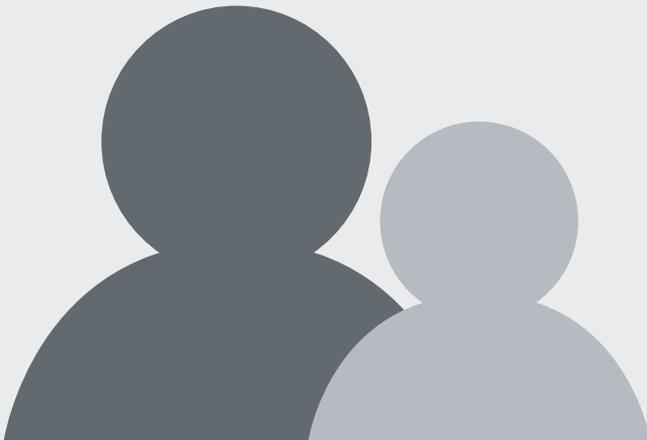


ZOLLNER CODE OF CONDUCT



The **Zollner Code of Conduct** is based on the principles of the Code of Conduct from the **Responsible Business Alliance (RBA)**, **DIN ISO 26000 Social Responsibility** and the **Global Compact** from the United Nations.

Commitment:

As a globally acting company, we affirm our holistic societal responsibility (Corporate Responsibility).

This is a critical part of the Zollner corporate culture. Our activities in the areas of Responsible Business, Ecological Sustainability and Social Responsibility are firmly anchored in our Integrated Management System.

Our expectations in terms of **quality, the environment and energy, occupational safety, health, information security, business ethics and social engagement** are consolidated in our "Integrated Management System Guidelines" and in our "Zollner Code of Conduct".

The Zollner Group of companies is committed to the observance of the rules and regulations listed here. In all of our activities, we act in full compliance with all applicable laws, regulations and directives of the countries in which we are doing business.

We expect adherence to these basic principles of conduct from partners as the basis for our business relationships.

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General information on the Zollner Code of Conduct

Our Zollner Code of Conduct imparts the content of our compliance activities to relevant stakeholders (employees and partners).

It describes the critical legal and business policy basic principles to which we orient ourselves in our relationships with our business partners as well as in our internal collaboration.

It defines standards to ensure that the working conditions in the supply chain are safe, that employees are treated with respect and dignity and that the manufacturing processes are environmentally sound and have a sense of responsibility.

A. LABOR

We commit ourselves to uphold the human rights of employees, and to treat them with dignity and respect as is understood by the international community. This applies to all employees, including temporary, student, direct employees and any other type of employee.

Our labor standards are:

1) Freely Chosen Employment

We do not use forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or labor coming from human trafficking. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. Our employees' freedom of movement in our facilities is in no way limited in an inappropriate way; there is also no inappropriate limitation to entering or leaving the facilities provided by us including, if applicable, employees' dormitories or living quarters. Within the scope of the hiring process, before the worker leave his or her country of origin, a written employment contract is delivered in the language of the country of employment and if needed in the language of the company, which contains a description of the working conditions. There will be no substitution or change(s) in the employment contract upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work is performed voluntarily, our employees can leave their workplaces at any time or end their employment relationship without penalty if reasonable notice is given as per the employment contract. Neither we nor our placement agencies and their sub-agencies are permitted to keep, destroy, hide, confiscate or prevent the employee from accessing their documents, such as an employee's entry or immigration documents or documents issued by a government like identification papers, passports or work permits, unless the retaining of such documents is lawfully prescribed in the work permits. Our employees are not asked to pay any placement fee or other fee to us or our placement agencies for their employment. If it turn out that our employees have paid such fees, those fees will be reimbursed.

2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The age of the employees is verified as part of the hiring process. If child labor is identified, help is provided to eliminate it. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. We ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. We provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3) Working Hours

In the plants of Zollner Group we take care that workweeks are not to exceed the maximum set by local law. Exceptions are emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

4) Wages and Benefits

Compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure is not conducted. For each pay period workers are provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5) Humane Treatment

Workers are not harshly and inhumanely treated including any violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, public shaming or verbal abuse of workers; nor is there to be the threat of any such treatment.

6) Non-Discrimination

We are committed to a workforce free of harassment and unlawful discrimination. We do not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. In addition, workers or potential workers are not subjected to medical tests, including pregnancy or virginity tests that could be used in a discriminatory way.

7) Freedom of Association

In conformance with local law, we respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly or to refrain from such activities. Workers and/or their representatives can openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

8) Diversity

We are committed to reach a proper balance of men and women in the leadership positions. This is valid also for the supervisory board and for the Managing Board, but at first for the other leadership positions. The main principle for filling the supervisory board and the Managing Board is furthermore the tradition to keep and maintain Zollner as a family company.

B. HEALTH and SAFETY

We recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health Management Systems were used as references in preparing the Code and may be a useful source of additional information.

Our health and safety standards are:

1) Occupational Safety

If workers are exposed to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards), these are reduced through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps are taken to remove pregnant women/nursing mothers from working conditions with high hazard levels, to

remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments.

2) Emergency Preparedness

Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clearly structured and unobstructed exits, adequate exit facilities and recovery plans. Such plans and procedures are focusing on minimizing harm to life, the environment and property.

3) Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is systematically identified, evaluated, and controlled. If any potential hazards were identified, we look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are controlled through proper design, engineering, and administrative controls. Engineering and administrative controls are used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is protected by appropriate personal protective equipment programs.

5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is identified, evaluated and controlled.

6) Machine Safeguarding

Production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Where applicable, worker dormitories provided by Zollner or a labor agent are maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate light, heat and ventilation, individually secured spaces for keeping personal items and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

We offer our employees appropriate information and training courses prior to and after taking up their jobs and at regular intervals thereafter regarding health and safety at the workplace in their native languages or in a language that they can understand. This also includes mechanical, electrical, chemical and physical hazards and the hazard of fire. Information regarding health and safety concerns are hung in the facility to be very visible. Employees are encouraged to raise safety concerns without retaliation.

C. ENVIRONMENT

We recognize that environmental responsibility is integral to our organization. In manufacturing operations, adverse effects on the community, environment and natural resources are minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001, ISO 50001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

Our environmental standards are:

1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are obtained and regularly updated. The operational and reporting requirements are followed.

2) Pollution Prevention and Resource Reduction

The use of resources, like water, fossil fuels and raw materials, and generation of waste of all types is reduced or if possible eliminated. This is accomplished either at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. Attention is constantly being paid to sustainability of the processes and measures when avoiding contamination and reducing utilized resources.

3) Hazardous Substances

Chemicals, waste and other materials posing a hazard if released to the environment are identified, marked and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4) Solid Waste and Wastewater

We have implemented a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater generated from operations, industrial processes and sanitation facilities are characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures are implemented to reduce generation of wastewater. We conduct routine monitoring of the performance of our wastewater treatment systems or equipment to guarantee adherence to regulations from authorities. The contamination of stormwater flowing through the company, for example from discharged fluids or the introduction of substances hazardous to the environment is prevented using precautionary measures.

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances are effectively managed in accordance with the Montreal

Protocol and applicable regulations. We conduct routine monitoring of the performance of our air emission control systems.

6) Materials Restrictions

We adhere to all applicable laws, contractual regulations and expressly accepted customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7) Energy Consumption and Greenhouse Gas Emissions

Energy consumption and resulting greenhouse gas emissions (categories 1 and 2) are tracked and documented at the facility and corporate level. We continuously look for cost effective methods to improve energy efficiency and to minimize our energy consumption and resulting greenhouse gas emissions.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, we uphold the highest standards of ethics including:

1) Business Integrity

The highest standards of integrity are upheld in all business interactions. We have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are for all employees disallowed even directly or indirectly to be offered or accepted. This prohibition refers to the promise, offer, granting or acceptance of non-cash benefits, whether directly or indirectly through a third party, with the intention of receiving or retaining business, broker business for a person or to obtain any other impermissible advantage. Procedures for monitoring and enforcing the standard are used to ensure that anti-corruption laws are obeyed. Also see the "Anti-Corruption Policy" internal guideline for more information.

3) Disclosure of Information

All business transactions are transparent, and everything in our company documentation can be correctly traced. Information regarding Zollner's labor, health and safety, environmental practices are disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights are respected; transfer of technology and knowhow is done in a manner that protects intellectual property rights.

5) Fair Business Activities, Advertising and Competition

Standards of fair business activity, advertising and competition are upheld. Appropriate means to safeguard customer information are available (confidentiality/non-disclosure agreement).

6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality and protection of partner and employee whistleblowers¹ are maintained. Our partners are provided with the option of reporting "behavior" that is not compliant with stated guidelines in their or our environments by means of an anonymous letter, or one of known origin, to the following address:

Zollner Elektronik AG
Director of Human Resource Management
Manfred-Zollner-Str. 1
93499 Zandt
GERMANY

We have developed a process for our suggestion boxes at all locations, which are protected from misuse, which allows all employees to raise any concerns without fear of retaliation.

Our company management is responsible for any further action to be taken concerning these reports.

7) Responsible Sourcing of Minerals

Where applicable, we develop measures and action items, which ensure in an appropriate manner that the tantalum, tin, tungsten and gold in the products we manufacture are sourced in a way consistent with the Organisation for Economic Cooperation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. We exercise due diligence on the source and chain of custody of these minerals and make due diligence measures available to partners upon their request.

8) Privacy and Data Protection

We are committed to protecting the reasonable privacy expectations of personal information of everyone we are doing business with, including partners and employees. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E. MANAGEMENT SYSTEM

We have established a management system whose scope is related to the content of this Code. The management system is designed to ensure:

- (a) compliance with applicable laws, regulations and customer requirements related to our operations and products;
- (b) conformance with this Code; and
- (c) identification and mitigation of operational risks related to this Code.

The management system encourages and demands continuous improvement.

The management system contains the following elements:

¹ Whistleblower: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

1) Company Commitment

Our executive management commits itself in its corporate policy to social, ecological and economic responsibility, which affirms the commitment to compliance with laws and regulations and continuous improvement.

2) Management Accountability and Responsibility

The Managing Board identified company representatives responsible for ensuring implementation of the Zollner management system and associated programs. Auditors review the status of the management system on a regular basis.

3) Legal Provisions and Customer Requirements

Processes have been established to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code of Conduct.

4) Risk Assessment and Risk Management

Processes have been defined to identify the environmental, information security, business continuity management, health and safety² risks, as well as the labor practice and ethics risks associated with our operations. The relative significance for each risk and the appropriate procedural and physical controls to manage the identified risks and ensure regulatory compliance have also been defined. The identified risks are knowingly accepted by management, have been reduced by appropriate means or transferred to third parties. We are committed to acting with awareness of risks to ensure business continuity.

5) Improvement Objectives

Our management establishes written performance objectives, targets and implementation plans to improve social and ecological performance, including a periodic assessment of performance in achieving those objectives.

6) Training

We conduct training for managers and employees to implement our policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

We have established a process for communicating critical information regarding policies, practices, expectations and performance with our employees and partners. We established measures according to ISO/IEC 27001 to ensure the availability, confidentiality and integrity of communications.

8) Worker Feedback and Participation

The Zollner Code of Conduct is subject to continuous improvement by employee feedback.

9) Audits and Assessments

Periodic self-assessments and audits ensure conformity to legal and regulatory requirements, to the content of the Zollner Code of Conduct and to contractual requirements from customers related to social and ecological responsibility.

² Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and employee housing/living quarters.

10) Corrective Action Process

A process is in place for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and examinations.

11) Documentation and Records

Creation and maintenance of documents and records is made to ensure regulatory compliance and conformity to company requirements. We established a document classification system to ensure that all documents and records are secured according to their classification level. Data security measures guarantee the availability, confidentiality and integrity of documents and records.

12) Supplier Responsibility

A process has been defined with which the provisions of the Code of Conduct are made clear to the most critical suppliers, and their adherence to them is monitored.

Additional information

The content of the Zollner Code of Conduct mostly complies with the internationally used term "Corporate Responsibility" (CR).

Thus, not only is social responsibility meant, but also holistic societal responsibility (economic, ecological and social).

The Spokesman of the board is responsible for establishing, implementing, monitoring and reporting the Zollner Code of Conduct.

Within the scope of orientation and at regular intervals, employees are informed of the contents of the Zollner Code of Conduct and trained in them.

Obligation to Report

All employees are obligated to report violations of the Zollner Code of Conduct in one of the following ways:

- report to their manager
- report to the Managing Board
- by submitting a written report (anonymous or not) in the locked suggestion box

The respective manager is the first point of contact for employees' questions and concerns. Managers pass all important information on to the Spokesman of the board, who will coordinate and initiate any further action with the Managing Board.

Zandt, May, 2021



Ludwig Zollner
Spokesman of the board

PD 113895335
Valid from May, 2021

LOCATIONS



USA

Milpitas

Fremont

Costa Rica

Cartago

Germany

Zandt

Zandt II

Lam

Unterschwandt

Neukirchen b. Hl. Blut

Altenmarkt I

Altenmarkt II

Altenmarkt III

Furth im Wald

Switzerland

Hombrechtikon

Hungary

Vác

Szügy

Romania

Satu Mare I

Satu Mare II

Tunisia

Beja

China

Taicang

Hong Kong

Kowloon Bay