AXICOM HV AG
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Code of Conduct for Suppliers

Corporate Social Responsibility Guideline

We expect our business partners to conduct themselves according to standards comparable to those practiced by AXICOM HV AG.

This Code of Conduct lays out our expectations, with which you contractually agree to comply.

Compliance with laws and generally accepted standards

As a supplier of AXICOM HV AG, you will:

- comply with applicable laws and regulations, including any anti-corruption regulations;
- act in accordance with generally accepted principles and standards regarding social and environmental responsibility and internationally recognized human rights, including existing laws to prevent modern slavery.

Countering bribery and corruption

As a supplier of AXICOM HV AG, you will:

- not engage in any form of bribery or corruption and ensure that business decisions are not influenced by improper or illegal quid pro quo arrangements, including cash exchanges, gifts, travel or other items of value, including intangible benefits;
- not offer any invitations, gifts or other objects of value with the intention of influencing AXICOM HV AG employees;
- inform AXICOM HV AG about any demands or pressure to offer bribes (benefits of any kind), whether directly or indirectly, to public officials or other parties with the intention of exercising influence or obtaining an unfair advantage.

Fraud and Business Integrity

As a supplier of AXICOM HV AG, you will:

- not engage in, facilitate or conceal fraud, extortion, and embezzlement, money laundering, falsification of records or other dishonest or unlawful conduct in connection with goods or services supplied to AXICOM HV AG;
- maintain controls proportionate to the nature, size and risk of your business that are designed to prevent, detect, and such conduct;
- Promptly notify AXICOM HV AG of any actual or reasonably suspected material breach of this section relating to goods or services supplied to AXICOM HV AG and reasonably cooperate with any related investigation and corrective action, subject to applicable law.

Intentional fraud, extortion, embezzlement or money laundering in connection with goods or services supplied to AXICOM HV AG constitutes a material breach of contract. AXICOM HV A reserves the right to immediately suspend or terminate all existing contracts and business

relationships with the Supplier without penalty, seek financial restitution, and report the fraudulent activity to relevant law enforcement and regulatory authorities.

Accounts and records

As a supplier of AXICOM HV AG, you will:

- maintain full and complete accounts and records that accurately document all business transactions and expenses and are maintained in accordance with applicable laws and regulations.

Conflicts of interest

As a supplier of AXICOM HV AG, you will:

- avoid situations in which our own interests are or could be in conflict with the business interests of AXICOM HV AG;
- inform AXICOM HV AG immediately if you become aware of a conflict of interest; this applies also if an employee of AXICOM HV AG has a financial interest in your company or is in an economic relationship with your company in another way.

Protecting assets and information

As a supplier of AXICOM HV AG, you will:

- help protect AXICOM HV AG’s assets from theft, misuse or waste;
- take necessary measures to protect and keep confidential any of AXICOM HV AG's confidential data and information to which you have access.

Antitrust law, economic and trade sanctions

As a supplier of AXICOM HV AG, you will:

- not pursue activities that can probably be construed as anti-competitive, abusive or unfair;
- comply with all applicable antitrust and competition laws and regulations;
- comply with laws and regulations governing the export and import of goods, products and services, including those relating to economic and trade sanctions.

Employees

As a supplier of AXICOM HV AG, you will:

- provide safe work spaces that comply with international labor standards, including the UN Guiding Principles on Business and Human Rights and relevant ILO fundamental principles/conventions, where applicable;
- ensure fair working conditions (e.g. harassment or physical violence);
- not discriminate on the basis of origin, gender, sexual orientation, religion, ideology, disability or age;
- ensure the right of association and collective bargaining and deliver written contracts of employment to employees in accordance with local legislation;
- ensure that wages, working hours, holidays and absences of employees and commissioned external subcontractors are in accordance with applicable law and/or contracts;
- comply with all applicable data protection laws.

Forced Labour

As a supplier of AXICOM HV AG, you will:

- ensure that no forced labour, compulsory labour, slavery, human trafficking or unlawful child labour is used in their operations or in the production of goods supplied to AXICOM HV AG, including in their upstream supply chains;
- carry out appropriate risk-based due diligence and provide relevant information and supporting documentation upon reasonable request.

Environmental protection

As a supplier of AXICOM HV AG, you will:

- maintain the safety of your operations and minimize their environmental impact;
- comply with applicable environmental laws and permits;
- comply with all applicable product, packaging and labeling, chemical, substance and material restrictions and disclosure requirements relating to goods supplied to AXICOM HV AG (e.g. REACH, GHS) and shall provide declarations, composition information and supporting documentation reasonably requested by AXICOM HV AG for regulatory compliance purposes.

Society

As a supplier of AXICOM HV AG, you will:

- respect and strive to avoid and minimize any negative impact to society.

Standards towards our own suppliers

As a supplier of AXICOM HV AG, you will:

- require your own suppliers and subcontractors to follow the principles set out in this Code of Conduct for Suppliers accordingly;
- systematically integrate and follow up on this Code or appropriate procedures in your business relations with them.

Material compliance and conflict minerals

As a supplier of AXICOM HV AG, you will:

- ensure that the goods and materials supplied to AXICOM HV AG have not been illegally or unethically sourced;
- confirm the implementation of due diligence measures for the responsible sourcing of minerals to ensure compliance with the appropriate regulations;
- inform AXICOM HV AG in the event of production, purchase or trading of controlled minerals (tantalum, tin, tungsten, gold or other minerals or materials subject to applicable responsible-sourcing requirements) originating from conflict-affected or high-risk areas and, upon request of AXICOM HV AG, provide information on your due diligence measures and any associated results in order to exclude the possibility of supplying AXICOM HV AG with such minerals.

By accepting an order from AXICOM HV AG, you undertake to adhere to the requirements of this Code of Conduct for Suppliers. If you are unable to provide corresponding documents on

request to demonstrate your adherence with these requirements, you agree to establish a documentation process covering your compliance with these regulations.

AXICOM HV AG reserves the right, should any concerns arise, to request further self-regulation statements and certifications or to implement other appropriate measures in accordance with the contractual agreements.

In the event of suspected misconduct or if you yourself become aware of any inappropriate action on the part of AXICOM HV AG employees, please submit a report to AXICOM HV AG, Management, Contact see www.AXICOM-HV.com