

# Code of Conduct

## for social responsibility

### Preamble

**Pulsotronic-Anlagentechnik GmbH** (subsequently referred to as Pulsotronic) acknowledges its social responsibility as part of its business activities around the world (normally referred to as “CSR”<sup>1</sup> internationally).

This CoC is designed as a self-commitment. It is intended as a guideline to react to different conditions in a global market and to face up to the challenges and social expectations that result from the ever-increasingly networked cooperation in value chains.

The contents make a statement about what this means particularly for working conditions, social and environmental responsibility, as well as transparency, trustful cooperation and dialogue.

### 1. **Basic understanding of socially responsible corporate governance**

A basic understanding of socially responsible corporate governance forms the basis of this CoC. For Pulsotronic, this means that we take responsibility by considering the consequences of our business decisions and actions from an economic, technological, social and ecological perspective, brings about an adequate balance of interests. Within its range of possibilities and action areas, Pulsotronic contributes voluntarily to the interests and sustainable development of global society in the locations in which we are active. We align ourselves with generally applicable values and principles, particularly with regard to integrity and honesty, and respect for human dignity.

### 2. **Area of application**

2.1 This CoC applies to all Pulsotronic branches and business units worldwide.

2.2 Pulsotronic commits to requiring compliance with the contents of this CoC, including with its suppliers and in the further value chain within our range of possibilities and action areas.

### 3. **Basic points of socially responsible corporate governance**

Pulsotronic acts actively to ensure that the values and principles stated below are observed and complied with sustainably.

#### 3.1 **Compliance with statutes and law**

Pulsotronic complies with the applicable laws and other legal regulations in the countries in which we are active. In countries with weak institutional frameworks, we will check carefully which good company practice from our homeland should be applied to support responsible corporate governance. If national laws have more restrictive regulations than the regulations applicable at Pulsotronic, the national law takes precedence.

#### 3.2 **Integrity and organisational governance**

3.2.1 Pulsotronic aligns our actions with generally applicable values and principles, particularly with regard to integrity, honesty, respect for human dignity, openness and non-discrimination of religion, ideology, gender and ethics.

**3.2.2** Pulsotronic rejects corruption and bribery as defined by the corresponding UN convention<sup>2</sup>. We will require transparency, acting with integrity and responsible management and checks within the company in a suitable way.

**3.2.3** Pulsotronic follows clean and recognised business practices and fair competition. In competition, Pulsotronic practices professional conduct and high quality work. Pulsotronic maintains a co-operative and trusting relationship with supervisory authorities. Furthermore, Pulsotronic complies with the specifications for acting in accordance with competition law.

### **3.3 Consumer interests**

If consumer interests are affected, Pulsotronic complies with consumer protection regulations, as well as adequate sales, marketing and information practices. Particular attention is paid to groups requiring particular protection (e.g. child welfare).

### **3.4 Communication**

Pulsotronic communicates openly and in a dialogue-driven manner with regard to the requirements of this CoC and its implementation to employees, customers, suppliers and other key stakeholders. All documents are compiled in accordance with obligations, not changed or destroyed unfairly, and stored properly. Company secrets and business information from partners are handled sensitively and confidentially.

### **3.5 Human rights**

Pulsotronic advocates for promoting human rights. We comply with human rights according to the UN Universal Declaration of Human Rights<sup>3</sup>, particularly those mentioned here:

#### **3.5.1 Privacy**

Privacy protection.

#### **3.5.2 Health and safety**

Ensuring health and occupational safety, especially guaranteeing a safe and healthy working environment to prevent accidents and injuries.

#### **3.5.3 Harassment**

Protect employees from corporal punishment and from physical, sexual, psychic or verbal harassment or violations.

#### **3.5.4 Freedom of opinion**

Protect and ensure the right of freedom of opinion and freedom of expression.

### **3.6 Working conditions**

Pulsotronic adheres to the following core working standards of the ILO<sup>4</sup>:

#### **3.6.1 Child labour**

The prohibition on child labour, i.e. employing people younger than 15 years of age unless the local legal regulations define higher age limits and unless exceptions are permissible<sup>5</sup>.

#### **3.6.2 Forced labour**

The prohibition of forced labour of any type<sup>6</sup>.

### **3.6.3 Remuneration**

The work standards with regard to remuneration, particularly with regard to the level of remuneration in accordance with the applicable laws and regulations<sup>7</sup>.

### **3.6.4 Employee rights**

Respecting the right of employees to freedom of association, freedom of assembly and collective bargaining and collective agreements, as long as this is legally permissible and possible in the relevant country<sup>8</sup>.

### **3.6.5 Discrimination ban**

Treating all employees without discrimination<sup>9</sup>.

### **3.7 Working hours**

Pulsotronic complies with the working standards regarding maximum permissible working hours.

### **3.8 Environmental protection**

Pulsotronic meets the regulations and standards for environmental protection, which apply to its relevant areas and acts in an environmentally responsible manner at all locations. Furthermore, we handle resources responsibly in accordance with the principles of the Rio Declaration<sup>10</sup>.

### **3.9 Civil involvement**

Pulsotronic contributes to the societal and economic development of the country and region in which it is active and requires its employees to participate in voluntary activities accordingly.

## **4. Implementation and enforcement**

Pulsotronic takes all suitable and reasonable efforts to implement and apply the principles and values specified in this CoC continuously. Contractual partners should be informed of the most significant measures on request and as part of reciprocity so that the way in which their compliance is guaranteed is clear. There is no right to transmit operational and business secrets, information relating to competitors or other confidential information.

## **5. Implementation and enforcement**

We respect freedom of expression and protection of personal rights and privacy. Our employees should be aware that they are also considered part of Pulsotronic in their free time. Our employees are therefore encouraged and requested to maintain the company's image through their conduct and appearance in public, particularly towards the media. When expressing private opinions, we ensure that we do not put the relevant function or job in the company into context with the private statement.

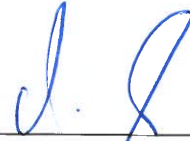
Niederdorf, 01/07/2022

(Location, date)



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<sup>1</sup> CSR = Corporate Social Responsibility

<sup>2</sup> United Nations Convention against Corruption from 2003, in force since 2005

<sup>3</sup> Universal Declaration of Human Rights, UN Resolution 217 A (III) from 1948

<sup>4</sup> ILO = International Labour Organization

<sup>5</sup> ILO Convention No. 138 from 1973 and ILO Convention No. 182 from 1999

<sup>6</sup> ILO Convention No. 29 from 1930 and ILO Convention No. 105 from 1957

<sup>7</sup> ILO Convention No. 100 from 1951

<sup>8</sup> ILO Convention No. 87 from 1948 and ILO Convention No. 98 from 1949

<sup>9</sup> ILO Convention No. 111 from 1958

<sup>10</sup> The 27 principles of the "Rio Declaration on Environment and Development" from 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro