Supplier Code of Conduct

1. Introduction

The Envanio Germany GmbH is committed to ecologically and socially responsible corporate governance, acting in compliance with all relevant laws and regulations and the following Group-wide guidelines:

- Code of Conduct of the Envanio Germany GmbH
- Human Rights and Fair Working Conditions Policy Statement
- Environment Policy

We expect our employees to observe the principles of proper ecological, social and ethical conduct. We furthermore strive to keep optimizing our business conduct and products in line with sustainability aspects, and encourage our suppliers to join us in our efforts in the interest of an integral approach.

We have defined rules of conduct, referred to as the Code of Conduct below, for our future cooperation with external partners. We expect our business partners to identify with the principles and requirements in this Code of Conduct and to take all necessary steps to fulfill them. Suppliers are in turn requested to obligate their own subcontractors by contract to comply with the standards and regulations listed in this document. If local laws at the company site set out specific requirements, then these requirements shall apply. The Code of Conduct shall supplement them in this case.

The Code of Conduct is based on laws, regulations and conventions such as the United Nations Universal Declaration of Human Rights, the UNICEF Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization Conventions and the United Nations Global Compact, of which the Envanio Germany GmbH is a member. We expect our suppliers to follow all relevant laws and regulations, as well as the requirements in this Code of Conduct.

2. Labor and Human Rights

2.1 Working Conditions, Times and Wages

We expect our suppliers to take responsibility for ensuring fair working conditions and to comply with the applicable regulations governing working times and leave arrangements. Overtime work is subject to the respective legal framework.
Employees should have at least one day off every seven days. The supplier must respect local laws and regulations governing maximum working times and leave entitlement. The supplier must pay appropriate remuneration on a contractual basis, in compliance with the respective, legally guaranteed minimum wage and the national labor market.

2.2 Harassment and Discrimination

The supplier must take all necessary steps to prevent harassment of any kind, such as sexual harassment, sexual abuse, corporal punishment, psychological or physical duress or verbal abuse.
All individuals and groups must be treated equally, irrespective of their personal traits, including gender, skin color, ethnic or social origin, genetic traits, language, religion or ideology, political or other views, membership of a national minority, net worth, birth status, disabilities, age or sexual orientation.

2.3 Freedom of Association

We expect our suppliers to allow their employees to peacefully assemble and associate, particularly for the purpose of addressing political affairs, labor representation and civic issues. This includes the right to establish labor unions to protect their interests and to engage in collective bargaining if this is provided for by law.

2.4 Forced Labor and Human Trafficking

The supplier must prevent modern slavery of any kind. Examples of this include forced overtime, retention of identification documents and human trafficking.

2.5 Child Labor and Young Employees

The supplier commits itself to refraining from employing children younger than the legal minimum age (pursuant to ILO Convention 138). The supplier is additionally expected to ensure that employees younger than 18 years of age do not work at night or work overtime and are protected against working conditions that are detrimental to their health, safety or development. The supplier should ensure that the young employees' work does not interfere with their school attendance.

2.6 Health Protection and Occupational Safety

The supplier's health and safety measures must comply with the local statutory requirements. The supplier must ensure that all workplaces, machinery, equipment and processes under its control are safe and do not pose a risk of harm to health. It is the responsibility of company management to provide sufficient funds to meet health and safety requirements and to ensure continuous improvement of the system by conducting periodic risk assessments and reporting. We recommend using an occupational health and safety management system certified in accordance with ISO 45001 or a comparable system.

3. Corporate Ethics

All suppliers are expected to refrain from engaging in criminal activities.

3.1 Combating Corruption

The Envanio Germany GmbH does not tolerate corrupt practices and actively combats them. Suppliers must not engage in or tolerate corruption, bribery, extortion or embezzlement of any kind.
Any direct or indirect bribery or the acceptance of undue advantages – be it by giving or accepting payments, gifts or gratuities of any kind – beyond the scope of what is legally permissible or normal is prohibited.

We also expect our suppliers to take an active role in preventing corruption and fraud.

3.2 Prevention of Money Laundering and Terrorist Financing

The supplier endeavors to meet its legal obligations to prevent money laundering and terrorist financing, within the scope of the applicable legal regulations, and to refrain from directly or indirectly promoting these activities.

3.3 Data Protection and Data Security

Personal data of employees, customers and business partners may be processed, i.e., acquired, saved, collected, used or shared, only in compliance with the applicable legal regulations.

The supplier must appropriately handle and protect all information. Data and information must be used exclusively according to their classification. The supplier ensures that the data to be protected is collected, processed, backed up and deleted properly. It additionally ensures that technical information systems are adequately protected against cyber threats by complying with the usual standards (e.g., antivirus protection, encryption, segmentation, roles and rights management). Proof of a certified information security management system is recommended.

3.4 Fair Competition and Antitrust Laws

The supplier commits itself to fair and unfettered competition. The Envanio Germany GmbH expects its suppliers to comply with the applicable provisions under competition and antitrust legislation. These provisions govern business practices that unlawfully restrict competition, the improper exchange of information concerning competition, price agreements, bid rigging and fraudulent market allocation.

3.5 Conflicts of Interest

Suppliers must avoid and disclose any conflicts of interest relevant to the Envanio Germany GmbH if these could affect the business relationship. Decisions must be made solely on an objective basis.

3.6 Physical and Intellectual Property

The supplier commits itself to respecting intellectual property and protecting it throughout the supply chain.
This applies equally to the Envanio Germany GmbH's physical property, which must be protected against loss, theft or misuse.

3.7 Export Control and Economic Sanctions

The supplier must strictly follow all applicable regulations and laws governing the import and export of goods, services and information as well as payment transactions. Existing sanctions and embargoes must be observed within the framework of laws and regulations in all business activities.

3.8 Whistleblowing and Protection against Reprisals

The Envanio Germany GmbH expects the supplier's employees to be able to speak out freely, without fearing reprisals, if the provisions in this Code of Conduct are violated.

4. Environment

4.1 General

The Envanio Germany GmbH expects its suppliers to minimize negative impacts on the environment and climate resulting from their business activities and to treat natural resources with care.

4.2 Compliance with Environmental Laws

The Envanio Germany GmbH expects its suppliers to comply with national and international environmental standards and laws.

4.3 Environmental Management Systems

The supplier is urged to monitor and continuously reduce its ecological footprint. Suppliers with production sites should have suitable environmental management systems in place.

4.4 Consumption of Natural Resources and Air Pollution

The supplier must reduce or avoid the use and consumption of natural resources, including raw materials, water and energy. Economic solutions must be found to enhance energy efficiency and minimize energy consumption. General emissions from company operations (air and noise emissions) must be avoided whenever possible.

4.5 Climate Protection and CO_2 Reduction

Based on the original Climate Strategy, we have set ourselves scientifically validated climate goals for the year 2030 and are taking comprehensive measures to reduce greenhouse gas emissions. We also involve our suppliers in this process and help them reduce their greenhouse gas emissions as well. We encourage the supplier to find economic solutions for reducing greenhouse gas emissions.

4.6 Waste, Wastewater and Hazardous Substances

The supplier should have measures in place to reduce both waste and wastewater and to treat them in compliance with all legal requirements. As much waste as possible must be recycled. The supplier ensures responsible handling of chemicals and hazardous substances with regard to environmental protection, health and safety.

5. Promotion of a Responsible Supply Chain

The Envanio Germany GmbH is committed to using a responsible supply chain. Our goal is to ensure that our products and materials are free from so-called conflict minerals (tin, tantalum, tungsten, their ores and gold from areas of conflict or high risk). These conflict minerals contribute to the direct or indirect financing of armed groups, forced labor and other human rights violations.

If our suppliers procure any minerals (particularly tantalum, tin, tungsten and gold) from areas of conflict or high risk, we expect them to obtain the minerals only from audited, conflict-free smelting plants and refineries. If goods or materials contain conflict materials, the supplier will be obligated to provide transparency about the entire supply chain, including the industrial processors (foundries/smelting plants), on request.

6. Asking Questions and Ways to Report Misconduct

The Envanio Germany GmbH investigates any potential misconduct reported. In order to become aware of potential rule violations in the first place, we depend on employees, business partners and third parties reporting any potential misconduct. This requires all parties involved to assist and support us by reporting any rule violations relevant to us.

Suppliers can, at any time, submit questions about the Code of Conduct to their responsible purchaser (procurement.de@envanio.com) or Corporate Compliance (integrity-speakup@envanio.com).

7. Compliance with Envanio Germany GmbH Requirements

The Envanio Germany GmbH reserves the right to employ suitable measures to check compliance with this Code of Conduct. These measures can take the form of questionnaires, assessments or on-site supplier audits. On-site audits are always announced in advance and performed together with representatives from the business partner in compliance with the applicable laws, including data privacy protection provisions, and contractual obligations such as non-disclosure agreements.

If deviations from the principles in this Code of Conduct are found, we will cooperate with the supplier to clarify how lasting remedial measures can be implemented within an appropriate timeframe. The supplier shall implement the measures at its own responsibility, without this resulting in costs for the Envanio Germany GmbH.

8. Legal Consequences of Violations

The requirements expressed here are considered important to the Envanio Germany GmbH. Any violation of this Code of Conduct can give the Envanio Germany GmbH cause to initiate appropriate legal actions. In particular, the Envanio Germany GmbH reserves the right to terminate the business relationship in the event of serious or repeated violations of this Code of Conduct. The Envanio Germany GmbH could refrain from pursuing such actions if the supplier credibly assures and can prove that it has initiated prompt countermeasures to avoid future violations.

Dr. Sebastian Baumann

Co-Chief Executive Officer (Co-CEO

Annex 3 – List of affiliated companies of Envanio

Brasilien/Brazil:

Envanio Brazil Ltda.

Rua Arnaldo Magniccaro, 500, Vila Gea | 04691-903 | Sao Paulo

Kanada/Canada:

Envanio Canada Inc

611 Kumpf Drive, Unit 100 | N2V 1K8 | Waterloo

China:

CTS Technology (Shanghai) Co., Ltd.

2F, Building 1, No.665 YingShun, Road Qingpu Industrial Park | 201799 | Shanghai

Frankreich/France:

Envanio France SAS

101 rue du Pelvoux | 91019 | Evry, France

Deutschland/Germany:

Envanio Germany GmbH

Carl-Benz-Straße 34 | 74321 | Bietigheim-Bissingen

Envanio Germany GmbH

Markgrafenstraße 4 | 95497 | Goldkronach

Großbritannien/Great Britain:

Envanio UK Ltd.

Barleyfield | Leicestershire | LE10 1YE | Hinckley

Envanio UK Ltd.

Lakeview 600 Lakeside Drive | WA11RW | Warrington

Indien/India:

Envanio India Private Limited

Office No 102, 1st Floor, Amar Apex Building, Near Baner, BanerRoad, Baner |11045| Pune

Italien/Italy:

Envanio Italy Srl00

Viale Martesana 12, | 20055 | Vimodrone

Mexiko/Mexico:

Envanio Universal Mexico S. de R.L. de C.V.

Av. Mantenimiento No. 130, Zona Industrial 78395

Südkorea/South Korea:

Envanio Korea Inc.

2-609, Acehitechcity 55-20, Munraedong 3 ga, Yeongdeungpo gu, Seoul, Korea Zip 07299

Schweden/Sweden:

Envanio Sweden AB

Olskroksgatan 30 | 41666 | Göteborg

USA/United States:

Envanio USA Inc.

26801 Northwestern Highway | 48033 | Southfield

Envanio USA Inc.

830 Prosper Street | 54115 | De Pere

Envanio Universal USA Inc.

1925 HIGHWAY 51 and 138 | 53589 | Stoughton