

Code of Conduct of the BMK Group of Companies (BMK Group GmbH & Co. KG, BMK professional electronics GmbH, BMK electronic solutions GmbH, BMK electronic services GmbH, BMK Czech Technologies s.r.o., BMK Electronics Changzhou Ltd.)

A. Employee and human rights

BMK is committed to protecting employee and human rights in accordance with the guiding principles of the ETI (Ethical Trading Initiative) Base Code. This means in detail:

- The principle of free choice of employment applies at all BMK sites, which is why we reject any form of forced labor.
- Any employment of children is unacceptable for BMK.
- The working hours, granting of work breaks as well as paid vacation are at least in accordance with the national legislation.
- BMK respects the right to adequate remuneration, which in any case corresponds to the minimum wages guaranteed by law and is based on the performance of the employees and the respective labor market. All employees receive remuneration commensurate with their work.
- BMK fully respects human dignity and therefore rejects any inhumane or brutal treatment or the threat of such, in particular sexual harassment, sexual abuse, physical restraint, psychological or physical coercion and verbal assault.
- BMK promotes a culture of diversity and equal opportunity in which people treat each other with respect. The selection, hiring and promotion of our employees is based exclusively on their qualifications and skills. Differences between employees are valued and respected. Discrimination, harassment or intimidation of any kind, particularly on the basis of ethnic background, gender, skin color, nationality, age, civil status, sexual orientation, religious or political beliefs, ancestry, social status or disability is prohibited.
- BMK recognizes the right to freedom of association and the right to join a trade union.

BMK expects compliance with these principles also from its business partners.

B. Occupational health and safety

BMK is committed to providing a safe and hygienic work environment. In addition to general knowledge of the industry and specific hazards, we take into account all international and site-specific safety regulations as well as the relevant working time and occupational health and safety laws. We have derived appropriate, partly certified standards from this for BMK, which we pay attention to and constantly review in order to prevent accidents and damage to health in the course of work or to minimize hazards associated with the working environment as far as this is reasonably practicable.

A corresponding occupational health and safety organization has been implemented and is constantly being further developed. This also includes

- The identification of potential emergency situations and their assessment, including the implementation of emergency response plans and procedures to minimize harm to life, the environment, and Material assets,
- Procedures for reporting, classifying, and recording work-related accidents and illnesses,

- the systematic identification, evaluation and monitoring of the handling of chemical, biological or physical agents by employees, including measures to control overexposure and the need for personal protective equipment,
- inspecting production equipment and other machinery for safety and injury hazards and installing and maintaining appropriate protective equipment and measures,
- Identify, evaluate and Surveillance hazards associated with physically demanding work.

BMK employees receive regular and recorded training on health and safety aspects. These trainings are repeated for new or rehired employees.

Every employee has access to clean sanitation, drinking water and food storage facilities

BMK prohibits all forms of alcohol, drugs and abuse of other substances in connection with work or in the workplace and offers support to employees with addiction problems.

C. Environmental protection

BMK maintains an environmental management system in accordance with EMAS at its German sites in order to be able to communicate in a targeted manner with interested parties outside the company and to help shape the development of ecological sustainability in its industry. In recognition of its responsibility for global climate protection, BMK monitors its emissions within the framework of EMAS and aims to achieve climate neutrality in the medium term in accordance with the GHG Protocol - Corporate Standard.

Managers as well as employees are required to make an active contribution to the protection of the environment and the prevention of environmental hazards through environmentally friendly behavior. This includes in particular:

- BMK ensures the continuous recording and evaluation of environmentally relevant regulations for all areas of the company and ensures at least that they are complied with and, where possible, that they are surpassed
- BMK is aware of its responsibility regarding the prevention of environmental pollution. Hazardous substances in particular are therefore stored, used and transported in such a way that the risk of environmental accidents is reduced to a minimum. The use of hazardous substances is subject to constant monitoring and testing by trained employees.
- Appointed responsible persons support BMK in the resource-efficient design of particularly relevant environmental areas such as energy requirements and waste generation. They are available to answer employees' questions in order to empower the safe and resource-conserving execution of all tasks in the company.
- The generation of solid waste as well as waste water is avoided at BMK as far as possible. For example, the on-site washing facilities are operated in closed water circuits. Each BMK customer can be supplied with individual reusable boxes to save unnecessary packaging waste. Each BMK customer can be supplied with individual reusable boxes to save unnecessary packaging waste
- In accordance with the customer's requirements, BMK is able to make its custom-made products resistant to weathering, vibration and high stress and thus durable. The possibility of repairing product components extends the service life of BMK products. With the portfolio

offered from development through production to end-of-life management, BMK contributes to society's pursuit of sufficiency and avoidance of obsolescence.

All employees receive regular training on proper environmentally friendly behavior in their workplace and are regularly informed on current environmental topics with the help of a company newsletter.

D. Ethic

1. Business integrity

The highest standards of integrity are the basis of all our business activities. BMK strictly prohibits any form of bribery, corruption, extortion and embezzlement. This also includes, where applicable, the responsible sourcing of conflict minerals.

2. Prohibition of improper advantage taking

The acceptance or granting of benefits that could impair business judgment or lead to a conflict of interest is prohibited. Employees are prohibited from taking any action that could give the impression of improperly influencing a business partner or of being influenced by a business partner.

3. Disclosure of information

We expect honesty in our dealings, courtesy in our dealings, respect and fairness in our cooperation with our business partners. This includes that decisions are made and communicated in a transparent and comprehensible manner. All business processes are documented in our business records and can be traced without gaps

4. Intellectual property

We respect intellectual property rights. Technology and know-how are handled in such a way that intellectual property rights are observed. We use third-party intellectual property only within the scope of cooperation and not for purposes other than those for which it is intended.

5. Fair business, fair advertising and fair competition

We keep the standards of fair business, fair advertising and fair competition.

6. Protection of identity and prohibition of retaliation

We maintain a process that ensures confidentiality, anonymity and whistleblower protection on the part of business partners and employees, unless prohibited by law. This process also allows our employees to raise concerns without fear of retaliation, and we have informed our employees of this process. We have embedded this in a whistleblowing policy.

7. Data Protection & Privacy

BMK is committed to meeting the reasonable expectations of our business partners and employees regarding the protection of private information. Compliance with applicable data protection laws and government regulations is important to us when collecting, storing, processing, transmitting or reproducing personal data.

Detailed instructions and requirements for employees on ethics in business are codified in internal behavioral guidelines.

E. Management system

BMK maintains an implemented management system that establishes or defines guidelines, policies, procedural instructions, process descriptions and responsibilities for the following topics:

- Obligation of the company
- Accountability and responsibility of the management
- Legal regulations and customer requirements

- Risk assessment and risk management
- Improvement targets
- Training
- Communication
- Employee feedback and participation; complaint procedures
- Controls and evaluations
- Procedures for corrective action
- Documentation and records
- Responsibility of suppliers

This management system is continuously developed and updated, taking into account relevant laws, regulations and requirements of our business partners. It also serves to identify and mitigate risks arising from business operations with reference to this Code of Conduct.

Augsburg, March 02, 2022

The Management of BMK Group GmbH & Co. KG