

Code of Conduct

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NOTICE

Please note that any terminologies used in this document are not to be interpreted as discriminatory under the General Equal Treatment Act. Terms and designations are used uniformly in a gender-neutral manner according to function or activity; these functional and/or activity designations are not intended to capture only women or only men. Any form of discrimination is excluded.

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Code of Conduct

1. Scope & Basics

- ☒ This policy applies to all employees within the corporation.
- ☒ Establishing and adhering to clear behavioral rules, as well as leading by example, builds trust. A professional and integral work attitude is central. The way in which the company and its business units present themselves, offer their products and services, and interact with their customers shapes the company's image (reputation). Our reputation is a valuable asset that we must work on daily.
- ☒ Compliance with the contents of this policy [Code of Conduct] helps us strengthen our reputation and provides clarity on how we want to interact with each other and be perceived as a company in society.
- ☒ Introducing, living, and monitoring compliance with a code of conduct is a practical measure to create a safe and pleasant working atmosphere within the corporate culture. We make agreements among ourselves about desired and undesired behavior and agree on how to deal with someone who does not adhere to these agreements.
- ☒ Companies are judged by the behavior of the people who work there. Therefore, it is important that behavior aligns with the expectations of the environment and the core values of the company.
- ☒ The contents of this policy also drive our vision of our employees and our company. Each of us can make a decisive contribution to realizing our strategy.
- ☒ The Code of Conduct is a living document that can be adjusted and/or supplemented as necessary.
- ☒ The guidelines include:
 - Use your common sense and act in accordance with the spirit of the Code of Conduct.
 - We expect all employees to demonstrate integrity.
 - Working at PSZ electronic GmbH entails knowing and adhering to the Code of Conduct.
 - To reinforce our values, Chapter 6 provides a statement on human rights and working conditions. Please support these points with a firm commitment, clear stance, and determination.
- ☒ We expect all employees to act in accordance with the Code of Conduct and adhere to it.

2. Behavioral Rules

Below are the behavioral rules along with examples that our company aims to enforce.

2.1. Respect

Examples of behavior:

- ☒ We treat others with respect, even when we disagree.
- ☒ We praise others.
- ☒ We listen to what our colleagues/customers have to say.
- ☒ We respect the uniqueness and diversity of others.
- ☒ We speak with each other, not about each other.
- ☒ We are compassionate.
- ☒ We are open to criticism.
- ☒ We look out for one another.
- ☒ We respect the environment.

2.2. Integrity

Examples of behavior:

- ☒ We keep our promises and fulfill our agreements.
- ☒ We aim to explain what we do and why.
- ☒ We handle information confidentially.
- ☒ We respect the boundaries of others and safeguard our own boundaries.

2.3. Professionalism

Examples of behavior:

- ☒ We continuously improve our standards and ensure that everyone adheres to them.
- ☒ We solve problems as quickly as possible, constantly seek new solutions, and have the courage to take initiative.
- ☒ We meet the requirements set for our role.
- ☒ Every task is handled professionally.
- ☒ We regularly review procedures, agreements, and methods of work.
- ☒ We are open to learning new things.

2.4. Engagement

Examples of behavior:

- ☒ Contribute to an inspiring work atmosphere characterized by engagement, humor, and joy in the work.
- ☒ Demonstrate externally that each business unit is a reliable partner.
- ☒ Work joyfully to achieve a good end product.
- ☒ Act appropriately, carefully, and reliably.
- ☒ Provide and accept positive criticism.
- ☒ If customers complain about our products or services, take them seriously and refer them to the appropriate department or your supervisor. Use this feedback to improve our products and processes.

2.5. Collaboration

Examples of behavior:

- ☒ All business units and departments work together towards the company's objectives.
- ☒ Share knowledge and information.
- ☒ Help each other and strive for good team spirit and performance.

2.6. Performance Orientation

Examples of behavior:

- ☒ Deliver high-quality work in collaboration with your colleagues.
- ☒ Prevent yourself and your colleagues from making mistakes.
- ☒ Agreements are measured and upheld.
- ☒ Have the confidence to ask your colleagues for help.

2.7. Clarity

Examples of behavior:

- ☒ An agreement is an agreement.
- ☒ Make agreements together. Take responsibility and have the courage to say no.
- ☒ Communicate clearly and directly (with the right person).
- ☒ Verify if you have been understood.
- ☒ Be punctual and notify in advance if you are going to be late.

3. Principles

The mentioned behavioral rules outline a framework based on the following principles:

3.1. Interaction with Each Other

interact openly, honestly, and respectfully with one another.

3.2. Honesty and Respect

We interact with each other honestly and politely. We work professionally, respectfully, and on equal footing, regardless of our position. We adhere to decisions once made.

3.3. Unwanted Behavior

We refrain from any form of unwanted behavior towards colleagues. Unwanted behavior includes any behavior that violates the personal integrity of others.

3.4. Diversity and Inclusion

We value the diversity of people and thinking and are aware of cultural differences. Different ideas, cultures, and perspectives overcome unconscious barriers and help build more powerful teams of well-trained employees. Inclusion reflects our corporate culture, where each individual feels valued, respected, and supported.

3.5. Handling of Resources

We handle our resources carefully and are responsible for their proper use and maintenance.

☒ Duty of Care

We handle the resources provided to us with care and are responsible for their proper use and maintenance. We adhere to the guidelines regarding the use of internet, email, social media, phone, and company or leased vehicles.

☒ Maintenance of Resources

We never leave resources or data unattended and take measures to prevent theft or loss. We immediately report any damage or loss of resources or data to our direct supervisor. Compensation may be demanded if the loss, theft, or damage to resources or data occurs due to the intentional or negligent behavior of the respective employee.

3.6. Interaction with Other Parties

We are careful in our dealings with other parties and do everything to ensure an independent position and avoid conflicts of interest. Towards our customers, we adopt a service-oriented approach. In our communication and interaction with other parties, we act objectively, transparently, service-oriented, factually, and in a clear and balanced manner. Contracts we enter into are understandable and verifiable and are concluded according to applicable procedures and regulations. We always provide services and deliver goods based on market-compliant conditions.

- ☒ **Conflicts of Interest**
We keep our personal and professional interests strictly separate. We ensure that any appearance of a conflict of interest is avoided.
- ☒ **Secondary Activities**
We do not engage in secondary activities that may impair our personal functioning within PSZ electronic GmbH or harm the interests of our company. We report secondary activities to our supervisor.
- ☒ **Gifts from Business Partners**
To avoid conflicts of interest, we do not accept gifts or invitations in exchange for a consideration. We inform our supervisor if gifts or invitations (with a value exceeding EUR 25.00 or in an inappropriate frequency) are offered to us. Without the prior approval of our supervisor, we do not offer gifts or other attentions to business partners.
- ☒ **Representing the Company**
speak, behave, and dress appropriately, correctly, decently, and politely.
- ☒ **Corruption, Extortion, and Bribery**
We pursue a zero-tolerance policy towards all forms of corruption, extortion, and bribery.
- ☒ **Favoritism**
We are impartial. No market party receives preferential treatment from us.

3.7. Handling of Information

We handle information carefully, both in internal and external communication. We are aware that some information is strictly confidential, but also that some information may need to be public or published according to the law and internal policies.

- ☒ **Data Protection and Information Security**
Protecting privacy and ensuring information security are top priorities.
- ☒ **Confidentiality**
We do not disclose technical, financial, operational, or other information/data without consent. We do not provide data or information to third parties if we know or reasonably believe that confidentiality or secrecy may be required. We handle employee personal data with care.
- ☒ **Acquisition, Use, and Disclosure of Information**
We only use sensitive or useful information, data, or operational knowledge acquired through our work to fulfill our responsibilities. We do so at all times in accordance with the law, our internal policies, and operating procedures. We disclose information only to those for whom the information is intended, and we do so objectively and consciously. Information about our operations that may imply a commercial advantage or disadvantage is disclosed in accordance with the law, our internal policies, and operating procedures. We do this in a targeted, (simultaneous), and non-discriminatory manner.

3.8. Compliance with the Law

We acknowledge all applicable laws and regulations and abide by them, as well as all internal policies and instructions.

3.9. Leadership



Team

The leader fosters collaboration across departments to achieve corporate objectives. They solicit input from their managers, colleagues, and employees in decision-making processes. Familiar with the goals of other departments, they integrate these into their own work and demonstrate willingness to compromise based on factual arguments.



Employees

Encouraging and nurturing self-responsibility in their team members, the leader helps develop their skills further. They take ownership of their employees and their performances, providing regular feedback to facilitate ongoing dialogue. Clearly articulating expectations, they empower their team by granting autonomy, thereby fostering potential.



Accountability

The leader stands by the company's performance and ensures adherence to agreements, both internally and with clients. Their instructions are precise, leaving no room for ambiguity. They accept responsibility for their actions and address the concerns and issues of their employees earnestly.



Performance and Results Orientation

The leader prioritizes results, recognizing and commending exemplary performance while addressing criticisms objectively and openly. They proactively tackle conflicts with a focus on finding solutions, and they lead by example in consistently improving work methods and quality, cultivating a constructive work environment.



Learning Organization

Constantly striving to enhance processes and quality, the leader identifies areas for improvement and implements necessary changes. They view changes as opportunities, actively involving stakeholders and ensuring clear communication of changes to affected parties.



Strategic Thinking and Action

Considering their objectives within the framework of medium- and long-term corporate goals, the leader takes proactive measures to ensure the company's enduring success. They anticipate customer needs and market trends, guiding and developing their team to meet future challenges.



Customer Orientation

Prioritizing customer interests and needs, the leader takes responsibility for delivering quality services and products, meeting customer expectations consistently and punctually.



Communication Efficiency

Tailoring communication to the audience, the leader ensures clarity and transparency in their messages, fostering engagement and buy-in from others. They communicate openly and honestly, and they choose presentation formats and media that effectively convey their message.



Expertise

The leader's knowledge and expertise drive the company forward, staying abreast of industry developments and technological advancements. They actively seek knowledge beyond their own field, leveraging their expertise to disseminate knowledge within the organization and adapt to future challenges.

4. Compliance (who & what)

4.1. Employees

The most crucial aspect is that the behavior of all employees must align with the Code of Conduct and the behavioral rules. Employees are encouraged to provide feedback to their colleagues regarding their behavior and to request feedback from their colleagues regarding their own behavior.

4.2. Supervisors

Supervisors are expected to set an example as role models. Additionally, they must address the behavior of employees if it contravenes the Code of Conduct and take appropriate measures as necessary.

4.3. Management

The role of the Compliance Officer is fulfilled within the company's management. The Compliance Officer is responsible, among other duties, for overseeing the functioning and adherence to the Code of Conduct within the company.

4.4. Confidential Contact Person

The company has appointed a confidential contact person to whom issues can be reported in confidence. These issues are then anonymously relayed to the appropriate person within the company.
Confidential Contact Person: Head of Human Resources Department

5. Who is responsible?

- ☒ Supervisors within the company ensure that the code of conduct is known to all existing and new employees and lead by example.
- ☒ The management and supervisors oversee the implementation of the code of conduct.
- ☒ All employees act in accordance with both the letter and the spirit of the code of conduct.
- ☒ Each employee can be addressed regarding the extent to which their behavior aligns with the code of conduct.
- ☒ Noticed a violation? Report it to your supervisor or the designated contact person.

6. Declaration on Human Rights & Working Conditions

According to national and international regulations, the company acknowledges human rights as inviolable and manages working conditions accordingly. The aim is to ensure no impairment of human dignity in the workplace. Regardless of any attributes, the company's employees are considered equal, as outlined in the following subchapters.

6.1. Child Labor and Young Workers

Child labor is not supported. The minimum age for employment must comply with the labor laws of the respective country.

6.2. Wages and Benefits

Compensation and benefits must be competitive and comply with the applicable laws of the country, including those related to minimum wages, overtime pay, and legally mandated benefits.

6.3. Working Hours

Working hours, including overtime, must comply with the applicable local regulations governing working hours.

6.4. Forced Labor

Any form of forced or compulsory labor, including human trafficking, will not be tolerated.

6.5. Freedom of Association

Employees can openly communicate with management about working conditions without fear of reprisal, intimidation, or harassment. Employees have the right to freely associate, join or not join unions, seek representation, and join works councils in accordance with the applicable laws of the country.

6.6. Occupational Health and Safety

Employees have a healthy and safe working environment that meets or exceeds applicable standards for occupational health and safety.

6.7. Harassment and Discrimination

Any form of harassment or discrimination against employees is not acceptable and will not be tolerated.

7. Final Provisions

7.1. Violations of this Policy

A violation of this policy may result in both employment consequences and criminal penalties.

7.2. Effective Date

This agreement comes into effect on June 1, 2023. Changes or additions will be made in writing through addendums or by revising the policy. Each employee will be notified in writing of the implementation or modification. The valid policy will be internally published and accessible for reference.

Place, Date

Vohenstrauß, May 30, 2023

Management

