

CODE OF CONDUCT

CORPORATE CONNECT GROUP DOCUMENT

CONNECT GROUP

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RISK AND COMPLIANCE



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TABLE OF CONTENTS

CORPORATE GOVERNANCE: **PRINCIPLES** OF COMPANY MANAGEMENT 4

We always abide by the law 5

SUSTAINABLE POLICY | CORPORATE POLICY 6

We apply our sustainability policy 6

We are committed to social responsibility and sustainability 7

We reject bribery and corruption 8

We do not practice tax evasion 9

We believe in fair competition 10

We respect the rules of international trading 11

We respect physical property 12

We safeguard and respect intellectual property 13

We observe the confidentiality of personal data 14

We report correctly and promptly on all business activities 15

We ensure the safety of our people and environment 16

We act in the interests of Connect Group 17

We respect other cultures and attitudes 18

We practice coordinated communication 18

ADDENDUM 19

CONTACT 20

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CORPORATE GOVERNANCE:
PRINCIPLES OF COMPANY MANAGEMENT

Dear colleagues of the Connect Group community,
Connect Group is a special company, primarily thanks to the fundamental values, which have guided us for more than 40 years.

An important aspect of our company philosophy is that we do not base our actions solely on legal requirements, but are also committed to ethical standards.

We treat people and the environment with respect and esteem. The principles outlined here are binding for every single employee and are intended to help everyone adhere to our rules and act in accordance with our values.

Connect Group also fulfills the requirements declared in the sustainability policy signed by our board of directors. This sustainability policy set down requests to ensure safe working conditions and respectful treatment of employees, as well as environmentally healthy and ethically acceptable business practices.

Please contact your superior, if you have any questions or doubts about how to act in a particular situation.

Management of the Connect Group

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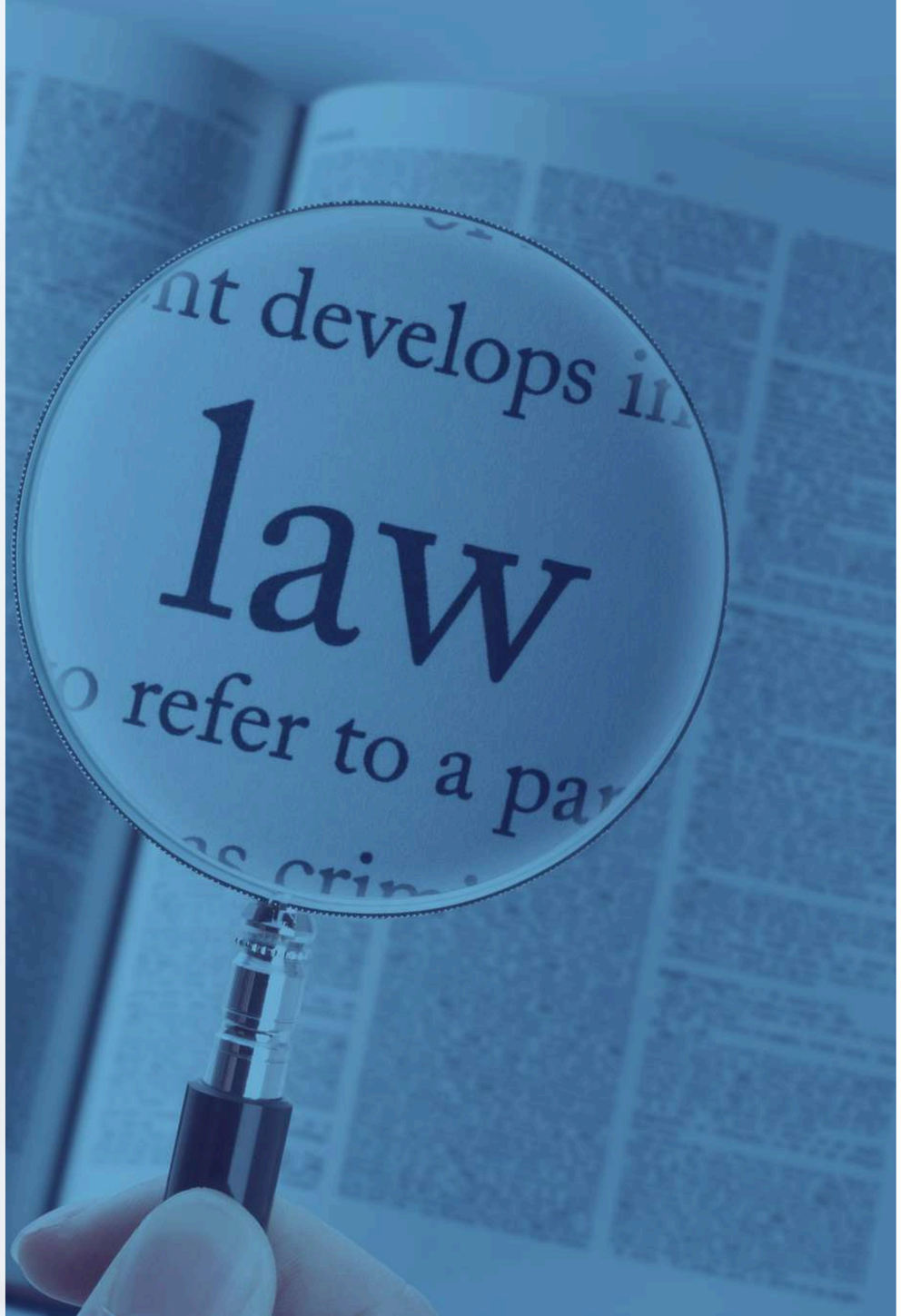

OVERRIDING PRINCIPLE:

WE ALWAYS ABIDE BY THE LAW

Illegal action is not an option and not in the interests of our company, as it is unethical, seriously damaging to our reputation and can lead to prosecution, claims for damages and loss of business.

Any employees breaching the law must be aware that they themselves will be at risk of prosecution. Acting in conformity with the law is in the best interests of each employee.

All employees are required to familiarize themselves with the local regulations applicable to their area of responsibility and to abide by these. On a regular basis we will inform employees regarding legal requirements and/or adjustments.

In the cases of doubt, the council of a superior should be sought.
The local regulations can be requested to the local Human Resources personnel.

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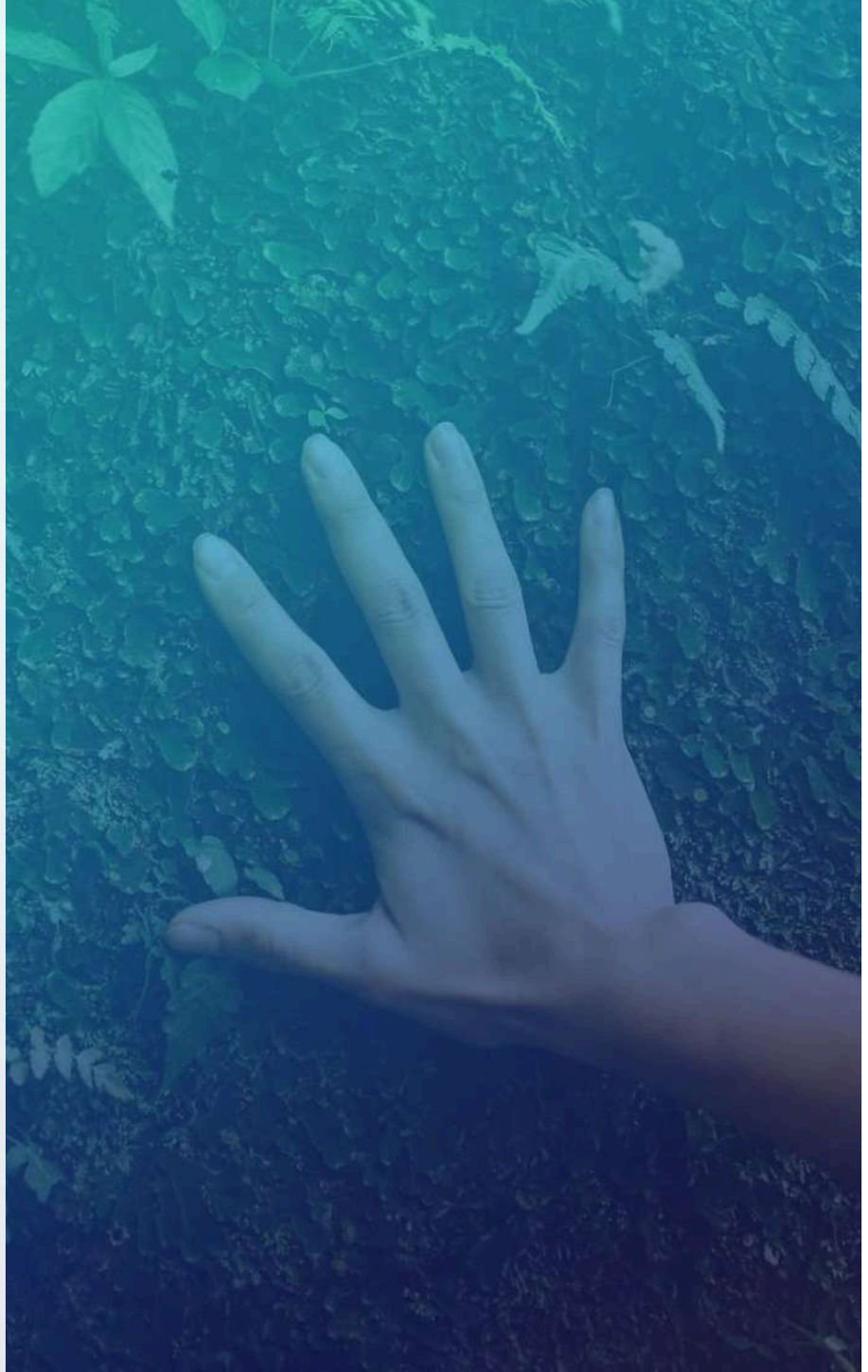

CORPORATE POLICY

SUSTAINABLE POLICY

We are all committed to comply to the corporate sustainability policy.
This policy is signed by our board of directors and evokes to comply on

- **Health and Safety**
- **Forced labor - child labor / labor regulations and conditions**
- **Environment**
- **Ethics - right to organize & no discrimination**

Connect Group commits to the UN sustainability development goals 3, 5, 8, 12 & 13 and 10 principles of UN Global Compact.



Its core concerns are safe working conditions, treating employees with respect and dignity, equal opportunity, right to organize and to succeed in an environmentally compatible, ethically tenable business process.

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WE ARE COMMITTED TO **SOCIAL RESPONSIBILITY** AND **SUSTAINABILITY**.

Connect Group is completely aware of its social responsibility. Above and beyond our compliance with the legal stipulations, we make a voluntary contribution to the sustainable development of Connect Group and our surroundings.

Besides efficiency and enthusiasm, humanity is at the center of our actions.

We are never inconsiderate in our drive for success. We understand ourselves to be open and reliable, local and trustworthy to our stakeholders, customers, suppliers and employees.

We behave with integrity.

As a company, we know that we also have an obligation to society. We create the space that each and every one of us requires to develop themselves – and we reward good performances.

In everything we do, we also consider the long-term effects. Resource preservation, energy efficiency, environmental protection and employee development is a safeguard for our own future.

By enclosing such behavior we would like to send out a positive signal, also internationally, and help to promote greater fairness in our world.

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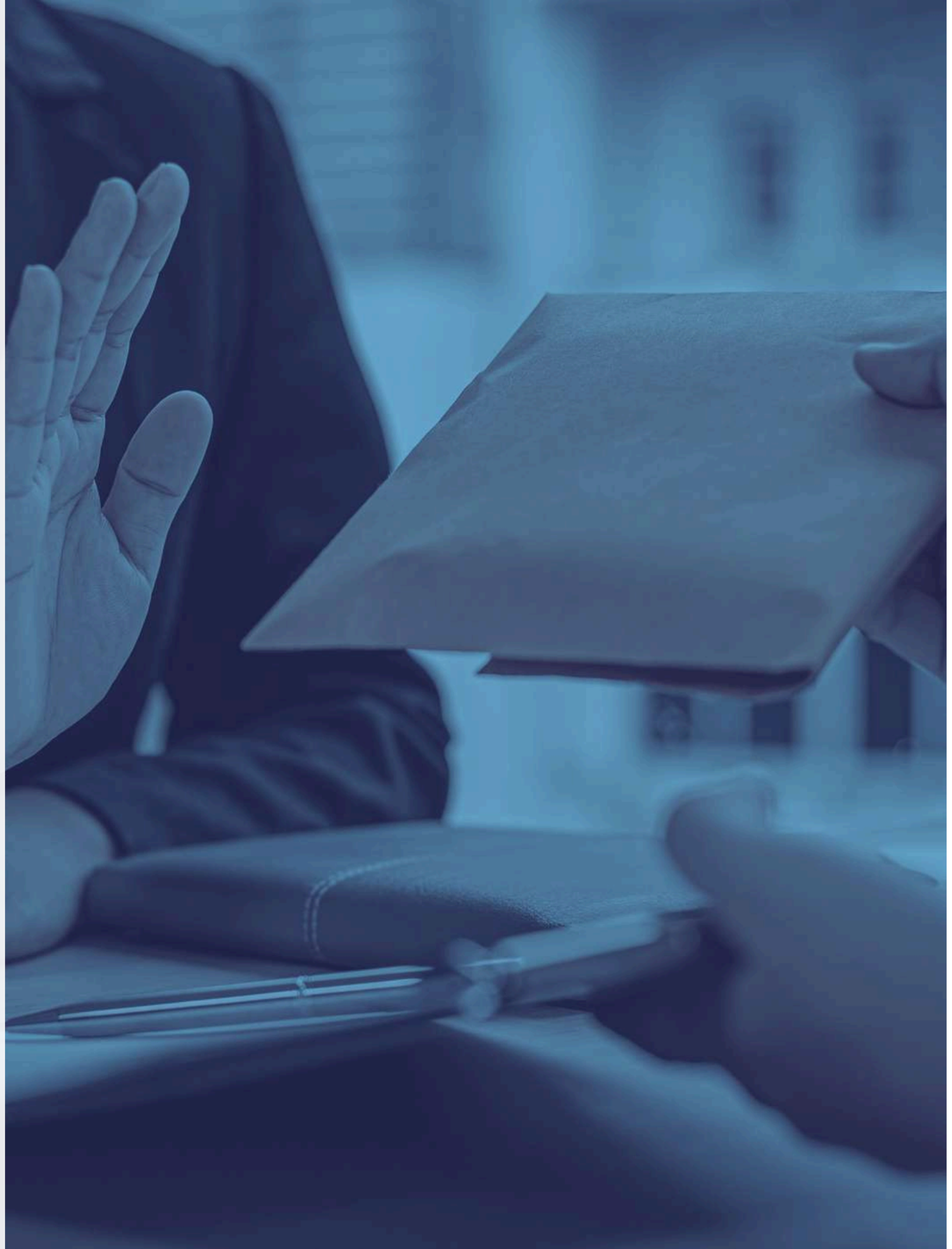

BRIBERY, CORRUPTION, GIFTS, GRATUITIES

Bribery and corruption are illegal and unethical.

Both constitute considerable risks for our employees and our company.

Bribery and corruption represent a threat to the existence for any company. They are therefore neither an option nor an acceptable practice – even if this means a loss of revenue.

We neither offer impermissible benefits to our trading partners nor do we accept any such benefits ourselves.

We consider corrupt behavior as being constituted by, e.g. facilitation payments, kickbacks and financial incentives as well as by having recourse to third parties/agents.

We have a cautious attitude towards both accepting and offering gifts and other gratuities (including invitations to dine or other activities for example).

Any such action must never take a form which exceeds normal business hospitality, manners and courtesy.

Attention will be given to ethical high risk professions such as sales, finance and procurement to ensure that ethical behavior is guaranteed.

The Whistle Blow procedure can be used to notify Connect Group on incorrect situations.

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TAXES AND SUBSIDIES

The tax laws of every country are binding for us and must therefore be strictly observed.

Every employee must be aware that tax offenses are liable to prosecution. This applies equally to both the company and the individual employee.

On account of regular thorough inspections by the tax authorities, there is a possibility of tax offences being discovered, when the local law is not respected.

Suspicious circumstances can lead to criminal investigations. If customer and suppliers are involved, cross-checks will be made with their tax authorities and vice versa.

The legal situation with regard to taxation and subsidies is often very difficult to assess.

In cases of doubt, a superior should be consulted and/or clarification must be requested from the financial department.

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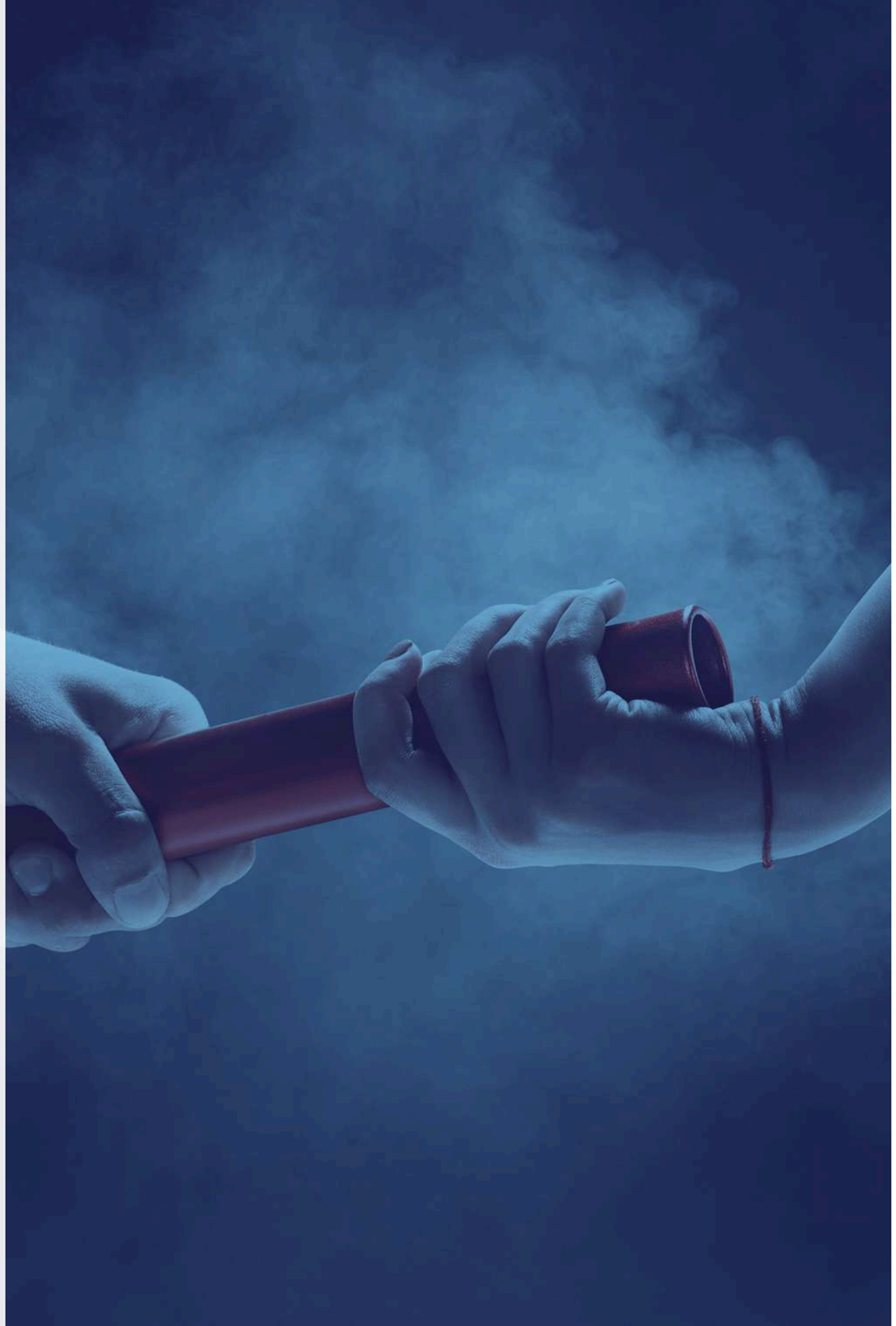

PRINCIPLE OF FAIR COMPETITION

Competition can only work if it is free and fair.

Agreeing with competitors on coordinated market action is strictly forbidden.

That is why we do not come to any arrangements with competitors regarding our business practices.

We abide by laws on the protection of competition. We specifically prohibit any agreements with competitors on prices or terms, and apportionment of markets and regions, the allotment of customers and the coordination of quotation, development and production strategies. Even exchanging information with competitors which could form the basis for coordinated behavior (in particular with regard to prices, costs, margins, terms, customers, quotations, product developments and manufacturing capacity) cannot be tolerated and is strictly forbidden.

Any violation of these bans is rigorously pursued by the authority and can lead to sanctions which may endanger the existence of our company.

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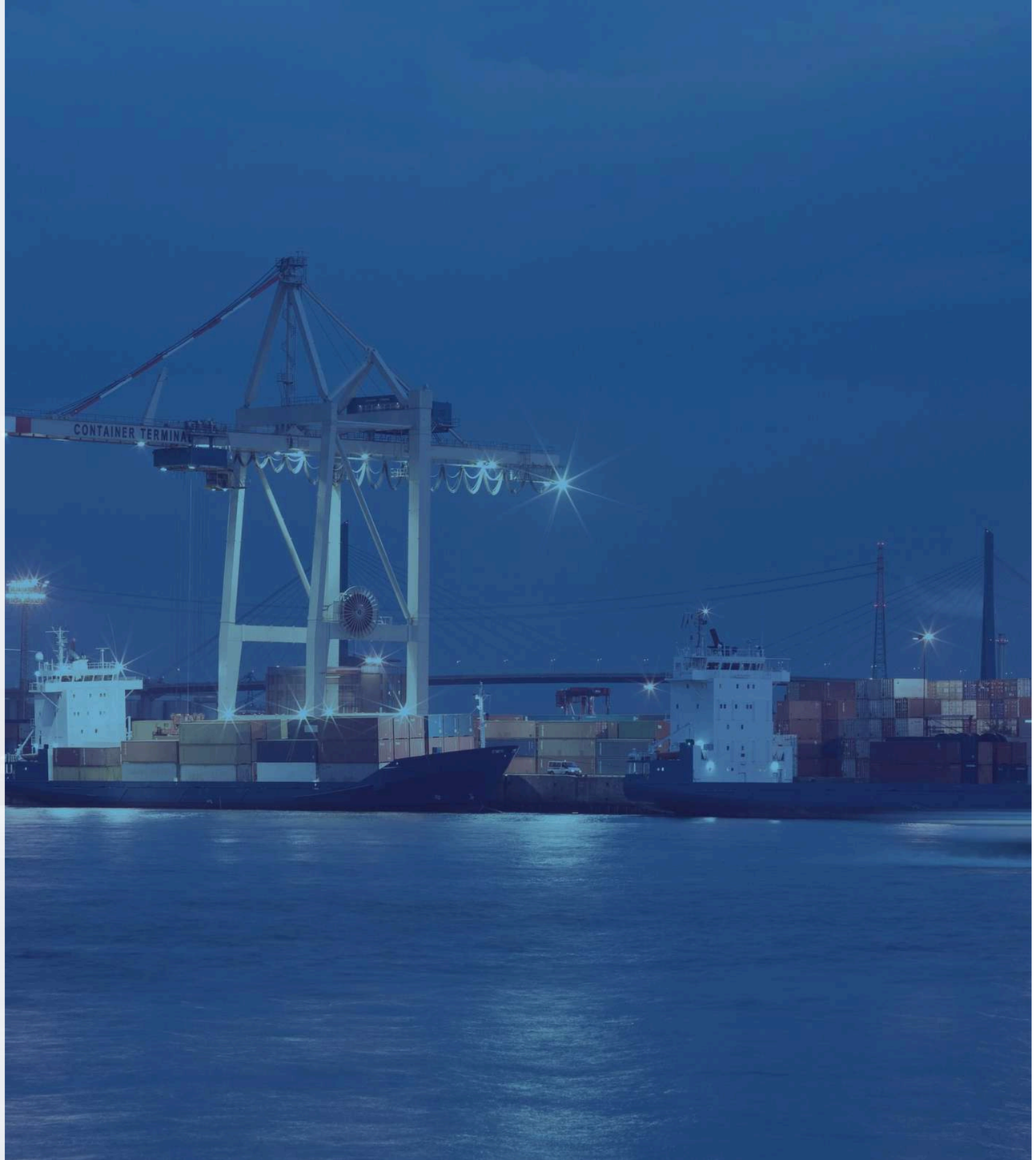

INTERNATIONAL TRADE

International trade is of vital benefit to Connect Group.

So supporting it abiding by the pertinent rules is very much in our own interest.

Consequently, we observe the existing import and export regulations, obtain the necessary permits and pay the applicable custom duties and taxes.

The authorities regularly check compliance with these regulations. Severe sanctions may be imposed by the authorities in the event of any violation.

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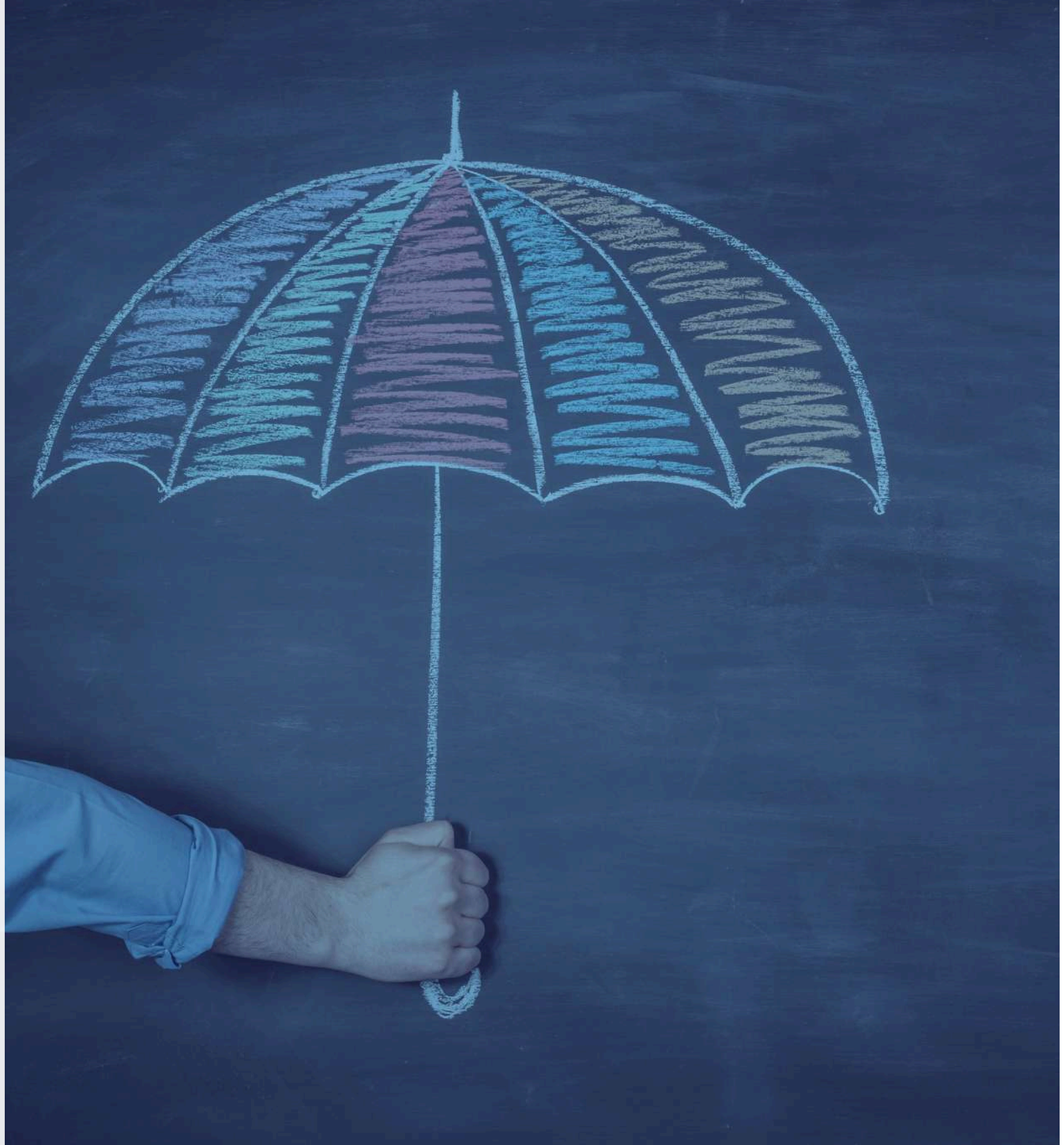

WE PROTECT THIRD PARTY OWNERSHIP RIGHTS

Property belonging to our or other companies is handled, treated and used carefully and responsibly. This also means taking into account the integrity of our trading partners.

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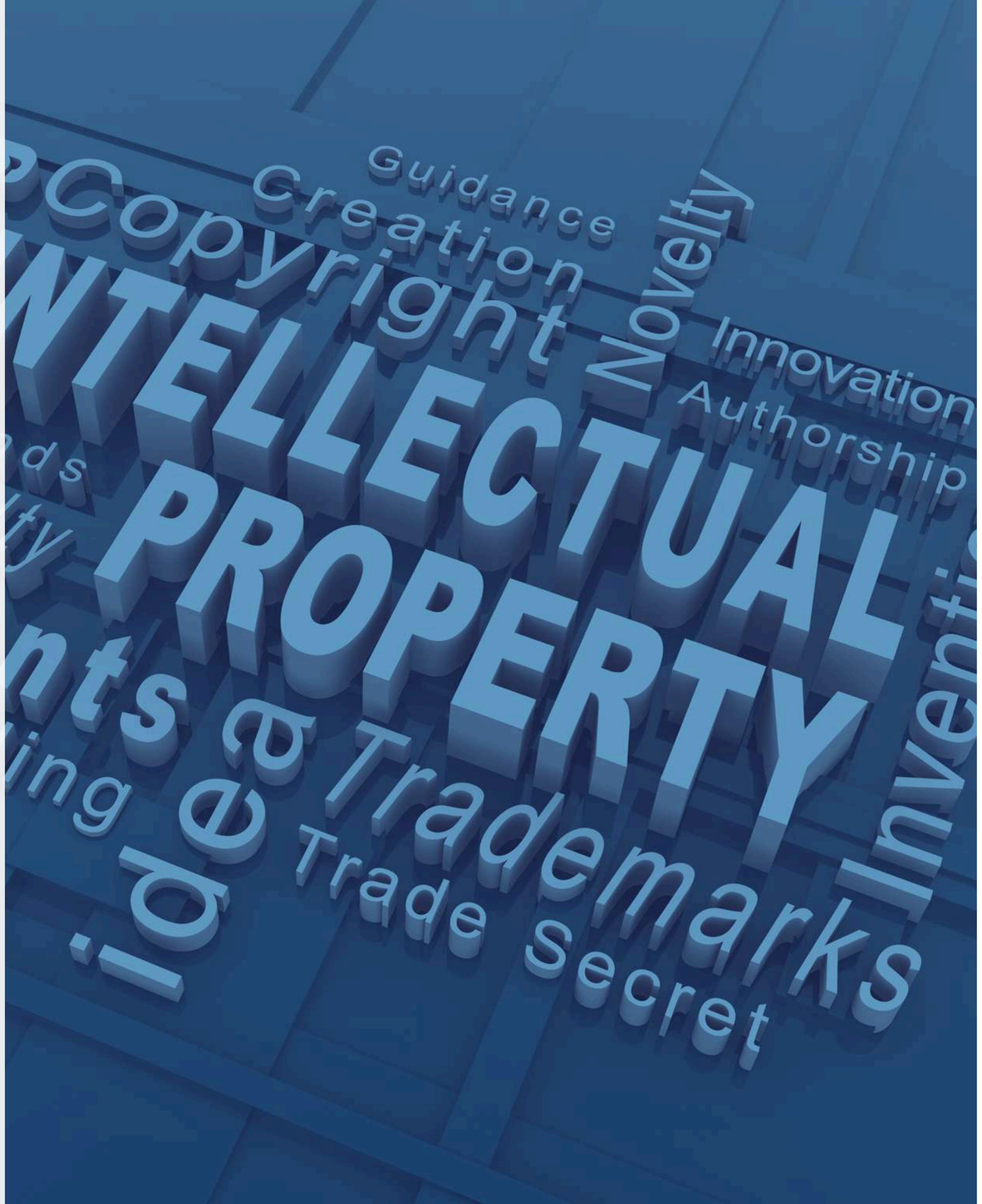

WE SAFEGUARD AND RESPECT INTELLECTUAL PROPERTY

Concepts, ideas and designs are all forms of property and therefore protected by law.

We respect third party intellectual property.

Being a technology supplier; investing a lot of effort to produce the research and development from our customers, the protection of inventions and expertise is vitally important to Connect Group.

That is why we treat business secrets with the utmost care. It must be ensured that confidential information is not passed on to unauthorized third parties. The same also applies to confidential information we receive from our trading partners. National and European legislation are applied to conform.

If special circumstances (e.g. customers sensitive development projects or company take-overs) require strict confidentiality, this must also be maintained, even with and towards colleagues.

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DATA PRIVACY

We only use the personal data of our employees and contractual partners for the express purposes for which they have been provided and always treat such data confidentially.

Connect Group strictly respects all laws on personal data privacy. (GDPR)

GDPR guidelines are available.

In cases of doubt, a superior should be consulted and/or clarification must be requested from the financial department.

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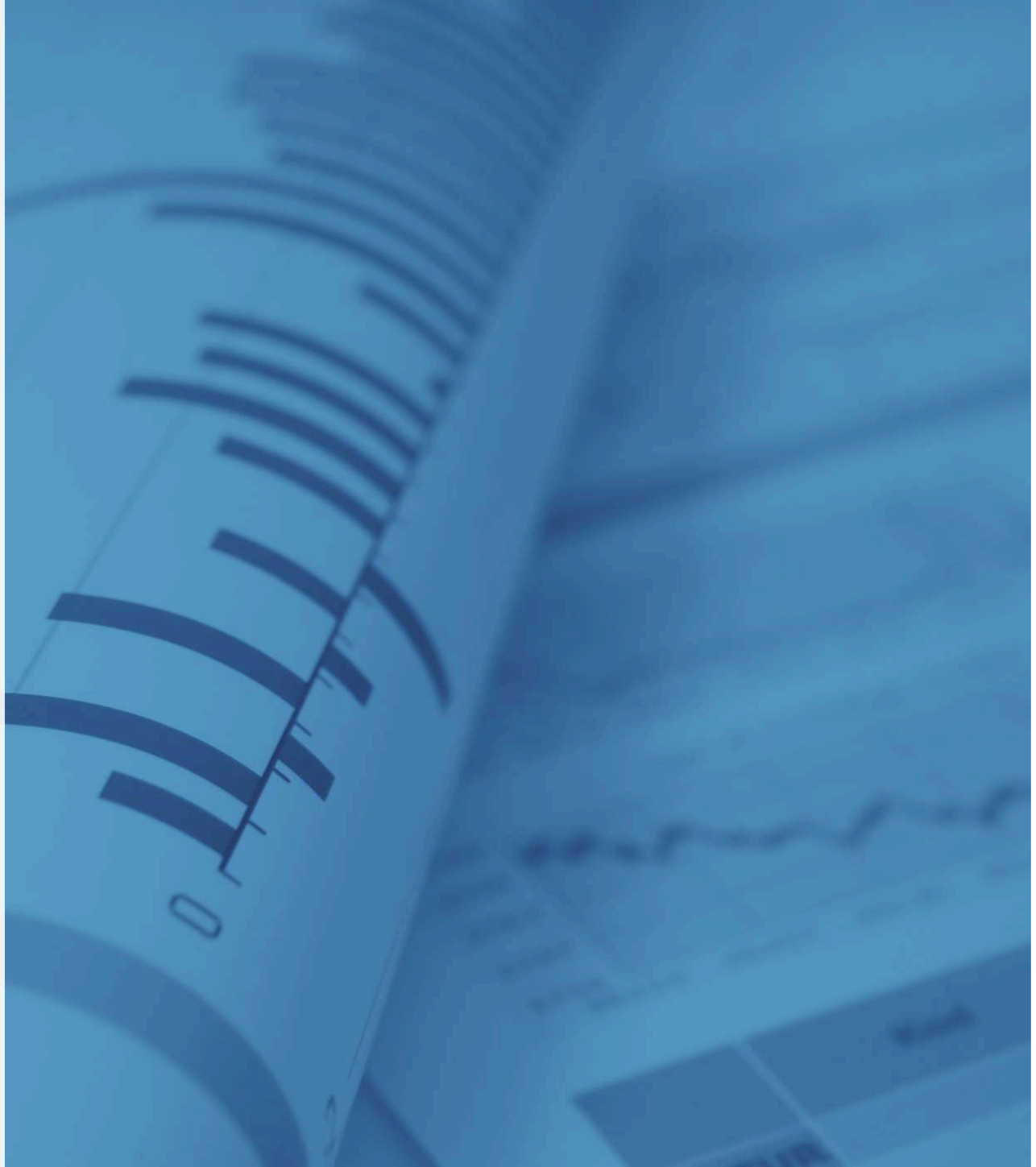

BUSINESS RECORDS

Both internal and external reports must be accurate and complete to provide the recipient with the appropriate information. We concentrate on the representation of facts and use an objective reporting style.

Documents required for ongoing or anticipated internal enquiries or official investigations must be kept as long as need be before being destroyed, removed or altered.

Documents are kept in accordance towards agreed customer requests, legal requirements or ISO certification related requirements.

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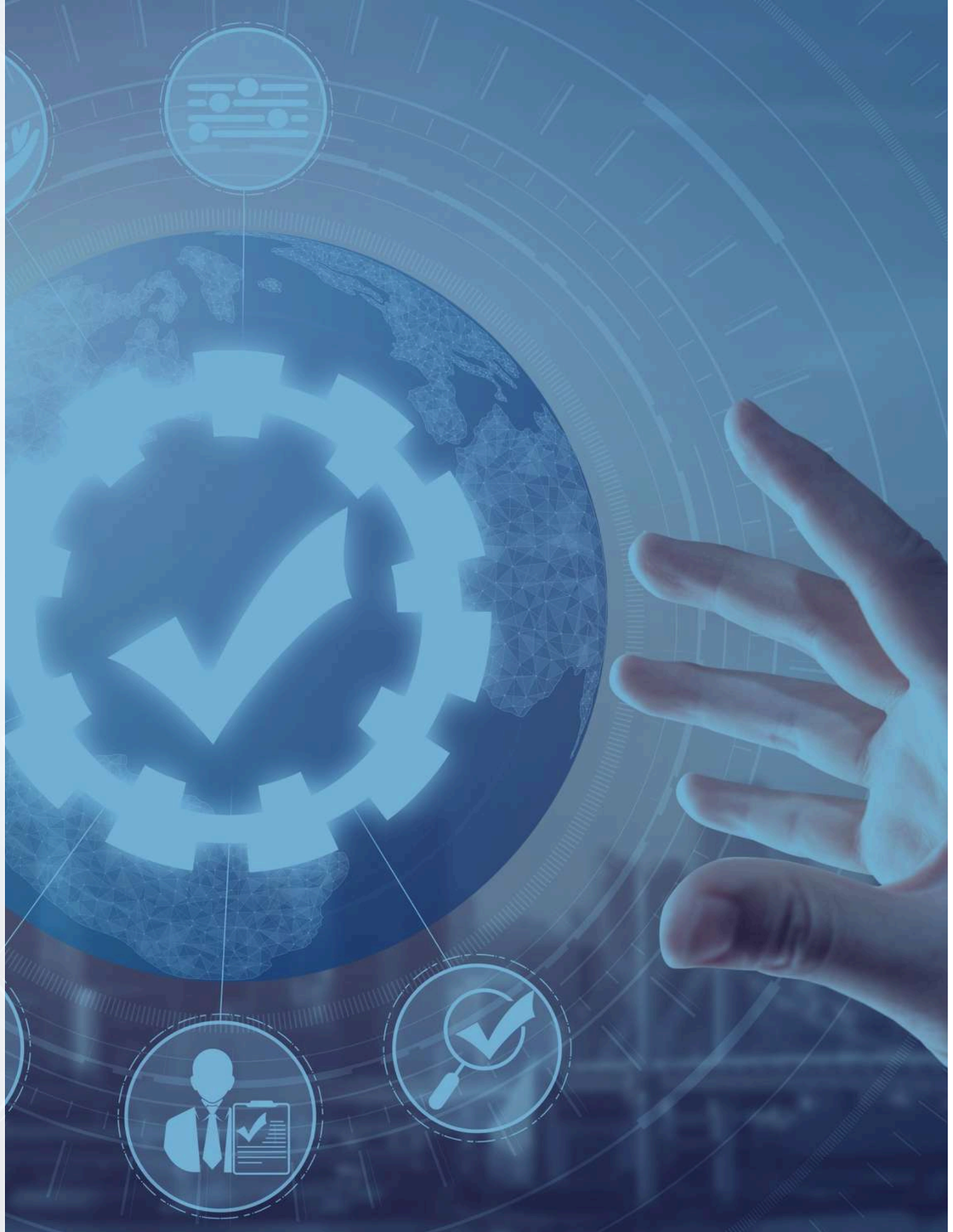

PRODUCT SAFETY, COUNTER FIT, WORK SAFETY AND PROTECTION OF THE ENVIRONMENT

We demand the highest standards of quality and safety for our products and services.

We monitor the quality of our products and help customers avoid potential hazards.

We inform our employees on the use of the product and it’s possible risks on failing.

We do not use counter fit components. When detected, the superior will be informed.

We make sure the working environment is safe. Safety regulations and laws must be strictly observed and checked with regard to their effectiveness. Any non-compliance is to be reported and rectified immediately.

We work economically with natural resources and we avoid anything which is harmful to the environment.

Compliance with all environmental protection law is a matter of course for our company

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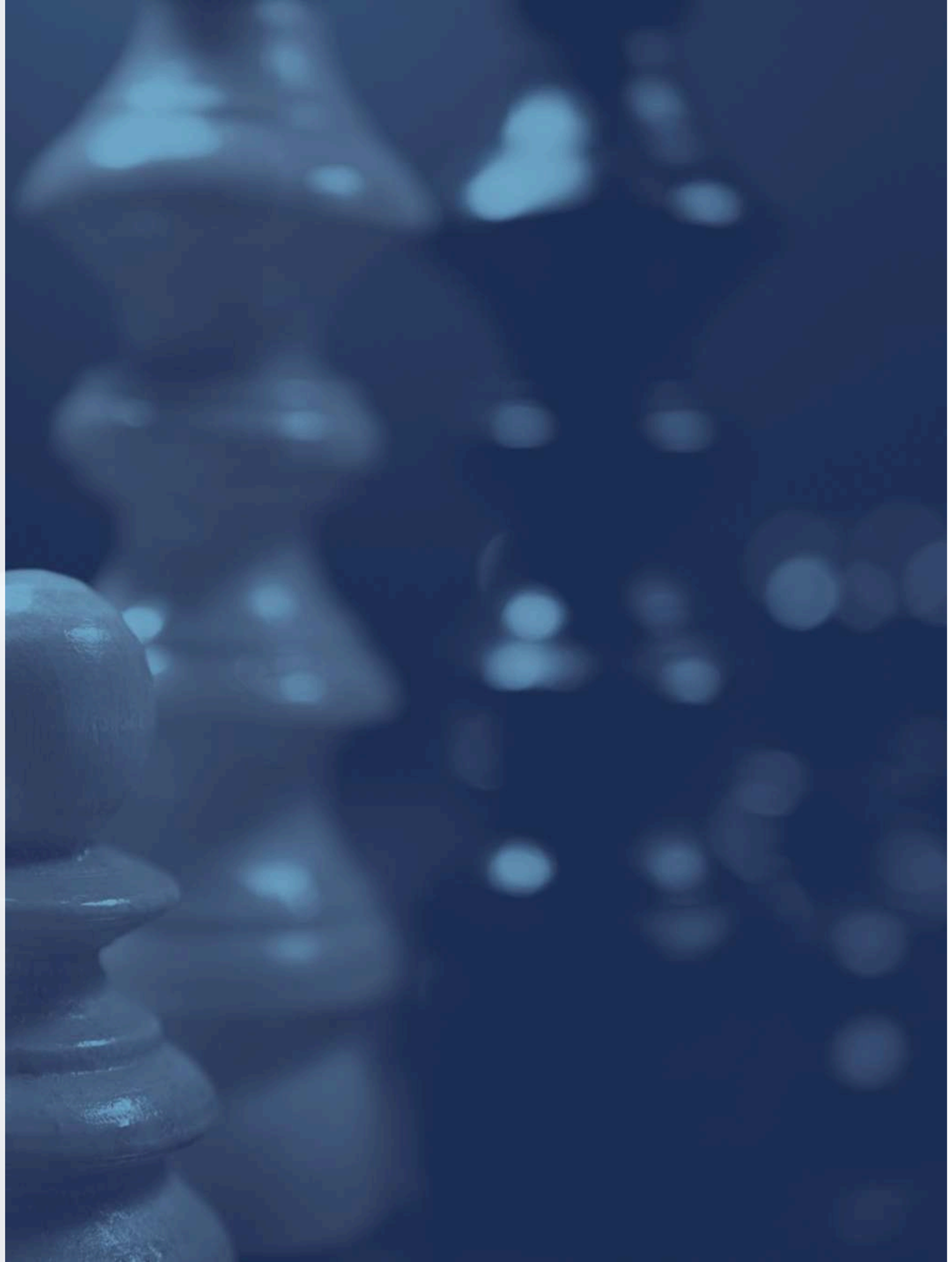

AVOIDANCE OF CONFLICTS OF INTEREST

We make a clear distinction between business and private interests. Any sideline activities require the prior consent of Connect Group management. A management approval must always be asked.

This applies in particular to sideline work for any rival companies, customers or suppliers of Connect Group or financial involvement in these.

Notification should be given if any close family members are involved in such activities or participants. An employee has to report any possible conflict of interest to his/her superior.

Working for Connect Group should also never be used to gain any private advantage, as a result from conflict of interest.

The placing of orders with business partners for private purposes is to be avoided. Trading partners are not be given preference for private reasons.

Objective review of all business partners has to be respected.

The Whistle Blow procedure can be used to notify Connect Group on incorrect situations.

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WE ARE PART OF A GLOBAL SOCIETY

Consequently, respect for other cultures and values is a matter of course for us.

We treat other people fairly, openly and with esteem. We reject all forms of discrimination.

We remain politically neutral in the company, meaning that Connect Group as a company doesn’t support political parties.

Respect for democracy and handling in accordance with international labor-, child and human rights are of high importance to us.

Connect Group checks and acts if in its value chains and operations any such abuses are found.

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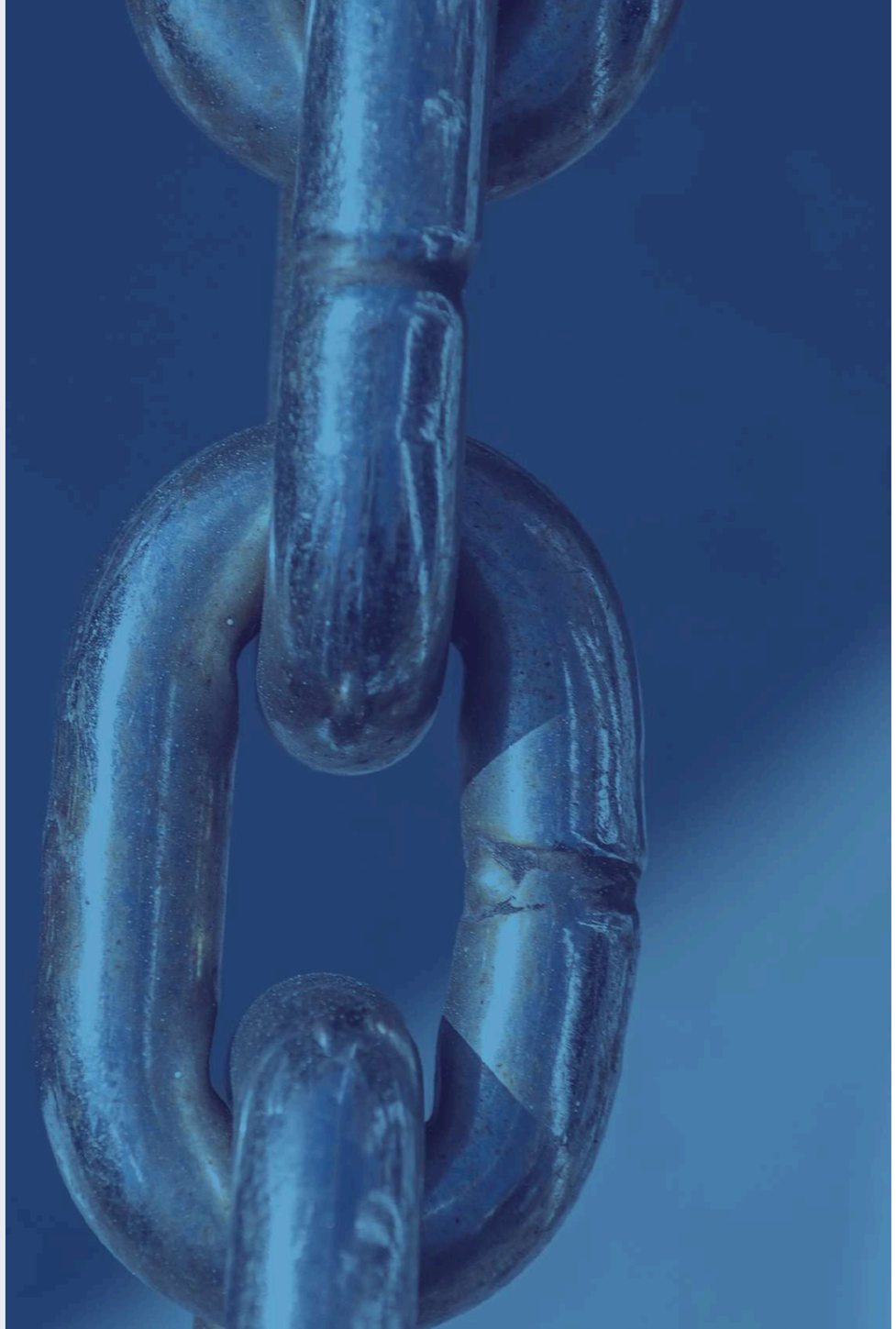

ADDENDUM

BINDING

This code of conduct is binding for all members of Connect Group. It can be substantiated and supplemented by regulations and training sessions on particular topics or for specific countries / plants.

Our senior management has particular responsibility. They are expected to set a good example with regard to Connect Group rules and values set out in this code of conduct.

They are the first point of contact for our employees on correct behavior. Within their area of responsibility, it is their task to ensure compliance with the code of conduct.

Specific questions concerning the code of conduct or correct behavior can be addressed to immediate superiors, the plant or division management.

No violation of the code of conduct will be tolerated. Any violation will be responded appropriate through proportionate measure or sanction and may lead to dismissal or prosecution according to local regulations.

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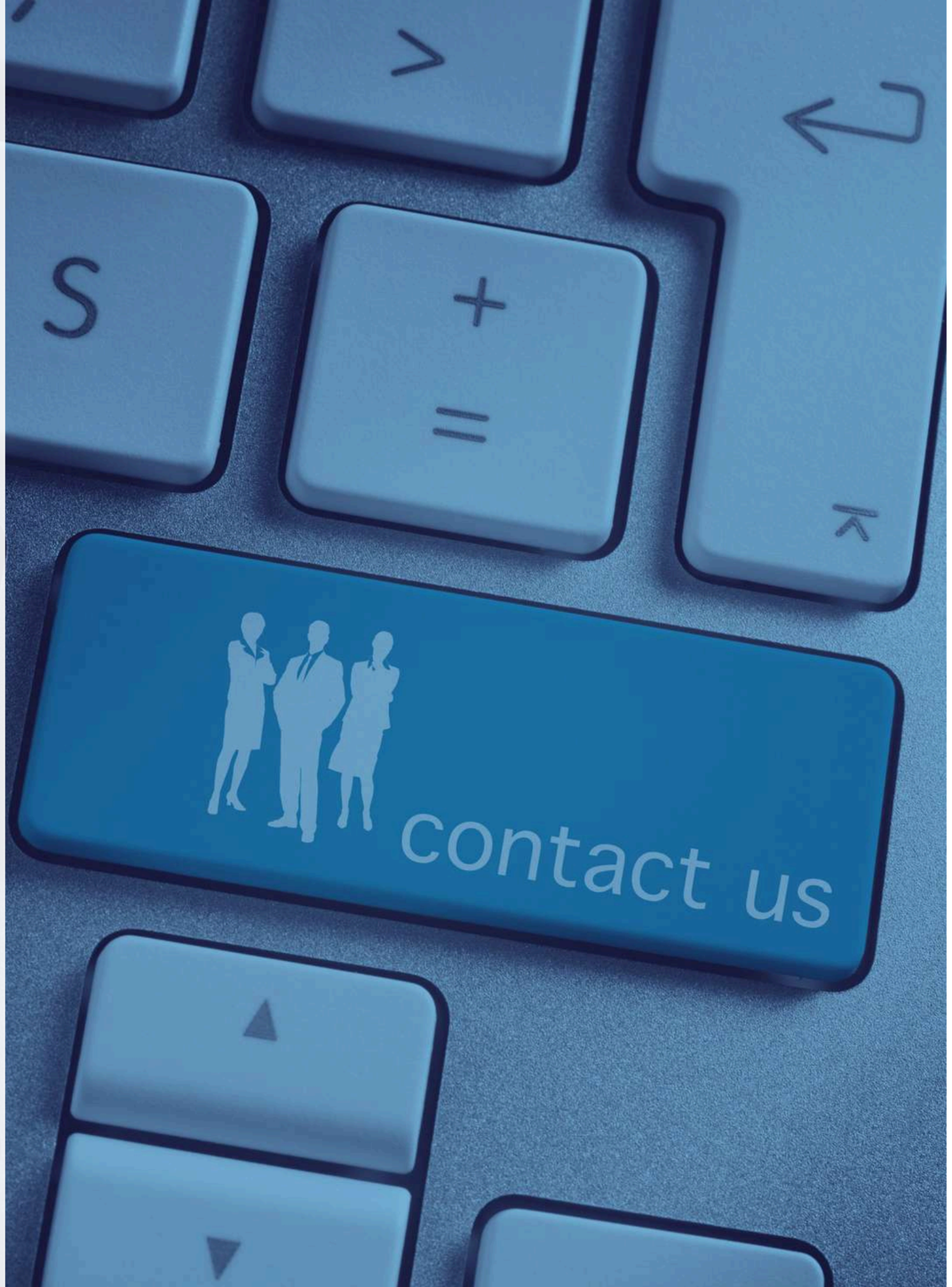

CONTACT

Regulatory compliance area (or compliance)

For any matters and questions on the topic of compliance, please contact:

- HR director
- Corporate QA/QM Manager
- Sustainability Manager
- Department Manager
- Direct Responsible
- Person Who Detects the Risk

In addition, the following e-mail address is also available to all employees for queries, questions or comments on any issue relating to regulatory compliance: **compliance@connectgroup.com**

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END OF CODE OF CONDUCT

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