worth protecting, which we defend against any unauthorized access by third parties.

We use company tangible and intangible property for corporate purposes only and not for personal purposes unless expressly permitted.

Improper use for other purposes, especially inappropriate personal, illegal or other unauthorized purposes, is prohibited. Any form of fraud is prohibited, regardless of whether it harms company assets or the assets of third parties.

6 Compliance with the Code of Conduct

Scope of application

This Code of Conduct applies to all branches and business units of Murrelektronik GmbH worldwide.

We share the basic principles for ethical behaviour, social commitment and environmentally-friendly action with our suppliers, subcontractors, representatives and consultants. We convey our guiding principles to our business partners and motivate them to base their actions on the same standards.

A handwritten signature in blue ink, appearing to be 'H', located at the bottom right of the page.

Obligations of managers

Our managers have a special duty to act as role models and their actions can be measured against the Code of Conduct. They are the first point of contact for questions regarding understanding the regulations and they ensure that all employees know and understand the Code of Conduct. As part of their management tasks, they prevent unacceptable behaviour or take suitable measures to prevent rule violations in their area of responsibility. Trusting and good cooperation between employees and managers is reflected in honest and open information and mutual support.

Contact persons, support and assistance

All guidelines mentioned in the Code of Conduct can be found on the process map on the intranet. Further information about the Code of Conduct and its requirements can be found in the KnowledgeBase. If you have any doubts about correct behaviour, the guide there provides initial assistance. The open discussion of concerns makes a decisive contribution to misconduct occurring less often or being recognized and corrected at an early stage. That is why we value an open atmosphere in which employees can turn to their superiors or management without hesitation and in confidence, even with critical issues. Managers encourage open discussions, stand by their employees and deal with any concerns they have expressed fairly and without prejudice.

If employees still have reservations about discussing their concerns with a contact person in their immediate vicinity, or if this has no effect, they can contact the complaints office at any time. Indications of possible violations of the law or guidelines that affect people and companies of Murrelektronik GmbH can be reported via the compliance complaint management. The relevant contact details are available on the Murrelektronik website. Employees who report information about non-compliance with the Code of Conduct in good faith will not be disadvantaged. Any information supplied will be kept in strict confidence.

Dealing with errors and rule violations

In the event of violations of this Code of Conduct, appropriate measures will be taken to ensure proper clarification. The priority is to try to settle the matter by explaining the meaning of our Code of Conduct to the employees concerned and thereby encouraging them to change their behaviour. However, it is also possible to impose labour or disciplinary measures within the framework of the applicable regulations.