

# Code of Business Conduct

## Börsig GmbH Electronic-Distributor

The family-owned company Börsig GmbH is active as an electronic distributor since 1969. The business purpose of the company is the worldwide trade in connectors, relays, switches, cables, tools, and electrical components.

As a partner of premium manufacturers of electromechanical components and with headquarters in Neckarsulm (Germany) and locations in Austria, Czech Republic and Poland, Börsig GmbH supplies its customers with a broad and high-quality portfolio. Our own cable assembly is the complement to the trade and offers customer-specific, high-quality solutions.

Our goal is to satisfy our customers with all we do. That is why the quality of our services has the highest priority. However, Börsig GmbH, its managers and employees have also committed themselves to socially responsible corporate governance.

They actively work to ensure that they act ethically, morally, and legally impeccably, especially in the areas of working conditions, social and environmental compatibility, as well as competition and transparency. Also they maintain respectful and trustful relations to employees, managers, business partners, suppliers, customers, and consultants.

Börsig GmbH aligns its economic activities with the values and principles of this document. Furthermore, Börsig GmbH also expects all employees, managers, business partners, suppliers, customers, and consultants to observe, adhere to and promote this Code of Conduct in the long term.

This Code of Conduct is available at the website of Börsig GmbH under [Code of Conduct of Börsig GmbH - Börsig GmbH \(boersig.com\)](https://www.boersig.com).

Neckarsulm, May 2024

Stefan Börsig  
*(CEO)*

Alexander Angelopoulos  
*(Head of Administration)*

Thomas Engler  
*(Head of Sales)*

Damir Baric  
*(Head of HR)*

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## Börsig GmbH Electronic-Distributor

### 1. Human and labour rights

#### 1.1 Respect fundamental labour rights

Börsig GmbH does not condone any violations of human rights and is committed to the promotion of human rights. It is committed to the UN Charter of Human Rights (Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948) and always upholds women's and human rights.

In its actions, Börsig GmbH is guided by ethical values and principles and promotes equal opportunities and equal treatment of employees, managers, business partners, suppliers, customers, and consultants regardless of their gender or age, ethnic and national affiliation, social and cultural background, any disabilities, sexual identity, sexual orientation and political or religious convictions. In doing so, it is also explicitly guided by the ILO Convention on Discrimination (Employment and Occupation) (No. 111)

Börsig GmbH protects its employees from corporal punishment and from physical, sexual, and psychological or verbal harassment or abuse and rejects forced labour as well as any kind of modern slavery and human trafficking. All employment relationships are voluntary and can be terminated at any time in compliance with contractual or legal obligations.

Börsig GmbH guarantees the right to freedom of opinion and expression. Respectful interaction is always expected from all those involved.

#### 1.2 Working standards

Börsig GmbH guarantees compliance with the respective national labour standards **regarding** working hours, occupational health and safety, remuneration and in particular regarding remuneration level as well as maximum permissible working hours in accordance with the applicable laws and regulations.

#### 1.3 Occupational safety

Börsig GmbH adheres to the applicable regulations and regulations on occupational health and safety and respects the privacy and personal rights of each individual. It ensures the health and safety of its employees and supports a safe and health-promoting working environment to avoid accidents and injuries.

Börsig GmbH also expects its business partners, suppliers, and customers to comply with the applicable regulations and regulations on occupational health and safety.

#### 1.4 Child labour

Börsig GmbH follows the prohibition of child labour, i.e. the employment of persons younger than 15 years of age, unless the local legislation sets higher age limits and unless exceptions are permitted (ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999). Börsig GmbH also expects this from its suppliers.

#### 1.5 Conflict materials

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, Börsig GmbH expects its suppliers to take appropriate measures and processes in accordance with EU Regulation 2017/821, the US Dodd-Frank Act (DFA) Section 15023 and the Guidelines of the Organization for Economic Cooperation and Development (OECD) to comply with due diligence requirements to promote responsible supply chains for minerals from conflict and high-risk areas.

### 2. Confidentiality, IT-Security, Data privacy

#### 2.1 Confidentiality

Börsig GmbH is committed to meeting the reasonable expectations of employees, managers, business partners, suppliers, customers, and consultants regarding confidentiality and protection of private information.

Confidential information may not be used to pursue one's own interests or to pursue the interests of third parties.

Employees and consultants are obliged to protect documents and information from access by third parties when working remotely or work from home, for example by locking away documents, locking the computer or securely destroying papers that are no longer needed. Search engines, chatbots or AI tools that are publicly available on the Internet, such as ChatGPT, are not to be used with confidential information.

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If confidential information is to be shared with business partners, suppliers, customers, and consultants in the context of a collaboration, appropriate non-disclosure agreements must be concluded.

Employees and managers are obliged to maintain absolute confidentiality, even after the termination of the employment relationship.

### 2.2 IT-Security

Börsig GmbH ensures that all data that is processed in the office or remotely is stored and transmitted in a secure manner. This includes, encrypted connections, access controls, and other security measures.

Employees and consultants must also ensure that laptops and mobile phones used for business purposes have the latest security patches and antivirus software installed. Börsig GmbH provides adequate support.

### 2.3 Data privacy

The collection, storage, processing, transmission, and disclosure of personal information complies with data protection and information security laws and government regulations, particularly the GDPR.

If the processing of personal data is based on Article 6 (1) (f) GDPR, our legitimate interest is the conduct of our business activities for the benefit of all our customers, employees and our shareholders.

Questions regarding data protection law must be addressed to the data protection officer of Börsig GmbH, the external data protection officer (eDSB-TÜV Süd) Bodo Braun. He can be reached by e-mail to [datenschutz@boersig.com](mailto:datenschutz@boersig.com), by phone at 07132-9393-0 or by letter to Börsig GmbH, Siegmund-Loewe-Str. 5, 74172 Neckarsulm.

### 2.4 intellectual property

Intellectual property rights must be respected. Technology and knowledge transfer must be carried out in such a way that the intellectual property rights of business partners, suppliers, and customers, but also of Börsig GmbH, are protected at all times.

## 3. Environment protection

Börsig GmbH is committed to climate and environmental protection. In all areas, active efforts are made to minimise environmental pollution, to act

in a resource-saving manner and to continuously improve climate and environmental protection. Business partners, suppliers and customers are also expected to pursue climate and environmental protection goals.

### 3.1 Environmental management

Börsig GmbH is committed to meeting national and international regulations and standards for environmental protection and environmental management and acts in an environmentally conscious manner at all locations.

Börsig GmbH only procures packaging material that is labelled in accordance with the EU Directives (EU Framework Directive 2018/851 and 2018/852). The need for paper and cardboard is reduced enormously by introducing a "paperless office" and the reuse of packaging material. Waste avoidance is largely achieved through separation, reuse and recycling.

Environmental risks, such as heavy rainfall and the resulting risk of flooding, are regularly analysed and evaluated.

### 3.2 Climate protection

Börsig GmbH invests in sustainability and climate protection. This is done, for example, by investing in own electricity generation through photovoltaic systems including battery storage to generate a large part of the required electricity itself and by purchasing 100% green electricity. The heat supply of the company building is provided by an efficient wood chip heating system.

## 4 Corruption

### 4.1 Compliance

The applicable laws and other legal provisions and regulations of the countries in which Börsig GmbH operates are binding for Börsig GmbH and all employees and must be complied with to the best of our knowledge and possibilities. These include, for example, the payment of duties and taxes owed, the obtaining of necessary official orders, the protection of tangible and intangible legal interests (e.g. intellectual property) of third parties and the observance of all criminal law barriers, especially in money laundering and fraud.

### 4.2 Whistleblower

Börsig GmbH complies with the Whistleblower Protection Act (Hinweisgeberschutzgesetz HinSchG) and has set up a corresponding secure channel for

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reporting grievances. This channel can be reached via the intranet or directly via the link:

[boersig.whistleport.de](https://boersig.whistleport.de).

### 4.3 Corruption and granting of benefits

Börsig GmbH and its employees do not conclude any transactions by unfair means. They consistently and fully comply with the respective national and international anti-corruption regulations and do not tolerate any form of corruption and bribery within the meaning of the UN Convention ("United Nations Convention against Corruption" of 2003, in force since 2005).

In the case of benefits, the principles of proportionality and common sense must be applied. Gifts and hospitality must reflect normal business conduct. Only gifts, hospitality, invitations, or discounts that do not exceed a socially customary framework and do not influence operational decisions can be exchanged.

### 4.4 Money laundry, financing terrorism

Börsig GmbH concludes transactions only with reputable business partners. Money laundering regulations must be complied with and the smuggling of funds or assets from crimes into the legal financial cycle must be excluded. The financing of terror or conflicts and human rights violations is also prohibited (see Chapter 1.5).

### 4.5 Fair competition

The rules of competition and antitrust law are complied with.

In relation to competitors, Börsig GmbH promotes an ethically and legally fair competition.

### 4.6 Export control

As a globally active company, Börsig GmbH must comply with international and national laws as well as embargoes and regulations that restrict the free trade, export, or import of technologies, goods or services, as well as capital and payment movements in certain cases. If necessary, appropriate permits must be obtained or orders that may not be supplied must be cancelled.

Börsig GmbH therefore works closely with customs. The reliability and trustworthiness in this context is documented, for example, by the AEO certificate as an "Authorised Economic Operator", which was assigned to us by the main customs office in Heilbronn.

Through an additional embargo check integrated into the ERP system, Börsig GmbH can ensure that relevant laws and guidelines as well as embargoes are complied with.

## 5 Business partner / responsibility along the supply chain

Börsig GmbH undertakes to support compliance with the contents of this Code of Conduct by its suppliers and in the wider value chain within the scope of its respective possibilities and scope of action and to promote the principles of equal treatment in the selection of business partners and in dealing with them.

When selecting new business partners, suppliers and consultants, Börsig GmbH applies the high ethical, moral and social standards documented in this Code of Conduct.