



# CODE OF CONDUCT

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We are pleased to present to you our Code of Conduct. This document embodies our company values, with trust, integrity and credibility at the heart of ES&S. Our Code of Conduct acts as a compass, directing the behavior of both our employees and management across all scenarios. It ensures that these principles are not only respected but also upheld by all.

We aim not only to uphold standards within our own company but also to ensure that our direct and indirect suppliers and business partners share and respect the same values.

We invite you to read this code carefully. Together, we can create a positive work environment based on respect, fairness and sustainability.

Thank you for your commitment and support.



## CODE OF CONDUCT

### 1. Our core principles in focus

#### TRUST, INTEGRITY & CREDIBILITY

At ES&S, trust, integrity, and credibility are the cornerstones of our corporate culture. These values are not only part of our identity but also guide our actions and determine our decisions. By committing to these values, we create a work environment characterized by reliability, honesty, and credibility.

#### SCOPE

Our code of conduct is binding for each of us. From management to team member, we all bear the responsibility to live these principles in our daily actions. They serve as a guide for responsible behavior, shape our corporate culture, and support us in facing ethical and legal challenges in our everyday work. Together, we stand for creating an atmosphere characterized by integrity and respect.

#### SUPPLY CHAIN

ES&S places great emphasis on ensuring that both direct and indirect suppliers adhere to the values of our code of conduct. We actively support them and encourage them to embed these values in their own supply chains.

#### COMPLIANCE WITH LAWS

We adhere to the laws and regulations of the countries in which we operate. We observe supply chain due diligence obligations, the Energy Efficiency Act, as well as conformity regulations (US Dodd Frank Act, Conflict Minerals Regulation (EU) 2017/821, TSCA, IMDS, CSRD, California Proposition 65). However, there is no scope of application.

### 2. Fairness and partnership in the business world

#### COMPETITION & ANTITRUST LAW

We consider competition and antitrust law not only as legal requirements but also as moral obligations. We actively advocate for fair and transparent competition and strongly reject agreements that could impair competition. These principles form the backbone of our corporate culture and help strengthen the trust of our customers and partners.

#### CORRUPTION, BRIBERY, EXTORTION & EMBEZZLEMENT

We tolerate no forms of corruption, bribery, extortion, or embezzlement. With our zero-tolerance policy, we create an environment where such offenses have no place. Every employee is called upon to seek advice or assistance immediately in case of suspicions or legal doubts.

#### AVOIDANCE OF CONFLICTS OF INTEREST | EMPLOYEE LOYALTY

Avoidance of conflicts of interest and employee loyalty are key aspects of our corporate culture. We rely on transparency to identify and avoid potential conflicts. Our employees are encouraged to be loyal and to commit to our company goals and values. This way, we create a trusting work environment characterized by solidarity and integrity.

#### DONATIONS & SPONSORSHIP

At ES&S, we view donations and sponsorship as important ways to have a positive impact on our community. We engage voluntarily and without expecting anything in return. Our donations and sponsorship activities are transparent: We disclose who the recipients are and how the funds are used. At any time, we are ready to be accountable for the purpose of our donations and their targeted use.

#### TAX LAW | CUSTOMS LAW | INTERNATIONAL TRADE LAW

We strictly adhere to the laws and regulations of tax, customs, and international trade law. We truthfully prepare tax returns and declarations. Additionally, we consistently advocate for compliance with export control and customs requirements and ensure their proper implementation. From our suppliers, we also expect timely provision of necessary data and adherence to appropriate standards for supply chain security to jointly ensure responsible and lawful trade.



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### 3. Responsible handling of Information

#### COMPANY & BUSINESS SECRETS

We carefully safeguard our company and business secrets as well as other confidential information. Each employee is obligated to maintain the confidentiality of this information and not to disclose it without authorization. This applies not only to internal matters but also to confidential information about our customers and partners. We take this obligation seriously and continue to uphold it even after leaving the company to maintain the trust and integrity of our company.

#### DATA PROTECTION

At ES&S, we consider data protection as our top priority. We treat personal data confidentially and only use it for legitimate purposes. Our handling of data complies with applicable data protection laws, especially the GDPR. We prohibit any unauthorized use or disclosure of protected personal data and ensure that they are only used for the respective lawful tasks. This obligation also applies after leaving the company.

#### TRUTHFULNESS

We value honesty and integrity in all our actions and communications. Each employee is required to accurately and truthfully compose reports and other written documentation, regardless of whether they are shared internally or externally. Our data collections and records always adhere to the principles of proper accounting and are complete and correct.

### 4. Together for a better world

#### HUMAN RIGHTS | CONFLICT MINERALS

We respect and support internationally recognized human rights. Additionally, we will do our utmost to ensure that our products do not contain raw materials from conflict regions. We demand from our suppliers that the 3TG conflict minerals (tin, tantalum, tungsten, their ores and gold, as well as the raw materials cobalt and mica) contained in our products originate exclusively from safe, listed mines that are not located in the conflict regions of the Democratic Republic of Congo or adjacent states. Our target is to create transparent supply chains in accordance with OECD guidelines and thereby contribute to responsible procurement.

#### CHILD LABOR | FORCED LABOR

We categorically reject child labour and forced labour. We are committed to ensuring that no children or forced labourers are employed throughout our entire supply chain. We demand compliance with these standards from our suppliers and work closely with them to ensure that our products are made free from exploitation.

#### PROHIBITION OF DISCRIMINATION | EQUAL OPPORTUNITY

At ES&S, discrimination in any form is not tolerated. Regardless of gender, skin color, origin, religion, sexual orientation, or other characteristics, we treat everyone fairly and equally. Discrimination contradicts our core values and corporate culture. We actively promote equal opportunities and foster a work environment where all employees have the same chances to realize their full potential.

#### EMPLOYEE RIGHTS

We respect the rights of our employees, including their freedom of assembly and association. We adhere to all legal labor standards, especially regarding fair compensation and maximum working hours. Our aim is to ensure fair working conditions and protect the rights of our employees.

#### WORKPLACE HEALTH & SAFETY

Another goal is to ensure a safe and healthy working environment for every employee. We adhere to all relevant safety regulations and promote conscious behavior to minimize accidents and health risks. Through our occupational health management, we actively advocate for the safety and health of our employees.

**ENVIRONMENTAL AND CLIMATE PROTECTION**

Protecting our environment and climate, as well as resource efficiency, is a personal concern for us. Following the ISO 14001, we ensure that all environmental impacts are minimized and sustainable measures are promoted. Each employee bears responsibility for conserving natural resources and contributing to environmental and climate protection through their individual behavior. Together, we are committed to a sustainable future.

**5. Our promise to ourselves****COMMUNICATION OF THE CODE OF CONDUCT, POLICIES & PROCESSES**

We ensure that all employees are familiar with our code of conduct and can actively participate in it. Communication is transparent so that everyone has the opportunity to ask questions, voice concerns, and learn about our standards. Organizational measures, clear policies, and transparent processes ensure successful implementation. They are accessible to everyone, so that each employee internalizes the standards and lives up to them.

**REGULAR CHECKS**

At ES&S, we rely on regular checks to ensure that we consistently adhere to our code of conduct. These checks help us to identify and correct possible deviations early on.

**CONSEQUENCES OF VIOLATIONS**

In cases of violations of our code of conduct or legal requirements, we take measures according to the severity of the violation. This can range from supportive training to legal consequences such as liability or prosecution. It is important for us to create an environment where everyone knows and respects the guidelines in order to be successful together.