



01 Aim of the Code of Conduct

With this Code of Conduct, the management and employees pursue the aim of ethically impeccable business activity at E-T-A Elektrotechnische Apparate GmbH. All employees of the company group worldwide are committed to this code, which determines the standards, applicable directives and expectations of our behaviour. The management board assumes a special role model function in this respect.



02 General principles

Honourable businessman

We always act fairly and decently in relationship with our customers, partners, employees and shareholders. We are committed to conducting our business ethically and legally impeccable, by complying with applicable laws, directives and standards. We avoid conflicts of interest and respect the customs, traditions and social values of the countries and cultures in which we operate.

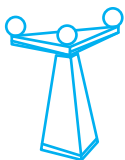
Protection of lives and assets

E-T-A's mission is to protect lives and assets. We see this as the purpose of our products and services. This is also the reason why we do not want to supply products or solutions for military customer applications, that are intended for combat operations.

No military business

Acceptance of further principles

We bindingly accept the directives of the BME Code of Conduct and thus the ten principles of the United Nations Global Compact. We expect and encourage our business partners to implement ethical principles themselves on this basis, and to follow the principles of the E-T-A Code of Conduct in co-operation with us.



03 Social responsibility

With our mission we pursue a healthy balance between the interests of customers, employees and shareholders, to guarantee a sustainable corporate development - both economically and ecologically. Achieving this balance has been an essential part of our value-oriented family business for decades.

CODE OF CONDUCT

Verhaltenskodex



Human rights	We respect human rights and positively contribute to their protection and promotion with our behaviour.
Child labour / Forced labour	We actively ostracise child and forced labour in any form.
Equal opportunity	People of different origins and different nationalities work at E-T-A. They are of different genders and have different sexual identities, different religions and different world views. They are young, elderly, disabled or not disabled. We benefit from this diversity in our daily work, because together we find better solutions. Regardless of all individual differences, each of us is entitled to fair and equal treatment and protection from discrimination and harassment.
Fair cooperation	The basis for successful cooperation is a corporate culture characterised by fairness, mutual respect and trust in our social interactions - today and in the future. Every employee should contribute to this and create an atmosphere of partnership in which discrimination has no chance. This requires a high degree of open-mindedness and tolerance in social interaction.
Work safety and health protection	The safety of our employees and customers is our utmost priority and one of E-T-A's central values. Together we create a safe working environment and ensure the safety of our products. We avoid hazards with consistent, preventive industrial safety. We realise this by predictive, thoughtful and safety-conscious behaviour. Maintaining the work capacity and health of our employees is very important for us, as we guarantee our company success by maintaining the know-how and capacity of our employees.
Know-How	
Environmental protection	E-T-A is fully committed to the protection and preservation of an environment worth living in. Therefore, we will continuously strive to shape the entire life cycle of our products as ecologically compatible as possible. This also applies to our efforts to reduce energy and resource consumption with all its effects and thus minimise the inevitable environmental pollution.
Climate protection	We take climate protection very seriously as a generational project and make our contribution as a company and community. For this reason, we set ourselves ambitious goals every year, which we then implement to decrease CO ₂ on our way to

becoming a climate-neutral company. We also sensitise and motivate our employees and business partners for climate protection.



04 Behaviour of our personnel

Appearance

Our employees have influence on E-T-A's public appearance. We take care to always interact with our customers and business partners in a friendly, accommodating way at eye level.

Confidentiality

All information on E-T-A's business activities, which is not public or general knowledge, is treated confidential. This also includes information from business partners and other parties, that E-T-A receives based on our joint business activities.

Avoiding conflicts of interest

We avoid situations in which personal or financial interests collide with the interests of E-T-A or those of our business partners. We take care not to interfere with E-T-A's interests and at the same time aim to guarantee the reconciliation of family and career. Secondary activities and shareholding of competitors or business partners must not put anyone at risk of a conflict of interest.

Invitations and gifts

In our business actions we do not offer, promise, request or grant gifts, payments, invitations or services with the intention of influencing a business relationship in an unacceptable way or jeopardising the professional independence of the business partners. In general, this does not apply to gifts and invitations which are customary in the context of hospitality, custom and courtesy. This includes reasonable, low-value and symbolic gifts, business lunches and events of our own company or of business partners or holiday and other gifts.



05 Behaviour towards business partners, competitors and officials

E-T-A responds to the needs of customers, suppliers and business partners and treats them responsibly, honestly and fair.

Corruption	E-T-A does not tolerate corruption or other unfair commercial practices of employees or third parties appointed by us. We completely reject incentives, privileges, benefits or other advantages that influence business decisions in an unacceptable way. We select consultants, agents and mediators carefully according to their suitability, professional qualification and integrity and remunerate them in an appropriate way for the services performed.
Behaviour towards officials	As a matter of principal, material and immaterial donations of any kind to public officials, employees or agents of state institutions or their relatives are prohibited. Donations of any kind to political parties, their representatives, politicians, elected officials and candidates for political office are prohibited as well.
Politics and parties	
Competition and antitrust law	We comply with the relevant competitive and antitrust law regulations and do not enter into any agreements that affect prices and conditions or otherwise unduly restrict fair competition.
Donations/Sponsoring	Donations and sponsoring activities must always be transparent and documented. They are done exclusively on a voluntary basis and without any expectation of consideration or covert promotion of interests. Donations are decided by a circle of employees from throughout the company. E-T-A uses sponsoring within the areas determined by the sponsoring circle.



06 Responsibility towards the management board

E-T-A's actions are characterised by responsibility and transparency towards our shareholders. In that sense, the protection of company assets and the sustainable increase of the company's value are goals of our entrepreneurial work. This is a prerequisite for the existence of our company group and for long-term job security.

Protection of the company's assets

Company property and all work equipment provided for operational purposes by the company must be treated with care and may generally only be used for business purposes - unless otherwise contractually agreed. Company property may not be

sold or loaned or used for non-business purposes without explicit permission, regardless of its condition or value.

In the scope of their work, all employees are obliged to protect E-T-A's property assets and handle it in an honest, correct and integer way. We do not tolerate fraud, corruption or other criminal actions. Suspected cases of misconduct are investigated to the legally possible extent and in compliance with data protection regulations. In case of confirmed misconduct we take appropriate actions.

Reporting

Company reports and records must be created correctly and honestly in every respect, correspond to applicable standards and include all relevant information.

Insider trading

Employees are prohibited from using non-public information from other companies, that was disclosed to them in the course of their work for E-T-A, to obtain financial or business advantages for themselves or third parties.

Money laundering

E-T-A takes all necessary measures to prevent money laundering in all areas within its control.

Privacy

We only survey, process and use personal data within the limits of the relevant laws and company policies. We expect our employees to handle personal data of our business partners and employees responsibly.



07 Adherence to the Code of Conduct

Obligation to adhere to the Code of Conduct

All members of the management board, supervisors and employees at E-T-A are obliged to adhere to the Code of Conduct and all regulations prevailing at E-T-A. The management board assumes special responsibility in the communication and implementation of these guidelines.

Whistleblowing

All E-T-A employees are obliged to report serious violations of the law and other acts that are likely to cause significant harm to E-T-A, through the existing whistleblower system or to their

CODE OF CONDUCT

Verhaltenskodex

supervisor. We protect employees, who report such violations, against negative consequences.

Consequences

Employees, who violate the law or internal regulations, must expect adequate consequences, up to severe labour law and disciplinary measures. Such violations can also result in criminal and liability consequences.



08 Source of information

More detailed information

For further information please visit www.e-t-a.com. If you have any uncertainties or questions, please contact your responsible manager. In addition, you always have the option of directly contacting the personnel department, the workers' council or management board.