



Eltronic Group
ENGINEERING IMPACT

Supplier Code of Conduct

1 Preface

It is clear to us that it is crucial to prioritize to accelerate the green transition. In Eltronic Group and its subsidiaries (hereafter named "Eltronic Group"), we have made sustainable development our core business strategy. Our purpose is to be at the forefront of industrial innovation and to deploy our know-how to accelerate the green transition.

We are operating across cultures and traditions, in a wide range of jurisdictions with each their own laws and regulations, we are dedicated to developing sustainable business practices.

As an important part of our journey to achieve this, we are committed to developing a culture that supports and respects global human rights, labor rights, environmental best practices, and scrupulous business honesty. It follows that we expect all our employees to always comply with the law and act ethically.

Just as we stipulate standards of ethical practice for ourselves in a formal Code of Conduct, we have a Supplier Code of Conduct that establishes related requirements for all our suppliers. We expect our suppliers to share our approach to ethics, human rights, and protecting the environment. We believe this is essential in building and developing trusting relationships with our suppliers.

We consider collaboration with our suppliers to be an integral part of our success and we look forward to working with them to develop more sustainable business practices for us all.

We promise to walk the talk - therefore, we have a whistleblower scheme that is available to our staff and our business partners via a neutral third party. Suppliers who believe that an Eltronic Group employee, or anyone acting on behalf of Eltronic Group, has engaged in illegal or otherwise improper conduct, should report the matter to the company. This can be done through the [Eltronic Group whistleblower portal](#).

2 General

Eltronic Group and its subsidiaries hold strong values, high ethical standards, and a reputation built on honesty and integrity. This Supplier Code of Conduct reflects Eltronic Group's Code of Conduct in extending our standards of good business ethics to our supply chain. We always expect suppliers to comply with applicable national and international laws and regulations, as well as, internationally recognized human rights. We expect Eltronic Group's suppliers to comply with the Eltronic Group Supplier Code of Conduct.

This Supplier Code of Conduct is in addition to applicable laws and general principles of law built on the UN Guiding Principles on Business and Human Rights, (the UN Global Compact), and the International Labour Organisation (ILO) Conventions. We expect Eltronic Group suppliers to have the necessary procedures and systems in place to comply with this Code of Conduct, including preventing and mitigating modern slavery and human trafficking in their own supply chain.

3 Supplier responsibility

3.1 Human rights

Suppliers of Eltronic Group shall comply with applicable laws and regulations in regard to human rights. Suppliers of Eltronic Group are expected to respect human rights and not be directly or indirectly involved in any human rights violations at any stage of their business activities. To achieve this, the supplier is expected to conduct its own due diligence. In addition to that, we have certain requirements for specific human rights, as defined below.

3.2 Working hours

The supplier shall ensure that working hours - including regular working hours, overtime, days of rest, and breaks - comply with applicable laws and regulations in the relevant country. Where legislation does not specify a limit for regular working hours, that limit shall not exceed 48 hours per week. Overtime hours shall be within the limits of applicable laws and regulations, or a total of 60 hours per week including both regular and overtime hours, whichever is the lesser. All persons shall be entitled to an uninterrupted weekly rest period of no less than 24 hours in the course of each period of seven days.

3.3 Child labor and employment of minors

Suppliers shall not recruit or employ child labor. The minimum age of workers shall be 15 years or the minimum age set by the national laws in the country of manufacturing, whichever is higher. Young workers, meaning those above the minimum age and below the age of 18, may only be employed for non-hazardous work and shall not be employed during night hours. The facility may employ persons between 13 and 15 years of age only if the conditions are in accordance with all applicable elements of ILO Convention 138 and other relevant ILO conventions.

3.4 Forced labor

Any form of forced labor is strictly prohibited. The supplier shall not use or benefit from any form of forced labor and/or human trafficking, including but not limited to:

- Any form of bonded, indentured, and/or prison labor
- Restriction on freedom of movement
- Retaining important original personal identification documentation; and any other excessive means to prevent employees from terminating employment at will.

A signed working contract must be available for all employees, which is provided by the supplier in a language that is understandable to the employee.

3.5 Discrimination, fair and equal treatment

Any form of discrimination is strictly prohibited. The supplier shall base employment decisions (recruitment, promotion, access to training, termination, or retirement) on merit and qualifications. The supplier shall not discriminate against diversity based on race, color, religion or creed, gender or gender expression, age, national origin or ancestry, medical condition, marital status, sexual orientation, mental or physical disability, or social status. Any form of physical, psychological, verbal, sexual, or any other kind of harassment is also prohibited. The supplier shall be aware of any unconscious bias and foster an inclusive work environment.

3.6 Freedom of association and collective bargaining

The supplier shall respect the workers' right to join or form unions and to bargain collectively, or the right not to join one if that is the case. If freedom of association and collective bargaining is restricted by laws and regulations in the relevant country, the employees shall be free to develop parallel means for independent and free association and collective bargaining.

3.7 Employment conditions

The supplier shall provide wages and benefits that comply with applicable laws and regulations and/or applicable collective bargaining agreements in the relevant country, which includes basic wages, benefits, and overtime. Wages shall be paid on time and within the timeframe and form agreed upon or following local laws and regulations. Deductions shall always be transparent and never used as disciplinary measures.

4 Health and safety

We expect that our suppliers, in line with Eltronic Group ambitions, work systematically on providing workers with safe and healthy work conditions. This includes, as a minimum, that safety incidents are recorded and that suppliers proactively work on reducing hazards beyond the legal obligation, if relevant, to protect the health and safety of employees. Hazards include but are not limited to occupational health and safety, emergency readiness, and access to clean water, sanitation, and hygiene facilities.

5 Environment

We expect that our suppliers proactively manage their major environmental risks and most relevant aspects (e.g. materials/packaging, energy, water, emissions/effluents). Environmental risk management should as a minimum include mapping of the major risks and implementation of risk mitigation actions. Management of the most relevant environmental aspects should as a minimum include problem identification and implementation of actions to reduce negative environmental impacts.

Coming EU law call for transparency and data from suppliers and sub-suppliers of Eltronic Group. Therefore, suppliers must deliver data environmental and/or social data on request.

6 Business ethics and integrity

Eltronic Group operates in many different countries, and across cultures, traditions, local laws, and regulations and has a strong commitment to developing and maintaining good business ethics. We also expect this commitment from our suppliers.

6.1 Anti-bribery

Any form of bribery is strictly prohibited. Suppliers shall not solicit, accept, offer, or pay bribes or facilitation payments during the performance of their business dealings.

6.2 Whistleblower protection

Suppliers should provide an anonymous method, and make sure to create awareness in relevant languages hereof, for workers to report workplace grievances and ensure that policies are in place to protect workers when complaints and grievances are reported in good faith through e.g., the Eltronic Group's whistleblower portal.

6.3 Confidentiality, data protection, and data security

Suppliers shall ensure that confidential information or personal data provided by Eltronic Group and others on behalf of Eltronic Group is used solely as explicitly permitted and in accordance with applicable laws

and regulations. This also applies after the business relationship with Eltronic-Group ends, and when relevant, complies with EU regulation on processing of data and IT security when dealing with Eltronic-Group.

6.4 Intellectual property rights

Suppliers shall ensure that intellectual property of Eltronic Group and other third parties, including but not limited to copyrights, patents, designs, and trademarks, are used and licensed to Eltronic-Group in accordance with relevant agreements, NDA and similar documentation as explicitly permitted and in accordance with applicable laws and regulations.

6.5 Entertainment, travel, gifts, and personal benefits

Suppliers must only offer entertainment, gifts, and personal benefits to Eltronic Group employees if they meet all the following criteria:

- The entertainment, gifts, and personal benefits are compliant with local customs and usual business practices.
- The entertainment, gifts, and personal benefits cannot be construed as a bribe, or otherwise given in exchange for a service.
- The entertainment, gifts, and personal benefits do not violate any laws, regulations, or internal rules of the supplier.
- The entertainment, gifts, and personal benefits would not seem inappropriate if disclosed publicly
- Suppliers who arrange events must not offer to pay travel and overnight expenses for Eltronic Group employees attending such events.

6.6 Export control and sanctions

Suppliers shall comply with all applicable export, re-export, and import laws and regulations.

6.7 Material Compliance and Conflict Minerals

Suppliers shall:

- Ensure that all goods delivered to Eltronic Group comply with all applicable laws and regulations regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals.
- Upon request and in a timely manner provide Eltronic Group with relevant and reasonable information about the substances in the delivered goods via designated platforms specified by Eltronic Group.

6.8 Fair competition

Suppliers shall conduct their business in line with all applicable competition laws and regulations.

7 Assessments and corrective actions

Eltronic Group expects suppliers to be able to demonstrate their compliance with the Eltronic Group Supplier Code of Conduct and with the coming EU Law CSRD. The CSRD will set new standards of transparency and data throughout supply chains. Hence, Eltronic Group will in the coming years develop and deploy the following Supplier Code of Conduct performance evaluation tools:

7.1 Off-site assessments

The supplier commits to providing clear evidence of compliance with this Supplier Code of Conduct on request in an electronic format. Eltronic-Group or third-party service provider appointed by Eltronic Group will handle the online assessment and the supplier is wholly responsible for subscribing to the service in order to complete the assessment process. The supplier must fill in all information required and submit any documentation in support of their application. The supplier has four weeks to submit a reply unless Eltronic Group approves a request for extending this deadline.

7.2 On-site sustainability audits

Eltronic Group can conduct on-site audits and follow-up audits. The initial audits will usually be announced, while follow-up audits may be unannounced. The supplier must prepare for and provide on-site auditors with the necessary documentation and access to workers for interviews. Sustainability audits are carried out by either Eltronic Group or a third party on behalf of Eltronic-Group. Any third-party auditor acting on behalf of Eltronic Group is subject to an obligation of confidentiality.

8 In case of non-compliance with the code

Eltronic Group or its subsidiaries can terminate the agreement with the supplier due to the seriousness of an issue or repeated non-compliance with the Eltronic Group Supplier Code of Conduct and reserves the right to end the business relationship immediately. However, Eltronic-Group will always engage to ensure development and collaboration to reach compliance, before any termination.

9 Eltronic Group responsibilities

We aim to improve performance regarding the Eltronic Group Supplier Code of Conduct in our existing supplier base. We will always communicate our expectations to our suppliers. We consider suppliers' performance on the Eltronic Group Supplier Code of Conduct as part of our evaluation of the supplier and create incentives to improve supplier performance. Eltronic Group will follow up on the outcome of sustainability audits and communicate expected actions to the supplier. Eltronic Group will ensure that reports and records used to assess suppliers' Code of Conduct performance are treated as confidential.

10 Signatures

Supplier Name	
Place	
Date	
Name, title	
Sign	

Eltronic Group / Name Subsidiary	
Place	
Date	
Name, Strategic Purchaser	
Sign	