



# OptoTech

## Supplier Code of Conduct

### Our understanding of sustainability in the supplier management

OptoTech sees sustainability as an essential component of its business processes. In our procurement activities, we pay attention not only to process-related, economic and technical criteria but also to social and ecological aspects such as human rights, fair working conditions, fair competition, prevention of corruption, and health and environmental protection.

As a technology group with a high level of materials expertise, we procure raw materials, goods and services from suppliers worldwide to ensure the sustainable success of our customers with innovative product and service solutions. The basis for this is a responsible corporate philosophy geared to long-term value creation. For this reason, we involve suppliers directly in our sustainability strategy.

In the area of conflict between product/performance, market, region and process, quality, reliability, costs, innovation, integrity and sustainability are essential factors in our selection of suppliers. OptoTech will therefore only select suppliers who conduct their business with professionalism and integrity, share our social and environmental values, and recognize and support our quality standards and health and safety culture.

Therefore, we expect the following from our suppliers:

- Conducting their business in full compliance with all applicable laws, regulations, policies and industry codes.
- Strict adherence to ethical principles for employee and human rights, environmental protection, health protection and occupational safety.
- Integration, application and sharing of these principles with their own suppliers and subcontractors.
- Recognition of the importance of diversity and inclusion through strict compliance with all equal opportunity and non-discrimination laws, regulations and policies.
- Ensuring that there are no violations of the law or discrimination of any kind in the workplace.
- Conscious, respectful interaction with cultural contrasts, beliefs and issues.

This Supplier Code of Conduct sets out the minimum requirements on sustainability issues and defines the core principles that OptoTech expects all business partners and suppliers to comply with.

OptoTech reserves the right to suspend or terminate the business relationship with a supplier who does not comply with these principles or applicable law at any time.

### 1. Respect for human rights/discrimination

Employees of OptoTech as well as all business partners and suppliers have the right to fair, courteous and respectful treatment. No one may be harassed or discriminated against on the basis of their ethnicity, skin color, nationality, ancestry, gender, sexual identity, faith or religious affiliation, ideology, political views, age, physical constitution, appearance or other personal characteristics.

OptoTech expects that its suppliers also promote equal opportunities and equal treatment and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and further education measures.



No employee of a supplier may be discriminated against on the grounds of gender, age, skin color, culture, ethnic origin, nationality, sexual identity, sex, disability, religious affiliation, political views or ideology.

## **2. Child labor**

OptoTech rejects any form of child labor, including among its business partners, customers, suppliers and their subcontractors. The definition of child labor is based on the principles of the United Nations Global Compact.

OptoTech therefore expects its suppliers to prohibit and refrain from any kind of child labor in their companies and along the supply chain.

## **3. Forced labor/Modern slavery**

Any form of slavery is incompatible with our ethical foundations. We expect our suppliers and their subcontractors to fight against any form of modern slavery and human trafficking along the supply chain and not tolerate it under any circumstances. In particular, the rights of indigenous people and local communities should be respected, promoted and protected throughout the supply chain.

## **4. Employee rights/Working conditions**

OptoTech is committed to the principles of social responsibility. It is therefore in the company's interest that fair working conditions apply worldwide in OptoTech. Compliance with all local legislation on minimum wages, social benefits, overtime, working and break times and working conditions is a matter of course for OptoTech.

OptoTech therefore also expects its suppliers to comply with all employee rights of the respective applicable national legislation as well as fair working conditions worldwide. OptoTech will not commission or use any private or public security forces if these security forces are deployed if

- a) the prohibition of torture and cruel, inhuman or degrading treatment is disregarded,
- b) life or limb is injured or
- c) the freedom of association and freedom of association are impaired.

## **5. Freedom of association**

The right of all employees to form and join trade unions and employee representative bodies is recognized by suppliers. Where this right is limited by local law, alternative means of employee representation that comply with the law shall be encouraged.

## **6. Remuneration/Working hours**

Suppliers must pay employees on time and in accordance with applicable wage laws, including minimum wages, overtime, prohibition of excessive overtime and mandated benefits.

## **7. Health protection/Occupational safety/Fire protection**

Safety in the workplace and the safety of our products are a fundamental principle for OptoTech. Processes, operating facilities and equipment, as well as all workplaces must comply with the applicable legal obligations for occupational safety, health and fire protection.

OptoTech therefore expects its suppliers to know and comply with the applicable national legislation on



health protection, occupational safety and fire protection. We require that suppliers have an appropriate occupational safety organization. This includes, for example, the containment of actual and potential occupational safety risks by means of suitable protective measures and the deployment of employees who are sufficiently qualified and instructed to carry out their work more safely.

OptoTech welcomes its suppliers having a certified occupational safety management system and positively considers this in its supplier selection process.

## **8. Environmental protection**

Protection of the environment is an integral part of OptoTech's corporate policy and this is therefore also consistently required of all suppliers.

OptoTech expects its suppliers to know and comply with the applicable national legislation on environmental protection. This also includes compliance with all official requirements and product-related environmental regulations in the destination country.

We require that suppliers have an appropriate environmental protection organization and ensure the protection of the following protected goods:

- Protecting people, animals and plants by preventing emissions that are hazardous to the environment and/or health and avoiding the manufacture of products with ingredients that are hazardous to the environment and/or health.
- Protecting the atmosphere by preventing air pollution from harmful and/or greenhouse gases and by maintaining air quality.
- Protecting soil by preventing the creation of harmful soil change and limiting land use.
- Protecting water by preventing lasting harmful water changes, treating all wastewater, and using this resource sparingly.
- Protecting all natural resources by
  - preventing excessive use of natural resources,
  - promoting the use of renewable energies and energy efficiency,
  - reducing the generation of hazardous waste and waste for disposal,
  - disposing of waste in a correct and harmless manner,
  - promoting the use of renewable raw materials,
  - and developing and manufacturing cycle-oriented products.

For OptoTech, it is also a matter of course that our suppliers also assume responsibility for damage already incurred and caused by their own business activities and make their contribution to repairing the damage or minimizing the effects of the damage.

OptoTech welcomes its suppliers having a certified environmental management system and positively considers this in the context of its supplier selection.

## **9. Conduct in the business environment/fair competition**

Suppliers must conduct business in accordance with fair and vigorous competition and in compliance with applicable competition law. Suppliers must adhere to fair business practices, including accurate and truthful advertising.

## **10. Corruption and bribery**

Any bribery, corruption, extortion, money laundering and embezzlement are prohibited. Suppliers may not grant benefits, offer, pay or accept bribes. This also applies to illegal inducements (e.g., bribes) and



any illegal influence in business or government relations. Nor may intermediaries (e.g., subcontractors, wholesalers, agencies, consultants) be used to conduct or support such unlawful activities.

Suppliers must therefore implement effective fraud prevention and reporting programs and report to OptoTech all incidents of fraud (confirmed or under investigation) related to their business relationship with OptoTech.

### **11. Invitations/Gifts**

Suppliers in an existing business relationship with OptoTech or those seeking such a relationship may not offer gifts, gratuities, entertainment, meals or entertainment activities that could influence the employee(s) decision regarding the business relationship with OptoTech.

### **12. Use of the OptoTech name/brand/logo**

The use of OptoTech's name, trademarks/brands or other similar information in any advertising, media publication or product recommendation of Supplier is prohibited without the prior written consent of OptoTech.

### **13. Avoidance of conflicts of interest**

Suppliers should avoid any interactions with OptoTech employees that could create or appear to create a conflict with OptoTech. For example, suppliers may not employ OptoTech employees or otherwise make payments to them that have not been approved in advance by OptoTech.

### **14. Money laundering**

OptoTech expects its suppliers to comply with all relevant legal obligations to prevent money laundering and not to engage in money laundering activities.

### **15. Intellectual property/plagiarism**

All intellectual property rights must be respected by suppliers. The transfer of technologies and know-how must be implemented in such a way that the protection of intellectual property rights of the respective owner is ensured.

For this reason, the use of plagiarized or counterfeit materials is prohibited. The OptoTech does not approve of the use, further processing or marketing of counterfeit products. In addition, detected counterfeit products are not put into circulation by the supplier, but are reported to the relevant law enforcement authorities.

### **16. Supply chain integrity/Supply Chain Act (LkSG)**

The supplier undertakes to observe human rights and environmental due diligence obligations in an appropriate manner in its respective supply chains.

The requirements of the Supply Chain Act must be complied within its scope of local application.

### **17. Export/Import control**

Suppliers must comply with all applicable import and export control laws, regulations and sanctions of the country in which the supplier is located and all countries in which transactions are conducted, including import, export, re-export, transfer or disclosure.

This includes all types of transactions of goods, software, technology or technical assistance that may be



subject to trade restrictions, regardless of the type of transfer. Suppliers must cooperate with OptoTech in determining applicable export control restrictions. In addition, suppliers must fully comply with other applicable trade and customs laws.

## **18. Privacy and data protection**

Suppliers must comply with and respect all personal data protection and privacy laws. Suppliers use personal data (e.g., of employees or business partners of OptoTech) only in accordance with the legal requirements for data protection.

Suppliers must protect confidential information, including personal data, received from or processed on behalf of OptoTech and actively prevent loss, misuse, theft, fraud, unauthorized access, disclosure or alteration and promptly report any potential breaches or security vulnerabilities. Suppliers should apply an appropriate information security system

## **19. Conflict materials**

Suppliers shall ensure that the products supplied to OptoTech do not contain any metals extracted from minerals or their derivatives that originate from conflict areas in which armed groups commit serious human rights violations and are directly or indirectly financed or favored. Furthermore, the guidelines of EU Regulation 2017/821 and the Dodd-Frank Wall Street Reform and Consumer Protection Act must be strictly adhered to.

## **20. Compliance with the Supplier Code of Conduct/Control**

In order to determine the compliance of suppliers with the principles and requirements of this OptoTech Supplier Code of Conduct, we reserve the right to check these ourselves, through third parties or by means of supplier self-assessments.

Furthermore, OptoTech expects its suppliers to implement these standards in an appropriate form.

In addition, on-site audits can be carried out by OptoTech or a third party commissioned by OptoTech or by the customer in coordination with the supplier.

OptoTech is provided with these audit results, which have a direct influence on supplier evaluation and approval as a supplier. Any violation of the principles and requirements stated in the OptoTech Supplier Code of Conduct shall be considered a material impairment of the contractual relationship on the part of the suppliers. In case of suspicion of non-compliance with the described principles and requirements of the OptoTech Supplier Code of Conduct, OptoTech reserves the right to request further information on the relevant facts from the supplier.

Furthermore, OptoTech has the right to terminate without notice individual or all contractual relationships with suppliers who demonstrably do not comply with this Supplier Code of Conduct or who do not strive for and implement improvement measures.

This Supplier Code of Conduct is permanently available to all suppliers of OptoTech on the OptoTech homepage.

Each supplier shall refer its employees to this Code of Conduct and explain its contents. Every supplier of OptoTech is called upon to examine their own conduct on the basis of the above standards and instructions for action and, if necessary, to adapt them.

Violations of this Supplier Code of Conduct will not be tolerated and may also result in civil or criminal penalties.



## 21. Whistleblowing system

If supplier employees believe that OptoTech employees or anyone acting for or on behalf of OptoTech has engaged in illegal or otherwise unauthorized activity, they must report it immediately to OptoTech.

OptoTech has set up a whistleblower system by appointing an external lawyer as an ombudsman (lawyer of confidence), which can also be used by suppliers.

This ombudsman is available at any time and free of charge as a contact person to all suppliers who wish to make a confidential reference to the suspicion of a criminal offense or similarly serious irregularities with reference to OptoTech.

Due to the lawyer's duty of confidentiality, it is ensured that the identity of whistleblowers is reliably protected and not disclosed to OptoTech.

### **Contact details of the OptoTech ombudsman (lawyer of confidence):**

Address: Dr. Rainer Buchert, Buchert Jacob Partner Partnerschaftsgesellschaft mbB  
Kaiserstrasse 22, 60311 Frankfurt am Main/Germany

Telephone: +49 69 710 333 30

Email: [kanzlei@dr-buchert.de](mailto:kanzlei@dr-buchert.de)

Information can also be provided via a contact form on the Buchert Jacob Partner website:  
<https://www.ombudsperson-frankfurt.de/de>.

Wettenberg, April 1, 2023

OptoTech Optikmaschinen GmbH