

## Topas GmbH - Code of conduct

version V1.0, 26.03.2024

Topas GmbH's values emphasise innovation, quality, sustainability, growth, trust and respect. These principles shape our behaviour within our organisation and in our relationships with customers, suppliers and other business partners. As a global company, we are aware of our legal, social and environmental responsibilities and are committed to ensuring that these values are upheld.

The "Code of Conduct" summarises Topas GmbH's ethical standards, which are based on the conventions of the International Labour Organisation (ILO), the UN Declaration of Human Rights, the UN Conventions on the Rights of Children and on the Elimination of All Forms of Discrimination and the OECD Guidelines for Multinational Enterprises.

Topas GmbH and its employees agree to comply with the Code of Conduct within their own sphere of influence.

Suppliers of Topas GmbH acknowledge the content of the Code of Conduct as a minimum standard and take suitable actions to comply with and implement it within their own sphere of influence. Furthermore, the supplier shall ensure that any subcontractors involved are informed about the content of the Code of Conduct and also implement it.

## 1 Topas GmbH assures the contractual partner in particular that

- human rights in accordance with the EU Charter of Fundamental Rights, in particular:
  - a. right to life, physical integrity, liberty and security
  - b. fair, appropriate and safe working conditions
  - c. freedom of thought, conscience and religion
  - d. right to a fair trial
  - e. right to respect for private and family life
  - f. right to freedom of expression
- · Reject all forms of forced and child labour.
- Employees to guarantee the following rights:
  - a. equality, non-discrimination, equal opportunities in terms of employment
  - b. legally regulated working hours, minimum wages and social benefits
  - to recognise freedom of association in accordance with legal regulations and the right to representation of interests and to neither favour nor discriminate against members of the employee organisation
  - d. safe and healthy working environment
- Reject corruption and bribery in any form and prevent money laundering and terrorist financing.
- Decisions are always based on objective criteria and thus avoid conflicts of interest.
- To comply with competition and antitrust laws within its own sphere of influence.
- To observe and implement applicable laws and regulations on the procurement of raw materials, materials and components.



PARTICLE UNDER CONTROL

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- Strict adherence to laws governing the import and export of goods and services and compliance with export control, customs, tax and foreign trade regulations, including EU sanctions, embargoes and other legal requirements, government directives and guidelines governing the transfer or shipment of goods, technology and financial transactions.
  - This applies in particular in the case of cooperation with a military organisation. In addition to the legal requirements, the ethical and moral aspects of cooperation are always taken into account when making decisions.
- Manage and protect personal data and intellectual property in a way that fulfils legal requirements. To organise the transfer of technology and know-how in such a way that the protection of intellectual property rights is guaranteed and the confidentiality of customer and supplier information is maintained.
- Compliance with environmental laws, regulations and standards.
- 2 In particular, the supplier warrants to Topas GmbH the following
  - a. To fulfil the requirements specified in section 1.
  - b. To reject all forms of slavery and human trafficking and not to participate in them.
  - c. To pass on the contents of this Code of Conduct to subcontractors and to require them to comply with the Code of Conduct. The supplier is responsible for checking subcontractors' compliance with the Code of Conduct.
  - d. To provide evidence of compliance with the Code of Conduct by the supplier itself and its subcontractors at the request of Topas GmbH.

Note: Topas GmbH accept the Code of Conduct of business partners and implements them if they are equivalent in content to the Code of Conduct of Topas GmbH.

Date, signature:

26.03. 2024

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