

# SUPPLIER CODE OF CONDUCT



ODU has been a leading international supplier of connector systems for the transmission of power, signals, data, and media for more than 80 years, serving customers in the medical technology, test and measurement, mass interconnect, military, security and communication technology, industrial electronics, and automotive sectors.

With creativity, inventiveness, and innovative strength, we actively shape our company's future and create value for our customers. In this context, we attach great importance to the selection of our own suppliers.

Reliability, credibility, responsibility, fairness and, in particular, legal compliance are essential building blocks of our commercial success.

To achieve this goal, sound morals and ethics must be consistently demonstrated throughout the supply chain. Consequently, we hold each of our suppliers accountable for bringing our principles to life – and for living up to their responsibilities with regard to the statutory requirements and the goals and principles mentioned in this document.

The principles set out in this Code of Conduct should be interpreted as a guide to our understanding of "integrity". We expect our suppliers to instruct and commit their subcontractors accordingly.

Mühldorf, March 2025

## Editorial note:

For editorial reasons, the term "employees" is used throughout this document. It describes and addresses people of all genders in equal measure.

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# SUPPLIER CODE OF CONDUCT



## 1 CORPORATE ETHICS AND COMPLIANCE

### 1.1 INTEGRITY IN OUR DEALINGS WITH PARTNERS, COMPLIANCE

Our suppliers must demonstrate both an ethical appearance and ethical conduct at all times. They must always ensure compliance with all applicable national, European and international laws and regulations.

Bribery, corruption, extortion, embezzlement and other unfair business practices are not acceptable under any circumstances. This same applies explicitly to any attempt to commit any of the aforementioned acts.

### 1.2 INDUSTRIAL PROPERTY RIGHTS

The protection of industrial property rights, whether our own or those of third parties, is paramount for ODU. As our supplier, you are therefore obligated to safeguard and protect our industrial property rights.

When disclosing information, care must be taken to ensure its accuracy and safety. As a matter of principle, information may only be disclosed if its classification permits such disclosure, whereby the recipient must also be obligated to implement appropriate security measures, or if the disclosure is in compliance with a statutory, judicial or other kind of official order.

### 1.3 RESPONSIBLE FINANCIAL ACTIVITIES, MONEY LAUNDERING AND TRANSPARENCY

As a matter of principle, our suppliers' accounting practices must comply with the Generally Accepted Accounting Principles (GAAP).

We expect our suppliers to take suitable and appropriate measures to counteract the infiltration of illegally acquired funds into the economic cycle.

Information and records pertaining to financial activities must be archived and stored in a secure, structured and traceable manner. All information communicated to business partners and authorities must be prepared and transmitted in accordance with the principles of transparency and integrity.

### 1.4 DATA PROTECTION

The principles of data protection must be observed in accordance with the respective national requirements. Personal data may only be used for authorized procedures and only within the scope of the purpose for which the data was collected.

### 1.5 FAIR COMPETITION AND ANTITRUST LEGISLATION

We expect our suppliers to comply with the current, applicable antitrust and competition laws. They may not enter into agreements with competitors, suppliers, customers or other third parties in violation of antitrust laws (e.g., agreements to fix prices or divide up markets), nor may they take undue advantage of any dominant market position they may enjoy. Furthermore, they shall desist from any actions that could create even the appearance of coordinated behavior.

### 1.6 QUALITY AND PRODUCT SAFETY

The success of our industry depends on the consistently high quality of our products. Therefore, our suppliers must organize all their business locations in a manner that places ISO 9001-compliant manufacturing quality at the center of all operations. In addition, the requirements set out in IATF 16949 shall apply insofar as the supplier's products are intended for use in the automotive industry. Equally, all components intended for use in medical products must comply with the requirements set out in ISO 13485.

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## **1.7 REPORTING SUSPICIOUS ACTIVITY; ANONYMITY AND PROTECTION AGAINST DISCRIMINATION**

In accordance with the applicable statutory requirements, our suppliers must establish a dedicated reporting office via which employees and third parties can report any ethical concerns, suspected criminal offenses or unauthorized practices – at any time and, if necessary, anonymously.

## **2 PERSONNEL**

### **2.1 SOCIAL RESPONSIBILITY**

Satisfied and motivated employees are among our suppliers' most important assets. Accordingly, each supplier must take responsibility for ensuring ethical and responsible treatment of each and every one of their employees. This applies to full-time employees as well as part-time or temporary staff, agency workers, trainees, students, freelancers, and all other employees, regardless of the form of employment.

### **2.2 HUMAN RIGHTS AND WORKING CONDITIONS**

Our suppliers must respect and promote internationally recognized human rights and fundamental social rights. They must also comply with all applicable laws at all locations.

ODU expects its suppliers to uphold internationally recognized human rights, such as the United Nations Declaration of Human Rights.

### **2.3 EQUAL OPPORTUNITIES, PREVENTION OF DISCRIMINATION AND HARASSMENT**

Our suppliers must ensure equal opportunities in the area of recruitment and avoid any discriminatory practices, unless the applicable national laws expressly permit employee selection on the basis of specific criteria. There must be no differential treatment of employees on the basis of sex, race, skin color, disability, origin, religion, age or gender orientation (ILO Conventions No. 100 and 111).

### **2.4 INDIVIDUAL AND COLLECTIVE LABOR LAW, WORKING HOURS**

Our suppliers must comply with the respective national laws and standards regarding working hours, wages, and social benefits, as well as the relevant ILO conventions. They must also comply with the relevant national laws governing freedom of association and collective bargaining.

As a matter of principle, working hours and overtime must be limited to the legally permissible scope.

### **2.5 CHILD LABOR AND YOUNG WORKERS**

Minors enjoy special protection under the law and may only be employed within the applicable legal framework. Employees who are minors may not be assigned hazardous work, night work, overtime, or other types of physically or mentally arduous work.

The minimum age of employees is determined by the respective national laws or collective agreement regulations, insofar as they do not contradict the minimum employment age stipulated in ILO Convention No. 138.



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## **2.6 WAGES AND BENEFIT PAYMENTS, LEAVE**

The remuneration/compensation and other benefits (social benefits, vacation, etc.) granted to the supplier's employees must be based on the principle of fairness and must at least correspond to the respective national laws or the typical levels within the respective economic sectors/industries in the country concerned.

Our suppliers must apply and comply with the respective national regulations and agreements regarding working hours and statutory paid leave.

## **2.7 FORCED LABOR**

ODU expects its suppliers to prohibit all forms of forced labor (ILO Conventions No. 29 and No. 105), servitude or involuntary labor, as well as child labor (ILO Conventions No. 138 and No. 182).

## **2.8 OCCUPATIONAL HEALTH AND SAFETY**

ODU expects its suppliers to ensure that appropriate occupational health and safety measures are implemented in the workplace within the framework of the respective national laws, and also to implement a continuous improvement process with regard to the working environment.

## **2.9 FREEDOM OF ASSOCIATION**

We expect our suppliers to recognize the right of workers to voluntarily establish or join trade unions of their choice (ILO Convention No. 87 and No. 98). Our suppliers must accept and positively welcome the establishment of company or trade union groups representing employees' interests, provided that such organizations are not in violation of the applicable national laws.

## **3 ENVIRONMENT AND ENERGY**

### **3.1 SUSTAINABILITY AND ENVIRONMENTAL PROTECTION**

Our suppliers must also develop and manufacture their products with environmental and climate protection in mind; in particular, this includes ensuring a long service life, a recycling-friendly design, as well as the conservation of resources and low energy consumption – both during the product's use phase and with regard to recycling.

### **3.2 ENERGY CONSUMPTION, GREENHOUSE GAS EMISSIONS, AIR QUALITY**

ODU expects its suppliers to lower their energy and water consumption, reduce greenhouse gas emissions, increase their use of renewable energy, and promote appropriate waste-management practices. At the same time, they should aim to create transparency about their CO<sub>2</sub> emissions and set ambitious CO<sub>2</sub>-reduction targets.

Our suppliers must promptly and comprehensively respond to specific inquiries regarding the CO<sub>2</sub> footprint (Scope 1–3) of the products, processes and services procured by ODU. Furthermore, the collection, calculation, evaluation, and communication of the relevant CO<sub>2</sub> data should be based on the applicable norms and standards set out in the Greenhouse Gas Protocol (GHG Protocol).

### **3.3 WATER CONSUMPTION AND QUALITY**

Our suppliers must constantly strive to reduce their water consumption and eliminate water pollution. In particular, in regions suffering from water scarcity, water withdrawals must be minimized and access to drinking water and sanitary installations ensured. Wastewater quality standards must be defined and monitored within the framework of the applicable legal and regulatory requirements.

## 3.4 MANAGEMENT OF NATURAL RESOURCES, WASTE-PREVENTION MEASURES

Our suppliers must strive to steadily reduce the amount of residual waste they generate. Unavoidable residual waste must be recycled or disposed of in a professional and environmentally friendly manner.

## 3.5 PERMITS, LICENSES AND INSPECTIONS

Our suppliers must ensure that all necessary environmental permits and licenses are obtained – and all mandatory inspections performed – in a timely manner.

## 3.6 PRODUCT COMPONENTS, CONFLICT MINERALS

The substances contained in the respective products must be transparently documented by our suppliers. If the products are used in the automotive industry, the substances they contain must also be recorded and continuously updated in the International Material Data System (IMDS) and, if applicable, in the China Automotive Material Data System (CAMDS). In principle, all components included in the bill of materials (BOM) must be documented. The supplier must not only comply with the regulations on prohibited and declarable substances, e.g. ELV, RoHS and REACH, but also provide evidence of such compliance.

Our suppliers are obliged to regularly monitor their supply chains with regard to conflict minerals ("3TG" = tin, tungsten, tantalum, gold) in accordance with Article 1502 of the Dodd-Frank Act, and on request must provide up-to-date information using the CMRT (Conflict Minerals Reporting Template).

## 3.7 RESPONSIBLE HANDLING OF CHEMICALS

Our suppliers must ensure that hazardous substances and other chemicals are stored, used and transported properly and safely. Products containing hazardous substances must include all the necessary documentation.

## 3.8 INTERNATIONAL ENVIRONMENTAL PROTECTION

Our suppliers must ensure that the following international conventions are observed:

- Prohibition of the manufacture of products with added mercury in accordance with Article 4 (1) and Annex A Part I of the **Minamata Convention** on Mercury of October 10, 2013 and related agreements
- Prohibition of the production and use of chemicals pursuant to Article 3 (1) (a) (i) and Annex A of the **Stockholm Convention** of May 22, 2001
- Import prohibition for chemicals pursuant to Annex III of the **Convention of September 10, September 1998** (PIC procedure)
- Prohibition of the production and consumption of certain ozone-depleting substances (i.e., CFCs, halons, CTCs, TCAs, BCMs, MBs, HCFCs and HBFCs) under the **Vienna Convention** for the Protection of the Ozone Layer and the related **Montreal Protocol** on Substances that Deplete the Ozone Layer
- Export prohibition for hazardous waste within the meaning of the **Basel Convention** on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989
- Prohibition on the import or export of specimens listed in an Appendix to the **Convention on International Trade in Endangered Species of Wild Flora and Fauna** (CITES) of March 3, 1973 without authorization in accordance with Articles III, IV and V
- Commitment to implement the necessary measures in relation to the use of biological resources to avoid or minimize adverse impacts on biological diversity in accordance with Article 10 (b) of the 1992 **Convention on Biological Diversity**.

Furthermore, the supplier's commitments encompass all laws, ordinances and other regulations in respect of the aforementioned agreements.



## 4 SUPPLY CHAIN

### 4.1 RESPONSIBLE PROCUREMENT

Integrity must be proactively demonstrated throughout the supply chain. Accordingly, our suppliers must carefully select their own subcontractors and subject them to stringent requirements with regard to proper business practices. In doing so, they must also take into account the circumstances under which the respective raw materials are obtained.

We expect our suppliers to provide us with ethically sound products. Specifically, this means that they will not knowingly source or use raw materials that have been extracted under circumstances that violate human rights, involve corruption, or are otherwise ethically questionable.

In particular, the Supplier shall comply with the provisions of the German Supply Chain Sourcing Obligations Act ("Lieferkettensorgfaltspflichtengesetz" – LkSG), as amended from time to time, to the required extent. We expect our suppliers to comply with all applicable statutory regulations on conflict minerals. In the event that a product contains one or more conflict minerals (tin, tantalum, tungsten, gold or the corresponding ores) or extended conflict minerals (e.g. Cobalt, Mica...), upon request we expect our suppliers to ensure transparency throughout their supply chain, including the smelter or refinery (source: <https://www.responsiblemineralsinitiative.org/>).

### 4.2 EXPORT CONTROLS, ECONOMIC SANCTIONS, ARMAMENTS AND DUAL USE

Compliance with all applicable laws governing the import and export of goods, services and information, including sanctions, embargoes, regulations, government orders and guidelines is mandatory for our suppliers.

## 5 INSPECTIONS AND PENALTIES

We reserve the right to verify compliance with the respective requirements by appropriate means and by engaging our own personnel and qualified third parties.

Violations of the aforementioned principles and rules shall be subject to our "zero-tolerance rule". In particular, in the event of violations we shall be entitled to immediately terminate all contractual relationships with the supplier concerned and assert claims for damages.

## 6 SCOPE

This Code of Conduct applies to all companies of the ODU Group.