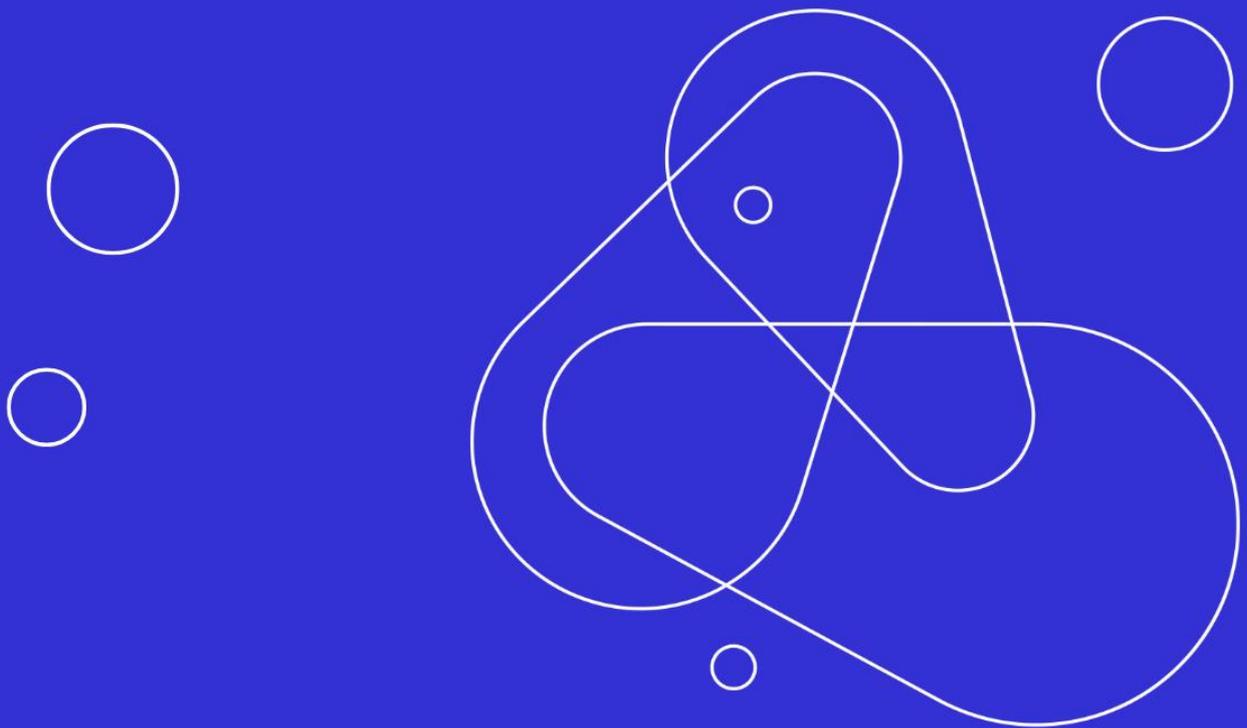


variosystems

# Supplier Code of Conduct



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**This Supplier Code of Conduct is based on the principles of the Variosystems Code of Conduct and the Electronic Industry Code of Conduct from the Electronic Industry Citizenship Coalition (EICC).**

Long-term cooperation, sustainability and social responsibility are important principles for Variosystems. Therefore, these principles are of particular importance in the procurement of raw materials, goods and services. Variosystems expect its suppliers and their employees, agents and subcontractors to adhere to these principles. Variosystems expects all of its suppliers to implement appropriate policies to ensure compliance with this Code and all relevant laws and regulations.

To the extent that this is reasonable and possible, suppliers will actively encourage their sub-suppliers or subcontractors to comply with the guidelines of this Code. Variosystems may explicitly require suppliers to also extend this code to selected sub-suppliers.

# A. Labor

Suppliers of Variosystems are committed to uphold the human rights of workers such as stipulated in the European Convention on Human Rights, the Universal Declaration of Human Rights as well as the UN Guiding Principles on Business and Human Rights, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

## 1 Freely Chosen Employment

Suppliers of Variosystems do not use forced, bonded or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of people. This includes transporting, harboring, recruiting, transferring or receiving people by means of threat, force, coercion, abduction or fraud for labor or services. There are no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. All work must be voluntary, and workers are free to leave work at any time or terminate their employment.

## 2 Young Workers

Child labor is not used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including mandated night shifts and overtime.

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### 3 Humane Treatment

There is no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to workers.

## B. Health and Safety

Suppliers of Variosystems recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers of Variosystems also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

### 1 Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

### 2 Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures focus on minimizing harm to life, the environment and property.

### 3 Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

### 4 Industrial Hygiene

Worker exposure to chemical, biological and physical agents is identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are provided with and use appropriate, well-maintained, personal protective equipment.

### 5 Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is identified, evaluated and controlled.

### 6 Machine Safeguarding

Production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are provided and properly maintained where machinery presents an injury hazard to workers.

## C. Environment

Suppliers of Variosystems recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

### 1 Environmental Permits and Reporting

All required environmental permits, approvals and registrations are obtained and regularly updated. Their operational and reporting requirements are followed.

## 2 Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.

## 3 Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Suppliers must ensure that their products comply with all applicable legal requirements and customer expectations regarding the prohibition or restriction of specific substances.

Suppliers must adhere to international standards and directives such as the RoHS Directive and the REACH Regulation when exporting to regions like the European Union, monitor and manage substances that are added, mixed, or used during the manufacturing process to ensure ongoing compliance.

To effectively manage hazardous substances in the manufacturing process, suppliers:

- Establish robust internal processes for tracking and documenting the use of hazardous substances.
- Communicate requirements clearly to all suppliers and partners in the supply chain.
- Regularly review and update compliance practices to reflect changes in laws, regulations, and customer requirements.

## 4 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterized, routinely monitored, controlled and treated as required prior to discharge. Suppliers of Variosystems conduct routine monitoring of the performance of their air emission control systems or as required by local law.

## 5 Materials Restrictions

Suppliers of Variosystems adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

# D. Ethics

To meet social responsibilities and to achieve success in the marketplace, suppliers of Variosystems uphold the highest standards of ethics including:

## 1 Business Integrity

The highest standards of integrity are upheld in all business interactions. Suppliers of Variosystems have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion and embezzlement.

## 2 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

## 3 Disclosure of Information

Information regarding the labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## 4 Intellectual Property

Intellectual property rights are respected; transfer of technology and know-how is done in a manner that protects intellectual property rights. Further, customer and supplier information is safeguarded.

## 5 Responsible Sourcing of Minerals

When applicable, suppliers of Variosystems develop measures and action items, which according to best knowledge make sure that the tantalum, tin, tungsten, gold, cobalt and any other so-called conflict minerals in the products suppliers of Variosystems manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.

Supplier should:

- be knowledgeable and transparent about the source of the tin, tungsten, tantalum, gold, cobalt, and any other so-called conflict minerals in the products they supply to us and take reasonable steps to responsibly source these minerals, especially if they are from the DRC, adjoining countries or any other CAHRAs.
- establish and maintain a publicly available policy on responsible mineral sourcing that aligns with the OECD Guidance,
- establish a due diligence process and management system consistent with the OECD Guidance.
- extend the above expectations to their own suppliers
- upon Variosystems periodic request, deliver certain information that we deem reasonably necessary, including certifications and documentation, to monitor and determine compliance with this policy. If an established or prospective applicable supplier is unable or unwilling to support our commitment to this policy or should the use of conflict minerals be discovered, we will promptly discuss with relevant supplier/business partner and take corrective actions. In case corrective action fails in the expected result termination of all business agreements with the supplier is deemed necessary.

Suppliers are expected to take necessary corrective actions to promptly remedy any identified noncompliance. Supplier's employees or contractors may report suspected violations of this provision. Variosystems reserves the right to terminate its business relationship with any supplier who is unwilling or unable to comply with the provisions mentioned.

## 6 Export Control

Suppliers of Variosystems ensure all national and international trade regulations and import and export control laws that affect their global business transactions.

# E. Take Action

Regarding their own supply chain, suppliers are expected to ensure the following:

## 1 Responsible Procurement and Supply Chain Management

Upholding the highest standards of ethical, sustainable, and responsible procurement is essential for any organization engaged in modern supply chains. This commitment extends beyond internal operations, encompassing the entire chain of partners and subcontractors to ensure alignment with both partner expectations and international best practices.

## 2 Communication of Code Requirements

Clear communication of the Code of Conduct for responsible procurement is fundamental. All parties involved—including subcontractors—must be informed of these requirements and understand the standards expected of them. These standards promote ethical business conduct, sustainability, and respect for human rights throughout the supply network.

## 3 Supply Chain Management

A robust management system is necessary to ensure compliance across the supply chain. Qualified personnel should be appointed to oversee adherence to these standards. Processes must be implemented to guarantee human rights and labour due diligence for all new partners. This includes conducting preliminary investigations, performing on-site verifications, agreeing on action plans, concluding contracts with explicit compliance expectations, and monitoring ongoing adherence.

## 4 Human Rights and Labor Risk Evaluation

Regular evaluation of human rights and labour risks within the chain is vital. Risk indicators and assessment tools should be utilized to identify and address potential issues. Partners are expected to respond to risk-related inquiries and provide evidence of compliance when requested.

## 5 Dialogue and Communication

Expectations, compliance methods, and opportunities for improvement should be discussed through structured communication processes. Discussions must be documented, with clear definitions of methods, and techniques used.

## 6 Occupational Safety and Health

On-site verification of occupational safety and health conditions is necessary to ensure a safe working environment. Partners are required to comply with all relevant safety regulations and standards, while continuous improvement in workplace safety practices should be actively monitored and supported.

## 7 Continuous Improvement

Ongoing enhancement of sustainability and compliance efforts is encouraged. Participation in training and capacity-building initiatives related to responsible procurement and supply chain management helps foster a culture of continuous improvement, benefiting the entire network.

## F. Final Provisions

Suppliers are expected to take necessary corrective actions to promptly remedy any identified noncompliance with this Code. Supplier employees or contractors may report suspected violations of this Code. Variosystems reserves the right to terminate its business relationship with any supplier who is unwilling or unable to comply with this Code.

### Revision History

Revision	Date	Initiator / Dept./ Function	Changes
00	2025-08-12	Sara Foršek Pažin / Global ESG Manager	Update of the document in accordance with market and regulatory trends and expectations from customers.