



Code of Conduct for Suppliers

- August 2025 -

1. Purpose

This Code of Conduct defines the fundamental requirements that MTC Micro Tech Components GmbH, hereinafter referred to as MTC, places on its suppliers, particularly with regard to their responsibility toward stakeholders and the environment. The principles set out herein are an essential component in the selection and evaluation of suppliers. They reflect the environmental, social, and governance principles that MTC incorporates into all areas of its business activities.

MTC reserves the right to adapt the requirements of this Code of Conduct as necessary within a reasonable scope. In such cases, MTC expects the supplier to accept the amended provisions..

2. Scope

This Code of Conduct applies to all suppliers currently providing goods and services to MTC. The following principles are addressed:

- **Ethical Requirements**

To fulfill their social responsibility, suppliers must conduct their business in an ethical manner and act with integrity.

- **People and Labor**

Suppliers must protect the human rights of their employees and treat them with dignity and respect.

- **Health, Safety, and Environment**

Suppliers must ensure the health and safety of all those affected by their activities and operate in an environmentally responsible and resource-efficient manner.

- **Governance**

Suppliers must implement effective management and control systems to ensure compliance with applicable laws in accordance with this Code of Conduct.



2.1 Ethical Requirements

2.1.1 Business Integrity

Suppliers must not engage in or tolerate any form of corruption, extortion, embezzlement, or money laundering. Bribery and improper advantages – such as kickbacks – are strictly prohibited. Presents or benefits to MTC employees are not permitted if they could be considered as influencing decisions or if they violate laws or ethical standards.

2.1.2 Conflicts of Interest

Suppliers are obliged to inform MTC of any circumstances that could potentially constitute a conflict of interest. This applies in particular if MTC employees have private, professional, or significant financial interests in the supplier's business activities.

2.1.3 Fair Competition

Suppliers operate in compliance with all applicable competition and antitrust laws and are committed to fair and transparent business practices.

2.1.4 Conflict Minerals

Suppliers must ensure that products delivered to MTC do not contain metals from conflict minerals or their derivatives that finance armed groups or promote human rights abuses. All applicable regulations on responsible sourcing of materials must be strictly observed.

2.1.5 Prevention of Tax Evasion

Suppliers are required to fully and properly meet all tax obligations in every country where they operate or deliver goods. They must also ensure that all individuals acting on their behalf or under their instruction comply with these requirements. Tax evasion – whether by the supplier or through third parties – is prohibited.

2.1.6 Export Controls and Economic Sanctions

Suppliers must strictly comply with all applicable laws and regulations on export controls and economic sanctions in the countries in which they operate. This includes, in particular, implementing appropriate control systems to detect and prevent unauthorized exports or violations of such requirements.

2.1.7 Reporting Concerns

Suppliers must establish procedures that enable their employees to raise concerns or report indications of unlawful conduct in the workplace freely and without fear of retaliation, intimidation, or harassment.



2.1.8 Data Protection and Intellectual Property Protection

Suppliers are required to handle confidential information with care and use it only for its intended purpose. They are also responsible for safeguarding and protecting the rights of their business partners and employees, as well as intellectual property.

2.2 People and Labour

2.2.1 Child Labour

Child labour will not be tolerated under any circumstances in our supply chain. Suppliers are required to strictly prohibit any form of child labour in their business operations. The minimum age for employment must at least comply with the respective national labour laws and must under no circumstances be undercut.

2.2.2 Modern Slavery

Any form of modern slavery – including servitude, forced labour, compulsory labour, and human trafficking – is strictly prohibited in our supply chain. Debt bondage, forced commitment, and involuntary prison labour are likewise neither accepted nor tolerated.

2.2.3 Working Hours, Wages, and Benefits

Suppliers must strive to avoid excessive working hours. Employees' working hours must not exceed the maximum limits set by national laws.

Payment must be made regularly, on time, and in full – in accordance with the legal requirements of the respective country. Wages and benefits must at least meet the statutory minimum requirements and be sufficient to enable employees and their families to lead a life in dignity.

Deductions from wages as a disciplinary measure are prohibited unless permitted by law. Suppliers are furthermore encouraged to ensure equal pay for work of equal value.

2.2.4 Fair Treatment

Suppliers must provide their employees with a work environment free from abuse. Any form of sexual harassment, physical or psychological violence, coercion, threats, or verbal humiliation is strictly prohibited.

2.2.5 Prohibition of Discrimination

Equal treatment and the prohibition of discrimination must be integral parts of suppliers' corporate policies. No one may be disadvantaged on the basis of personal characteristics – such as origin, gender, age, religion, disability, or sexual orientation.



2.2.6 Human Rights

Suppliers are obliged to respect and promote internationally recognized human rights and to ensure that they do not contribute to human rights violations.

2.3 Health, Safety, and Environment

2.3.1 Occupational Health and Safety

Suppliers must effectively protect their employees from chemical, biological, and physical hazards. Risks arising from working conditions, physically demanding activities, or infrastructure must be actively minimized - through safe work processes, technical protective measures, regular maintenance, and personal protective equipment.

Employees must be informed about, trained on, and protected from potential hazards. A safe workplace must at least provide clean drinking water, adequate lighting, ventilation, sanitary facilities, and - if necessary - safe accommodations.

2.3.2 Product Safety

Suppliers must comply with all applicable product safety regulations, label their products correctly, and provide clear instructions for handling. Safety-related information on hazardous substances must be made available where there is a legitimate need.

2.3.3 Waste and Emissions

Suppliers must properly store, transport, dispose of, or recycle waste, emissions, and wastewater. Environmental and health risks must be monitored, minimized, and controlled through appropriate measures. The release of hazardous substances and unintended leakages must be avoided or mitigated.

2.3.4 Protection of Natural Resources

Suppliers should use natural resources such as water, energy, and raw materials sparingly and efficiently. Environmental and climate impacts arising from their operations or supply chain should be avoided or reduced as far as possible at the source. The use of renewable energy and the improvement of energy efficiency are expressly encouraged.



2.3.5 Environmental Management

Suppliers should implement, document, and operate an effective environmental management system - ideally based on international standards such as ISO 14001. The aim is to identify, manage, and reduce environmental impacts. All necessary environmental permits must be obtained, kept up to date, and relevant reporting obligations fulfilled to ensure ongoing compliance with legal requirements.

2.4 Governance

2.4.1 Compliance with Legal Requirements

Suppliers must comply with all applicable international, national, and local laws, regulations, contractual obligations, and recognized standards. This also includes taking into account industry best practices, as well as applying for, maintaining, and regularly updating all necessary permits, licenses, certificates, and registrations.

2.4.2 Right to Assessment

Suppliers grant MTC, upon reasonable notice, the right to review their performance in order to ensure compliance with this Code. They are obliged to maintain and provide all necessary evidence and documentation demonstrating such compliance.