



## **Code of Conduct**

### **of EBE Elektro-Bau-Elemente GmbH**

#### **Preamble**

EBE Elektro-Bau-Elemente GmbH perceives itself as part of an internationally entwined economy and, as a company at its local sites, is part of the countries and their societies in which EBE Elektro-Bau-Elemente GmbH is active. EBE Elektro-Bau-Elemente GmbH is guided by the basic understanding of the "honourable merchant" and is committed to its responsibility as a business company.

- EBE Elektro-Bau-Elemente GmbH monitors the direct and indirect impact which its business activities have on the environment and society and strives to achieve an adequate balance between economic, ecological and social concerns and interests.
- EBE Elektro-Bau-Elemente GmbH acts in accordance with generally recognised values and principles, in compliance with the law and, in particular, observes internationally recognised human rights and labour standards as set out below.
- EBE Elektro-Bau-Elemente GmbH stands for the goals and values of the Code of Conduct and will make every suitable and reasonable effort within the realms of its specific legal and actual possibilities to live up to its voluntary commitment on an ongoing basis at all its company locations.

If existing national regulations run counter to the values of the Code of Conduct or if the national context makes it impossible to fully comply with them, EBE Elektro-Bau-Elemente GmbH will search for ways to still adhere to the requirements of the Code of Conduct as far as possible.

#### **1. Ethical / moral obligation and integrity**

EBE Elektro-Bau-Elemente GmbH pursues exclusively lawful business objectives and practices and maintains business relationships only with reputable partners.

EBE Elektro-Bau-Elemente GmbH behaves fairly and respectfully towards its business partners and customers. EBE Elektro-Bau-Elemente GmbH respects different legal, economic, social and cultural backgrounds and the special circumstances of the countries and regions in which EBE Elektro-Bau-Elemente GmbH does business. EBE Elektro-Bau-Elemente GmbH complies with the law and statutes of the countries and regions in which its business activities are carried out.

EBE Elektro-Bau-Elemente GmbH always gears its business activities to generally recognised ethical values and principles, including integrity and respect for human dignity. EBE Elektro-Bau-Elemente GmbH relies on free and fair world trade.

#### **2. Anti-corruption, trade control, money laundering**

EBE Elektro-Bau-Elemente GmbH strictly rejects any form of bribery and corruption. To this end, we strive to avoid even the slightest appearance of such practices – whether in the form of granting or accepting unfair advantages. Monetary gifts are basically not allowed. Gifts must be appropriate to the occasion and

the value of gifts may not exceed 25 EUR, the value of invitations may not exceed 50 EUR. EBE Elektro-Bau-Elemente GmbH acts in conformity with the applicable regulations for import and export control and complies with the legal requirements for the prevention of money laundering.

### **3. Fair competition**

EBE Elektro-Bau-Elemente GmbH is strongly committed to free and fair competition. EBE Elektro-Bau-Elemente GmbH does not tolerate any anti-competitive agreements and makes sure that the company acts in conformity with the applicable antitrust laws. EBE Elektro-Bau-Elemente GmbH strictly rejects competitive advantages gained through unfair business practices.

### **4. Avoidance of conflicts of interest**

EBE Elektro-Bau-Elemente GmbH avoids conflicts of interest that might illegitimately influence business relationships. If this is not possible, we are transparent about it.

### **5. Handling of personal data, protection of confidential information and intellectual property**

EBE Elektro-Bau-Elemente GmbH respects the privacy and the personality rights of its employees, business partners and customers and complies with the applicable legal and regulatory requirements for the processing of personal data and information security when handling personal information.

EBE Elektro-Bau-Elemente GmbH protects business secrets and other confidential information entrusted to it by its business partners and customers against unauthorised access, use and disclosure, by ensuring at least compliance with the relevant statutory provisions for the protection of business secrets.

EBE Elektro-Bau-Elemente GmbH respects the intellectual property of its business partners, customers and other third parties and ensures that sufficient precautions are taken to protect intellectual property rights when exchanging know-how and technologies.

### **6. Ecological responsibility and commitment**

The protection and the preservation of natural resources are issues that affect us all and make us all responsible. With this in mind, EBE Elektro-Bau-Elemente GmbH carries out its business activities in an ecologically responsible manner and is committed to the goal of a climate-neutral future.

### **7. Protection of the environment and climate**

EBE Elektro-Bau-Elemente GmbH lives up to its ecological responsibility by observing the applicable legal requirements and recognised standards for the protection of the environment and climate. EBE Elektro-Bau-Elemente GmbH is working to continuously reduce the negative impact of its business activities on the environment and climate.

EBE Elektro-Bau-Elemente GmbH acts in accordance with applicable law and implements appropriate practices that are based on statutory and internationally recognised standards and include the following measures, among others:

- Proper and responsible handling of hazardous substances, chemicals and waste, including their disposal;
- Measures to reduce or avoid waste;

- Minimising emissions from operational processes (e. g. waste water, exhaust air, noise, greenhouse gases);
- Conserving natural resources, by using for example measures to save water, chemicals and other raw materials and promoting the circular economy;
- Use of climate and environmentally friendly technologies, processes, raw materials and products;
- Measures to increase energy efficiency and the share of renewable energies in energy consumption at the company sites.

## **8. Human rights and labour standards**

Human dignity is inviolable. That is why EBE Elektro-Bau-Elemente GmbH respects the internationally recognised human rights set out in the United Nations Universal Declaration of Human Rights.

EBE Elektro-Bau-Elemente GmbH complies with the internationally recognised labour standards of the International Labour Organization (ILO) as set out below.

In all its business activities, EBE Elektro-Bau-Elemente GmbH strives neither to cause nor to contribute to human rights violations. EBE Elektro-Bau-Elemente GmbH expects the same from its business partners. Where necessary and possible, EBE Elektro-Bau-Elemente GmbH supports its suppliers in this effort.

## **9. Employment relationships**

EBE Elektro-Bau-Elemente GmbH treats its employees with respect. EBE Elektro-Bau-Elemente GmbH strictly rejects any form of unlawful punishment, abuse, harassment, intimidation or other dishonourable treatment of employees.

EBE Elektro-Bau-Elemente GmbH complies with the applicable employment and labour laws in all employment relationships and expects the same from its contractual partners. Upon commencement of the employment relationship, employees must be provided with comprehensible information on the essential working conditions, including their rights and obligations, working hours, remuneration and payment and payroll modalities.

EBE Elektro-Bau-Elemente GmbH respects and protects the right of employees to terminate their employment relationship in compliance with the applicable notice period.

## **10. No child labour / protection of young workers**

EBE Elektro-Bau-Elemente GmbH does not tolerate child labour and observes the applicable legal minimum age for taking up work. In any case, EBE Elektro-Bau-Elemente GmbH does not employ persons under the age at which compulsory schooling ends according to the law of the place of work or under the age of 15. Internships are organised in accordance with the statutory provisions.

EBE Elektro-Bau-Elemente GmbH expects its contractual partners to have appropriate means in place to verify the age of workers in order to prevent child labour. If child labour is detected, all necessary measures must be taken immediately to focus on the welfare, protection and development of the child.

In Germany, school attendance is compulsory until the age of 18. The rights of young workers under the age of 18 must be observed; they may only be employed if it is certain that the working and employment conditions neither pose a risk to their health, safety or morals nor are detrimental to their development.

#### **11. No forced labour**

EBE Elektro-Bau-Elemente GmbH strictly rejects any form of forced or compulsory labour. The same is true for any form of debt bondage, serfdom, slavery or slave-like practices, human trafficking, including all other forms of involuntary labour and services that are not compatible with internationally recognised labour and social standards.

#### **12. Principles of remuneration**

EBE Elektro-Bau-Elemente GmbH complies with the statutory or – where applicable – collectively agreed provisions when paying its employees for their work or services. EBE Elektro-Bau-Elemente GmbH makes sure that the rates paid to its employees do not fall below the applicable statutory minimum wage or, if applicable, the minimum wage stipulated by collective agreement or customary in the industry. In countries or regions without a statutory or collectively agreed wage scheme, EBE Elektro-Bau-Elemente GmbH ensures that the wages paid for regular full-time work are sufficient to cover the basic needs of the employees.

EBE Elektro-Bau-Elemente GmbH does not tolerate any deduction from wages that is not permitted by law, including deduction from wages as a disciplinary measure.

#### **13. Working hours**

EBE Elektro-Bau-Elemente GmbH complies with the statutory or – where applicable – collectively agreed provisions on working hours, including overtime, rest breaks and holidays. EBE Elektro-Bau-Elemente GmbH makes sure that

- the regular weekly working time plus the maximum admissible overtime is not exceeded,
- working time regulations are observed.

#### **14. Freedom of association**

EBE Elektro-Bau-Elemente GmbH respects the right of employees to freedom of association and freedom of assembly as well as the right to collective bargaining, if and to the extent that this is legally permissible and possible in the relevant country of employment. If this is not permissible, EBE Elektro-Bau-Elemente GmbH will seek adequate arrangements for its employees.

#### **15. Diversity and inclusion, prohibition of discrimination**

EBE Elektro-Bau-Elemente GmbH appreciates the diversity of its employees and promotes a working environment that enables inclusion. EBE Elektro-Bau-Elemente GmbH is therefore committed to equal opportunities and strictly rejects any form of discrimination and unequal treatment due to national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology. EBE Elektro-Bau-Elemente GmbH implements the principle of equal pay for male and female employees for work of equal value.

#### **16. Health and safety in the workplace**

EBE Elektro-Bau-Elemente GmbH complies with national and international occupational health and safety standards. EBE Elektro-Bau-Elemente GmbH ensures a safe and healthy working environment (prevention

of accidents, injuries and work-induced illnesses) in order to maintain the safety and health of its employees and third parties.

#### 17. Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company is establishing due diligence processes to promote responsible supply chains for minerals from conflict-affected and high-risk areas and expects the same from its suppliers.

#### 18. Supply chain, audit

EBE Elektro-Bau-Elemente GmbH wants the principles of this Code of Conduct to be observed in our supply chain as well. We therefore require our suppliers and business partners to implement this Code of Conduct or equivalent codes of conduct.

Wherever permitted by law and contract, we reserve the right to audit suppliers' compliance with the Code of Conduct.

#### 19. Complaints procedure, whistleblowing reporting channel

EBE Elektro-Bau-Elemente GmbH offers its employees and business partners access to a protected mechanism to confidentially report potential violations of the principles set out in this Code of Conduct. If you have any pertinent information, please contact the following

whistleblowing reporting channel

E-mail address: [Whistleblowing@ebe.de](mailto:Whistleblowing@ebe.de).

#### 20. Signatures

Leinfelden-Echterdingen, 3 December 2024

EBE Elektro-Bau-Elemente GmbH



Dr.-Ing. Gerd Fricke  
Management Board



Dr. Philipp Murmann  
Management Board



Armin Wellhöfer  
Management Board