

## Behavioral Guidelines

# Code of Conduct

## Business Partners

### 1. Introduction

b2 electronics (b2) and its employees recognize their social responsibility and are closely guided by the values of integrity, honesty, respect, trust, responsibility and fairness. The Code of Conduct is a binding guideline, which intends to emphasize the importance of a fair, responsible, and ethical mode of operation in the interest of b2 and its employees. Similar behavior is also expected from b2's Business Partners.

The outlined ethical guidelines are strongly related to principles of the UN Global Compact (see attached appendix). All these components together enable us to offer our business partners the best quality products.

### 2. Professionalism and Fairness in Business Conduct

#### 2.1. Rights and the Law

b2 commits to observing the laws and other governing regulations of the perspective countries in which it operates. If you are not familiar with laws and customs in a foreign jurisdiction, obtain consultation prior to negotiating or conducting any foreign transaction. All business partners are to be treated with fairness.

#### 2.2. Unaffected decisions

Playing favorites or having conflicts of interest – in practice or in appearance – runs counter to the fair treatment to which we were all entitled. Avoid any relationship, influence or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. Business relations have a voluntary base.

##### 2.2.1. Anti-Corruption and Bribery

In interactions with business partners (e.g. customers, suppliers) and governmental institutions, corporate and any personal interests of employees will be strictly separated. Actions and decisions (e.g. purchase decisions) will be made free of external or personal considerations.

Employees and other representatives of b2, as well as b2's Business Partners are not permitted to offer, promise, demand, permit or accept gifts, payments, invitations or other services, which have the intention of influencing the business relationship in an illegitimate manner or which run the risk of endangering the professional independence of one of the business partners. This does not include gifts or invitations offered as part of the usual hospitality, customs or courtesy of business interaction.

### 2.2.2. Awareness of Conflicts of Interest

Other interests, like financial or personal ones, should not conflict with work performance.

### 2.2.3. Conduct with Competitors – Competition Law

b2 acts in accordance with both national and international competition law standards. The sphere of intellectual property rights of others is not encroached upon. There are neither market agreements on quantity and price, nor collusion on the division of the market.

Fair competition is respected and as such encouraged compliance with the applicable laws that protect and advocate competition.

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## 2.3. Conflict Minerals

b2 supports the 2010 Dodd-Frank Act and the related U.S. Securities and Exchange Commission rule that promote transparency and consumer awareness regarding the use of defined conflict minerals and seek to cut direct and indirect funding of armed groups engaged in conflict and human rights abuses in conflict regions.

## 2.4. Raw Material Supply Chain

Special care is taken in the selection of elements in the supply chain in order to protect people and the environment in the best possible way.

## 2.5. Export and Import

b2 complies with export and import regulations.

## 2.6. Anti-Money Laundering and Terrorist Financing

Money laundering and terrorist financing are not promoted in any way.

# 3. Human Rights and Mode of Operation

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## 3.1. Human Rights

b2 adheres to and supports all internationally recognized human rights. Mention should be made of the rights of vulnerable groups such as children.

## 3.2. Anti-Discrimination

b2 opposes all forms of discrimination. In particular, this is applicable to discrimination against employees or prospective employees on the basis of gender, race, color, disability, ethnic or cultural background, religious conviction, age, sexual orientation or identity. Mental harshness, sexual harassment and inappropriate gestures towards employees are not to be tolerated.

## 3.3. Forced Labor

Human trafficking is neither accepted nor encouraged in any form. Forced or compulsory labor, servitude or other forms of slavery, including modern slavery, are unacceptable.

### 3.4. Child Labor

b2 observes the United Nations regulations of children's rights (see the attached appendix). Any form of child labor is rejected.

The ILO Convention No. 138 which thematizes the Minimum Age and Convention No. 182 on the Worst Forms of Child Labor are expressly observed.

To make an active contribution, b2 supports the association "Crossing Borders" to improve educational opportunities of children in disadvantaged regions.

### 3.5. Fair Working Conditions

All provisions on fair working conditions are complied with. This includes both working time regulations and adequate remuneration for the work, among them, of course, is at least the payment of the minimum wage. Forward-looking decisions and investments should provide employees with greater job security. To further support the employees and give them the freedom to work, they are supported in childcare.

Furthermore, inclusion and respect in the workplace are a significant part of the work environment.

### 3.6. Health and Safety

All national and international requirements on occupational safety, health and safe working conditions for employees are followed. To implement this, there is an adequate, organized occupational safety and health system.

## 4. Data and Information Security

### 4.1. Data Protection

As an international company, it is important for b2 to respect everyone's privacy and therefore to comply with applicable data protection regulations.

### 4.2. Trade secrets

b2 endorses the importance of transparency towards customers and partners, while emphasizing non-disclosure and confidentiality where necessary. All information related to b2's business should be considered proprietary and confidential unless it has been released in documents available to the general public.

## 5. Environmental Responsibility

b2 is committed to protecting the environment for current and future generations. b2 employees should adhere to laws governing environmental protection. Their awareness is supported by b2. In addition, sustainable mobility is promoted, various events are organized according to "Green Standards" and company premises are kept as sustainable as possible.

## 6. Suppliers and Partners

The standards and values described in this Code of Conduct shall be equally supported by b2's Suppliers and Partners by implementing the covered points to the best of their ability.

A misconduct of Suppliers and Partners of these standards may entitle b2 to termination the business relationship with immediate effect.

## 7. Contact

Breach of any points in the Code of Conduct are to be reported to the respective Regional Manager directly. If in doubt, you can send your concern also directly to the Integrity and Compliance team in Klaus / Austria ([ethics@b2hv.com](mailto:ethics@b2hv.com)).

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b2 electronics GmbH



Signature only valid  
for Code of Conduct

Bernhard Baumgartner  
Managing Director



Signature only valid  
for Code of Conduct

Stefan Baldauf  
Managing Director

### Annex

#### United Nations Global Compact

The Global Compact demands of the companies, within their areas of influence, to support and practically implement a catalog of basic values in recognition of human rights, labor norms, environmental protection and anti-corruption efforts:

##### Human Rights

**#1:** Organizations shall support and respect the protection of the international human rights within their area of influence and

**#2:** ensure that they are not complicit in any human rights violations.

##### Labor Norms

**#3:** Organizations shall preserve freedom of association and the effective recognition of the right for collective negotiations, as well as advocating

**#4:** the removal of all forms of forced labor

**#5:** the abolition of child labor and

**#6:** the removal of discrimination during recruitment and employment.

##### Environmental Protection

**#7:** Organizations shall support a preventative approach in the handling of environmental concerns

**#8:** start initiatives to create a greater sense of responsibility for the environment, and

**#9:** support the development and distribution of environmentally friendly technologies.

##### Fighting Corruption

**#10:** Organizations shall counter all forms of corruption, including black-mail and bribery.