

Elmos Code of Conduct for Suppliers and Business Partners

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Preamble

Dear ladies and gentlemen,
Suppliers and business partners,

In the following chapters Elmos Semiconductor SE specifies its requirements for its suppliers and business partners as a basis for a successful and sustainable business relationship.

The ***Elmos Code of Conduct for Suppliers and Business Partners*** applies to Elmos Semiconductor SE as well as all entities affiliated with Elmos Semiconductor SE (in the following: "Elmos").

Elmos acknowledges its social and ecological responsibility. Everyone involved in the procurement process particularly has a responsibility, as an intermediary between their own company and the suppliers in the respective procurement market, towards their own company, to customers, suppliers and employees, and to the environment and society. The actions of companies as the conduct of their employees shall be aligned especially with values of integrity and fairness.

The ***Elmos Code of Conduct for Suppliers and Business Partners*** is a code intended to emphasize the interest of Elmos for fair, sustainable, responsible and ethical principles of conduct. Among other factors, the long-term success of any company is also dependent on how strictly the law, directives and other regulations as well as ethical principles are implemented at all business levels. We require from our suppliers and business partners just as we do from our own employees to adhere to the following principles at all times.

1. Basic principles

Our suppliers and business partners shall commit themselves to fulfilling their responsibility to society in all their business activities, actions and decisions and to comply strictly with the applicable law as well as all other relevant provisions in those countries they operate in. They shall also adhere to the statements, guidelines and recommendations that form the basis of this Code.

2. Anti-Corruption, transparent and fair market behavior

Corruption

In all interaction with business partners (customers, suppliers) and government institutions, the Company's interests and personal interests of employees on both sides are kept strictly separate from each other. Actions and purchase decisions are free from extraneous considerations and personal interest.

The applicable corruption criminal law must be complied with. Attention is to be paid in particular to the following aspects:

Criminal offenses involving public officials:

Granting personal benefits (payments and non-cash benefits in excess of customary courtesies) to public officials (such as public officers or public service employees) by suppliers and business partners or their respective employees with the intention of gaining advantages for suppliers and business partners, themselves, or third parties, is prohibited.

Commercial criminal offenses:

Personal cash or non-cash benefits in consideration of preferential treatment in business transactions must neither be offered, promised, granted, or approved.

Likewise, in dealing with business partners, personal benefits of value must neither be demanded nor accepted. Suppliers and business partners must obligate their employees not to let anyone promise them such benefits.

Management and employees of suppliers and business partners must not offer, promise, demand, grant, or accept gifts, payments, invitations, or services in business transactions intended to affect a business relationship improperly or threatening to jeopardize the professional independence of the business partner. This is generally not the case with gifts and invitations within the framework of customary hospitality, conventions and courtesy.

Suppliers and business partners may compose binding guidelines for granting and accepting gifts, invitations to lunch or dinner and to events of any kind. Such guidelines may provide for exceptions with respect to adequate low-value courtesies and tokens of appreciation, adequate business lunches and dinners, and adequate events organized both by the company and by business partners (customers, suppliers).

Dealing with competitors (antitrust law)

Suppliers and business partners respect fair competition.

Therefore, they comply with the applicable law for protecting and promoting competition, in particular antitrust law and other acts for the prevention of unfair competition.

In dealing with competitors, those provisions especially prohibit anti-competitive agreements and other activity affecting prices or conditions for customers, assigning sales territories or customers, or impeding a free and open competition improperly in other ways. Such provisions also generally ban agreements between customers and suppliers aimed at restricting the customers' freedom to autonomously determine prices and other conditions upon resale (determination of price and terms and conditions).

3. Human rights, forced labor and child labor, employee rights

Human rights

Our suppliers and business partners respect and observe the internationally acknowledged human rights and ensure their protection.

Forced labor

Our suppliers and business partners disapprove any kind of forced labor and respect the principle of freely chosen employment.

Child labor

Our suppliers and business partners employ only staff of the minimum age required for performing work according to the respective national legislation.

They will observe and respect children's rights.

The exploitation of children and their employment (child labor) are prohibited.

Interaction with employees

Our suppliers and business partners comply with the fundamental employee rights based on the respective applicable national law. For guidance they adhere to the basic principles as defined by the International Labour Organization (ILO).

Freedom of association

Our suppliers and business partners respect the freedom of association and the right to establish interest groups. They grant the right to their employees based on respective national legislation to protect their interests, even organized in trade unions.

Non-discrimination

Our suppliers and business partners are committed to oppose any kind of discrimination within the framework of applicable law.

They do not tolerate any discrimination of employees because of skin color, ethnical heritage, gender, age, nationality, social background, disability, sexual orientation, religious affiliation, or convictions.

Each individual's personal dignity, privacy and personal rights shall be respected.

Fair working conditions

Our suppliers and business partners pay wages and provide social benefits that correspond to or exceed the national and local statutory standards, provisions or agreements.

Respective applicable provisions governing working hours and vacation are adhered to.

Health protection and occupational safety

Suppliers and business partners must actively promote the health and safety of all employees to protect each one of them from harm.

Our suppliers and business partners maintain at least the respective national standards for a safe and hygienic work environment and take appropriate measures in this context for safeguarding and promoting health and occupational safety in order to guarantee healthy and safe working conditions. Elmos recommends the implementation of a certified management system, for example an occupational health and safety management system in accordance with ISO 45001.

4. Environmental protection

Responsibility to nature and environment

Our suppliers and business partners share a long-term commitment to environmental protection for today's and future generations.

Elmos expects their suppliers and business partners to actively promote environmental protection and support eco-conscious conduct of their employees.

They shall avoid hazards to man, nature and the environment, keep any impact on the environment as low as possible and handle resources economically. Processes, plants and equipment comply with the applicable statutory provisions and standards for fire and environmental protection. Elmos recommends the implementation of a certified management system, for example an environmental management system in accordance with ISO 14001.

In particular, we expect from our suppliers and business partners to:

- minimize energy consumption,
- reduce greenhouse gases and emissions,
- cut down on waste and increase recycling,
- minimize water consumption and preserve and protect biodiversity

Elmos recommends the implementation of an energy management system, for example in accordance with ISO 50001.

Conflict-free procurement and restricted substances

Elmos expects its suppliers and business partners to procure conflict minerals contained in components, parts or products they manufacture from conflict-free sources, implement corresponding guidelines for the procurement of conflict minerals and communicate those to their own suppliers. Elmos reserves the right to ask their suppliers for further documentation of their supply chain with respect to conflict minerals down to their mining.

Applicable laws and regulations with respect to restricted materials, e.g. REACH, RoHS, must absolutely be complied with and the respective requirements must be met.

5. Handling information and data

Business secrets/Confidentiality

Our suppliers and business partners commit their boards and employees to pay attention to company and business secrets. Confidential information must not be disclosed.

Data protection and data security

Applicable provisions for data protection and data security must be complied with.

Personal data may only be collected, processed or used insofar as permissible under law.

6. Commitment to compliance

Elmos expects its suppliers and business partners to adhere to and safeguard the above listed principles or comparable (minimum) standards. Suppliers and business partners shall ensure as far as possible that their suppliers will maintain such standards, too. Suppliers and business partners are at liberty to introduce more extensive business conduct guidelines with stricter demands on ethical and social conduct for themselves and their employees.

Suppliers and business partners commit to communicating to their employees the issues treated by this Code of Conduct and the obligations that result from this Code.

They commit to making an effort particularly by creating or adjusting guidelines and processes to the effect that the respective company's conduct complies with the principles of the *Elmos Code of Conduct for Suppliers and Business Partners*.

7. Whistleblower system

Elmos has implemented a web-based whistleblower system.

It can be accessed by suppliers and business partners via the Elmos website and enables an anonymous report of violations of laws and/or obligations.

Elmos is committed to treat every incoming report confidentially, to examine it thoroughly and to initiate necessary measures. We will not tolerate retaliation against whistleblowers and will protect them resolutely.

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Elmos Semiconductor SE
Heinrich-Hertz-Str. 1
44227 Dortmund | Germany
Phone + 49 (0) 231 - 75 49 - 0
Fax + 49 (0) 231 - 75 49 - 149
www.elmos.com