

Code of Conduct

Outlining the Social Norms and Responsibilities

VIVAVIS AG bundles the business activities of the VIVAVIS Group of Companies. VIVAVIS comprises all subsidiaries of VIVAVIS AG and their affiliated companies.

VIVAVIS is committed to its social responsibility in the context of its global business activities.

This Code of Conduct (CoC) is based on the guidelines of the ZVEI e.V. (German Electrical and Electronic Manufacturers' Association), especially with regard to working conditions, social and environmental compatibility and transparency as well as trustworthy cooperation and dialogues.

Those guidelines have been elaborated and coordinated by the ZVEI with its member companies; they express a shared system of values as defined in ZVEI's vision and mission, and are laid down especially in their commitment to adhere to the social market economy.

1. Basic Concepts of Socially Responsible Corporate Governance

This CoC is based on a shared basic understanding of socially responsible corporate governance. This means that VIVAVIS as signatory of this CoC commit ourselves to accept responsibility by considering the consequences of our business decisions and activities with regard to their economic and technical as well as social and ecological consequences, and to bring about a fair and reasonable reconciliation of interests.

We also commit ourselves, within the scope of their respective possibilities and activities, to voluntarily contribute to the prosperity and sustainable development of the global community at our respective business locations. Our decisions are based on universally accepted ethical values and principles, particularly on integrity and honesty, and on a common respect for human dignity.

2. Scope

2.1 This CoC applies to all member companies of VIVAVIS, its branches and business units, worldwide.

2.2 We commit ourselves to encourage our suppliers to adhere to the CoC's contents and to promote compliance throughout the value chain within their respective scope of possibilities and activities.

3. Key Points of Socially Responsible Corporate Governance

We actively promote a consistent compliance with the values and principles laid down hereinafter.

3.1 Observance of Applicable Laws

We adhere to the valid laws and other legal provisions of the countries in which we conduct operations. In countries with a weak institutional framework, we will carefully examine which good business practices from our home country should be applied to enable supportive, responsible company management.

3.2 Integrity and Organisational Governance

3.2.1 We commit ourselves to act in accordance with universally accepted ethic values and principles, especially integrity, honesty, respect of human dignity, openness, non-discrimination regarding religion, world views, gender and ethics.

3.2.2 We reject corruption and bribery within the meaning of the corresponding UN convention⁽¹⁾. We promote, in an adequate manner, transparency, actions based on integrity, responsible leadership and control within the company.

3.2.3 We pursue clean and accepted business practices and a fair competition. In competition, we are guided by the principles of professional behaviour and quality-assured workmanship. Our relationship with supervisory authorities shall be based on cooperation and trust. We also adhere to the regulations of ZVEI's "Guide for our Association Activity – Instructions for Compliance with Competition Law in the ZVEI".⁽²⁾

3.3 Consumer Interests

As far as consumer interests are concerned, we observe consumer protection regulations and the appropriate sales, marketing and information practices. Groups that are in need of special protection (e.g. protection of minors) are to be given special consideration.

3.4 Communication

We communicate in an open and dialogue-oriented manner on the requirements of this CoC and its implementation with respect to employees, customers, suppliers and other stakeholder groups. All documents shall be dutifully prepared and shall not be improperly modified or destroyed, and shall be stored as appropriate.

Trade secrets and business information of the partners shall be treated sensitively and confidentially.

⁽¹⁾ United Nation Convention against Corruption of 2003, in effect since 2005, ratified by Germany in 2014

⁽²⁾ Guide for our Association Activity – Instructions for Compliance with Competition Law in the ZVEI dtd 2007

3.5 Human Rights

We support the promotion of human rights and comply with human rights as defined by the UN Charter of Human Rights, especially with respect to the following:

3.5.1 Privacy

Protection of privacy.

3.5.2 Health and Safety

Protection of health and occupational safety, in particular guaranteeing a safe and salubrious working environment to prevent accidents and injuries.

3.5.3 Harassment

Protection of employees against physical punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4 Freedom of Speech

Protection and guarantee of the right to freedom of speech and free expression of opinion, within the applicable laws.

3.6 Working Conditions

We observe at least the following key working norms of ILO⁽⁴⁾:

3.6.1 Child Labour

Prohibition of child labour, i.e. employment of persons under the age of 15 years, unless local regulations do not specify a higher age limit and no exceptions are allowed.

3.6.2 Forced Labour

Prohibition of forced labour of any kind ⁽⁶⁾.

3.6.3 Remuneration of Work

Work norms with respect to remuneration, particularly with respect to the remuneration level in accordance with the valid laws and provisions ⁽⁷⁾.

3.6.4 Employees' Rights

Respect for the right of employees concerning freedom of association, freedom of assembly and collective bargaining insofar as this is legally justified and possible. ⁽⁸⁾

⁽³⁾ General Declaration of Human Rights, UN-Charter 217 A (III) of 1948

⁽⁴⁾ ILO = International Labour Organisation

⁽⁵⁾ ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

⁽⁶⁾ ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957

⁽⁷⁾ ILO Convention No. 100 of 1951

⁽⁸⁾ ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949

3.6.5 Ban on Discrimination

Non-discriminatory treatment of all employees. ⁽⁹⁾

3.7 Working Hours

We observe all applicable work norms governing the maximum permissible number of working hours.

3.8 Protection of the Environment

We fulfil the provisions and standards for protection of the environment that are relevant for our particular business enterprises, and act in an ecologically responsible manner on all our locations. Furthermore, we use natural resources in a responsible manner and in accordance with the principles of the Rio Declaration. ⁽¹⁰⁾

3.9 Active Citizenship

We contribute to the social and economic development of the countries and regions in which we conduct our operations, and promote the corresponding voluntary activities of our employees.

4. Implementation and Enforcement

We make, and shall continue to make, all suitable and reasonable efforts to continually implement and apply the principles and values laid down in this CoC. Upon request and within the scope of reciprocity, contract partners shall be informed about relevant measures, thereby ensuring that compliance with these measures can be made transparent. No entitlement exists on the disclosure of trade and business secrets or information related to competition or other classified information.

Ettlingen, 19/11/2020

VIVAVIS AG

Board of Directors

Norbert Wagner (Chairman),
Jörg Figge, Harald Herrmann, Michael Schambach

⁽⁹⁾ ILO Convention No. 111 of 1958

⁽¹⁰⁾ The 27 principles of the "Rio Declaration on Environment and Development" of 1992 as the result of the UN Conference on the Environment and Development in Rio de Janeiro