

 Member of Accuron Industrial Technologies	Code of Ethics and Compliance for Suppliers Internal document	Revision: 2.0
		MD_POL_004

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Code of Ethics and Compliance for Suppliers

The company *mechatronic systemtechnik GmbH* (hereinafter referred to as *mechatronic*) is an internationally active company that develops mechanical, electrical and control systems for the automated handling of wafers. Responsible, sustainable and legally compliant action is an integral part of *mechatronic*'s corporate philosophy. This claim applies equally to all suppliers and partner companies with whom *mechatronic* strives for a long-term and cooperative business relationship.

This Code of Ethics and Compliance for Suppliers (hereinafter referred to as the *Code*) defines the basic requirements that *mechatronic* places on all its suppliers. The aim of this code is to ensure sustainable business practices and compliance with environmental, labor and social standards along the entire supply and value chain.

1 SCOPE OF APPLICATION

This code applies to all direct and indirect suppliers and their subcontractors who provide goods or services to *mechatronic*. Suppliers undertake to implement the contents of this Code within their own supply chains and to ensure compliance with the principles described therein.

2 COMPLIANCE WITH LAWS, STANDARDS AND REGULATIONS

Compliance with all applicable laws, regulations and standards is a matter of course for *mechatronic* and is also expected from all suppliers. This includes, among other things, requirements

- an established quality management system that ensures consistently high product and service quality. Certification according to ISO 9001 is desirable, but not mandatory.
- Information security in accordance with the Network and Information System Security Act (NISG) and data protection in accordance with the General Data Protection Regulation (GDPR). The specific requirements with regard to IT security and data protection are regulated in supplementary, separate contractual agreements.
- with regard to compliance with all relevant export control, embargo and customs regulations as well as the applicable sanctions lists (e.g. EU, UN, USA). The procurement of raw materials from conflict or high-risk areas must be avoided, especially materials that are associated with human rights violations.

3 INTEGRITY, FAIRNESS AND TRANSPARENCY

mechatronic attaches great importance to a trusting, honest and long-term cooperation with its suppliers. They are expected to uphold and actively promote the principles of integrity, fairness and transparency in their business activities.

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To ensure that these expectations are met, suppliers are committed to the following principles in particular:

- **Anti-corruption and unfair business practices:** Suppliers undertake to refrain from any form of corruption, bribery, extortion or other unfair or unethical business practices. No inappropriate advantages may be offered, promised, granted or accepted, either directly or indirectly, in order to influence business decisions or gain unfair advantages.
- **Avoidance of conflicts of interest:** Suppliers must recognize potential conflicts of interest that could affect their business decisions in relation to *mechatronic* at an early stage and disclose them immediately. This applies in particular to personal or economic ties with employees or affiliated companies of *mechatronic*.
- **Dealing with gifts and invitations:** Suppliers are expected to handle gifts, invitations and other benefits responsibly. At no time may these give the appearance of improperly influencing business decisions. In case of doubt, prior consultation with the responsible contact person at *mechatronic* is recommended.
- **Fair competition:** Suppliers undertake to comply with all applicable laws to combat cartels, price fixing and other anti-competitive practices. Fair and transparent market behavior is a prerequisite.

4 OCCUPATIONAL SAFETY AND WORKING CONDITIONS

mechatronic expects its suppliers to ensure safe, fair and legally compliant working conditions. This includes both technical occupational safety and compliance with basic labor law standards. A safe and healthy working environment is an essential component of responsible corporate practice.

Suppliers are committed to the following principles in particular:

- **Compliance with legal and industry-specific regulations:** All relevant national laws as well as customary industry standards in the area of occupational safety and labor law must be consistently implemented. The aim is to avoid accidents at work, work-related illnesses and risks in the workplace.
- **Safety-oriented design of workplaces:** Workplaces, machines, systems and work equipment must be designed in such a way that they comply with legal safety requirements and do not pose a risk to employees.
- **Training and instruction:** Employees must be instructed regularly and as required about applicable safety regulations and rules of conduct - particularly in the case of high-risk activities or changes to the work process.
- **Provision of personal protective equipment (PPE):** Where necessary, suitable personal protective equipment must be provided that meets the legal requirements, is regularly inspected and is used properly.
- **Compliance with labor law requirements:** Suppliers shall ensure that applicable regulations on working hours, rest breaks and vacation entitlements are complied with. At least the legally prescribed minimum wages are paid, and attention is also paid to fair and appropriate remuneration in line with local and industry standards.

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5 HUMAN RIGHTS AND HEALTH PROTECTION

mechatronic is committed to respecting internationally recognized human rights and expects the same from its suppliers. In addition, the protection of the physical and mental health of all employees is a central component of responsible and ethical cooperation.

Suppliers are committed to the following principles in particular:

- **Prohibition of forced labor and modern slavery:** any form of forced or compulsory labor, involuntary labor or modern slavery is prohibited.
- **No child labor:** The employment of minors below the legally prescribed minimum working age is prohibited. The applicable provisions on the protection of young workers must be complied with.
- **Equal treatment and non-discrimination:** Fair, respectful and non-discriminatory treatment of all employees must be ensured. Discrimination on the basis of gender, age, ethnic origin, religion, ideology, disability, sexual orientation or political conviction is not tolerated.
- **Freedom of association and collective bargaining:** Within the framework of applicable laws, employees must be granted the right to organize themselves into trade unions and to participate in collective bargaining.
- **Health promotion and prevention:** Suppliers should take measures to help maintain and promote the physical and mental health of their employees. This includes respectful treatment in the company, a health-promoting working environment and preventive offers that strengthen well-being.

6 ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

mechatronic considers the protection of the environment and the responsible use of natural resources to be key components of sustainable and responsible business practices. Suppliers are expected to take environmental concerns into account in their business activities and to take appropriate measures to avoid or minimize negative environmental impacts.

Suppliers commit to the following principles in particular:

- **Compliance with environmentally relevant laws and regulations:** All applicable statutory provisions and official requirements relating to environmental protection must be complied with. These include regulations on emissions, waste disposal, waste water treatment and the handling of hazardous substances.
- **Environmental management:** *mechatronic* recommends that suppliers establish an environmental management system or follow recognized standards such as **ISO 14001** in order to systematically monitor and continuously improve their environmental performance.
- **Conservation of resources and energy efficiency:** Suppliers should use energy and natural resources responsibly. The aim is to reduce energy consumption, the use of water and raw materials as well as the generation of waste and emissions.

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- **Avoidance of environmental pollution:** When manufacturing products or providing services, environmental impacts are to be minimized through the use of environmentally friendly materials and technologies. The use of materials originating from conflict or high-risk areas must be avoided.
- **Promotion of sustainability:** Although no concrete sustainability targets are currently defined for suppliers, *mechatronic* welcomes and appreciates independent commitment in this area. This includes, in particular, the continuous reduction of the carbon footprint and measures to improve energy efficiency.

7 RESPONSIBILITY IN THE SUPPLY CHAIN

mechatronic expects its suppliers to implement the principles described in this Code of Ethics and Compliance not only within their own company, but also to take them into account throughout their entire supply and value chain.

Suppliers undertake to

- inform their subcontractors and contractually involved partners about the requirements of this Code,
- ensure compliance with these requirements in an appropriate manner and
- actively identify and minimize potential risks relating to human rights, working conditions, the environment or ethical conduct in their supply chain.

Particular care must be taken in areas of increased risk - especially when selecting partners outside the European Economic Area or when procuring sensitive raw materials.

8 REPORTING VIOLATIONS

The early detection and reporting of violations of applicable laws, regulatory requirements or the principles described in this Code is an important part of responsible business relationships. *mechatronic* expects its suppliers to take indications of potential misconduct seriously and to respond appropriately.

To support a transparent and trusting cooperation, *mechatronic* provides a whistleblower system. This can be used to report violations - anonymously if desired. The whistleblower system can be accessed via the following link:

<https://customer-portal.smartintegrityplatform.com/AT/mechatronic-systemtechnik-gmbh-300/third-party/home>

mechatronic guarantees the confidential treatment of all reports and the protection of the whistleblower against discrimination, provided that the report is made to the best of its knowledge and in good faith.

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Suppliers are also encouraged to create suitable internal structures and processes within their own organization to enable and appropriately handle reports of misconduct.

9 VERIFICATION AND OBLIGATIONS TO PROVIDE EVIDENCE

mechatronic reserves the right to demand proof of compliance with the legal, regulatory and requirements described in this Code from suppliers at any time. This applies in particular, but not exclusively, to the areas of human rights, working conditions, environmental and climate protection, occupational safety, data protection and information security.

In addition, *mechatronic* may, if necessary, obtain information on the practical implementation of these requirements or carry out random checks - especially with IT service providers.

10 FINAL PROVISIONS

This Code of Ethics and Compliance for Suppliers is an integral part of the business relationship with *mechatronic*. Suppliers confirm that they have taken note of the content and undertake to comply with the principles described and to implement them in their organization and along their own supply chain.

mechatronic reserves the right to revise this code if necessary and to adapt it to new legal, regulatory or internal company requirements. In such a case, suppliers will be informed of the changes in good time.

This code becomes effective as soon as the online form completed by the supplier is submitted to *mechatronic*.

The supplier is aware that violations of these requirements may result in labor law measures (warning, termination), contractual penalties, criminal prosecution (e.g. in the event of data theft) and even financial losses due to claims for damages.

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