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#### **Preamble**

Our Code of Conduct is intended to be a guideline for the entire company Printec-DS Keyboard GmbH and therefore applies equally to all of us. Specifically, it is addressed to the top management, the executives and all our employees and suppliers. On the one hand, it represents the demand on ourselves to live up to the values and principles listed therein and, at the same time, signals to the outside world responsible behavior towards our business partners, customers and our employees.

#### Commitment of the company management

The company Printec-DS Keyboard GmbH sees itself in the obligation to act economically, socially and environmentally conscious. The company Printec-DS Keyboard GmbH strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and acceptance of anti-trust prohibitions or restrictions on competition. We avoid obtaining undue advantages over customers, suppliers or competitors.

### Implementation and enforcement

Printec-DS Keyboard GmbH is committed to making the necessary efforts to live up to the principles and values described in this Code of Conduct:

# Team spirit, constructive cooperation

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we encourage constructive teamwork among our employees. Their interests and demands on us are decisive for our work and further development. We are successful in our cooperation due to the diversity of our employees and their commitment to the business areas.



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# Standards of cooperation

We expect all our employees to act at all times in accordance with the highest professional standards and the guiding principles of our company. If employees violate existing guidelines, rules or regulations in the course of their work or through their behavior, they will be subject to disciplinary action.

### Open communication with employees

We do not cover up misconduct. If our employees report actual or suspected misconduct in good faith, we will not tolerate any attempts at intimidation or retaliation against these individuals. We understand "in good faith" to mean that our employees are convinced that their account is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

#### Dialog with cooperation partners

All business information of our partners and their trade secrets are treated sensitively and confidentially. Necessary documents are properly prepared, stored or, if necessary, destroyed after the end of the cooperation.

#### **Customer orientation**

We behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a target-oriented implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.



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### Acceptance of gifts, donations

#### a) Gifts to our employees

Our employees do not demand or accept any personal benefits from customers or suppliers that could influence or affect their own behavior with regard to their work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or favor (promotional gifts with the logo of the donating company, such as calendars or pens).

#### b) Gifts from our employees

Gifts on our part may also only be offered within the scope of what is customary for the business relationship and to a materially reasonable extent. The person receiving the gift must not be able to associate it with any obligation that would influence his or her business decisions.

### c) Donations

As a matter of principle, Printec-DS Keyboard GmbH does not make donations to political parties, to individuals or to organizations whose goals contradict our corporate philosophy or damage our reputation. The allocation of donations is always transparent.

#### **Bribery and corruption**

We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties. We have control mechanisms in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

Our employees are prohibited from accepting or giving favors of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (contract award, project award, etc.). Any invitations and gratuities to third parties with a business connection must be transparently substantiated and documented in the books and records.

Our business partners are also required to avoid conflicts of interest that pose a risk of corruption.



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#### **Data protection**

We treat all personal data relating to our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information on current health status. Our employees are obligated to take all appropriate measures to protect our IT system against both internal and external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially of inappropriate material from the Internet.

#### Protection of the environment

The protection of the environment and climate protection are important to us. Our employees are required to treat all natural resources used in our company (e.g. energy, water) with care and thus reduce the environmental impact. Our employees are expected to act responsibly in the production and distribution of our products and/or services. To protect our employees, we comply with all laws and regulations relating to health and safety in the workplace. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

### Compliance with applicable law

We require our managers to familiarize themselves with the laws, rules and regulations relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in complying with the Code of Conduct.

The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import,

export, and domestic trade in goods, technologies or services, but also payment and capital transactions. Violation of economic embargoes as well as trade, import and export control regulations must also be ruled out by our business partners, as must the financing of terrorism.

We respect the principles of the ILO conventions (International Labor Organization) and international human rights conventions, such as the UN Declaration of Human Rights. Furthermore, Printec-DS Keyboard GmbH complies with the UN and ILO conventions on the rights and protection of children and does not engage in or support the use of child labor or forced labor in any way.



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### Fair competition

We are committed to fair competition and adhere to these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not participate in any anti-competitive boycotts.

#### Prohibition of discrimination

Any form of discrimination is prohibited as a matter of principle. This applies regardless of nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or belief. Promotions, new hires are always made free of discrimination.

## Dealing with internal company information

It is important to us that the products manufactured, the work equipment used and the intellectual property of the company are handled carefully and responsibly.

#### Whistleblower procedures

We provide all our employees with the opportunity to report any violations of the principles of this Code of Conduct in a protected procedure.



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### Monitoring

Our employees are regularly informed and trained about the application and content of the principles described here. Any questions are directed to the direct superiors or persons of trust made known to them. The whistleblower procedure offers the possibility of reporting any violations anonymously. In the event of serious violations, an investigation will be conducted by management or occupational safety specialists.

Actions that violate these guidelines will be corrected immediately. Disciplinary action may be taken, up to and including termination of employment. Reporting violations of these guidelines will not negatively affect the employment relationship in any way.

Steißlingen, 01.03.2022

Thomas Holeczek

**CEO** 

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