

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 industry guideline of the German Electrical and Electronic Manufacturers' Association (ZVEI), which specifies in particular what this means in terms of working conditions, social and environmental compatibility, as well as transparency, trusting cooperation and dialog.

The contents of this CoC were elaborated and coordinated upon by the ZVEI together with the member companies in 2008. They are an expression of the common value basis of the ZVEI, as defined in the vision and mission of the ZVEI and in particular in the commitment to the social market economy. In addition, we, as VIVAVIS AG, have supplemented the CoC with current aspects in the area of human rights.

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 signatories of this CoC commit themselves to accept responsibility by considering the consequences of their 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.

Signatories also commit themselves, within the scope of their respective possibilities and activities, to voluntarily contribute to the prosperity and sustainable development of the global community at their respective business locations. Their 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 will 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⁽³⁾ and current aspects beyond that, 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.

3.5.5 Ethical Recruitment

Further to our commitment to the prohibition of forced labour (see below), the signatory company also rejects any form of unethical recruitment.

3.5.6 Women's Rights

We are committed to upholding and promoting women's rights.

3.5.7 Diversity, Equal Rights and Inclusion

We support the rights of all people and reject any form of discrimination, in particular discrimination on the basis of descent, race, language, home and origin, beliefs, religious or political opinions, biological or social gender or the lack thereof, or on the basis of disabilities.

3.5.8 Rights of Minorities and Indigenous Peoples

We support and respect the United Nations Declaration on the Rights of Indigenous Peoples dtd 13.09.2007.

3.5.9 Land, Forest and Water Rights, Forced Eviction

We undertake to protect land, forests and waters and their use, to respect the livelihoods of people (especially, but not exclusively, ethnic minorities and indigenous people), and we recognise the right of local people to use land, forests and water for their livelihoods.

Any kind of expropriation and forced eviction may only - if at all - be carried out in a procedure that meets the standards of the rule of law, and even then only in return for adequate compensation and indemnification; expropriation and forced eviction are to be avoided wherever possible.

3.5.10 Use of Private Security Forces

Insofar as we operate in locations or situations requiring the use of security staff to execute a company project, we will ensure that security personnel comply with social responsibility requirements, act only proportionately and not only with respect for law and order, but also with respect for our ethical standards.

3.6 Working Conditions

We observe 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.⁽⁵⁾

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 Organization

⁽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 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 of our particular business enterprises, and act in an ecologically responsible manner on all its 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 country and region in which we conducts our operations, and promote the corresponding voluntary activities of its employees.

3.10 IP Compliance

We advocate compliance with copyright, trademark and other intellectual property laws. We do not use plagiarisms and counter them where we encounter them.

4. Implementation and Enforcement

We 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, 27 July 2023

VIVAVIS AG

Board of Directors

Norbert Wagner (Chairman),
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