

Company policy

Expert Transformatorenbau GmbH

Content

1	PREAMBLE.....	3
2	CODE OF CONDUCT	4
2.1	COMPLIANCE WITH LAWS, STANDARDS, AND DIRECTIVES.....	4
3	SECRECY, ETHICS, AND BUSINESS CONDUCT	5
3.1	CONFIDENTIALITY AND DATA PROTECTION	5
3.2	PREVENTION OF CORRUPTION.....	5
3.3	HANDLING COMPANY PROPERTY	5
3.4	INTERNAL AND EXTERNAL IMPACT.....	5
3.5	CONCLUSION OF CONTRACTS.....	5
3.6	PROHIBITION OF DISCRIMINATION	5
3.7	WORKING HOURS	5
3.8	WAGES AND SOCIAL BENEFITS.....	5
3.9	INTERACTION WITH EACH OTHER.....	5
3.10	FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING	5
3.11	PREVENTION OF CHILD AND FORCED LABOR	5
3.12	INFORMATION AND COMMUNICATION	6
3.13	PROMOTION OF STANDARDS IN THE SUPPLY CHAIN	6
3.14	DEALING WITH INDICATIONS AND QUERIES.....	6
3.15	SANCTIONS	6
4	SUPPLIER MANAGEMENT.....	7
5	CONFLICT MINERALS.....	8
6	HEALTH AND SAFETY – ZERO RISK	9
6.1	ENVIRONMENTAL PROTECTION – FOR OUR PLANET	9
7	QUALITY MANAGEMENT – ZERO FAULTS.....	10

1 Preamble

As an internationally active company and thus as part of the global, ecological overall system, we understand our daily actions as a contribution to maintaining the ecological balance.

As a commercial enterprise, we acknowledge our special responsibility and want to fulfill our contribution to the preservation of natural living conditions. Our corporate guidelines form the basis for these actions.

These company guidelines apply to all employees and contractors who work for or on behalf of Expert Transformatorenbau GmbH. All visitors are requested by Expert Transformatorenbau GmbH to adhere to these guidelines.

The management is responsible for compliance with this policy.

2 Code of conduct

2.1 Compliance with laws, standards, and directives

Expert Transformatorenbau GmbH is committed to compliance with applicable laws, regulations, guidelines and standards and other requirements.

All employees of Expert Transformatorenbau GmbH must comply with the applicable laws, standards, guidelines, and principles.

Following guiding principles apply:

- We act responsibly.
- We fulfill the wishes and requirements of the customers.
- We live the company policy.
- We assume social responsibility.
- We act cost-consciously.
- We work together.

Fundamental basis are management systems according to common international standards (e.g. DIN ISO 9001/14001, IATF 16949 or similar). These systems are based on continuous improvements in the areas of health and safety, environmental protection, and quality management. The objectives of the management system are regularly measured, evaluated, documented, and communicated (also in dialog with politicians, authorities, the public and social interest groups). A transparent corporate culture is a matter of course for Expert Transformatorenbau GmbH. Through regular audits, we monitor compliance with the effectiveness.

3 Secrecy, ethics, and business conduct

3.1 Confidentiality and data protection

Within the limits of business confidentiality, transparent communication is practiced. The regulations on company and business secrets are to be followed. Data protection laws and security guidelines must be followed. Customer data is subject to special protection and is communicated in a restricted manner. Private use of the Internet, software and hardware is not permitted.

3.2 Prevention of corruption

The respective legal regulations for combating corruption must be complied with. Gifts and benefits in kind above and beyond "normal" promotional gifts may not be accepted. No obligatory dependency may arise. Crimes against competition, granting of advantages, bribery and corruptibility are to be refrained from. Every effort must be made to prevent fraud or embezzlement, as well as other acts of corruption by employees of or other third parties.

3.3 Handling company property

All employees handle the assets of Expert Transformatorenbau GmbH with care. Theft will be reported to the police and will have consequences under criminal law.

3.4 Internal and external impact

All employees of Expert Transformatorenbau GmbH and their representatives work professionally and in the interest of the company.

3.5 Conclusion of contracts

The goal when concluding contracts is the creation or maintenance of a customer relationship, considering long-term, loss-free, economic development of Expert Transformatorenbau GmbH.

3.6 Prohibition of discrimination

Discrimination of employees in any form is prohibited. This applies to discrimination based on, for example, gender, race, skin color, disability, origin, religion, age, pregnancy, or sexual orientation.

3.7 Working hours

The respective legal regulations and company provisions on working hours as well as industry standards must be complied with.

3.8 Wages and social benefits

Expert Transformatorenbau GmbH remunerates work performance in accordance with applicable legal and company regulations. Legal social benefits are guaranteed.

3.9 Interaction with each other

The employees of Expert Transformatorenbau GmbH pay attention to a fair and respectful interaction with each other. New employees are carefully introduced to the processes and operational peculiarities.

3.10 Freedom of association and right to collective bargaining

The right of employees to freedom of association and collective bargaining is respected.

3.11 Prevention of child and forced labor

All forms of child and forced labor are rejected.

3.12 Information and communication

All employees have access to the provisions of this corporate policy. Business partners and suppliers alike have access to this company policy on the homepage.

3.13 Promotion of standards in the supply chain

The supplier has knowledge of the sustainability standards and is obliged to observe them equally.

3.14 Dealing with indications and queries

Reasonable suspicions of violations of the guideline are to be reported.

3.15 Sanctions

In case of violations, depending on the severity of the violation, the right is reserved to initiate legal measures.

4 Supplier management

The CSR/sustainability requirements set out in this Corporate Directive have been and are communicated to suppliers. Corresponding self-disclosures are and were requested.

- Child labor and young workers
- Wages and social benefits
- Working hours
- Modern slavery (i.e. slavery, servitude and forced or compulsory labor, and human trafficking)
- Freedom of association, including collective bargaining
- labor protection
- Harassment and non-discrimination
- Corruption, extortion and bribery
- Privacy and data protection
- Fair competition and antitrust law
- Conflicts of interest
- Whistleblowing and protection against retaliation
- Greenhouse gas emissions, energy efficiency and renewable energies
- Water quality and consumption
- Air quality
- Sustainable resource management and waste reduction
- Responsible chemical management
- Sustainability requirements for your own suppliers

5 Conflict minerals

Tin, tantalum, tungsten and gold (also known as 3TG) are mined in the eastern provinces of the Democratic Republic of the Congo and neighboring countries. The mining there with inhumane working conditions directly or indirectly finances armed groups and accepts violations of human and international law.

For this reason, these four minerals are referred to as "conflict minerals"; regardless of whether they are sourced from the above regions or not.

To curb the financing of armed conflict, the U.S. Securities and Exchange Commission implemented the requirements of the Dodd Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act for short) in 2012. This included regulations on reporting and disclosure relating to the use of conflict minerals.

Since then, companies listed on the U.S. stock exchange have been required to inform the U.S. Securities and Exchange Commission in an annual report whether their products contain conflict minerals that are necessary for their function or production.

We are not listed on the U.S. stock exchange and are therefore not subject to these reporting and disclosure requirements.

As a producer of products with tin-plated components, we have no way of avoiding the use of conflict minerals.

Nevertheless, we are aware of our social responsibility regarding human rights and for this reason we do not buy, process, or sell minerals originating from conflict areas. We also expect this from all our suppliers.

6 Health and Safety – zero risk

The highest priority of Expert Transformatorenbau GmbH is to protect the health and safety of every employee, visitor, and contractor. Everyone is required to perform his or her activities in a safe manner to prevent accidents, injuries, and illnesses. All workplaces are designed to preventively protect the health and safety of employees.

Expert Transformatorenbau GmbH sets itself the goal of making workplaces safer and healthier. Constant analyses ensure safe equipment, tools, procedures, and work processes.

The safety and health of employees during their free time is also important to Expert Transformatorenbau GmbH; it supports employees and creates action programs in this regard. Through continuous information, training and instruction, we encourage our employees to act in a safety-conscious manner.

6.1 Environmental protection – for our planet

Considering economic aspects, we constantly strive to conserve resources and to use them efficiently, as well as to avoid waste and emissions. Environmental aspects and measures derived from them are regularly reviewed and updated. We are committed to the continuous improvement of our environmental performance. To this end, we provide all necessary resources (personnel, time, finances) as well as all relevant information. When developing new products and production processes, we take the requirements of health, safety, and environmental protection into account as early as the development and testing phase. Furthermore, it is our policy to use all possibilities to save energy and raw materials, to avoid, reduce or recycle pollutants and noise emissions as well as waste. In addition, we recycle valuable materials in a suitable manner and properly dispose of waste that can no longer be recycled. On our own responsibility, we monitor and control plants and processes as well as air, water, soil, waste and noise. Preventive inspections, servicing and maintenance prevent incidents. Every employee in our company is called upon to make an active contribution to environmental protection. We encourage our employees to act in an environmentally conscious manner by providing information and training. Respect for the environment as well as responsible and environmentally conscious actions are continuously communicated and strengthened.

7 Quality management - zero faults

Expert Transformatorenbau GmbH manufactures sustainable products that meet contractually agreed quality criteria and can be safely used for their intended purpose. In our daily work it is important to meet the customer requirements with all their specifications. In doing so, it is important to establish the highest level of customer satisfaction, to gain the trust of our customers and thus to become a reliable, long-term partner for our customers. To achieve this goal, we also involve our suppliers and service providers to ensure optimum quality, delivery reliability and comprehensive service in the supply chain to us. The continuous improvement and optimization of our value-added processes, as well as, if necessary, the adaptation of organizational structures is the basis for this. The employees of Expert Transformatorenbau GmbH are qualified according to these guidelines. Their sense of responsibility for this, as well as their direct and indirect influence on it, are continuously communicated to the employees.