

1. Targets and Purpose

This Partner Code of Conduct (“Code”) applies to all third parties – such as suppliers (manufacturers, distributors, brokers), contractors and consultants (“Business Partner”) – collaborating regularly with APAG and any of its subsidiaries (“APAG Group”), both present and future. This Code highlights important standards that are consistent with APAG Group’s values, which we expect our Business Partner to implement as standard with its own partners.

Responsibility and good reputation for corporate trustworthiness are fundamental to our success and our ability to create long-term value for customers, employees, and the general public. It is a step towards establishing a sustainable relationship with our Business Partner. We demand our Business Partner to meet the standards of this Code, as well as any applicable laws and regulations. It is the task of our Business Partner to implement and maintain programs to ensure that this Code is complied with.

APAG Group regards the provisions of this Code to be essential for the business relationship between APAG Group and the Business Partner. APAG Group regards any violation of this Code as a serious matter. In case of significant breaches by the Business Partner of this Code, APAG Group reserves the right to terminate the business relationship with the Business Partner subject to applicable laws. APAG Group reserves the right to audit the Business Partner’s compliance with this Code. Any audit will be scheduled by mutual agreement with the Business Partner.

2. Commitments

2.1 Principles & laws

The basis for sustainable economic success is compliance with the respective attainable international laws and standards such as the *Universal Declaration of Human Rights* or the Core Conventions of the International Labor Organization “*ILO Convention*” along with the respective national laws. APAG Group requires from its Business Partner compliance with the respectively applicable laws. The Business Partners will always use as a reference point those laws, regulations, practices, international or company standards / policies / codes that set the higher standards.

2.2 Responsible Supply Chain Management

It is the task of our Business Partner to implement and maintain programs to ensure that this Code is complied with and that the content and understanding of the principles of this Code is communicated to all relevant employees through briefing and training. The Business Partner shall cascade this Code to its own supply chain.

Editor:	TKA, KLI, LAC	Date:	14_Aug_2023	Location Validity:		Document:		Index:	
Reviewed:	KW,LAC	Date:	24_Aug_2023	APAG Global (AGL)		D-SP011-AGL	E		
Released:	TKA	Date:	28_Aug_2023						

3. Labor & Social Policies

3.1 Child labor & forced labor

The use of child labor will not be tolerated. The minimum age for our Business Partner’s employees shall be in accordance with the *ILO Convention 138, 182* or the age specified by local legislation, if higher. Every employment must be solely voluntary; it must correspond to employment conditions that satisfy national laws and regulations.

3.2 Working hours

We expect our Business Partner to comply with any applicable laws, agreements, and industry standards on working hours (including overtime), wages and compensation. Overtime work should be voluntary and paid as such.

3.3 Ethical Recruiting

Hold fast to ethical recruitment practices. You believe that ethical recruitment not only promotes the values of fairness, respect and integrity, but also contributes to the long-term success of both your organization and the organizations you work with.

3.4 Fair wages

The remunerations are to be paid according to the respective national laws and regulations, including those relating to minimum wages, overtime, and legally mandated benefits. In places where no legal requirement exists for defining a minimum wage, *ILO Convention 131* can serve as a basis for the definition.

3.5 Human rights & non-discrimination

We expect our Business Partner to support and respect the protection of the *United Nations’ Universal Declaration of Human Rights* and the *ILO Convention*. None of the Business Partners may complicit in abuse of human rights.

No one is allowed to be personally wronged, favored, controlled, or excluded due to their race, the color of their skin, nationality, descent, ethnic origin, belief, philosophy of life, membership in an association of workers (including unions), sex, age, social background or social origins, their sexual orientation, physical constitution, appearance, or other personal characteristics.

We encourage our suppliers to promote gender equality and women’s rights. We believe in equal pay, diverse career growth, work-life balance and a non-discriminatory workplace. Our inclusive culture fosters respectful dialogue and values every voice. We support women’s leadership and strive for balanced representation. Join us and create a workplace that promotes gender equality for the success of all.

We are dedicated to upholding the rights of minorities and indigenous peoples. Our commitment is rooted in respect, equality, and human dignity. We pledge to promote diversity, prevent discrimination, enhance cultural awareness, support human rights, and contribute to the well-being of society. Through these efforts, we create an inclusive workplace and contribute to a just and equitable world. Thank you for joining us in this important journey.

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Promote diversity, equality and inclusion (DEI). Improve the symbiotic relationship, philosophy, and culture of recognition, acceptance, support, and acceptance of people of all racial, sexual, gender, religious, and socioeconomic backgrounds, including differentiating factors.

3.6 Freedom of association

In compliance with applicable laws, our Business Partner must respect its employees' right to organize themselves, join associations or bargain collectively or individually, if they wish to do so. Employee representatives must be protected against discrimination.

3.7 Health & Safety

Our Business Partner is encouraged to provide a safe and healthy workplace for its employees and to integrate health and safety management practices into its business. We expect our Business Partner to ensure that the employees work free from the influence of illegal drugs or controlled substances, or the abuse of prescribed or over-the-counter drugs or alcohol.

Health and safety related information such as emergency procedures and potential safety hazards should be made known to the employees.

Required personal protective equipment shall be made available and easily accessible by the employees.

3.8 Use of Private or Public Security Forces

Safety is paramount at APAG. Where necessary, we combine private and public security to ensure a robust approach to protection. We recommend to our suppliers:

In the area of Public Security collaborate with local authorities to share information, creating a secure environment.

Keep Transparency: Maintain openness with stakeholders, promptly communicating any security updates.

Adaptation: Update and grow policies based on new challenges and feedback-based insights.

Choose Private Security Forces for expertise, reputation, and compliance with values. Ensure seamless integration for effective protection.

3.9 Land, Forest and Water Rights and Forced Eviction

We value land, forests and water resources and the rights of local communities. We ask our suppliers:

1. Respect indigenous and local rights: Honor their heritage and engage in meaningful cooperation whenever possible.

2. Follow the principle of free, prior, and informed consent before any impact.

3. Oppose forced evictions and try to prevent damage.

4. Our practices promote conservation and biodiversity.

5. Ensure transparency, address concerns and maintain accountability.

Together, we contribute to a just, just and sustainable world.

3.10 Animal welfare

Our Supplier Code of Conduct underscores the paramount importance of upholding rigorous standards for animal welfare throughout our supply chain.

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4 Environment & Responsible sourcing

4.1 Environmental Protection

We expect our Business Partner to ensure compliance with the following environmental principles provisions of this Partner Code of Conduct in all their business dealings, especially but not limited to the provisions of the applicable binding Partner Code of Conduct of APAG Group.

APAG Group respects and undertakes environmental responsibility as an integral part of producing and developing electrical control units and lightening. We expect our Business Partner the same level of scrutiny and responsibility in their business operations.

Business conduct

We expect our Business Partner to integrate environmental considerations into its activities and strive for continuous improvement, by minimizing any adverse effects upon the environment. For this purpose, we advocate for implementation of D and P-FMEA in early phases of project to minimize wastes, for the practice of reuse and recycling.

Environmental impacts

Our business partner commits to manage and continuously reduce the negative impact on the environment in its business activities, in terms of reducing energy, gas and water consumption, introducing responsible waste and chemical management, sustainable use of resources and reducing air emissions incl. GHG emissions, water and soil pollution.

We consider the protection of biodiversity, responsible land usage, prevention of deforestation, and the preservation of soil quality as integral priorities.

We emphasize minimizing noise emissions as a significant aspect within our commitment to responsible environmental practices.

Energy management

Consider and prefer the use of renewable energy sources as part of your energy management.

Legal compliance

Our Business Partner have to comply with any relevant local and national environmental laws and regulations, as well as any requirements for environmental licenses and permits.

Compliance to standards

As part of the evaluation of our Business Partners, we favor those with an established environmental management system according to ISO 14001.

4.2 Responsible Procurement of Minerals Policy

Procurement of Cobalt, Mica and Minerals from Conflict-Affected and High-risk areas
 APAG Group recognizes that the procurement of tin, tantalum, tungsten, gold (together known as 3TG), cobalt and mica from states in conflict areas and other high-risk areas, may inadvertently fund organizations involved in bribery and other unlawful activities, which is a socially grave concern.

In order to make its activities on the issues more clearly, APAG Group formulates the Responsible Procurement of Minerals Policy and publishes it to the APAG Group Web site as below.

Responsible procurement of minerals (3TG)

Supplier shall:

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- Comply with existing **legal requirements** concerning the mining of raw materials in conflict and high-risk territories – so called “conflict minerals” defined for instance in the Dodd-Frank Act and respective EU-regulations.
- Report the origin and the certification status of the smelters and refiners involved (Considering OECD’s “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.”)
- Design and implement a strategy to respond to identified risks;
- Refrain from sourcing from illegal channels and commit to promoting a responsible supply process. (sourcing the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program)

Responsible procurement of cobalt and mica

Based on the guidelines of the OECD, suppliers shall specifically:

- Develop an appropriate management system to conduct due diligence in the supply-chain to determine whether cobalt originates from conflict-affected or high-risk areas.
- Develop due diligence policies and require tier-one suppliers to (i) adopt corresponding due diligence policies and (ii) request the same from their suppliers down to the level of extraction of cobalt and mica.
- Require your direct suppliers to source cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program.
- Identify the risks by mapping the supply-chain and take appropriate steps to mitigate them.
- Report on supply-chain due diligence.

APAG Group regularly report the outcome of our data collection and analysis of the certification status.

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5 Economic Practices

5.1 Zero tolerance of bribery & corruption

With regard to corruption and bribery, APAG Group pursues a zero-tolerance policy. Corruption is prohibited virtually worldwide by national laws and international conventions. APAG Group expects its Business Partner to ensure that no benefits are promised or granted to employees of APAG Group with the intention of obtaining a business advantage. Further, the Business Partner shall not, under any circumstances, demand, offer or grant bribes, kickbacks or other illegal payments, employment to related parties, incentives, gifts, entertainment, favors or other benefits of value for the realization of business opportunities with APAG Group. APAG Group expects its Business Partner not to tolerate any kind of unlawful contributions in dealing with authorities.

5.2 Fair competition – Compliance with the antitrust law

APAG Group requires from its Business Partner to support free and fair competition, which is ethical and lawful. Our Business Partner will not engage in price-fixing, market sharing or similar anti-competitive practices. Other illegal anti-trust law actions such as concerted actions, informal discussions or informal gentlemen’s agreements are to be refrained from. **Accurate records of activities and transactions are mandatory to ensure transparency and compliance.**

5.3 Avoidance of conflicts between private & business interests

The Business Partner has to act transparently and with integrity in relation to its business activities. Any direct or indirect close relationship between the Business Partner and APAG employees that has an impact on business relations, or comparable cases, must be disclosed to APAG Group. The conflict of interest shall be disclosed before the start of negotiations or as soon as the conflict comes to light.

5.4 Import & export control

Compliance with export and import laws as well as regulations is fundamental in order to ensure that all parties maintain export and import privileges, and sustain their ability to participate in the global marketplace. We expect our Business Partner to comply with any applicable import and export control and associated regulations.

5.5 Privacy

The Supplier shall process personal data of which it becomes aware in the course of its business relationship with APAG Group exclusively in accordance with the applicable data protection laws and regulatory requirements.

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6 Ensuring standards

6.1 Reporting

Supplier shall, within 10 business days, inform their APAG contact in case of a violation of this Partner code of conduct.

In case of reporting questionable behavior or a potential violation of this Partner code of conduct, please contact APAG through following method:

APAG Whistleblower via email to: compliance@apagcosyst.com

7 References

Conflict minerals legislation – US Security and Exchange Commission

<http://www.gpo.gov/fdsys/pkg/FR-2012-09-12/pdf/2012-21153.pdf>

International Labour Organisation (ILO) Convention n° 138 and 182 – Child labour

<http://www.ilo.org/ipec/facts/ILOconventionsonchildlabour/lang--en/index.htm>

International Labour Organisation (ILO) Conventions n° 29 and 105 – Forced labour

<http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/lang--en/index.htm>

International Labour Organisation (ILO) Convention n° 131 – Minimum wage

http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_ILO_CODE:C131

International Labour Organisation (ILO) Convention n° 100 – Equal remuneration

http://www.ilo.org/declaration/info/factsheets/WCMS_DECL_FS_84_EN/lang--en/index.htm

International Labour Organisation (ILO) Convention n° 111 – Discrimination

http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_decl_fs_85_en.pdf

International Labour Organisation (ILO) Convention n° 98 and 87 – Freedom of Association

<http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/freedom-of-association/lang--en/index.htm>

International Labour Organisation (ILO) Convention n° 155 – Health and Safety

http://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C155

International Labour Organisation (ILO) 26000 – Social Responsibility – 2010

http://www.iso.org/iso/discovering_iso_26000.pdf

OECD Guidelines for Multinational Enterprises – 2011

<http://www.oecd.org/daf/inv/mne/48004323.pdf>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

<https://www.oecd.org/corporate/mne/mining.htm>

United Nations guiding principles on Business and Human Rights – 2011

http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

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Document History

Change-Date:	Changed by:	Released by:	Change Reason	Version
12_Sept_2019	KW	STU	Creation of document	A
20_Jan_2022	LAC, KW	LAC	Added 5.5 Responsible Procurement of Minerals Policy:	B
16_Mar_2022	LAC, KW	LAC	Added 5.5 Mica as Conflict mineral	C
18_Oct_2022	TKA, KLI	TKA	Update of the chapter's names, Update of chapter 4.1 Environmental protection, Added chapter 5.5. Privacy, 6.1 Reporting	D
28_Aug_2023	LAC, KLI, TKA	TKA	Update of chapter 3.3, 3.5, 3.8, 3.9, 3.10, 4.1, 5.2	E

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