

Code of Conduct

for suppliers and service providers
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Table of contents

FOREWORD.....	3
1. WORKING CONDITIONS	4
1.1. Free choice of employment	4
1.2. No child labor	4
1.3. Working hours	4
1.4. Wages and employee benefits.....	4
1.5. Humane treatment.....	4
1.6. Prohibition of discrimination.....	4
1.7. Freedom of association	5
2. HEALTH AND SAFETY	5
2.1. Health and safety at the workplace.....	5
2.2. Emergency preparedness.....	5
3. ENVIRONMENT	5
3.1. Environmental protection.....	5
3.2. Energy consumption / efficiency.....	5
3.3. Air emission.....	6
3.4. Treatment and discharge of industrial wastewater	6
3.5. Hazardous substances.....	6
3.6. Regarding substances in products.....	6
4. BUSINESS ETHICS	6
4.1. Law-abiding behavior.....	6
4.2. Integrity.....	6
4.3. Prohibition of improper advantages.....	6
4.4. Fair competition (antitrust law)	7
4.5. Avoiding conflicts of interest.....	7
4.6. Protection of confidential information.....	7
4.7. Export/import legislation.....	7
4.8. Disclosure of information.....	7
4.9. Intellectual property	7
4.10. Responsible procurement of raw materials.....	7
4.11. Financial responsibility	7
5. IMPLEMENTATION OF THE SUSTAINABILITY POLICY	8
5.1. Measures in the supply chain	8
5.2. Reporting Violations (“Whistleblowing”)	8

FOREWORD

The reputation of our company has grown steadily in its more than 20 years of existence. Our customers, suppliers and service providers as well as business partners base their trust in us because of years of reliable partnership and the solidity of an independent family company that is dynamically developing and constantly improving.

Therefore, it is our responsibility to ensure that our products and services are created in a value chain in compliance with international standards. We have summarized our expectations of our suppliers and service providers (InnoSenT partners) regarding to working conditions, health and safety as well as the environment and business ethics in our "**Code of Conduct for Suppliers and Service Providers**". This code of conduct is primarily based on the principles of the "UN Global Compact", the standards set out in the conventions of the International Labor Organization (ILO) and the code of conduct for the electronics industry (EICC).

In this Code of Conduct, InnoSenT's principles and requirements for our InnoSenT partners and their employees are defined. This includes acting responsibly and adhering to the principles listed.

We expect our partners to ensure that their suppliers and service providers also follow and comply with the principles of this code of conduct and the underlying standards. In the case that other provisions or laws providing more extensive regulations, these take precedence over this code of conduct.

This code of conduct is an integral part of supplier selection and evaluation. InnoSenT GmbH reserves the right to terminate business relationships with partners if they do not comply with the principles defined below.

Compliance with these principles along the entire value chain is very important to us. As our supplier, service provider or business partner, you are part of this value chain and so we count on your participation. If you have any questions about the following code of conduct, please get in touch with your contact person in the purchasing department of InnoSenT GmbH.

Robert Mock
CEO & President

1. WORKING CONDITIONS

The INNOSENT partner agrees to safeguard the human rights of its employees and to treat them with dignity and respect. This refers to all employees including part-time and migrant workers, student interns, temporary workers, full-time employees and any other form of manpower.

1.1. Free choice of employment

There shall be no forced labor, slave labor or any other form of comparable labor. All labor must be voluntary and employees must be free to end their labor or their employment relationship at any time.

1.2. No child labor

The employment of children is prohibited. Those below 15 years of age (depending on national law below 14 years of age), children of school age or those that have not yet reached the minimum age for employment in the respective country shall not be employed. Employees under 18 years of age shall not perform work that could endanger their health or safety. Where this is the case there shall be special measures put in place to protect these young persons.

1.3. Working hours

The weekly hours of work shall not exceed the respective statutory maximum. The weekly hours of work including overtime shall in any event not exceed 60 hours. Emergencies and extraordinary circumstances constitute an exception. Employees shall be entitled to at least one day off per calendar week.

1.4. Wages and employee benefits

Alongside economic circumstances, the requirements for business development and productivity, the remuneration paid to employees (employees and their family members) shall accord with all applicable national laws on remuneration, which includes laws on the minimum wage, overtime and statutory welfare benefits. Such remuneration shall furthermore enable the employees to participate in social cultural and political life.

1.5. Humane treatment

Employees shall not be subjected to disproportionate stringency or treated in an inhumane manner. This includes sexual harassment, sexual abuse, physical reprimand and physical and mental abuse. It also applies to the threat of such treatment.

1.6. Prohibition of discrimination

The INNOSENT partner agrees not to tolerate any unlawful harassment or discrimination within its workforce. The INNOSENT partner's selection and employment practices, such as for advancement and remuneration or access to training opportunities, shall not discriminate against employees on the basis of race, skin color, age, gender, sexual orientation, ethnic background, disability, pregnancy, religious or political conviction, trades union membership or family status.

1.7. Freedom of association

In line with the relevant national legislation, the INNOSENT partner grants employees the right to form and join associations and to safeguard their interests.

Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or retaliation.

2. HEALTH AND SAFETY

The INNOSENT partner acknowledges that a safe and healthy work environment contributes to improvement in the quality of goods and services and to motivation of the workforce.

2.1. Health and safety at the workplace

The INNOSENT partner shall ensure that it has organization systems, processes and/or measures in place in order to comply with national health and safety legislation.

The INNOSENT partner shall identify, assess and take measures to eliminate potential safety risks. The employees shall be informed of potential safety risks and instructed on proper, safe behavior and the corresponding safety measures to be implemented. Should such measures not afford adequate hazard management, the employees shall be provided with suitable personal protective equipment.

2.2. Emergency preparedness

Potential emergency situations and events shall be identified and evaluated. Their impact shall be minimized by implementing emergency plans and reporting procedures.

3. ENVIRONMENT

The INNOSENT partner acknowledges that environmental responsibility is an integral part of product manufacture. Production processes shall be designed to prevent negative impacts on the environment and natural resources shall be conserved.

3.1. Environmental protection

The INNOSENT partner confirms that it has implemented systems, processes and/or measures and has obtained the necessary approvals in order to comply with statutory national environmental regulations. The employees shall be instructed on how to mitigate environmental risks.

3.2. Energy consumption / efficiency

The energy consumption must be monitored and documented. Economical solutions have to be found to improve energy efficiency and minimize energy consumption.

3.3. Air emission

General emissions from operational processes (air and noise emissions) as well as greenhouse gas emissions are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems to minimize any emissions.

3.4. Treatment and discharge of industrial wastewater

Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. Furthermore measures should be introduced to reduce the production of wastewater.

3.5. Hazardous substances

Chemicals and other materials, that pose a hazard to the environment if released, shall be identified and managed in such a way that ensures their safe handling, transport, storage, use and recycling or disposal.

3.6. Regarding substances in products

The INNOSENT partner shall abide by all applicable national laws and regulations and customer specifications regarding the prohibition or restriction of specific substances. This includes mandatory labeling for recycling and disposal.

4. BUSINESS ETHICS

The INNOSENT partner and its representatives shall uphold high ethical standards in order to fulfil their social responsibilities and be regarded as successful in the market. The following principles shall apply:

4.1. Law-abiding behavior

The INNOSENT partner agrees to comply with all applicable national laws and other regulations in the context of its business operations at any time.

4.2. Integrity

All business interactions shall be governed by high standards of integrity. The INNOSENT partner shall not have any tolerance towards bribery, corruption, extortion, fraud and embezzlement and shall prohibit them in any form. All business processes must be transparent and properly reflected on INNOSENT partners' business records.

4.3. Prohibition of improper advantages

Bribes or other means of obtaining an illegal or improper advantage shall not be offered, accepted as a promise or received. Procedures shall be put in place to monitor and implement these requirements in order to ensure adequate compliance with anti-corruption laws.

4.4. Fair competition (antitrust law)

The INNOSENT partner shall respect fair competition and conduct every business activity in compliance with the applicable antitrust legislation and provisions.

4.5. Avoiding conflicts of interest

Decisions shall only be taken on the basis of objective, business-related considerations and not influenced by personal interests.

4.6. Protection of confidential information

Business secrets and personal information shall only be used to the extent to which they are necessary and permitted and they shall be protected appropriately.

4.7. Export/import legislation

Applicable legislation and regulations relating to export and import control as well as customs shall be adhered to.

4.8. Disclosure of information

Information on the company's business activities, structure, financial situation and performance shall be disclosed in accordance with the applicable provisions and usual business practices in the sector. The falsification of records and misrepresentation of conditions and practices in the supply chain are not acceptable.

4.9. Intellectual property

Intellectual property rights shall be respected; transfer of technology and knowhow must be done in a manner that protects intellectual property rights.

4.10. Responsible procurement of raw materials

The INNOSENT partner shall adopt appropriate measures which ensure to the best of its knowledge and belief that raw materials used in the manufacture of its products (tantalum, tin, tungsten, gold, etc.) do not directly or indirectly serve as means to finance or support armed groups that commit serious human rights violations. The INNOSENT partner shall exercise due diligence with respect to the origin and chain of custody of such minerals and shall disclose these precautionary measures to INNOSENT upon request.

4.11. Financial responsibility

The INNOSENT partner complies with the principles of proper accounting and financial reporting. Where required by law, the INNOSENT partner shall provide information on the current financial situation. Social, tax and customs regulations are observed and complied with.

5. IMPLEMENTATION OF THE SUSTAINABILITY POLICY

The INNOSENT Partner shall bring this Code of Conduct to the attention of its employees and business partners in an appropriate manner and at specified intervals and shall ensure compliance with it.

5.1. Measures in the supply chain

We also expect the INNOSENT partner to ensure their subcontractors/suppliers comply with this policy. You are requested to pass on the contents of this guideline to all those involved in your supply chain and to actively promote compliance with it.

5.2. Reporting Violations (“Whistleblowing”)

Whistleblowers can help to ensure that grievances are remedied and damage can be limited or even prevented. In order to protect whistleblowers from retaliatory measures, INNOSENT has set up a reporting address at <https://innosent.hinweis.de>. Reports received here will be treated with the utmost confidentiality. These principles must also be observed and ensured by the subcontractors.

InnoSenT GmbH

Am Rödertor 30
97499 Donnersdorf
GERMANY

Tel.: +49 9528 9518 0
E-Mail: info@innosent.de
URL: www.innosent.de