

## Supplier code of conduct of Hekatron Manufacturing\_

Hekatron Manufacturing is committed to its social responsibility as part of its business activity worldwide.

The following supplier code of conduct establishes the minimum requirements for all companies (hereinafter “supplier”) that deliver goods or services to Hekatron Manufacturing.

These minimum requirements constitute the ideals of Hekatron Manufacturing and apply to all suppliers as well as their subsidiaries, branches and associated companies worldwide.

The supplier is to ensure adherence to the minimum requirements by its suppliers. Consistency throughout the supply chain is the objective and should be aimed for by all direct and indirect suppliers of Hekatron Manufacturing.

### 1. Complying with the relevant laws

The supplier is obligated always to act in full accordance with all relevant laws, rules and regulations (“laws”) at all its locations and to monitor their implementation and compliance. In the case of countries with a weak institutional framework, the supplier shall examine carefully which good company practice from its own home country should be applied on a supporting basis for responsible corporate governance.

### 2. Working conditions

The supplier must protect the human rights of its employees pursuant to the UN Human Rights charter (Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948) and treat them with dignity and respect.

The supplier may employ exclusively employees who have reached the legally prescribed minimum age. Under no circumstances may persons under 16 years of age be employed, even if the locally applicable laws allow this. Nevertheless, suppliers may allow persons of 15 years of age or older to work within the framework of an apprenticeship. Such an apprenticeship must be permitted according to the laws of the respective country and offer training in one or several specifically named industrial apprenticed trades as part of the enrolment at an educational institution.

The supplier participates neither in forced labour nor in slave labour, serfdom or human trafficking and does not use these.

At the locations of the supplier, the working hours, wages and payment of overtime must be regulated in accordance with all relevant laws. The employees must be paid at least the statutory minimum wage or a local wage customary in the industry. The higher value in each case is to be applied.

The supplier shall employ employees based on their technical abilities alone. It shall not carry out any corporal punishment and shall not permit it. It shall not threaten any violence and shall not use it in actuality.

The supplier shall not participate in discrimination or harassment, whether based on gender, race, skin colour, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political conviction or other legally protected features.

The supplier must respect the right of the employees to join any legally permitted organisation, including trade unions and works councils and/or to desist from membership and it must comply with all laws on freedom of association and collective bargaining agreements.

### 3. Health and safety

The supplier must ensure that the health and safety of employees, executive employees, directors, agents and contractors ("personnel") are protected.

The supplier shall comply with the safety guidelines and all location-specific safety requirements or protocols while it is active on site at Hekatron Manufacturing or a customer of Hekatron Manufacturing.

The supplier:

- Bears responsibility for the health and safety of its personnel.
- Ensures a safe working environment and minimises the physical and chemical risks by means of orderly construction, technical and administrative controls, preventative maintenance and safe working processes as well as continuous safety training.
- Provides the workers with suitable personal protective equipment for such activities where the associated dangers cannot be adequately counteracted with other means.
- Provides and maintains physical protective equipment, locking systems and barriers where machines constitute a potential injury risk for workers.
- Minimises the impact of emergency situations by implementing emergency plans and measures.
- Carries out training and ensures that its personnel is adequately educated and trained in relation to health and safety matters.
- Provides suitable health insurance and does not terminate the employment relationship in the event of illness or injury.

## 4. Ethics and compliance

The supplier undertakes to comply with the highest standards of ethical behaviour in its dealings with its personnel, suppliers, customers and other relevant stakeholders.

The supplier:

- Must communicate and disclose correctly and fully information about its business activity, structure, financial situation and performance according to the applicable laws as well as the customary business processes in the industry.
- Prohibits any form of fraud, extortion, theft or embezzlement by its personnel
- Must preserve all intellectual property rights and protect information of its customers. The passing on of technologies and expertise must take place while protecting all intellectual property rights.
- Must use processes and approaches and apply due care in order to determine and rule out product falsifications.
- Must implement processes with which the anonymity and protection of employees is ensured who, in good faith, notify of concerns, provide reporting or assist in an investigation in connection with potential ethical misbehaviour or possible penal violations.

Products manufactured by Hekatron Manufacturing must not contain “conflict minerals” (minerals fused with tin, tantalum, wolfram and gold) obtained from entities that directly or indirectly finance the conflict in the Democratic Republic of Congo or neighbouring countries.

The supplier:

- Examines its supply chain with due care as to whether products sold to us contain tin, tantalum, wolfram or gold and, if so, to what extent these metals come from conflict-free steel mill operations.
- Passes the results of this examination on so that Hekatron Manufacturing can fulfil its legal obligations and achieve the objectives defined in its guideline; and undertakes to be or become “conflict-free” so that all metals are obtained exclusively from conflict-free steel mill operations.

## 5. Fighting corruption

Hekatron Manufacturing adheres strictly to the anti-corruption laws within the meaning of the corresponding UN convention (United Nations Convention against Corruption of 2003, in force since 2005). These prohibit bribes or other corrupt measures aimed at obtaining an illegal advantage.

The supplier may neither offer nor directly or indirectly accept bribes, non-transparent commissions or other dishonest payments from persons and organisations. This applies to government authorities, individual government representatives, private companies and all employees of these organisations.

## **Gifts, entertainment and hospitality:**

In the case of business dealings with or on behalf of Hekatron Manufacturing, the suppliers are permitted, for legitimate business purposes, to offer sub-suppliers, customers or other business partners gifts, entertainment or hospitality or to accept these from them.

The requirement for this is that the gifts, entertainment or hospitality are, in all cases:

- not illegal and do not constitute a violation of this code
- do not constitute fraud, a non-transparent commission or any otherwise illegal payment
- are not offered in exchange for any type of reward
- take place without request
- do not give rise to the impression (or entail an actual or implied obligation) that the giver has a right to preferential treatment, being awarded the contract for a mandate, better prices or more favourable sale conditions.

## **6. Monitoring compliance**

The supplier shall allow Hekatron Manufacturing and/or its representatives or authorised representatives access to its locations and all relevant documents in connection with the products and services supplied for Hekatron Manufacturing at their request. Appointments are made at mutual consent; however, in the event of immediate risks to its business activity, Hekatron Manufacturing may also require immediate access to the products, services and the associated documents and the suppliers must grant associated requests. The supplier continues to pledge its cooperation in the investigation of allegations regarding misbehaviour, offences or corruption.

## **7. Environment**

Environmental protection is a key component of our business practice.

The supplier:

- Must obtain all necessary environmentally relevant approvals and consents and comply with the operational requirements and reporting obligations defined therein.
- Complies with the specifications for regulated substances and product contents and all relevant laws prohibiting or limiting the use, contents and handling of certain substances, including RoHS,

WEEE, REACH and California Proposition 65 as well as similar laws. The supplier shall provide Hekatron Manufacturing with all the information in relation to the aforementioned substances and product contents, including, as required, material declarations without being requested to do so.

- Ensures that its delivered products are not soiled by paint-wetting impairment substances ("PWIS") and/or emit these substances. Such substances can include silicones, substances containing fluorine (PTFE), certain oils and greases.
- Must treat, control, prepare and/or dispose of waste, wastewater and/or air emissions produced during its business activity in accordance with the applicable laws, even if they do not constitute hazardous substances.
- Minimises the contamination of the environment and effects continuous improvements in order to reduce or eliminate waste, wastewater and air emissions by implementing adequate protective measures in its production, maintenance and plant processes.

## 8. Application

The supplier shall contractually oblige its suppliers and/or sub-contractors to comply with behavioural standards that correspond to the provisions of this code. Hekatron Manufacturing reserves the right to examine the suppliers of the supplier and/or its sub-contractors with regard to their compliance with this code. The supplier shall also ensure that its personnel complies with the provisions of this code when goods or services are delivered to Hekatron Manufacturing.

## 9. Infringement

The supplier must monitor its supply chain and immediately notify all infringements upon this code known to it and take corresponding countermeasures to eliminate the infringement within a defined period. This period will be defined jointly between the supplier and Hekatron Manufacturing.

Hekatron Manufacturing:

- reserves the right to terminate the business relationship and, to this end, to take such measures as discontinuing the awarding of future mandates and possibly terminating current production.
- reserves the right to hold the supplier liable for all appropriate costs of the investigation of an infringement.

**10. Supplier declaration**

The supplier has received the "Supplier code of conduct of Hekatron Manufacturing" and hereby undertakes to comply with and acknowledge all principles and regulations of the code of conduct.

\_\_\_\_\_  
Place, Date

\_\_\_\_\_  
Complete business name

\_\_\_\_\_  
Name of signatory in fair copy

\_\_\_\_\_  
Signature