

DEUTA

CODE OF CONDUCT



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Preamble

Our Code of Conduct conforms with the “Code of Conduct (CoC)” of the German Railway Industry Association (VDB) to which we have committed ourselves.

The contents of this CoC were developed by the VDB on the basis of the Code of Conduct of the German Zentralverband der Elektrotechnik und Elektroindustrie (ZVEI) e.V. and the VDMA e.V.¹

DEUTA’s commitment to observe the CoC of the VDB shall emphasise our engagement in fair, sustainable, responsible and ethical principles of business conduct. It is also an expression of DEUTA’s understanding of social responsibility and future-oriented action.

Bergisch Gladbach, October 2023

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¹ The use of wording from the ZVEI/VDMA CoC (2022 version) has been made with the kind consent of the ZVEI and VDMA.



Basic Understanding

1. Basic Understanding of Corporate Management

This CoC is based on a common basic understanding of socially responsible corporate management, as defined in the following guidelines. This means for DEUTA that we assume responsibility by considering the consequences of our business decisions and actions in the context of economic, technological, social and ecological issues, and by striking an appropriate balance between these interests.

DEUTA shall voluntarily contribute to the welfare and sustainable development of those societies at the locations where we operate throughout the world, within the framework of our respective options and scope for action.

DEUTA is guided by universally accepted ethical values and principles, in particular integrity and rectitude, as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.



2. Scope

The geographical scope of this CoC includes all of the countries in which DEUTA conducts business.

The material scope of this CoC includes DEUTA and its supply chain. This means that DEUTA undertakes to demand compliance with the contents of this CoC from its suppliers within the scope of its respective abilities and sphere of influence and to call upon and support them to do the same in their supply chains. Rights in favour of third parties shall thereby not be established.

3. Basic Principles

DEUTA shall actively work to ensure that the values and principles set out below are observed and upheld in a sustainable manner.

3.1 Compliance with the Law

DEUTA shall comply with the applicable laws and regulations of the countries in which we operate. Where local laws and regulations are less restrictive, our actions shall be guided by the principles of this CoC. In cases where there is a direct contradiction between mandatory local law and the principles contained in this CoC, local law shall prevail, although DEUTA shall endeavour to comply with the contents of this CoC.



Basic Principles



3.2 Integrity and Corporate Management

DEUTA shall orient its actions to universally valid moral values and principles, in particular integrity, transparency, righteousness, the respect for human dignity, openness and the imperative of non-discrimination on the grounds of racial or ethnic origin, gender, religion or belief, disability, age or sexual identity.

DEUTA rejects corruption and bribery in accordance with the relevant UN Convention². DEUTA shall promote integrity, responsible management and controls within the company in an appropriate manner and shall take suitable measures to avoid, in particular, the direct or indirect perpetration of the following breaches of the law:

Theft, embezzlement, fraud, breach of trust, forgery, money laundering, agreements which restrict competition in tenders, such as price, customer, market or tender collusion or the division of markets, as well as infringement of trade secrets and unauthorised exploitation of templates or regulations of a technical nature, corruption and bribery in business dealings, granting of favours as well as the granting of benefits or other favours to employees of contractual partners or the acceptance of such benefits or favours.

DEUTA is committed to reputable and recognised business practices and fair competition, in particular in compliance with antitrust and competition law. DEUTA observes the relevant statutory obligations for the prevention of money laundering and does not participate in transactions that serve to conceal criminal or illegally obtained assets. In addition, DEUTA avoids conflicts of interest that could illegitimately influence business relationships. Existing conflicts of interest shall be disclosed and resolved by taking appropriate measures.

² United Nations Convention against Corruption of 2003, effective since 2005.

3.3 Protection of Information and Intellectual Property

Confidential information shall be protected and intellectual property shall be respected; technology and know-how transfers shall be made in a manner that protects intellectual property rights and confidential customer information, trade secrets and other information that is not in the public domain. The relevant prevailing legislation on the protection of commercial secrets shall be observed, confidential information belonging to business partners shall be treated accordingly and shall neither be passed to third parties without authorisation nor be made accessible to them.

3.4 Consumer Interests

Where consumer interests are concerned, DEUTA shall comply with the applicable consumer protection regulations as well as with appropriate sales, marketing and information practices. Particularly vulnerable groups shall be given an enhanced level of attention.

3.5 Communication

DEUTA shall communicate openly and in a manner conducive to dialogue on the requirements of this CoC and on its implementation with respect to employees, customers, suppliers and other interest- and stakeholder groups. All documents and records shall be produced with due care, shall not be improperly altered or destroyed and shall be stored appropriately. DEUTA shall provide its employees and business partners with access to a protected mechanism to report any potential violations of the principles of this CoC in confidence, as required by law.



Communication

3.6 Human Rights and Working Conditions

DEUTA is committed to the promotion of human rights. It observes human rights in accordance with the UN Human Rights Charter³. Furthermore, it complies with the core labour standards of the ILO⁴, insofar as these are referred to in the following.

Privacy and Data Protection

Privacy, including personal data, shall be protected. Personal data shall be collected confidentially and in a transparent manner and shall only be used for legitimate, previously defined purposes. Personal data shall only be processed if it is protected against loss, alteration and unauthorised use or disclosure by means of appropriate technical and organisational measures.

Health and Occupational Safety

Health and safety at work shall be maintained, in particular by ensuring a safe and healthy working environment to prevent accidents and injuries. The health of employees shall be safeguarded by taking appropriate health and safety measures (e.g. the implementation of a company health and safety management system) that adequately covers the following topics:

- ▶ Compliance with applicable laws and orientation to international standards in terms of health and occupational safety;
- ▶ appropriate workplace design, safety regulations and the provision of suitable personal protective equipment;

- ▶ implementation of preventative controls, emergency measures, an accident reporting system and any other appropriate measures for continuous improvement;
- ▶ provision of access to drinking water in sufficient quantity and access to clean sanitation facilities for members of staff.

Appropriate staff training shall be ensured.

Protection from Harassment

Employees shall be protected from corporal punishment and from physical, sexual, psychological or verbal harassment or abuse.

Human Rights

Freedom of Expression

Freedom of opinion and expression shall be ensured and protected.

Prohibition of Child Labour

The prohibition of child labour, i.e. the employment of persons younger than 15 years of age and 18 years of age in the case of hazardous work, shall be complied with, unless local legislation sets higher age limits and unless exceptions are permitted.⁵

Prohibition of Forced Labour

The prohibition of forced labour, modern slave labour and work that involves the use of measures that deprive workers of their freedom shall be observed⁶, as shall the prohibition of oppression in the workplace environment.

Remuneration

The labour standards concerning remuneration, in particular those relating to the level of remuneration in accordance with applicable laws and regulations, including those relating to the minimum wage, shall be observed.⁷ Employees shall be informed clearly, in detail and regularly as to the structure of their remuneration.

Workers' Rights

The right of workers to freedom of association, freedom of assembly and collective bargaining shall be respected, to the extent legally permissible and possible in the respective country of operation.⁸

Prohibition of Discrimination

Employees shall not be discriminated against.⁹ All people shall be treated equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

Working Hours

The labour standards relating to maximum permissible working hours shall be observed. In the absence of such provisions, as a minimum it shall be ensured that

- ▶ the working hours, including overtime, do not exceed the legally permissible maximum limit;
- ▶ the working hours per week, including overtime, do not exceed 60 hours, even in exceptional cases;
- ▶ workers have at least one full day of rest per calendar week.

Security Personnel

When engaging or using private or public security personnel, DEUTA shall undertake to provide sufficient instruction and supervision to prevent human rights violations.

³ Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948.

⁴ ILO = International Labour Organization.

⁵ ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999.

⁶ ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957.

⁷ ILO Convention No. 100 of 1951.

⁸ ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949.

⁹ ILO Convention No. 111 of 1958.



Environmental Protection

3.7 Environmental Protection

DEUTA shall comply with the regulations and standards on environmental protection, including relevant conventions under international law¹⁰, that affect our respective operations and activities, and shall act in an environmentally aware manner at all of our sites. DEUTA shall take appropriate measures (e.g. the implementation of a corporate environmental protection management system) for continuous improvement regarding environmental factors such as the reduction of CO₂ emissions, an increase in energy efficiency and the use of renewable energies, the safeguarding of water quality and the reduction of water

consumption, the safeguarding of air quality, the promotion of resource efficiency, the reduction of waste and its proper disposal as well as the responsible handling of hazardous substances.

DEUTA shall take due account of human rights and environmental due diligence obligations with the goal of avoiding environmental damage that poses a threat to the community.

¹⁰ Minamata Convention on Mercury of 2013 in force since 2017, Stockholm Convention on Persistent Organic Pollutants of 2001 in force since 2004, Basel Convention on the Control of Transboundary Shipments of Hazardous Wastes of 1989, in force since 1992, for Germany in force 1995.



3.8 Dealing with Conflict Minerals

DEUTA shall exercise due diligence to avoid the use of conflict minerals in our products in order to prevent human rights abuses, corruption and the financing of armed groups or other similar activities.

3.9 Foreign Trade, Sanctions

DEUTA shall comply with all applicable national and international foreign trade regulations, in particular customs, trade, import and export control regulations as well as sanctions and embargoes. This includes, among other things, the import and export of products, services and technologies.

3.10 Civic Engagement

DEUTA shall contribute to the social and economic development of the country and region in which we operate and shall promote any appropriate voluntary activities by our employees.

3.11 Implementation and Enforcement

DEUTA shall make all appropriate and proportionate efforts to continuously implement and apply the principles and values set out in this CoC. Contractual partners shall be notified of the key measures upon request within the framework of reciprocity, so that it is clear how compliance with these measures is ensured as a matter of principle. There shall be no obligation to disclose business secrets, competitive information or any other confidential information.

All members of staff shall be made aware of the contents of this CoC and receive training on relevant topics as required. Violations of this CoC shall not be tolerated and may result in disciplinary action.



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