



SUPPLIER CODE OF CONDUCT

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OUR SUPPLIERS PLAY AN IMPORTANT ROLE IN OUR BUSINESS

Throughout the last few years, SGB-SMIT grew to become one of Europe's leading transformer manufacturers. SGB-SMIT CALIDUS is part of the SGB-SMIT group and must adhere to policies and guidelines as set out by SGB-SMIT.

For the future, SGB-SMIT want to uphold and further develop this status and, additionally, compete on a worldwide basis. To support these targets, SGB-SMIT defined ethical values for proper and compliant behaviour within the whole group. SGB-SMIT CALIDUS is committed to integrity and sustainability in all business activities and apply to the highest ethical standards.

Customers from all over the world rely on the products and reputation of the SGB-SMIT Group. Suppliers (material suppliers, service providers and others) play an important role in this overall success as their behaviour has a significant influence on the business and reputation of the SGB-SMIT Group.

We call on our suppliers to comply with all applicable laws, regulations and contractual obligations towards us. This supplier code of conduct defines the basis for this behaviour.

SCOPE OF APPLICATION OF THE SUPPLIER CODE OF CONDUCT

This “Code of Conduct” is applicable to all suppliers of the SGB-SMIT Group including SGB-SMIT POWER MATLA and SGB-SMIT CALIDUS.

Our suppliers are to ensure the fulfilment of the principles of this Code of Conduct in their supply chain as well.

STRICT ADHERENCE TO THE SUPPLIER CODE OF CONDUCT

We insist that all of our suppliers follow the principles of this Code of Conduct.

We reserve the right to check compliance with this Code in all supplier audits. If any supplier does not fulfil the principles of this Code of Conduct, we may take actions, which could include the suspension

or termination of our activities and association with the supplier.

1. COMPLY WITH THE APPLICABLE LAWS AND HONOUR YOUR CONTRACTS AND AGREEMENTS!

As our supplier you have to comply with applicable laws in all countries where you have business.

Instruct your employees to refrain from conducting their own private interests whilst doing business with us.

CORRUPTION AND BRIBERY

We do not tolerate any kind of corruption and bribery. We insist on a strict separation of personal and business interests.

Your business decisions should never be influenced by any form of corruption or bribery. Oblige and train your employees to take or give any kind of present, benefit, cash or invitation only in a lawful and socially acceptable scope. We also expect that our suppliers have implemented an anti-bribery policy based on internationally recognized standards in all their entities.

CARTEL AND ANTI-TRUST LAW

We are committed to fair competition. A fair treatment with full integrity of all participants in the market is very important to us.

Adhere to the principles of free and unadulterated competition. Do not take part in any agreement that is against national or transnational cartel, anti-trust or competition law.

PRODUCT LIABILITY AND PRODUCT SAFETY

We see ourselves as a partner to our suppliers and customers and focus on long-term relationships with them.

We expect safe and high quality products from our suppliers. We expect you to secure this level throughout your whole supply chain.

EXPORT CONTROL LAW AND FOREIGN TRADE

Our suppliers have to comply with current economic embargos or regulations of trade, import or export controls, or regulations for the prevention of financing of terrorism.

2. TAKE RESPONSIBILITY FOR YOUR EMPLOYEES!

As our supplier, you have to provide a safe and healthy workplace for your employees. You have to ensure fair and equal labour conditions for your employees, no matter if they are migrant, temporary, student or contract workers.

HUMAN RIGHTS

We expect our suppliers to respect and support human rights. You have to take care for and respect the personal dignity, privacy and personal rights of each individual.

Every Supplier is committed to providing a work environment free from any kind of harassment, including sexual harassment, whether direct or indirect, physical or psychological, verbal or non-verbal.

Every employee shall have the right to be free to enter or terminate its employment. We expect that you respect the International Bill of Human Rights.

WORKERS' SAFETY

Suppliers shall protect their employees. You have to determine and eliminate potential risks immediately and implement regular and systematic health and safety controls.

SOCIAL EQUALITY AND FREEDOM OF ASSOCIATION

We set a high value on fair, equal and respectful interaction with people. Everyone should have equal opportunities.

As our supplier, you shall not accept any kind of discrimination due to gender, religion, race, ethnic, age or sexual orientation. Respect the rights of all people as well as their social and cultural interests.

We ask that you respect the right of all employees to form and join (or not join) a trade union, select their own representatives and to bargain collectively.

CHILD LABOUR, FORCED LABOUR

We request that our suppliers do not participate in or benefit from any form of child labour, forced labour or any act of modern slavery.

As our supplier, you must comply with the UN Convention on the rights of the child concerning minimum age for admission to employment and concerning the prohibition and immediate action for the elimination of the worst Forms of child labour. No individual who is below the age of having completed compulsory education, or is below the age of fifteen may be employed.

WORKING HOURS, WAGES AND BENEFITS

We expect our suppliers to comply with applicable laws, industry standards and relevant collective agreements on wages, working hours, breaks, public holidays, leave and compensation in case of overtime.

3. TAKE CARE OF THE ENVIRONMENT AND ACT SUSTAINABLY!

We expect our suppliers to operate in an environmentally responsible and efficient way. You shall minimize adverse impacts on the environment and health of humans.

You have to comply with the laws and rules for environmental protection and aim to avoid pollution and secure resources.

4. SUPPORT A RESPONSIBLE HANDLING OF KNOW-HOW, DATA AND INFORMATION!

PROTECTION OF BUSINESS SECRETS

We keep all business secrets of our business partners confidential. We also expect our suppliers to act accordingly. You have to protect the know-how and business secrets of the SGB-SMIT Group, SGB-SMIT POWER MATLA and SGB-SMIT CALIDUS or our customers against unauthorized disclosure or usage and you have to respect our rights of intellectual property or protected contents.

DATA SECURITY

Our suppliers have to comply with the rules of data protection and data security. Collect and use personal data only in compliance with the applicable laws and policies.

5. WE PLACE A PHONE CALL IF THERE IS AN ETHICAL OR LAWFUL VIOLATION!

Every supplier who knows about inadequate behaviour of any person relating to a legal or ethical violation in the business relationship with the SGB-SMIT Group is required to report it to the Ombudsman of the SGB-SMIT Group, in charge of the Whistleblower Hotline for the Group.

Contact Details and FAQs on our Ombudsman system are available under:

<https://www.sgb-smit.com/sgb-smit-group/procurement/#ombudsman>

<https://www.sgb-smit.com/de/sgb-smit-group/einkauf/#ombudsmann>