



MTM POWER®

Code of Conduct

***based on the ZVEI-VDMA "Code of Conduct" as of 01/2022 adapted to MTM
Power Messtechnik Mellenbach GmbH, Schwarzatal***



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Preamble

As a medium-sized company in the electrical industry, we are also required to fulfill our responsibility with regard to climate protection, the conservation of resources, the provision of secure jobs and other sustainable social and economic developments. Our actions are in line with the applicable legal framework and a responsible ethical understanding, which are formulated in our Code of Conduct.

Basic understanding

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in accordance with the following guidelines.

We, MTM Power Messtechnik Mellenbach GmbH, Schwarzatal, assume responsibility within the scope of our respective possibilities and scope of action by taking into account the consequences of our business decisions and actions in legal, economic, technological as well as social and ecological terms. In this way, we contribute to the social and economic development of the countries and regions in which we operate.

Our actions are in accordance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organization (ILO) as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively require our employees worldwide to observe. The content applies to all branches and business units of our company.

We expect the same basic understanding from our business partners. Rights in favor of third parties should not be established.

Compliance with the law

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law takes precedence. However, we endeavor to comply with the contents of this Code of Conduct.



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Integrity and compliance

We have taken appropriate compliance measures to ensure that the following topics are adequately covered. Compliance stands for the observance of legal requirements, regulatory standards, voluntary commitments and internal guidelines:

Corruption

We do not tolerate corruption, bribery or extortion; they prevent fair competitive conditions. In our business relationships, we neither promise, offer, grant, demand or accept inducements that are connected with the intention of influencing business decisions or could give the impression of doing so, nor do we allow ourselves to be promised such inducements. A particularly strict standard must be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or supply agreements.

Money laundering prevention

Money laundering refers to the process of smuggling illegally obtained money or assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information, business secrets and non-public information are protected. We observe the applicable laws on the protection of business secrets and treat confidential information of our business partners accordingly. In this context, we are aiming for ISO27001 certification in the financial year 2025.

Data protection

We process, store and protect personal data in compliance with legal regulations. For example, personal data is collected confidentially, only for lawful, previously defined purposes and in a transparent manner. We only process personal data if it is protected against loss, alteration and unauthorized use or disclosure using appropriate technical and organizational measures.



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Export control

We undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and assistance bans - when transferring and exporting our goods.

Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose these conflicts.

Health and safety

We protect the health of our employees by taking appropriate health and safety measures (e.g. implementing a company health and safety management system) that adequately cover the following topics:

- Compliance with applicable laws and orientation towards international standards in health and safety at work;
- suitable workplace design, safety regulations and the provision of suitable personal protective equipment;
- Implementation of preventive controls, emergency measures, an accident reporting system and other suitable measures for continuous improvement;
- Enabling access to drinking water in sufficient quantities as well as access to clean sanitary facilities for employees.

We ensure that all our employees are instructed accordingly.

Remuneration and working hours

Remuneration is based on the applicable laws and any existing binding collective agreements and is supplemented by the relevant national minimum wage laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration.

We comply with the applicable laws and (international) labor standards regarding the maximum permitted working hours and ensure that

- the working hours, including overtime, the respective legally permissible does not exceed the maximum limits;
- the weekly working hours, including overtime, even in exceptional cases, no longer than 60 hours in the absence of such provisions;
- employees have at least one full day off per calendar week.



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Respect for human rights

We respect and support the observance of internationally recognized human rights and

- respect personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of expression and freedom of Expression of opinion;
- do not tolerate any unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination.

Ban on child labor

We do not tolerate child labor. We do not hire any employees who are not at least 15 years old and ask for proof of age. In countries that fall under the exception for developing countries in accordance with ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not hire employees for hazardous work who are not at least 18 years of age in accordance with ILO Convention No. 182.

Ban on forced labor

Forced labor, modern slave labor or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary and it must be possible to terminate the employment relationship.

Freedom of association and collective bargaining

We respect the right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

Promotion of variety and diversity, equal opportunities

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.



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Environment, energy and climate protection

We act in accordance with the applicable laws and are guided by international standards in order to minimize negative effects on the environment and continuously improve our activities for environmental and climate protection.

All employees are sensitized to environmental protection and the necessary training measures and courses are offered.

We have taken appropriate environmental protection measures (e.g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

- Objectives, definition and implementation of measures as well as their continuous improvement;
- Environmental aspects such as reducing CO2 emissions, increasing energy efficiency and using renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly and handling hazardous substances responsibly for people and the environment.

Dealing with conflict minerals

We take the necessary care to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and the financing of armed groups or similar.

Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains.

We reserve the right to review the application of this Code of Conduct at our suppliers systematically and on an ad hoc basis. This may take the form of questionnaires, assessments or audits, for example.

If there are still doubts regarding compliance with this Code of Conduct, the supplier is requested to take appropriate countermeasures and to report the matter to his responsible contact in our company. If necessary, the cooperation will be terminated.



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Consumer interests

Where consumer interests are affected, we comply with consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. young people or pregnant women) enjoy increased attention.

Implementation and enforcement

We make suitable and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labor law.

Communication

We communicate openly and in a dialog-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interest and stakeholder groups.

Indications of violations

We offer our employees and business partners access to a protected mechanism to report possible violations of the principles of this Code of Conduct confidentially.

If you have a tip-off, please contact our whistleblower reporting channel directly or anonymously

[Reporting platform - MTM Power GmbH \(sicher-melden.de\)](https://www.mtm-power.com/sicher-melden.de)

which you can find on our homepage www.mtm-power.com ("Homepage" below).

Schwarzatal, 01.07.2024

Anselm Hugle

MTM Power Management Board

Florian Greiner-Matzen son

The above Code of Conduct is based on the joint template "ZVEI-VDMA Code of Conduct" of the VDMA e.V. industry associations, Frankfurt and ZVEI e.V. (The Electrical Industry), Frankfurt as of 1/2022