

# Code of Conduct

## for Corporate Social Responsibility

### Preamble

KUVAG affirms its Corporate Social Responsibility as a part of its global business activities (internationally known as “CSR”; CSR = Corporate Social Responsibility). “KUVAG’s Code of Conduct for Corporate Social Responsibility” (hereinafter called “CoC”) acts as a guideline in the industry, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust. Developed and agreed to by ZVEI (Electro and Digital Industry Association) and its member companies, the content of this CoC is an expression of ZVEI’s collective core values as they are defined in ZVEI’s vision and mission statements and especially as they are affirmed in the social market economy. It is designed as a self-imposed obligation that is also the understanding of KUVAG’s conduct of business. By providing this CoC, KUVAG assists them in responding to different general conditions in a global market and in facing challenges and social expectations that come from intensified collaboration from within the value chain.

### 1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means KUVAG assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests. KUVAG voluntarily contributes to the well being and long-term development of a global society at every point it can at the locations where it is in business. It is geared towards universally held ethical values and principals, especially integrity, honesty and respect of human dignity.

### 2. Where the CoC applies

2.1 This CoC is in effect for all KUVAG branches and business units worldwide.

2.2 KUVAG commits to promoting adherence to the content of this CoC at every point it can for its suppliers and in other parts of the value chain.

2.3. KUVAG chooses business partners who act with the same high level of professionalism and integrity and share our ethical and environmental values. Therefore, we expect all our suppliers and subcontractors to replicate these values and the corresponding responsibilities further down their supply chain.

### 3. Core Values for Social Responsibility in Corporate Management

KUVAG will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.

#### 3.1 Adherence to Laws

KUVAG will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

#### 3.2 Integrity and Organizational Governance

3.2.1 KUVAG gears its activities towards universally held ethical values and Principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender, sexual orientation, age and ethnicity.

3.2.2 KUVAG rejects corruption and bribery as stated in the relevant UN Convention (UN Convention against corruption in 2003, in force since 2005). It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

3.2.3 KUVAG pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behavior and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities. Additionally, it will hold to the parameters of the "Guide for our Association Activity – Instructions for Compliance with Competition Law" in the ZVEI.

3.2.4 KUVAG endeavors not to purchase any material that contains "conflict minerals" which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) or an adjoining country (Angola, Congo, Central African Republic, Sudan, Uganda, Rwanda, Burundi, Tanzania and Zambia). In our products tin is being used as soldering material. Tin is one of the "conflict minerals" defined in the Dodd-Frank Act. We are contacting our direct suppliers to increase the transparency of the materials they provide to KUVAG and to determine the source and the origin of the "conflict materials" within our supply chain. Our policy is consistent with the "Dodd-Frank Wall Street Reform and Consumer Protection Act" (US H.R. 4173, Sec. 1502).

#### 3.3 Consumer Interests

To the extent consumer interests are affected, KUVAG abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

### 3.4 Communication

KUVAG will communicate in an open way and is oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence. All employees, stakeholders and suppliers must comply with privacy and data protection laws, in particular the EU GDPR.

### 3.5 Human Rights

KUVAG is committed to promote human rights. It respects human rights as also stated in the Charter of the United Nations (General explanation of human rights, UN Resolution 217 A (III) from 1948), especially those named in the following:

#### 3.5.1 Privacy

Protection of privacy. More specifically, we respect the privacy and integrity of all of our stakeholders, and do our utmost to maintain the secrecy of any confidential information entrusted to us. All KUVAG employees must keep information related to customers and KUVAG secret if they do not have permission to disclose such information. We expect our employees to follow this guideline, even after their employment contract has ended. Employees must respect the privacy of colleagues and customers when processing personal data. An employee with access to the personal data of customers and KUVAG must read and know the more detailed privacy instructions in place concerning such data and act accordingly.

#### 3.5.2 Health and Safety

Ensuring health and work safety, especially the guarantee of a safe and healthpromoting work environment, avoiding accidents and injuries.

#### 3.5.3 Harassment

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

#### 3.5.4 Freedom of Conscience

Protection and guarantee of the right to freedom of conscience and freedom of expression.

### 3.6 Working Conditions

KUVAG abides by the core work standards from International Labour Organization (ILO) as well as United Nations Global Compact (UNGC) including the following:

#### 3.6.1 Child Labor

The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted. (ILO Convention No. 138 from 1973 and ILO Convention No. 182 from 1999).

Particular actions companies can take to eliminate child labour in the workplace include (Remediation Plan):

- Adhere to minimum age provisions of national labour laws and regulations and, where national law is insufficient, take account of international standards.
- Use adequate and verifiable mechanisms for age verification upon recruitment.
- Maintain accurate and up-to-date records of all employees.
- When children below the legal working age are found in the workplace, take measures to remove them from work and
- To the extent possible, help the child removed from workplace and his/her family to access adequate services and viable alternatives.
- Exercise influence on subcontractors, suppliers and other business partners to combat child labour.

### 3.6.2 Forced Labor

The prohibition of forced labor of any kind. (ILO Convention No. 29 from 1930 and ILO Convention No. 105 from 1957)

### 3.6.3 Prohibition of human trafficking and modern slavery

No individual shall be employed against their will. Forced, bonded (including debt bondage), involuntary prison labor or victims of slavery, human trafficking, coercion shall not be used in employment. All employees should have basic liberty, dignity, freedom of movement and clearly written contracts in language that is understandable to them. Workers should have freedom to leave the employment at reasonable notice without any penalty or obstruction. The suppliers, any agent/intermediary, shall not withhold original documents, wages of the workers, migrant or otherwise.

We are aware that in any country and in most cases in the context of contractors and their subcontractors, so called modern slavery can occur. Any kind of modern slavery is incompatible with our ethical standards. We expect our suppliers/service providers/business partners and their business partners to fight against any form of modern slavery.

Particular actions companies can take to eliminate modern slavery/ forced labour/ human trafficking in the workplace include (Remediation Plan):

- Extract the worker from the job, contact the local NGO/regulatory agency who support the victims in rehabilitation. Maintain contact with the NGO to monitor the wellbeing of the individual. If viable support the worker in getting an alternate job.

### 3.6.4

Workforce service providers should take responsibility of ensuring the workers employed at KUVAG have not been charged money by any middle men in lieu of the promise for job or under any other pretext. In case such an incident is discovered, KUVAG will reimburse the money to the worker and charge it to the supplier and the same shall be adjusted from the professional fees of the relevant agencies.

3.6.5 Wage Compensation

Work standards concerning compensation, especially in regards to the level of compensation as stated in the laws and requirements that are in force. (ILO Convention No. 100 from 1951)

Moreover, compensation extended to the workers should be more than the legal minimum standards, at least equal to, living wages based on the place of work done. This should include the legally mandated benefits for workers such as social security, paid leaves etc. In case of overtime work, the wage should be paid at premium rate. All wage calculations, including payment and standard deductions should be done in a clear and transparent manner and communicated in written form, e.g. wage slip, in a language that is understandable to the worker. No disciplinary deduction of wages should be done.

3.6.6 Employee Rights

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country. (ILO Convention No. 87 from 1948 and ILO Convention No. 98 from 1949).

3.6.7 Prohibition of Discrimination

Treatment of all employees in a non-discriminatory fashion. (ILO Convention No. 111 from 1958).

More precisely, the equal treatment of all employees shall be a fundamental principle of the corporate policy of KUVAG and its business partners. They shall provide a workplace free of harassment and discrimination. Any discrimination for reasons such as race, color, ethnicity, gender, sexual orientation, age, physical characteristics, social origin, disability, union membership, religion, marital status, pregnancy, veteran status or political opinions is prohibited.

3.7 Hours of Work

KUVAG abides by work standards concerning the longest permitted time of work.

4. Environmental Protection

KUVAG fulfills the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio Declaration. (The 27 principles from the “Rio Declaration on Environment and Development“ from 1992 as the result from the UN Conference on Environment and Development in Rio de Janeiro)

5. Civic Commitment

KUVAG contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities by its employees.

6. Responsible Minerals Sourcing

Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

Document Number <b>COC.01.00</b> Revision <b>A0</b>
--

Created by <b>Christoph Haubmann</b> Date <b>05.07.2024</b>
--

Verified by <b>Gertraud Öllinger</b> Datum <b>05.07.2024</b>
---

Released by <b>Gregor Rumpelmayr</b> Datum <b>05.07.2024</b>
---

## Supply Chain

Use reasonable efforts to make its suppliers comply with the principles of this Code of Conduct and check their compliance on a risk-based approach. Comply with the principles of non-discrimination with regard to supplier selection and treatment.

### 7. Implementation and Application

KUVAG will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CoC both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No right exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

### 8. Remediation plan

If deviations or misconduct against any principles or rules of this Code of Conduct are observed, contact contact KUVAG's Trust Line at [trustline@eucoma.at](mailto:trustline@eucoma.at), the head of trade union at the respective KUVAG site, or in severe cases the nearest government authority office to report it.

Neumarkt/H., July 5, 2024

Document Number <b>COC.01.00</b> Revision <b>A0</b>
--

Created by <b>Christoph Haubmann</b> Date <b>05.07.2024</b>
--

Verified by <b>Gertraud Öllinger</b> Datum <b>05.07.2024</b>
---

Released by <b>Gregor Rumpelmayr</b> Datum <b>05.07.2024</b>
---