

SAFELOG

Code of Conduct

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1. General regulations

1.1 Scope of the regulations

This Code of Conduct applies to all branches and production facilities of the company.

1.2 Laws, standards and ethical behavior

The company complies with the applicable laws and standards of the countries in which it operates.. It is guided by generally accepted ethical values and principles, in particular integrity, honesty and human dignity.

1.3 Trade secrets

Business secrets of business partners are treated confidentially by the company and its employees. Disclosure of confidential information to third parties or making it publicly available is prohibited. This also applies to company employees after termination of the employment relationship.

1.4 Financial responsibility and disclosure of information

SAFELOG GmbH bases its decision-making processes on the correctness and accuracy of accounting records. The confidential treatment of safety and personnel data as well as accounting and financial data is of particular importance in this respect. All business transactions must be recorded in our books in accordance with established procedures and auditing standards and generally accepted accounting principles. These records contain the necessary information about the respective transactions.

1.5 Export controls and economic sanctions

Governments and international organizations may impose temporary restrictions, such as embargoes or economic sanctions, on certain business transactions that apply to countries or individuals. SAFELOG GmbH respects the international regulations and does not engage in transactions or business with goods or technologies that are affected by restrictions.

1.6 Avoidance of conflicts of interest

At SAFELOG GmbH, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, should be avoided from the outset. If they are unavoidable, the management must be informed proactively and the next steps must be determined jointly.

2. Antitrust and competition law requirements

2.1 Antitrust law

The company is committed to fair competition. Laws that protect competition, in particular antitrust law and other laws regulating competition are adhered to. Unlawful agreements on prices or other conditions, sales territories or customers as well as abuse of market power contradict the principles of the company.

2.2 Bribery, corruptibility and corruption

SAFELOG GmbH rejects bribery and corruption and does not tolerate such behavior. Employees must ensure that no personal dependencies or obligations to customers or suppliers arise. In particular, company employees may not accept or give any gifts that could reasonably be expected to influence business decisions. If gifts are customary and polite in a country, it must be ensured that no binding dependencies are created and that the national legal standards are observed. Violations are generally punished with measures under labor law.

2.3 Counterfeit products

In the event that counterfeit products are discovered or there are concrete grounds for suspicion, we inform our supply chain immediately and, if appropriate, take legal action against them. All employees are required to inform their line manager immediately.

3. Global guidelines

3.1 Human rights

The internationally recognized human rights are expressly and sustainably supported. Even in the event of disciplinary measures, all company employees must be treated with dignity and respect. Such measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights¹.

3.2 Child labor

Child labor and any kind of exploitation of children and young people are rejected. The relevant laws are complied with.

3.3 Forced labor

Any form of forced labor, bonded labor, servitude and slave labor or slavery and similar conditions are rejected. Company employees may not be forced into employment either directly or indirectly through violence or intimidation².

3.4 Remuneration, employee rights

All employees should receive a fair wage for full-time employment that is at least sufficient to cover basic requirements. Remuneration must be paid in a practical manner (check, bank

transfer) and a pay slip must be made available to an appropriate extent ³. The right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country, is respected ⁴.

3.5 Working hours

Working hours comply with the applicable national law, the industry standard or the relevant ILO conventions. Overtime must be voluntary ⁵.

3.6 Health and safety at work

The national and international regulations for ensuring health and safety in the workplace are complied with. Appropriate systems are in place to avoid risks to health and safety ^{6 7}.

3.7 Data protection

When collecting, storing, processing or transferring personal data (e.g. name, address, telephone number, date of birth, health information) of employees, customers or other third parties, we exercise the utmost care and strict confidentiality and comply with applicable laws and regulations.

3.8 Environmental protection

The company observes the goals of sustainable environmental protection. Environmentally friendly production methods are used in this context. In accordance with the principles of the Rio Declaration of the United Nations ⁸, the company uses natural resources responsibly ⁹.

4. Ethical and social principles

4.1 Intellectual property

We respect and protect intellectual property of all kinds.

4.2 Non-discrimination

The company rejects discrimination in hiring or employment, in particular discrimination based on race, ethnic or national origin, skin color, gender, mental or physical disability, age, creed, affiliation with an employee organization or other personal characteristics ¹⁰.

4.3 Harassment

The company disapproves of physical, psychological or sexual violence.

4.4 Freedom of expression

The right to freedom of opinion and expression is guaranteed.

4.5 Privacy

Privacy is respected.

5. Responsible procurement of raw materials

SAFELOG GmbH and its suppliers undertake to exercise due care in the procurement and extraction of raw materials, including conflict minerals. The procurement and use of raw materials that were obtained illegally or through ethically reprehensible or unreasonable measures must be avoided. This also applies to the procurement and extraction of raw materials as well as to environmental protection, including chemical management, and respect for human rights ¹¹.

6. Compliance with the Code of Conduct

6.1 Measures

The company shall bring this Code of Conduct to the attention of its employees in an appropriate manner and at specified intervals and shall ensure compliance with it.

6.2 Notification of violations („Whistleblowing“)

All employees are required to contact their line manager if they become aware of a breach of this Code of Conduct, laws and regulations. Reports can also be made anonymously. The employer shall ensure that the identity of the employee is protected and that the employee does not have to fear any disadvantages.

SAFELOG GmbH / SAFELOG Inc.

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SAFELOG

¹ Universal Declaration of Human Rights - UN Doc. 217, so-called UN Charter of Human Rights

² Cf. ILO Conventions 29 and 105

³ Cf. ILO Conventions 26 and 131

⁴ Cf. ILO Convention 87 of 1948 and 98 of 1949

⁵ Cf. ILO Conventions 1 and 14

⁶ Cf. ILO Convention 155

⁷ SAFELOG occupational health and safety guideline

⁸ 27 Principles of the Rio Declaration on Environment and Development, adopted by the United Nations Conference on Environment and Development (UNCED), Rio de Janeiro, 1992

⁹ SAFELOG Environmental Protection Directive

¹⁰ Cf. ILO Conventions 100, 111, 158 and 159 (CoC 09/14/2011)

¹¹ SAFELOG sustainability policy for suppliers