

CODE OF CONDUCT GINZINGER ELECTRONIC SYSTEMS



CODE OF CONDUCT OF GINZINGER ELECTRONIC SYSTEMS GMBH

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VERSION: 1.0

LAST REVISED: 21.07.2017

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1 PREAMBLE

For more than 25 years, Ginzinger electronic systems has been a partner for the customized development and production of embedded Linux solutions and customer-specific applications in hardware and software. As an owner-managed medium-sized company, Ginzinger electronic systems stands for openness, honesty and long-term personal relationships with handshake quality. Our employees live and breathe absolute customer orientation, have in-depth technological knowledge, take on complexity for our customers and inspire lasting enthusiasm over the entire product life cycle.

2 PRINCIPLES, OBJECTIVES AND AREAS OF APPLICATION

The Code of Conduct cannot regulate all conceivable cases, but it is intended to help ensure compliance with framework conditions that are to be observed equally by all those employed in the company. In the context of its business activities, Ginzinger electronic systems is subject to a variety of social, political and legal conditions that must be observed. However, violations of these conditions, in particular those against the legal system, can cause considerable financial disadvantages for the company but also for its partners, suppliers and customers and cause lasting damage to its reputation.

In addition to internal regulations and instructions, as well as national and international laws, this code of conduct forms the basis for all business actions and decisions at Ginzinger electronic systems. It is the basis for legally, ethically and morally impeccable behavior of all employees in the company.

3 RESPONSIBILITY AND IMPLEMENTATION

Each person employed in the company is responsible for compliance with and implementation of the Code of Conduct. The company's managers are to be role models for all persons employed in the company by living the practice of implementing the contents of the Code of Conduct, instructing their team members on how to deal with the Code of Conduct, monitoring compliance and, if necessary, with the support of the responsible to instruct their team members in dealing with the Code of Conduct, to monitor compliance and, if necessary, to provide training with the support of the responsible.

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4 COMPLIANCE WITH LAWS AND OTHER EXTERNAL AND INTERNAL REGULATIONS

Ginzinger electronic systems informs the persons employed in the company about the current, applicable national and international legal principles, guidelines, regulations and instructions. These legal regulations, internal guidelines, regulations and instructions as well as the provisions of this Code of Conduct are to be complied with by each and every employee. Ginzinger electronic systems does not tolerate any violations of the law. All employees are also required to keep themselves fully informed of the regulations applicable to their respective areas of responsibility and to contact their superiors in case of doubt.

5 ENVIRONMENT / HEALTH / SAFETY

Ginzinger electronic systems acts sustainably and responsibly, applying the relevant regulations regarding the environment, health and safety. All Ginzinger electronic systems employees must also comply with these regulations and be accountable to their colleagues for doing so. In our business activities, we attach great importance to preventing negative impacts on the environment and society. Social standards and the sensible use of resources and energy are very important to us. The use of our technology must serve ethically justifiable purposes.

6 FAIR COMPETITION

Ginzinger electronic systems is committed to free and fair competition. Concerted competitive behavior counteracts competition. All competition and antitrust regulations must be fully complied with by every employee. As part of their business activities, therefore, all employees in the company must refrain from coordinating competitive behavior with competitors – whether in written or oral form or by conclusive behavior. In particular, it is also forbidden to agree on prices and production capacities, to divide markets, customers and to boycott a customer or other market participants.

Even the exchange of information with competitors, which may be the basis for a coordinated approach (in particular regarding prices, costs, production conditions, conditions, customers, offers, stocks) is not permitted. In case of uncertainty, employees must contact their superiors immediately. Violations of these regulations can have serious consequences for Ginzinger electronic systems. In particular, they can result in heavy fines and claims for damages. Oral agreements and coordinated behavior are punished just as much as written agreements.

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7 CORRUPTION / BRIBERY / ACCEPTANCE OF GIFTS

Ginzinger electronic systems expressly prohibits the direct or indirect offering or acceptance of benefits (gifts, invitations, interest-free loans, etc.) if this is intended to influence business transactions in an improper manner or if even the slightest impression of this could arise. Entertainment or gifts of little value (such as simple ballpoint pens, USB sticks, writing pads, etc.) that are appropriate in terms of general business practice are permissible provided that national law is observed. All other gifts are to be refused or returned, or, in the case of Christmas gifts, made available to all employees in the company in the form of a raffle employees. Under no circumstances is the offering or accepting of money or monetary benefits permitted.

8 MONEY LAUNDERING

Various countries, including the member states of the European Union and the United States, have enacted laws against money laundering. All employees are prohibited from taking measures, either alone or in conjunction with third parties, that violate money laundering regulations. Money laundering is in particular the smuggling – for example through exchange or transfer – of funds or other assets originating from criminal acts into the legal financial and economic cycle.

9 RESPECT AND INTEGRITY

Ginzinger electronic systems considers respect for other cultures and values to be self-evident. Within the company, all employees are required to maintain political neutrality. We value a working environment characterized by fairness, trust and professional interaction is characterized. Decency, appreciation and an open communication style define our way of working. Personnel decisions are made solely on the basis of aptitude, performance, qualifications and integrity. Bullying, discrimination and sexual harassment will not be tolerated under any circumstances. Ginzinger electronic systems is committed to complying with all applicable labor laws and is committed to its social responsibility in terms of health and occupational safety.

10 CONFLICTS OF INTEREST

Every employee must separate business and private interests. However, should the personal or economic interests of an employee come into conflict with those of Ginzinger electronic systems, this must be reported unsolicited and without delay to the supervisor, the human resources department or a manager of the company. Every employee is obliged to deal with such issues transparently and must fully disclose any current or potential conflicts of interest, even if

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only the appearance of a conflict of interest could exist, to their supervisor immediately and without being asked. Secondary employment requires the prior written consent of the company management. This applies in particular to secondary employment for competitors, customers or suppliers of Ginzinger electronic systems or financial interests in them. Conflicts of interest can also arise through family relationships. These must therefore be disclosed to the supervisor without being asked. The following situations can lead to conflicts of interest:

- A direct or indirect interest in business partners or competitors (e.g. through family members or other related parties)
- Business transactions with business partners whose employees are family members or close associates

11 HANDLING OF COMPANY INFORMATION / CONFIDENTIALITY

Confidential information of any kind obtained in the course of business activities – including information outside one's own area of activity – may not be used for one's own interests, nor may it be made available for the use of third parties. It must be ensured that information of any kind from Ginzinger electronic systems, as well as its customers, partners and suppliers, is always stored securely and encrypted if necessary. If such information has to be taken outside the company for business reasons, it must be protected against inspection or access by third parties. When external partners are involved, appropriate confidentiality agreements must be concluded.

The confidentiality and protection of intellectual property and company information is a top priority for all employees and they must therefore take measures to protect it, electronically or not, from loss, misuse or theft. This includes information, know-how, trade secrets (in particular if a corresponding confidentiality agreement has been concluded for this) and intellectual property of Ginzinger electronic systems, their customers, partners and suppliers. Care is taken to ensure that no rights of third parties are violated and that the use of (intellectual) property of third parties only takes place in accordance with the rights acquired for it.

We protect property provided to us with the same care as our own. The obligation to maintain confidentiality continues without restriction even after the termination of the employment relationship. In addition, the confidentiality provisions of the respective employment contracts apply.

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12 CORPORATE COMMUNICATIONS

All oral and written statements and press releases that affect the interests of Ginzinger electronic systems are made exclusively by the managing director and the head of the marketing department. This applies to both classic and digital communication. In their communication with customers and within the company, all employees value a professional and respectful manner.

Internal or confidential information is not disseminated either in the private sphere or on social media. In particular, if this information and statements are damaging to the company. Harmful statements are all those that could damage or impair the reputation of Ginzinger electronic systems, its employees, customers, partners or suppliers.

13 IT USE

The disclosure, storage and processing of personal data (such as names, addresses, telephone numbers, personnel numbers, etc.), both within Ginzinger electronic systems and externally, is only permitted within the framework of legal provisions. In the context of IT use, the guidelines and security regulations of Ginzinger electronic systems must be observed in order to limit the general risks.

IT devices (PC, notebook, smartphones, etc.) must always be stored in a suitable manner and, as far as technically possible, be provided with password protection. Personal passwords must not be passed on to other employees or third parties. For representation clear verifiable regulations are to be made.

If company-related data is stolen or cannot be found, the supervisor must be informed immediately. If electronic data is affected, the appropriate and suitable steps must be taken in consultation with the head of the IT department or the management, such as blocking the affected users.

14 USE OF THE PROPERTY OF GINZINGER ELECTRONIC SYSTEMS GMBH

The operating resources and technical equipment provided are intended for operational use. Private use by employees is only permitted within the explicitly allowed framework. All operating resources are to be treated carefully and appropriately.

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15 REPORTING MISCONDUCT

It may happen that employees of Ginzinger electronic systems violate the provisions of the Code of Conduct, other internal guidelines and regulations or legal requirements. If employees recognize such misconduct, they are free to report it immediately to the managing director, their direct superior or the human resources department.

All incoming reports will be carefully investigated and treated confidentially if requested. To facilitate the investigation process, it is necessary that the employee identify themselves when reporting, whereby confidentiality regarding their person will be assured if requested in any case. To promote open and trusting communication, it is expressly stated that employees who report violations against the Code of conduct, internal guidelines and regulations, as well as laws, report, under no circumstances will negative consequences of any kind arise from this.

This also applies to other persons who provide important information for the investigation of such misconduct. However, Ginzinger electronic systems expressly reserves the right to take disciplinary action against employees who intentionally or through gross negligence make false accusations.