

## Behavioral Guidelines

# Code of Conduct

## Business Partners

OMICRON and its employees recognize their social responsibility and are closely guided by the values of integrity, honesty, respect, trust, responsibility and fairness. The Code of Conduct is a binding guideline that emphasizes the importance of a fair, responsible, and ethical mode of operation. OMICRON expects its business partners, including suppliers, service providers, and sales partners, to comply as well.

This Code of Conduct is aligned with the principles of the UN Global Compact (see appendix) and supports a consistent, values-based approach to decision-making and behavior.

## 1 Governance and Business Integrity

### 1.1 Rights and the Law

OMICRON is committed to observing the laws and other governing regulations of the countries in which it operates. If you are not familiar with the laws and customs of a foreign jurisdiction, obtain consultation prior to negotiating or conducting any foreign transaction.

### 1.2 Integrity in Business Decisions

Favoritism or having conflicts of interest – in practice or in appearance – are contrary to the fair treatment to which we are all entitled. Avoid any relationship, influence or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when engaging in business activities. All business partners are treated fairly.

#### 1.2.1 Anti-Corruption and Bribery

Employees and other representatives of OMICRON do not offer, promise, demand, permit or accept gifts, payments, invitations or other services that are intended to improperly influence business relationships or that could endanger the professional independence of a business partner. Generally acceptable are gifts or invitations offered as part of the usual hospitality, customs or courtesy of business interaction, provided they do not violate applicable law.

#### 1.2.2 Awareness of Conflicts of Interest

When dealing with business partners (e.g. customers, sales partners, suppliers) and governmental institutions, company interests must be strictly separated from personal interests. Actions and decisions, including purchasing decisions, should be made without undue personal consideration. Personal interests, whether financial or other, must not interfere with work performance.

#### 1.2.3 Conduct with Competitors – Fair Competition

OMICRON acts in accordance with national and international competition law standards. We operate with integrity, free from any illegal market agreements on quantity and price, and without any collusion regarding market division.

#### **1.2.4 Intellectual Property Rights, Use of AI**

Intellectual property rights are respected, and confidential information is protected. This includes ideas, inventions, patent applications, know-how, and other confidential material relating to OMICRON and its stakeholders. Confidential or sensitive information must be protected and used only for its intended purpose. Artificial Intelligence tools should be used with caution and responsibly, considering legal constraints.

#### **1.2.5 Anti-Money Laundering, Terrorist Financing, Fraud**

OMICRON does not promote or tolerate money laundering or terrorist financing in any form. All employees and business partners are expected to act responsibly, follow applicable rules and remain aware of anything that may seem unusual. Fraudulent activities are not tolerated.

## **2 Social Responsibility and Inclusion**

### **2.1 Human Rights**

OMICRON adheres to and supports all internationally recognized human rights and children's rights.

### **2.2 Anti-Discrimination and Diversity**

OMICRON opposes all forms of discrimination. This includes any form of discrimination against employees or prospective employees based on gender, race, color, disability, ethnic or cultural background, religious conviction, age or sexual orientation. Discrimination among co-workers will not be tolerated. Rude, harassing or bullying behavior is unacceptable and must be addressed firmly.

### **2.3 Forced Labor, Human Trafficking**

Human trafficking is unacceptable and will not be tolerated in any form. Forced or compulsory labor, servitude, and other forms of slavery, including modern slavery, are unacceptable. OMICRON is dedicated to prohibiting all forms of forced labor and slavery in its own business and in its supply chain. Business partners are required to equally support the prohibition of human trafficking and all forms of modern slavery in their supply chains, applying appropriate measures to ensure compliance. Business partners must inform OMICRON without delay if they become aware of any misconduct.

### **2.4 Child Labor**

OMICRON observes the United Nations regulations on children's rights. Any form of child labor is rejected. OMICRON expressly observes ILO Conventions No. 138 on the Minimum Age and Convention No. 182 on the Worst Forms of Child Labor.

### **2.5 Fair Working Conditions**

All provisions regarding fair working conditions are observed. This includes working time regulations and fair compensation. Employees have channels through which they can voice their interests. Furthermore, inclusion and respect are significant parts of the work environment.

### **2.6 Health and Safety**

All national and international applicable requirements on occupational safety, health and safe working conditions for employees are followed. These standards are maintained through an adequate and organized occupational safety and health system.

## **3 Environmental Responsibility**

OMICRON is committed to protecting the environment for present and future generations and complying with all applicable environmental protection laws and standards. OMICRON business partners are expected to adhere to the same high standards.

## **4 Responsible Sourcing and International Trade**

### **4.1 Export and Import**

OMICRON has established reliable processes for complying with export and import regulations.

### **4.2 Conflict Minerals and Raw Material Supply Chain**

OMICRON is committed to protecting people, preventing exploitation, and avoiding environmental damage when selecting raw materials and elements and managing the supply chain. OMICRON does not knowingly engage, directly or indirectly, in funding armed groups or human rights violations in conflict-affected regions. OMICRON supports regulations that promote transparency and awareness regarding the use of conflict minerals, such as the 2010 Dodd-Frank Act. EMRT Reports can be shared upon specific requests including the affected order and products.

## **5 Data Protection and Information Security**

### **5.1 Data Protection**

As an international company, OMICRON recognizes the importance of everyone's privacy. Therefore, OMICRON complies with applicable data protection laws and requests that its business partners act alike. Data breach notifications or requests on data subject rights can be sent to [data.protection@omicronenergy.com](mailto:data.protection@omicronenergy.com).

### **5.2 Trade Secrets**

OMICRON emphasizes transparency with customers and partners while maintaining confidentiality where necessary. All information related to OMICRON's business should be considered proprietary and confidential, unless it has been released in documents available to the general public.

### **5.3 Information Security**

OMICRON aims to provide innovative solutions that are designed, developed, and delivered with all aspects of information security in mind. Accordingly, OMICRON has established an Information Security Management System to facilitate the constant monitoring of applicable requirements, risk evaluation, and implementation of adequate measures. Business partners are requested to ensure that they always meet the applicable information security requirements according to the state of the art and the "OMICRON Information Security Guideline for Third Parties" (available at [www.omicronenergy.com/legal](http://www.omicronenergy.com/legal)) in its most recent version.

## **6 Applicability to Business Partners**

The guidelines described in this document shall be equally supported by business partners of OMICRON group companies, particularly suppliers and service providers, as well as OMICRON's downstream sales partners and resellers, by implementing the covered points to the best of their ability. Serious violations of this Code of Conduct entitle OMICRON to terminate the business relationship with immediate effect, including reimbursement for any damages suffered due to such misconduct.



## 7 Contact

Any concerns or breaches of any points in this Code of Conduct should be reported directly to the respective Regional Manager. If in doubt, you can also send your concern directly to OMICRON's Integrity and Compliance team ([ethics@omicronenergy.com](mailto:ethics@omicronenergy.com)), or submit a report via the OMICRON Integrity & Compliance Reporting Platform (<https://omicronenergy.integrityline.app>).

Klaus, June 2, 2025



**ppa Jakob Halder**  
Authorized Signatory  
OMICRON electronics GmbH

### United Nations Global Compact

The Global Compact demands of the companies, within their areas of influence, to support and practically implement a catalog of basic values in recognition of human rights, labor norms, environmental protection and anti-corruption efforts:

#### Human Rights

- #1: Organizations shall support and respect the protection of the international human rights within their area of influence and
- #2: ensure that they are not complicit in any human rights violations.

#### Labor Norms

- #3: Organizations shall preserve freedom of association and the effective recognition of the right for collective negotiations, as well as advocating
- #4: the removal of all forms of forced labor
- #5: the abolition of child labor and
- #6: the removal of discrimination during recruitment and employment.

#### Environmental Protection

- #7: Organizations shall support a preventative approach in the handling of environmental concerns
- #8: start initiatives to create a greater sense of responsibility for the environment, and
- #9: support the development and distribution of environmentally friendly technologies.

#### Fighting Corruption

- #10: Organizations shall counter all forms of corruption, including black-mail and bribery.