

# **KONTRON Group Policy 5.c.**

**Supplier Code of Conduct**

**Version 4**

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**Kontron AG**

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## Change Log

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## Preamble

A key priority for Kontron is conducting its business in a responsible and sustainable manner. Kontron AG and its affiliates (“**Kontron Group**” or “**Kontron**”) implemented high standards to guarantee the compliance and awareness with ethical, social and environmental standards and human rights. Kontron has a groupwide applicable Kontron Code of Conduct (<https://www.kontron.ag/about/corporate-governance/>), which addresses Kontron principles and values to internal and external stakeholders.

The performance of suppliers sets an important part of the value generated by Kontron. This “Kontron Supplier Code of Conduct” shows Kontron’s expectation towards its suppliers in a clear and transparent manner directly addressable to them. Every Kontron supplier shall respect and comply with the standards laid down herein by taking reasonable measures depending on its size and nature of its operation, as far as it is reasonably practicable.

The Kontron Supplier Code of Conduct shall be applicable for all suppliers, that are (or will be) business partners of Kontron AG and/or its affiliates belonging to Kontron. Kontron's suppliers are required to fully comply with the contents of the Kontron Supplier Code of Conduct and are required to sign it as part of their contractual agreement. Kontron reserves the right to terminate relationships with suppliers if non-compliance with the Supplier Code of Conduct is discovered or issues of non-compliance are not addressed in a timely manner.

Kontron might amend this Kontron Supplier Code of Conduct from time to time and expects its suppliers to review and implement the changes made within a reasonable time into its business practices, if the requirements are not already met.

Suppliers shall make reasonable efforts to continuously improve the development and the implementation of measures to ensure best business practice related to sustainability und high quality standards. Suppliers are also requested to have a procedure in place on how to deal and remedy within reasonable timeframe in case of any violations of the requirements herein.

## 1 General principles

The Kontron Code of Conduct, available at Kontron's website under Corporate Governance, is incorporated by reference in this document.

The principles and values of Kontron set forth in the Kontron Code of Conduct for its Employees, also apply to suppliers of Kontron.

## 2 Compliance with laws, rules and regulations

Suppliers shall fully comply with all laws and regulations applicable to them. Suppliers shall especially ensure their compliance with the provisions set forth in this Code of Conduct as well as contractual obligations agreed between the supplier and the respective company. This includes in particular local laws and regulations and international standards in all aspects. Measured by suppliers' size and type of business, Kontron expects its suppliers to implement and maintain an appropriate compliance and quality management system.

In particular, suppliers should aim to prevent or minimize any risks to human rights or environmental-related risks or to end the violation of human rights-related or environment-related obligations. Suppliers shall therefore ensure the compliance with the requirements as laid down in the applicable regulations, e.g. in the German Act on Corporate Due Diligence Obligations in Supply Chains of 1 January 2023, as well as international requirements and regulations. This means, including, but not limited to:

- › establishing a risk management system and designate responsible persons within the enterprise;
- › performing regular risk analyses, laying down preventive measures in its own area of business and towards direct suppliers;
- › taking remedial action and establishing a complaints procedure;
- › implementing due diligence obligations regarding risks at indirect suppliers, documenting reporting.

### 2.1 Conventions and recommendations of international organizations

Kontron expects supplier to meet the high standards and to recognize and apply these standards, in particular in relation to the:

- › International Bill of Human Rights, consisting of: Universal Declaration of Human Rights; International Covenant of 19 December 1966 on Civil and Political Rights, (Federal Law Gazette 1973 II pp. 1533, 1534); and International Covenant of 19 December 1966 on Economic, Social and Cultural Rights (Federal Law Gazette 1973 II pp. 1569, 1570);
- › European Convention on Human Rights;
- › ILO (International Labour Organization) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work, and fundamental freedoms, in particular, as follows:
  - › elimination of child labor, minimum age (especially ILO Convention No. 182 and No. 138),
  - › abolition of forced labor (especially ILO Convention No. 105, ILO Convention No. 29 and Protocol of 11 June 2014 to Convention No. 29),
  - › prohibition of discrimination (especially ILO Convention No. 111 and equal remuneration for men and women ILO Convention No. 100),
  - › freedom of association and the right to collective bargaining (especially ILO Convention No. 87 and No. 98);
- › Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II p. 610, 611) (Minamata Convention);

- › Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II pp. 803, 804) (POPs Convention), last amended by the decision of 6 May 2005 (Federal Law Gazette 2009 II pp. 1060, 1061);
- › Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704) (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (Federal Law Gazette II pp. 306/307);
- › OECD-Guidelines for Multinational Enterprises;
- › “Agenda 21” on Sustainable Development (concluding document of the founding UN Conference on the Environment and Development);
- › UN Convention against Corruption;
- › UN Convention on the Rights of the Child UN Conventions on the Elimination on all Forms of Discriminations;
- › OECD Convention against Bribery of Foreign Public Officials;

Kontron expects suppliers to adhere to the material principles set by "UN Global Compact" and aims to reach the principles by "Responsible Business Alliance". Kontron identifies with the standards laid down and strives to comply with the high standards to date and in the future and expects the same from its suppliers, throughout the supply chain.

## 3 Compliance Management System (CMS)

Maintaining a state-of-the-art Compliance Management System (CMS) is a cornerstone of Kontron's Corporate Governance and ESG strategy. Upholding the highest standards of ethical and legal conduct is essential to building trust with stakeholders, ensuring full regulatory compliance, and safeguarding the company's reputation and integrity.

Kontron's Compliance Management System is managed by a closely coordinated Compliance Management Team at Kontron's Headquarters, with strong collaboration from local Compliance Officers to ensure consistent monitoring and enforcement across all levels of the organization.

The team is led by Kontron's General Counsel, who reports directly to the Executive and Supervisory Board. This structure ensures both independence and a direct reporting line to the Executive Board, guaranteeing the highest standards of compliance oversight.

Kontron expects its suppliers to implement a robust compliance approach that includes implementation of preventive measures to proactively manage risk and ensure compliance. These measures include regular and comprehensive training programs, ensuring that Employees are well-versed in legal and ethical standards. Audits are conducted periodically to monitor adherence to internal policies and regulatory requirements, while risk assessments are systematically performed to identify potential vulnerabilities before they escalate.

### 3.1 Compliance Management Team

Kontron's Compliance Management Team is located directly under the Executive Board of Kontron AG, guaranteeing independence and a direct reporting line to the Executive Board. In addition, the Group Compliance Officer is supported by local Compliance Managers in the Group companies.

Kontron's Compliance Management Team is responsible for:

- › Supporting the management in establishing, operating and maintaining, evaluating, documenting and improving the Compliance Management System, which aims to ensure compliance of the company and promote integrity;
- › Aligning the Compliance Management System with compliance objectives;
- › Monitoring compliance within the Kontron Group;
- › Ensuring compliance with laws, regulatory requirements and internal policies and procedures;
- › Creating and updating policies;
- › Reporting to the Management Board of Kontron AG on compliance with the policies throughout the Group;
- › Establishment and operation of a group-wide reporting process for compliance-related violations.

Suppliers are expected to adhere to similar principles by implementing strong compliance systems, clear policies and effective reporting mechanisms to maintain ethical and legal standards.

### **3.2 Compliance Risk Assessment**

Kontron expects all suppliers to understand and address compliance risks as part of their commitment to responsible business practices. Compliance risks can arise from legal, financial or reputational challenges related to violations of laws, regulations or internal policies. Key risks include those related to management decisions, employee behaviour, agent behaviour and vendor due diligence obligations.

Suppliers are required to implement structured processes to identify, assess and mitigate potential compliance risks. Regular reassessments are essential, particularly during significant business changes such as acquisitions, market shifts or strategic transitions.

Kontron expects suppliers to prioritise preventive measures that proactively address risks before they escalate, ensure compliance with legal and industry standards, protect Kontron's reputation and ensure sustainable business operations. Suppliers are required to implement continuous monitoring and improvement of processes and controls to reinforce this commitment.

## 4 Business conduct of suppliers and fair practice of business operations

### 4.1 Fair competition and anti-trust law

Competition and anti-trust laws are the pillars of efforts to preserve a free market and fair and open competition. Kontron expects suppliers to treat all business partners in a fair and respectful manner, to behave fairly towards competitors, to support free and undistorted competition and to comply with all applicable laws and regulations in this respect. This means, including but not limited to:

- › no conclusion of anti-competitive agreements e.g. no agreements with competitors related to prices / customers / markets/ territories/ products offered;
- › no agreements with competitors in regard of refraining from competition; to restrict dealings with suppliers, to submit bogus offers for bidding;
- › no communication with competitors about prices, output, capacities, sales, bids, profits, profit margins, costs, methods of distribution or any other fact or factor that determines or influences the competitive behaviors;
- › customers and suppliers shall be treated in fair manners, all decisions made in these areas shall be objective in nature;
- › no participation in any form of bid rigging or other mechanism that limit fair competition in tender situations, any form of cartel practices with competitors such as dividing or allocating of markets.

### 4.2 Prohibition of corruption, extortion and bribery

Suppliers are expected to reject all forms of corruption practices and all forms of behavior, which might violate law and the principles of fair competition.

Neither Employees and subcontractors nor any other representatives of the suppliers shall grant, offer or accept bribes, facilitation payments and benefits, inadmissible donations or other not reasonable granted benefits from or to customers, officials or other business partners. Suppliers should have a procedure in place, which helps their Employees to understand when an offering and/or gift are ok and when especially not and should be rejected.

A number of anti-corruption standards have been promulgated at international level and implemented at national levels. The latter laws and regulations prohibit bribery and corrupting acts in all and any forms. These include the UK's Bribery Act and the USA's Foreign Corrupt Practices Act. They have a worldwide scope of application and they are and shall be strictly enforced.

This means, including but not limited to:

- › establish a compliance system which provides awareness in this regard (e.g. regular training of Employees; provide internal adequate controls to prevent and detect corruption);
- › maintain an appropriate system related to financial and accounting procedures to ensure the maintenance of fair and accurate books, records and accounts, to ensure that they can only be used for legitimate purposes.

### **4.3 Combating money laundering**

Suppliers shall ensure by appropriate measures that legal money laundering and terrorism financing provisions are not breached. Kontron has committed itself to conducting business with reputable business partners, with “reputable” being defined as those parties that are engaged in lawful business activities, whose funds stem solely from legal sources, and whose operations adhere to the stipulations of anti-money laundering and anti-terrorism laws. Suppliers of Kontron are expected to work solely with business partners who are reliable and for which, appropriate, risk-based measures to verify the identity and economy background are taken, to secure that the origin of payment comes from a legitimate source.

### **4.4 Conflict of interest**

Suppliers are expected to take their decision based on objective reasons. Personal interests and/or relationships of persons acting for or on behalf of supplier shall have no influence on supplier’s behaviors and decisions taken. Suppliers are expected to prevent the arising of any conflicts of interest and shall guide their Employees to maintain a clear distinction between business and personal interests. Suppliers are expected to inform Kontron on any personal interest that might exist in connection with the relevant business relationship.

### **4.5 IT security / handling of non-public information / data protection / respect of intellectual property of third party**

Supplier shall take reasonable measures to secure personal data of individuals as well as non-public information (business know how, intellectual property, trade secrets and especially confidential information) from Kontron. As a result of the future changes and developments in this area, Kontron pays particular attention to the privacy and security requirements of business-to-business (B2B) contracts and is continuously working to integrate them into its structure, organization and processes. Suppliers shall respect and establish a system to behave in a responsible manner in accordance with all applicable privacy laws (including especially the GDPR and local laws) with personal data, regardless of who it is from e.g. own workers, Employees of Kontron and/or other individuals. Suppliers are expected to have an appropriate IT security procedure established. Where applicable, also products of suppliers shall confirm with the standards of IT and data security.

This means, including, but not limited to:

- › appropriate protection of personal data as well as confidential data and business know how;
- › data processing and documentation thereof according to international and national requirements;
- › no collection, processing, usage and/or storage of personal data when there is no legal basis (e.g. mandatory law and/or consent of the individual concerned);
- › implementation of an appropriate (IT) security system, especially to ensure the protection of personal data and confidential information (including technical and organizational measures to safeguard personal data, products, know how and business data);
- › protect data against modification, loss and unauthorized use or disclosure;

- › respect third party intellectual property rights by establishing an appropriate licensing management system.

If the supplier, due to the performance of a supply agreement might obtain or is required to obtain access to personal data, the supplier shall prior to any access of the personal data inform Kontron without undue delay about the required access, so that Kontron and the supplier can conclude a data processing agreement in accordance with applicable laws to protect the rights of individual.

## 5 Respect of human rights and labor practices

Kontron expects its suppliers to respect the fundamental human rights set out in international conventions of the United Nations (UN), International Labor Organization (ILO) and other applicable statutory and international standards as set out in section 3.1. in this Code of Conduct as well as described in the Kontron Code of Conduct. Suppliers shall implement procedures to avoid any conflict with these principles.

This means, including, but not limited to:

- › no forced or compulsory labor / slavery / human trafficking / servitude;
- › no child labor (no workers under the age of 15/14 in accordance with ILO Conv. 138);
- › no workers under the age of 18 for hazardous work;
- › no discrimination and fair labor practice;
- › freedom of association and collective bargaining.

### 5.1 Corporate Sustainability Due Diligence Directive (CSDDD)

Kontron expects its suppliers to actively monitor and adapt to evolving human rights and environmental regulations, including the European Commission's proposed Corporate Sustainability Due Diligence Directive (CSDDD). The CSDDD aims to establish binding legal requirements for companies and their suppliers to comply with recognized human rights and environmental standards, thereby promoting ethical business practices and fair competition on a global scale.

Against this background, suppliers are expected to implement rigorous human rights and environmental due diligence throughout their operations and supply chains. This includes identifying and mitigating risks, addressing negative impacts, and ensuring compliance with international standards. These efforts contribute to Kontron's ongoing commitment to sustainability, ethical behavior, and long-term value creation.

### 5.2 Human Rights Due Diligence

Human rights due diligence has gained in importance in recent years, particularly as a result of the CSDDD and the EU Taxonomy Minimum Safeguards.

Kontron expects its suppliers to conduct regular and ad hoc risk analyses of their own operations and supply chains. The results of these analyses shall be communicated to all relevant decision makers to ensure that potential risks of human rights or ethical violations are adequately addressed. As part of the ongoing business relationship and during order processing, Kontron expects its suppliers to conduct audits with a special focus on HSSE (Health, Safety, Security & Environment) aspects, including issues such as forced labor, slavery and human trafficking.

In addition to ongoing human rights due diligence, Kontron expects its suppliers to establish a robust Whistleblower System, that allows to confidentially report potential violations of human rights or ethical standards. Kontron expects its suppliers to guarantee the anonymity of whistleblowers and to ensure that

all reports are carefully investigated, and that appropriate action is taken to remedy any violations. Through these efforts, Kontron aims to contribute to the fulfillment of human rights throughout its operations and supply chain.

### **5.3 Ethical recruitment**

Kontron promotes transparent and objective recruiting and hiring processes that are aligned with the organization's values and its commitment to Diversity, Equity and Inclusion. Employees are hired lawfully and in a fair manner that respects and protects their rights.

The principle of equal opportunity and non-discrimination is strictly observed in recruitment and throughout the entire Employee cycle – recruitment, onboarding, learning and development. Employees and job applicants will not be discriminated against on grounds of gender, age, race, faith or religion, skin color, nationality, ethnic origin, political or other beliefs, sexual orientation, disabilities, or family status.

Kontron also provides the same level of information to all foreign applicants, candidates and Employees, including details of

- (i) the likely cost of living in the area the prospective employer is situated,
- (ii) the likely duration of the employment in question and
- (iii) the state of the employment market in the field the applicant, candidate or Employee is being recruited.

Kontron expects its suppliers to uphold the rights of employees, including migrant workers, by ensuring ethical and fair treatment throughout their employment. Suppliers shall not retain, destroy, conceal, or confiscate identity or immigration documents, such as government-issued identity cards, passports, or work permits. Employees shall not be required to pay recruitment fees or related costs for their employment. If such fees are found to have been paid, suppliers will ensure that they are fully refunded to the employee. These expectations reflect Kontron's commitment to international standards and the promotion of ethical labor practices within its supply chain.

### **5.4 Prohibition of modern slavery**

Kontron expects its supplier strictly to not tolerate any forms of modern slavery such as forced or bonded or servitude or compulsory labor, human trafficking or practices similar to that, especially other forms of domination or oppression in this context. Suppliers shall adhere to the standards and provisions laid down in international conventions and local regulations.

### **5.5 Young workers and prohibition of child labor**

Kontron does not tolerate child labor in any form and it's strictly prohibited and Kontron expects its suppliers to strictly comply with this requirement. Moreover, its Kontron's expectation that supplier also secures compliance in its own supply chain. Suppliers have to act in particular in accordance with the two fundamental ILO conventions on child labor (Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labor). Suppliers shall not employ anyone younger than 15 years of age, who is still of compulsory school age or who has not reached the legal minimum age for employment,

whereby the regulation with the strictest age limit shall take precedence. Supplier shall establish an action plan including remedies to be executed without undue delay and in accordance with international standards and local requirements, in case of discovering violations of the prohibition of child labor. Legally permissible employment of young people, including the development of permissible on-the-job training programs for the benefit of the education of young people shall be supported by the supplier. Suppliers must prohibit Employees under the age of 18 from activities that endanger their health or safety (e.g. night work, overtime, working with toxic or hazardous substances).

## **5.6 Deployment of private or public safety forces**

Kontron ensures respect for human rights and is bound by the Code of Conduct. The use of private or public security forces shall be refrained from if, during their use/deployment, persons are subjected to inhuman or degrading treatment or restrictions on freedom of association.

## **5.7 CONTRACT OF EMPLOYMENT**

Kontron expects its suppliers to promote long-term employment relationships and maintain a stable workforce. Suppliers should prioritize permanent and direct employment and seek to limit the use of non-regular employment, such as temporary or contract labor, even during periods of increased demand. Recognizing the potential negative impact of excessive reliance on non-regular employment on employee well-being and organizational culture, suppliers are expected to ensure stable and sustainable employment practices in line with ethical and operational standards.

This approach is rooted in the commitment to promoting stability, employee well-being, and a positive workplace culture. While suppliers may recognize the occasional need for contingent employment for short-term projects or fluctuations in workload, such arrangements should be used prudently and in compliance with the law. By promoting regular employment, suppliers not only uphold ethical standards but also set a positive example for their partners and contribute to a more sustainable and equitable global workforce.

As part of this commitment to fair and ethical labor practices, suppliers are expected to ensure that workers, including migrant workers, are provided with employment contracts in a language they understand. These contracts should explicitly state their rights and responsibilities with respect to the terms and conditions of employment before they are hired. These conditions should include wages, working hours, and more. Any changes to the contract or working conditions must comply with local regulations and be fully transparent to the migrant worker.

## **5.8 Fair labor practices / diversity & equal opportunities and non-discrimination**

Supplier shall respect the right of their Employees in accordance with all relevant legislations, regulations and directives. Kontron expects suppliers to ensure that workers, including migrant workers, are provided with employment contracts in a language they understand, that explicitly state their rights and

responsibilities with respect to the terms and conditions of employment before they are hired. These conditions include wages, working hours, and more. Any changes to the contract or working conditions must comply with local regulations and be fully transparent to the migrant worker. Further, Kontron expects its supplier to promote diversity and equal opportunities within its company and to enforce the employment of individuals of a variety of ethnic backgrounds, cultures, religions, ages, levels of ability (disabilities), races, sexual identities and persuasion, genders and mindsets. Suppliers are expected to provide a workplace free of harassment or discrimination and should foster a social environment with respect for all individuals. Suppliers should implement measures to avoid any form of discrimination and unacceptable treatments of individuals and to promote in this regard also an awareness of its Employees.

This means, including, but not limited to:

- › no discrimination based on gender, age, religion, social background, disability, ethnic, national or territorial origin, nationality, political affiliation or opinion, sexual orientation, gender identity, family responsibility, marital status, skin color, disease, pregnancy, or other criteria;
- › zero tolerance related to unacceptable treatments of individual, e.g. any forms of harassment, abuse or mental cruelty;
- › promotion of diversity and equal opportunities for all Employees;
- › respect of freedom of association and collective bargaining;
- › fair and reasonable payment of wages and benefits to Employees (in respect of applicable minimum wages by law; collective bargaining agreements and industry standards as the case may be);
- › respect of working hours regulations and laws.

Suppliers does not tolerate any form of harassment, intimidation, insults, threats, unjust accusations, bullying, sexual harassment, abusive behavior, or other acts of physical or psychological violence that negatively affect the dignity of its Employees. Harassment can take many forms, including violence or threats of violence; offensive or intimidating comments or conduct, such as derogatory remarks, nicknames, jokes, pranks or insults; nonverbal conduct, such as stalking; and explicit verbal conduct of a sexual nature, such as unwelcome and clearly intended advances or suggestive comments about personal or physical characteristics.

Suppliers also prohibit the exchange or display of offensive images or objects of a sexual nature, as well as images or objects that could promote hate, discrimination, or stereotyping in the workplace. Unwelcome sexual conduct, such as unwelcome physical contact or advances, is also unacceptable, as is the implication of an expectation of reciprocity for hiring, promotion, or job advancement.

## **5.9 Freedom of association and collective bargaining**

Suppliers must respect the freedom of association and the right to collective bargaining. Suppliers shall ensure that Employees are free to exercise their rights and are no subject to any form of harassment or reprisal. Where the right to freedom of association and collective bargaining is restricted by applicable laws, alternative and lawful means of establishing Employee representation shall be fostered. Suppliers should, where possible, promote social and community dialogue through collective bargaining to ensure that working hours are humane and compatible with health.

Kontron's Whistleblower System allows confidential reporting of concerns or violations of the right to freedom of association and collective bargaining.

### **5.10 Wages and benefits**

Suppliers must offer fair and reasonable wages and benefits to all Employees according to the applicable laws and regulations (minimum wages, compensations laws). This commitment is fundamental to fostering a professional and respectful work environment. In accordance with local laws, Employees shall be compensated for overtime work at a rate in excess of their regular hourly rate. For each pay period, suppliers are expected to provide Employees with a timely and adequate wage statement that contains sufficient information to verify accurate compensation for work performed, ensuring that thorough documentation is maintained. Wage deductions as a disciplinary measure are not permitted. Suppliers respect the equal pay principles, meaning no discrimination is committed on the basis of gender. Compensation and benefits shall be provided according to the applicable regulations.

To protect and reconcile work commitments with family needs, Kontron expects its suppliers to implement a number of measures. These include access to extensive resources and referral services, free of charge advisory, involvement of employees on leave, and easing of re-entry after maternity leave. In addition, suppliers are encouraged to accommodate individual needs related to dependents and personal circumstances and aim to provide flexible solutions wherever possible and in accordance with applicable laws and internal policies.

### **5.11 Working hours**

Suppliers adhere to all applicable working hours regulations globally and ensure the compliance at any time, especially when Employees working from home/mobile offices. This means that a working week shall not exceed 60 hours, including overtime (limited to 48 regular hours per week and no more than 12 hours of voluntary overtime). All overtime must be voluntary. Exceptions are permitted only in emergencies or unusual circumstances and must be clearly defined and permitted by national law and worker agreements. Employees shall be allowed to have at least one day off every seven days (ILO no.14).

### **5.12 Training and skills**

Kontron expects its suppliers to adhere to the same high standards that Kontron applies in its internal training and education programs. In addition to the development of technical and social skills, Kontron offers regular training in safety awareness, data protection and compliance. These expectations are an integral part of our Supplier Code and underline our joint commitment to ethical behavior and responsibility along the entire supply chain.

### **5.13 Land, forest, water rights, forced eviction and rights of indigenous people**

Suppliers shall not engage in forced protection or the unlawful appropriation of land, forests and waters when acquiring, developing, or otherwise using land, forests, and waters. Particularly in need of protection

are also the rights of indigenous peoples, whose displacement or negative impact must be ruled out. Kontron expects all Employees of suppliers to support local communities and indigenous peoples in the vicinity of Group companies. In particular, high value is placed on compliance with national and international legal and regulatory requirements.

#### **5.14 Community Relations and Development**

Given the nature of their business, Kontron expects its suppliers to acknowledge the impact their activities may have on local communities. Many of these activities will be visible to local people and will affect their surroundings. Suppliers should build and maintain good relationships with local stakeholders to address community needs and contribute to the UN Sustainable Development Goals (SDGs).

Stakeholder engagement and human rights issues are fundamental building blocks of trust, and suppliers should seek to maintain good relations with their neighbors. Suppliers should engage with the communities in which they operate to build capacity and support local development. A key objective of these efforts is to promote sustainable economic and social progress in these areas.

## 6 Health and Safety

Suppliers shall act in compliance with all statutory and international standards as well as regulations related to occupational health and safety and the measures to be taken in this regard. Suppliers should provide safe working conditions and a safe and healthy working environment to their Employees, including fire safety. Suppliers shall establish a reasonable occupational health and safety management system (including guidelines, procedures and regular risk assessments, and an incident and accident management system), e.g. in accordance with ISO 45001 or shall implement other reasonable procedures depending on the specific business activities and corresponding risks, as well as factors such as the supplier's sector, size, geographical location, and type of work performed.

This means, including, but not limited to:

- › provision of appropriate regular training and working instructions to Employees including occupational safety, emergency preparedness, machine safeguard, fire safety etc.
- › taking of preventive actions and measures to avoid accidents/near-accidents and emergency preparedness
- › to ensure, that all Employees act according to the applicable health and safety laws and regulations,
- › regular reviews, evaluations and elimination of identified potential health and safety risks by taking of reasonable risk mitigation measures
- › provision of appropriate safety equipment, personal protection equipment, first aid/ firefighting equipment and any other material necessary for emergency preparedness as well as ergonomic workplaces

### 6.1 Workplace ergonomics

Workplace ergonomics plays a crucial role in keeping Employees fit and healthy throughout their working lives. Kontron provides a safe and healthful workplace for its Employees. While ergonomic workstations provide optimal working conditions, technical aids facilitate the work of Employees and promote favorable ergonomic postures. At most Kontron's offices and work sites, company physicians are available to provide medical treatment in the workplace and advice on ergonomic workplace design. Kontron expects its suppliers to provide similar resources and support to their Employees, including access to company physicians and guidance on ergonomic workplace design.

### 6.2 Working and living conditions

Suppliers must provide immediate access to clean toilets, potable water and sanitary food preparation, storage and eating areas. All food consumption, preparation and storage facilities must meet applicable minimum sanitation requirements. Dormitories provided by suppliers must meet standards of cleanliness and safety, including emergency exits, hot water, adequate lighting, conditioned ventilation, secure storage for personal items, and adequate personal space. Entry and exit privileges should be reasonable and unrestricted.

### **6.3 Emergency preparedness and response**

Kontron expects its suppliers to be committed to taking reasonable measures to ensure safety of the workplace in accordance with national requirements, in order to prevent emergencies, work accidents and to protect the health of its Employees. These include procedures for notification and evacuation of Employees, emergency training and drills, first-aider training, availability of appropriate first-aid materials, adequate fire detection and suppression equipment and sufficient exit facilities. Valid local regulations on occupational protection, health and safety in the workplace, as well as building safety and fire protection have been observed, to reduce the risk of accidents and work-related illnesses to a minimum. Suppliers shall provide all Employees with regular training to develop their security awareness and behavior.

### **6.4 Accident/incident management**

Suppliers are expected to ensure that arrangements are made for emergency management and response in accordance with applicable laws and regulations. These include Employee alerting and evacuation, dispatching of first aiders and application of fire extinguishing equipment.

### **6.5 Personal protective equipment**

The Personal Protective Equipment provides a high level of safety and complies with legal requirements. Its purpose is to reduce Employee exposure to hazards when engineering and administrative controls are not feasible or effective to minimize this risk to an acceptable level. Whenever necessary, Employees are provided with appropriate Personal Protective Equipment. Kontron expects its suppliers to provide such equipment free of charge and to ensure that it is in good working order and hygienic condition.

### **6.6 Machine safety**

Kontron expects its suppliers to be committed to creating a safe and compliant work environment for its Employees. In this regard, machine safety is of paramount importance. Suppliers are expected to ensure preventive service and maintenance of all machines and work equipment as applicable. In addition, work tools are equipped with appropriate protective devices to prevent injury to workers from contusions, cuts, burns, etc. Suppliers shall provide machine safety training to all Employees before they are allowed to operate any machine.

### **6.7 Handling of CBRN hazards**

Kontron expects its suppliers to protect their Employees from all chemical, biological, radiological and nuclear (CBRN) work-related hazards. Appropriate risk mitigation includes technical, organizational, personal and informal measures.

In particular, if potentially hazardous substances and processes can't be avoided, Kontron considers occupational health and safety. All related health and safety measures mentioned above apply. Wherever possible Kontron expects its suppliers to strive to replace them with less hazardous ones.

## 7 Environmental responsibility

Suppliers are expected to have a clear understanding of the environmental risks, impacts and responsibilities they have associated with their business conduct and the products/services they supply. Suppliers should have a process in place to mitigate these risks and to ensure that its operations shall confirm to all applicable environmental legislations.

This shall mean, including, but not limited to:

- › establishing of a reasonable environmental management system, preferably with ISO 14001 certification;
- › documentation and maintenance of all required environmental permits, approvals and registrations;
- › minimization of pollution;
- › preservation of water quality;
- › minimization of water consumption, usage of energy, raw materials and resources;
- › minimization of emissions and responsible waste handling e.g. by putting best efforts to re-use and recycle materials;
- › separation and safe keeping of chemicals, oils, batteries and any other hazardous waste
- › safe handling, storage and labelling of chemicals;
- › performance of regular risk assessments related to the negative environmental impact of business conducts and products/services to be supplied.

Kontron expects its suppliers to contribute to Kontron's environmental objectives as laid down in the Code of Conduct of Kontron and to collaborate with Kontron to improve the environmental performance of Kontron's supply chain.

### 7.1 Responsible mineral sourcing / REACH and RoHS compliance

In connection with the respect of human rights, suppliers are also expected (if applicable for their business operations), to establish a procedure to avoid "conflict minerals" (3TG - tantalum, tin, tungsten, and gold), as well as other critical mineral resources, in the products they manufacture. Suppliers are committed to increasing its efforts and initiatives in the area of circularity, with a particular focus on actions that promote the reuse or recycling of materials. Through these efforts, suppliers aim to reduce the global demand for raw materials, including conflict minerals and other controversial raw materials such as copper, cobalt and lithium.

Suppliers have to avoid in their products the use of raw materials, which originate from high-risk areas and/or conflict-affected areas, which potentially supports human right abuse, corruption, the financing of armed groups, terrorism or equivalent circumstances.

Moreover, suppliers must ensure compliance with other applicable product-related requirements, such as REACH and RoHS, and may be required to declare the material content and origin of products delivered to Kontron.

Several regulations have to be respected by suppliers, if applicable, to name some (including; but not limited to) in this regard:

- (i) **European Union:** Regulation concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Regulation concerning Restriction of Hazardous Substances (RoHS), Timber Regulation, F-Gases Regulation, Conflict Minerals Regulation; Corporate Sustainability Due Diligence Directive (CSDDD), which requires suppliers to conduct due diligence on human rights and environmental impacts throughout their supply chains;
- (ii) **USA:** Dodd-Frank Act, Sec 1502 “Conflict Minerals”, California Transparency in Supply Chains Act of 2010, Business Supply Chain, Transparency on Trafficking and Slavery Act of 2015;
- (iii) **Germany:** German Supply Chain Due Diligence Act (LkSG), which requires companies and their suppliers to comply with human rights and environmental standards.

This means for suppliers, including, but not limited to:

- › implementation of reasonable procedures to minimize the risk of raw material use from conflict areas, contained in components, materials and/or products (e.g. by taking measures as described in OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas);
- › suppliers shall also promote in their supply chain a sustainable sourcing practice to avoid any violations of the requirements described above;
- › no use of prohibited and restricted substances RoHS and REACH compliance is mandatory;
- › when supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) the supplier has to submit information on these articles to ECHA (SCIP database);
- › reporting of part material compositions/ material and safety data sheets.

## 7.2 US Dodd-Frank Act Compliance

Suppliers must adhere to the highest standards of respect for human rights and comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act. Kontron expects its suppliers to share this commitment and strictly adhere to responsible and ethical mineral sourcing practices as outlined in Section 1502 of the Dodd-Frank Act and EU Regulation 2017/821.

Suppliers are expected to avoid sourcing minerals from Conflict-Affected and High-Risk Areas (CAHRAs) identified in Annex 2 of the OECD Due Diligence Guidance, including but not limited to the Democratic Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia. Key minerals under review include tantalum, tin, tungsten, their ores and gold.

Kontron promotes the development of these regions through its supply chain practices and expects its suppliers to contribute to this effort.

Suppliers are required to work closely with Kontron to implement responsible sourcing practices. Where necessary, suppliers must work with Kontron to mitigate risks and conduct additional due diligence to ensure responsible sourcing.

In addition, suppliers are expected not to support a de facto embargo on CAHRAs. This is in line with Kontron's commitment to non-discrimination in supplier selection and is consistent with international human rights standards. Suppliers must recognize and adhere to risk-based due diligence processes in the mineral supply chain and source from regions that are following legal and international regulations.

### **7.3 Usage of original parts / counterfeit parts prevention**

Kontron sources only original parts for its products and services and aims to ensure that no counterfeit parts are used within its supply chain.

Suppliers shall implement and maintain effective methods and processes to identify and minimize the risk of counterfeit parts and materials being introduced into the supply chain relating to Kontron. If any incident within the supply chain is suspected or detected, procedures shall apply and be initiated to quarantine the product and all recipients of counterfeit products shall be informed properly.

### **7.4 Sustainable resources management / waste reduction / hazardous substances**

Supplier should ensure to minimize and to possibly avoiding waste of all types, e.g. the reduction of water consumption as well as promoting the reduced usage of energy, fossil fuels, minerals and other resources, including raw materials. Waste treatment shall be in accordance with environmental laws.

Suppliers should advise and implement respective processes and procedures to identify, label, and instruct their Employees on the safe handling, movement, storage, use, recycling or reuse, and disposal of chemicals, waste, and other materials posing a hazard to humans or the environment.

### **7.5 Product Compliance**

Ensuring the compliance and safety of products is of paramount importance to Kontron and its suppliers. Suppliers have a responsibility to minimize risks to the health, safety, environment, and property of customers and third parties. To achieve this, suppliers should develop their products according to the state of the art and comply with legal regulations and additional safety requirements based on the latest scientific findings. Suppliers are expected to operate in accordance with internal guidelines and global regulations, in particular the EU Regulation on the Registration, Evaluation and Authorization of Chemicals (REACH). The commitment to compliance also includes maintaining and updating mandatory registrations to reflect current regulatory standards. Suppliers are expected to design their products in alignment with sustainability principles and regulatory frameworks such as the Ecodesign for Sustainable Products Regulation (ESPR). This includes efforts to enhance energy efficiency, circularity, and recyclability, ensuring compliance with evolving environmental standards.

Suppliers should systematically ensure compliance through established structures and stable processes. Once products are on the market, suppliers should continuously monitor them in the field to promptly address any deviations. Suppliers are expected to meet customers' quality and cost expectations while integrating environmental, health, and safety considerations into every aspect of product management.

Additionally, suppliers are encouraged to prioritize transparency by providing detailed information about their products to both partners and customers.

## **7.6 Product-related environmental Protection**

Kontron expects its suppliers to commit to product design that promotes the longevity of products and consciously avoids planned obsolescence. This commitment should be based on a deep understanding of customer needs and the requirements of sustainable business practices. Suppliers are required to provide spare parts throughout the lifecycle of products, enabling repairs and extending the useful life of the products, thereby reducing waste and resource consumption.

In addition, suppliers are expected to design energy-efficient products that minimize environmental impact while reducing operating costs for customers. This approach not only builds customer trust but also demonstrates the supplier's commitment to sustainable business practices and responsible corporate citizenship.

## **7.7 Circular economy and waste management**

Suppliers are required to adopt a life-cycle perspective and practice Extended Producer Responsibility (EPR) to ensure the circular management of resources and waste. Adherence to the waste hierarchy is essential, prioritizing waste prevention, preparation for reuse, recycling, recovery and, as a last resort, disposal. It is imperative that suppliers identify and properly manage any hazardous materials to prevent environmental contamination.

In addition, suppliers must monitor, control and treat wastewater and solid waste generated by their operations, industrial processes and sanitary facilities. Air emissions, including volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products, must be characterized, monitored, controlled and treated to minimize environmental impact.

Kontron requires suppliers to adhere to a strict policy for the proper disposal of waste in production facilities and offices. Production waste must be categorized and placed in designated containers for paper and cardboard, recyclables (e.g. Styrofoam, plastics), scrap metal, electronic waste and batteries. ESD areas should have special disposal bins.

Office waste should be separated into special bins for paper and other materials to be disposed of by specialized companies. Confidential documents should be kept in locked containers. Hazardous waste must be handled by certified waste management companies.

To minimize waste, suppliers must use minimal packaging for products and work with Kontron to use environmentally friendly packaging such as biodegradable materials and recyclable items such as paper and cardboard.

## **7.8 Pollution prevention / energy efficiency / renewable energy**

Suppliers shall take appropriate measures to minimize their pollution, including carbon emissions and greenhouse gas (GHG) emissions. The use of renewable energy sources, e.g. from photovoltaic systems or wind turbines, shall be encouraged over the use of non-renewable energy sources. Suppliers shall further focus on the efficient use of energy, water and raw materials.

## **7.9 Animal welfare**

The responsible treatment of living beings is part of Kontron's values. Compliance with national and international legal standards on animal protection and animal welfare is a matter of course.

Kontron is committed to implementing high animal welfare and traceability standards in its business operations. In particular, Kontron is committed to the highest standards for endangered species and condemns any mistreatment of animals. Kontron also expects that its suppliers will follow these regulations.

## **7.10 Biodiversity, land use and deforestation**

Kontron expects its suppliers to align with its sustainability strategy aims to protect and restore biodiversity – with a particular focus on forests and land. For Kontron, protection of the environment includes protection of biodiversity. Suppliers are expected to ensure that their business activities do not involve native forest conversion and/or unsustainable logging and promote conservation of natural forests as well as their ecosystem services and biodiversity. Kontron requires its suppliers to commit to avoid deforestation in all forms. Suppliers are expected to minimize disturbance to protected areas and local flora and fauna in all their activities.

## **7.11 Greenhouse (GHG) gas emissions, water and soil protection**

Kontron ensures that it does not cause harmful soil contamination, water pollution, air pollution or avoidable greenhouse gas (GHG) emissions. To improve the environmental performance of their products and services, suppliers should actively work to reduce their Scope 3 emissions. This not only means to reduce direct emissions from sources on site, but also to reduce both indirect emissions of the supply chain or services and emissions from utilities. This could be mostly achieved by increasing the use of carbon-neutral energy sources.

To enable Kontron to fully comply with the requirements of the Corporate Sustainability Reporting Directive (CSRD), suppliers shall, upon request, provide the data necessary to calculate the Corporate Carbon Footprint (CCF).

Healthy soils are essential for achieving climate neutrality, a clean and circular economy as well as halting desertification and land degradation. They are also essential to reserve biodiversity loss, provide healthy food and safeguard human health. To this end, Kontron implements management systems to measure, mitigate and demonstrate continuous improvements of environmental impacts of its own operations and along with its value chains.

Furthermore, Kontron should not cause excessive water consumption that adversely affects human health, access to clean water or sanitation or that has a significant negative impact on the natural

resources needed to preserve and produce food. Kontron expects its suppliers to implement measures to minimize water consumption at their sites and along with their supply chains, with priority given to water-stressed regions. The right to water will always be respected. Suppliers should provide Kontron with information on total freshwater consumption at product level upon request.

### **7.12 Noise emission**

Kontron aims to minimize noise emissions at its sites, including relevant noise pollution by freight traffic from external suppliers. Kontron has implemented operating procedures to comply with applicable legal requirements on noise emission. To minimize the impact of noise on environment and people from the outset, noise control measures are taken into consideration as early as the planning of operational processes and also during the modification or reconstruction of existing sites.

## **8 Adherence to export, import and trade controls**

The importing and exporting of products and services are highly regulated. Kontron expects its suppliers to comply with all applicable export controls, laws and regulations in the countries in which they operate. Kontron expects from its suppliers that the foreign trade regulations are carefully complied with when goods are traded or transported, services are provided, or other technical know-how or software is transferred, including regulations on EU and US sanctions lists are checked as well as an appropriate background check regarding politically exposed persons and an appropriate documentation is made.

## 9 Supplier's supply chain

Kontron expects its suppliers to use their best efforts to extend the principles embodied in this Kontron Supplier Code of Conduct to their suppliers and agents that are engaged in the production, supply and support of products or services for Kontron. Suppliers are recommended to ensure this by a properly documented risk-based due diligence for their own supply chain and that suppliers take suitable measures to ensure that their suppliers permanently meet the minimum requirements as laid down herein (e.g. by self-assessment requests, auditing). Suppliers might also use towards their supply chain their own code of conduct, provided the standards of the Kontron Supplier Code of Conduct are contained therein.

### 9.1 principles of procurement

Kontron expects its suppliers, both direct and indirect, to strictly adhere to the principles outlined in the Supplier Code of Conduct. Suppliers are expected to comply applicable laws and internal policies, emphasizing human rights, compliance, labor standards, fair business practices, diversity, equity and inclusion (DEI), environmental protection, and occupational health and safety as fundamental non-financial principles.

Suppliers are expected to implement best practices, including robust selection and monitoring processes, to ensure compliance with Kontron's expectations. This includes evaluating their own suppliers based on criteria such as industry, geographic location, size, and type of work performed.

Kontron expects suppliers to mitigate the negative impact of procurement practices by building stable, long-term relationships through clear commitments and multi-year contracts. Fairness in contract pricing remains a guiding principle, with a focus on including labor costs in negotiations and a willingness to pay above market prices to ensure fair compensation.

### 9.2 Supplier Selection Process and Documentation

Each supplier is expected to follow a rigorous selection and monitoring process in line with Kontron's principles. Suppliers are evaluated thoroughly, with an appropriate approval and selection process that includes a supplier risk assessment and management system where applicable. The decision to establish a supplier as a Kontron business partner is based on a comprehensive evaluation.

Suppliers should consider criteria related to their specific business models, operations, and local characteristics when engaging with Kontron. Supplier decisions are expected to be based on transparent, material, and objective criteria, with all assessments appropriately documented.

Kontron encourages suppliers to implement local supply chain risk assessment and management systems. These systems should address risks associated with the country of sourcing and the category of supplier (e.g., service provider, hardware supplier, original equipment manufacturer, broker, software licensor, single source).

Critical suppliers can be identified based on several risk categories, including:

- › Located in high-risk countries with forced labor, child labor, or health and safety risks;
- › Single-source suppliers that create a high dependency on Kontron;
- › Suppliers with high purchase volumes;
- › Suppliers that sell refurbished materials or used software licenses;
- › Suppliers providing services or goods in highly regulated environments;
- › Brokers or distributors that do not purchase directly from OEMs;
- › Suppliers of products subject to REACH or RoHS legislation;
- › Suppliers of products or services with a high carbon footprint;
- › Suppliers relevant to responsible mineral sourcing.

If a supplier is identified as critical, Kontron expects additional efforts to ensure compliance with its principles. These efforts may include requesting further commitments, obtaining written acceptance of Kontron's Supplier Code of Conduct, and conducting on-site visits and audits.

Suppliers that achieve a highly satisfactory result in the risk assessment may be considered for a preferred and/or key supplier ranking. A higher score increases the likelihood of becoming a key supplier to Kontron and strengthening the business relationship.

### **9.3 Supplier Audits/Supplier Risk Assessment**

Suppliers are required to assess their compliance with the Code of Conduct through a questionnaire before being considered for selection. This self-assessment or self-declaration is part of Kontron's comprehensive selection and qualification process, which considers various factors such as industry, size, geographical location and type of work performed.

This assessment ensures that suppliers comply with relevant laws, human rights principles and labor and social standards. Kontron will not do business with suppliers that receive a disqualifying rating in the evaluation process, and those that do not meet Kontron's high standards will not be considered for business, which may result in the termination of existing contracts in accordance with the Procurement Principles.

Reasons for disqualification include non-compliance with environmental, health and safety standards, non-compliance with International Labor Organization and United Nations conventions, and non-compliance with Kontron's principles, values and codes of conduct, which emphasize respect for human rights and the prevention of the use of conflict minerals.

Suppliers from countries with less stringent environmental and labor laws are subject to increased scrutiny due to a higher risk of non-compliance. Suppliers that manufacture complex or safety-critical components, particularly in key industries such as electronics and automotive, are subject to more intensive audits due to their significant impact on Kontron's products and services. In addition, large, single-source suppliers

are subject to greater scrutiny than smaller, one-time suppliers due to their significant business volume and impact.

Further, Kontron expects suppliers to implement systematic processes for evaluating and monitoring their performance across multiple criteria, including quality, delivery, cost, compliance, service, environmental innovation, and financial stability. These processes should enable suppliers to identify and address supply chain weaknesses, track performance continuously, and implement targeted improvement measures. By maintaining robust monitoring practices, suppliers contribute to strengthening their relationship with Kontron and ensuring a reliable and high-quality supply chain.

#### **9.4 Consequences of poor results and non-compliance of suppliers**

If a supplier's assessment, review or audit reveals minor deviations from Kontron's expectations as outlined in this Kontron Supplier CoC, Kontron will work with the supplier to develop an action plan to improve performance within a reasonable timeframe.

If the supplier provides evidence and transparency on multiple criteria and a violation of Kontron's standards isn't clearly evident, the supplier must commit to implement improvement measures promptly to demonstrate compliance. If non-compliance with the Kontron Supplier CoC is identified, Kontron will work with the supplier to agree on corrective actions to be taken within a reasonable timeframe. If corrective actions do not produce satisfactory results due to the supplier's unwillingness or inability to meet Kontron's standards, Kontron may terminate its relationship with the supplier.

Repeatedly underperforming suppliers will be removed from Kontron's network. In the case of serious violations, such as support of child labor, Kontron will immediately terminate its relationship with the supplier and notify its affiliates.

#### **9.5 Third Party Due Diligence**

Kontron expects its business partners to align with its commitment to understanding and mitigating risks associated with third-party relationships. To ensure that suppliers do not pose significant risks, Kontron requires regular compliance reviews of third parties and business partners. This process helps identify and address risks associated with sanctioned parties and ensures alignment with Kontron's values.

Kontron expects its business partners to ensure that sanctioned parties (e.g., those sanctioned by the EU or the United Nations) are not accepted as part of their business relationships. Partnerships should only be formed with suppliers and contractors who share Kontron's values. Through collaboration with such partners, Kontron seeks to embed key human rights principles and foster awareness of ethical and environmental standards in business practices.

To comply with legal and capital market regulations, Kontron requires annual and ad hoc due diligence reviews of third parties. This includes reviewing the most important customers and suppliers of each

Group company, especially those with a high volume of business. Particular attention shall be paid to third parties in countries with a high risk of corruption as defined by Transparency International.

The screening process requires checking various databases, including sanctions lists, politically exposed persons (PEP) lists, and press reports. Sanctions lists help to identify individuals and companies subject to economic or legal sanctions. PEP lists highlight politically exposed persons who may be vulnerable to corruption or bribery. Press reports are reviewed to ensure that business partners have not been involved in economic crimes such as corruption, money laundering, fraud, or bribery. This comprehensive approach ensures thorough due diligence and effective risk mitigation, supporting the maintenance of ethical business partnerships.

Suppliers are expected to properly document and maintain all compliance reviews, due diligence reports, and other relevant records. These records must ensure that all processes and assessments are transparent and traceable.

In the event of any identified impact or business risk, appropriate measures, including the potential termination of business relationships, should be taken to effectively manage and mitigate the situation. This proactive approach reflects the shared commitment to maintaining integrity and ensuring the success of all business relationships.

## 10 Control mechanism

Kontron regularly monitors and evaluates supplier performance and, where appropriate, performance within its upstream supply chain. Kontron expects each supplier to be willing to continually improve its sustainability and complies with all requirements laid down in this Kontron supplier Code of Conduct and any update hereof. Kontron may request from time to time from their suppliers a self-assessment related to the requirements laid down in this Kontron Suppliers Code of Conduct. Kontron might also conduct regular, one-time and/or event-driven audits at supplier's premises and/or sites to monitor supplier's compliance. Kontron expects the best possible cooperation from its suppliers when they are asked to conduct audits or provide information, or when Kontron needs to conduct on-site inspections to meet the legal requirements imposed on Kontron or its affiliates.

Information on compliance performance and progress of improvements must be made available to Kontron on request. Suppliers shall notify Kontron as soon as reasonable, when suppliers become aware of existing violations of applicable laws, regulations and material requirements of this Kontron Supplier Code of Conduct provided that this violation can be considered to have material influence on Kontron's business and/or reputation.

## 11 Consequences of non-compliance

Kontron expects its suppliers to fully comply with the Kontron Supplier Code of Conduct. Kontron shall be informed immediately of any violations of the Kontron Supplier Code of Conduct.

Violations constitute a deterioration of the business relationship between Kontron and the respective supplier. In case of minor violations of the Kontron Supplier Code of Conduct, the supplier will be requested by Kontron to agree on a reasonable timeframe within which they will correct the deviation in consultation with Kontron. Suppliers shall provide evidence to Kontron that the violation has been corrected.

In particular, if a supplier discovers that a violation of a human rights-related or an environment-related obligation has already occurred or is imminent in its own business area or at a direct supplier, it must inform Kontron without undue delay. The Supplier and Kontron shall without undue delay agree on an appropriate remedial plan of action to avoid, terminate or minimize the extent of any violation.

To support the reporting and resolution of such violations, Kontron provides a confidential and anonymous whistleblower platform available in multiple languages. This platform is accessible to all stakeholders, including employees in the supply chain, and allows them to report concerns without fear of retaliation.

In case of a significant breach as well as a violation of essential material principles (e.g. human rights) or if no measures have been taken to correct the breach(es) within a reasonable period of time as requested by Kontron, or if the measures taken were insufficient and the breach has not been remedied, Kontron reserves the right to terminate any agreements with the supplier with immediate effect.

## 12 Reporting of non-compliance and concerns

Everyone is entitled to report proven or suspected violations of compliance regulations. In case of (possible) violations in the supply chain against the above requirements, please get in contact via email:

[compliance@kontron.com](mailto:compliance@kontron.com)

Another option is using our whistleblower platform, which is available on Kontron's website in various languages:

<https://whistleblower.kontron.com>

Additionally, Kontron has introduced a telephone hotline (24/7) for anonymous reporting. The hotline is accessible via the following numbers:

0800 / 700 799 (toll-free from Austria)

+43 1 80191 1194 (international)

All complaints can be submitted confidentially as well as anonymously, if desired, at any time. All complaints will be investigated.

Suppliers shall establish a whistleblower tool themselves if required by applicable laws. No reprisals or retaliation of any kind will be taken or tolerated against complainants.