

# **Code of Conduct for Business Partners**

## Syntegon Group



## Preamble

From its beginnings in the last century, SYNTEGON has grown to become a leading global supplier of technology and services. Throughout its development, the company has been guided by its values and ethical principles. Adherence to the principle of legality, and acting responsibly and fairly in our business dealings, have always been the cornerstone of our corporate values.

Our business partners play a significant role in achieving these goals. We thus regard a common understanding of ethical values and sustainable practices as the essential basis of such relationships. The rules and requirements stated in this Code of Conduct form an important part of every collaboration agreement between SYNTEGON and its business partners.

## Principle of strict legality

SYNTEGON strictly respects the principle of legality in all activities of the Group, both implicitly through its actions and explicitly in contractual agreements. These include payment of applicable taxes and customs duties, compliance with competition and antitrust laws, a strict prohibition of corruption and money laundering, application of state-of-the-art technology, procurement of the required official licenses, compliance with export control laws, and respect for the legal rights of third parties.

Consequently, we expect our business partners to act in accordance with the prevailing laws and regulations, to comply with the principles of the United Nations Global Compact and to abide by the rules of the present Code of Conduct as part of their collaboration with SYNTEGON. We furthermore expect them to take steps to ensure that third parties engaged for the purpose of fulfilling contractual obligations towards SYNTEGON also comply with this Code of Conduct.

## Fair treatment of employees

Our business partners must observe the fundamental rights of their employees based on the applicable national labor laws. The following rules are aligned with the International Labor Organization's (ILO), Declaration on Fundamental Principles and Rights at Work.

### Human rights

Our business partners respect internationally recognized human rights and actively protect such rights.

### Child labor

Our business partners only employ persons who have reached the minimum legal age for work according to the legislation applicable in the country of employment. Moreover, they respect and uphold children's rights.

### Forced labor

Our business partners reject all forms of forced labor and respect the principle of freely chosen employment.

### Freedom of association

Our business partners respect freedom of association and the right to form interest groups. They grant their employees the right to articulate their interests within the framework of the labor laws in force in their country.

### Equal opportunities

Our business partners do not tolerate discrimination of any kind, may it be based on skin color, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religious belief, or human ideology.

### Fair working conditions

Our business partners pay wages and social benefits equal to or higher than the rates prescribed by national or regional authorities, legal standards, or other labor agreements. The

applicable regulations governing working hours and vacation entitlements are observed.

### **Occupational health and safety**

At the minimum, our business partners comply with national standards of workplace safety and hygiene and take appropriate measures to ensure that the relevant occupational health and safety requirements are met, in order to ensure healthy working conditions.

## **Environmental protection**

Our business partners take measures to avoid risks to human life and the environment, limit the environmental impact of their operations, and manage resources responsibly. All processes, operating sites and production resources employed by our business partners must meet the applicable legal requirements and standards concerning fire safety and environmental protection.

## **Business relations**

### **Avoiding conflicts of interest**

Decisions made by our business partners must be based on factual considerations, rather than being improperly influenced by personal interests. If any business partner becomes aware of a potential conflict of interest, this fact must be communicated to SYNTEGON immediately.

### **Free competition**

Our business partners observe the rules of fair competition, complying with all applicable statutory regulations. Moreover, they refrain from forming cartels or engaging in concerted practices deliberately or incidentally designed to bypass, restrict or distort competition as defined by antitrust laws, or abuse a dominant market position.

### **Corruption**

Our business partners agree to abide by the applicable anti-corruption laws. In particular, they ensure that their employees, subcontractors or representatives do not offer, promise or grant advantages to associates of the SYNTEGON Group with the aim of obtaining a contract or other preferential treatment in the course of business. The same rules apply to agreements with third parties, concluded in connection with a contract with SYNTEGON.

### **Trade secrets**

Our business partners must ensure that confidential company information is kept secret and intellectual property rights are respected. This condition applies beyond the termination of the business relationship. Our business partners furthermore agree to comply with all applicable data protection laws, and limit their use of third-party software (including open-source software and firmware) only within the scope allowed by law and in compliance with the respective license conditions.

### **Money laundering**

Our business partners are required to comply with the legal regulations concerning the prevention of money laundering.

### **Funding of armed groups**

We expect our business partners to desist from all activities that might directly or indirectly contribute to the funding of armed groups. This includes the observance of international treaties and national laws concerning trade in conflict minerals and other natural resources.

## Compliance with the Code of Conduct

We expect our business partners to communicate the content of this Code of Conduct to all third parties they engage to fulfil their contractual obligations toward SYNTEGON, to observe its principles when selecting subcontractors, and ensure they comply with its requirements.

SYNTEGON reserves the right to take reasonable steps to verify compliance with the Code of Conduct on the part of its business partners. SYNTEGON will contact the business partner beforehand to agree on the scope, time and place of such controls.

Any breach of this Code of Conduct constitutes a deterioration of the relationship between SYNTEGON and the business partner. Notwithstanding other rights, SYNTEGON reserves the right in such cases to demand clarification of the facts and initiation of countermeasures by the business partner. In the event that the business partner should fail to provide evidence that appropriate corrective action has been initiated within a reasonable timeframe, or if the breach of the Code of Conduct is so severe that SYNTEGON cannot be reasonably expected to continue the business relationship, and notwithstanding other rights, SYNTEGON reserves the right to terminate the relationship without prior notice and rescind any associated contracts or agreements.

### **SYNTEGON Technology GmbH**

Legal and Compliance (PA/LS)

Postfach 11 27

71301 Waiblingen

Germany

Phone +49 7151-14-2111

[compliance.management@SYNTEGON.com](mailto:compliance.management@SYNTEGON.com)