


Quality **M**anagement **M**anual

Code of Conduct
Supplier
QM09-1

A large, detailed photograph of industrial machinery, specifically a large gear and a turbine-like component, set against a blue sky background. The gear is metallic and has several bolts. The turbine-like component is white and has a fan-like structure.

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1. Introduction / preamble

The supplier of Vogt Ultrasonics GmbH is committed to ecologically and socially responsible corporate management. We expect the same conduct from all of their suppliers. We also expect their employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. The suppliers also strive to continuously optimize their entrepreneurial activities and their products and services in terms of sustainability and call on their suppliers to contribute to this with a holistic approach.

The Code of Conduct is based on national laws and regulations as well as international agreements such as the United Nations General Declaration of Human Rights, the Guidelines on Children's Rights and Entrepreneurship, the United Nations Guidelines on Business and Human Rights, the international labor standards of the International Labor Organization and the Global Compact of the United Nations.

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2. Social Responsibility

2.1. Exclusion from forced labor

No forced labor, slave labor or similar work is employed. All work is voluntary and employees have the option to terminate their work or employment at any time. In addition, unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, will not be tolerated.

2.2. Prohibition of child labor

Child labor is not used in any phase of production. The age of the employees must not be less than the age at which compulsory schooling ends and in any case not under 15 years. If children are found at work (e.g. when working with customers), the activities must be documented that are to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protective regulations must be followed.

2.3. Fair wages

The pay for regular working hours and overtime corresponds to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. The pay for overtime must in any case be at least equal to the pay for regular hours. All legally required benefits are granted to employees. Deductions from wages as punishment are not permitted. VOGT ensures that employees receive clear, detailed and regular written information about the composition of their pay.

2.4. Fair working hours

The working hours correspond to the applicable laws or industry standards. Overtime is only permitted if it is done on a voluntary basis and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

2.5. Freedom of association

The right of workers to form and join organizations of their choice and to negotiate collectively must be respected. In cases in which the freedom of association and the right to collective negotiation are restricted by law, alternative possibilities for an independent and free association of employees for the purpose of collective negotiating are to be granted. Employee representatives are to be protected from discrimination. They should be given free access to their colleagues' workplaces to ensure that they can perceive their rights in a lawful and peaceful manner.

2.6. Prohibition of Discrimination

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

2.7. Health protection; safety at work

The supplier is responsible for a safe and healthy work environment. The necessary precautions against accidents and damage to health that may arise in connection with the job are taken through the establishment and application of appropriate occupational safety systems. In addition, employees are regularly informed and trained about applicable health and safety standards and activities. Employees are given access to sufficient drinking water and access to clean sanitary facilities.

2.8. Complaint management

The supplier provides an effective complaint management for individuals and communities who may be affected by negative effects.

2.9. Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt, the company establishes processes in accordance with the principles of the Organization for Economic Cooperation and Development (OECD) for the fulfillment of the duty of care to promote more responsible supply chains for minerals from conflict and high risk areas and expects the same from its suppliers. Smelting plants and refineries without adequate, audited care processes should be avoided.

2.10. Emergency preparedness and activities

Emergencies can occur at any time despite careful precautions. There are therefore emergency plans for all business premises (e.g. escape route plans, rules of conduct), which are communicated to the employees on a regular basis. In addition, every employee is encouraged to point out security gaps at an early stage.

3. Environmental responsibility

3.1. Treatment and discharge of industrial wastewater

Wastewater from operating procedures, production processes and sanitary facilities must be typified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures are being introduced to reduce the generation of wastewater.

3.2. Dealing with air emissions

General emissions from operational processes (air and noise emissions) as well as greenhouse gas emissions must be typified before they are released, routinely monitored, checked and, if necessary, treated. The supplier also has the task of monitoring its exhaust gas cleaning systems and finding economical solutions to minimize any emissions.

3.3. Handling of waste and hazardous substances

Der Lieferant folgt einer systematischen Herangehensweise, um Festabfall zu ermitteln, zu handhaben, zu reduzieren und verantwortungsvoll zu entsorgen oder zu recyceln. Chemikalien oder andere Materialien, die bei ihrer Freisetzung in die Umwelt eine Gefahr darstellen, sind zu ermitteln und so zu handhaben, dass beim Umgang mit diesen Stoffen, der Beförderung, Lagerung, Nutzung, beim Recycling oder der Wiederverwendung und bei ihrer Entsorgung die Sicherheit gewährleistet ist.

The supplier follows a systematic approach to identify, handle, reduce and responsibly dispose or recycle solid waste. Chemicals or other materials that represent a hazard if released into the environment must be identified and handled in such a way that safety is ensured when handling these materials, transporting, storing, using, recycling or reusing and disposing them.

3.4. Reducing the consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, must be reduced or avoided.

This is done either directly at the point of origin or through processes and measures, e.g. by changing the production and maintenance processes or processes in the company, through the use of alternative materials, through savings, through recycling or with the help of the reuse of materials.

3.5. Dealing with energy consumption / efficiency

The energy consumption is monitored and documented. Economical solutions must be found to improve energy efficiency and minimize energy consumption.

4. Ethical business conduct

4.1. Fair competition

The norms of fair business activity, fair advertising and fair competition are followed. In addition, the applicable antitrust laws must be applied, which prohibit in particular agreements and other activities that affect prices or conditions when dealing with competitors.

Furthermore, these regulations forbid agreements between customers and suppliers with which customers are to be restricted in their freedom to determine autonomously their prices and other conditions for resale.

4.2. Confidentiality/data protection/disclosure of information

The supplier undertakes to meet the reasonable expectations of his client, suppliers, customers, consumers and employees with regard to the protection of private information. When collecting, storing, processing, transmitting and passing on personal information, the supplier observes the laws on data protection and information security and the official regulations.

4.2.1. Whistleblowing and protection from retaliation

In the event of threats or use of improper and therefore business-damaging disclosure of information, including in the form of whistleblowing, criminal proceedings will be initiated.

4.3. Intellectual property

Intellectual property rights are respected; technology and know-how transfer are carried out in such a way that intellectual property rights and customer information are protected.

4.4. Integrity/bribery, taking advantage

All business activities are based on the highest standards of integrity. The supplier pursues a zero tolerance policy with the prohibition of all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing the standards are used to ensure compliance with anti-corruption laws.

4.5. Conflicts of interest

All decisions are made solely on the basis of objective criteria and are not influenced by personal interests or relationships. The personal interests and the private life of colleagues and employees are respected. Care is therefore taken to avoid conflicts between private and business interests or even their appearance.

4.6. Financial responsibility (exact record)

Annual statements of accounts and books, records and accounts of every legal entity within the company are part of the company records and therefore constitute company property. They must be accurate and comply with all legal, tax and internal accounting requirements. All company records are important company assets. All employees are responsible for the creation, use, administration, safe storage and, if necessary, safe destruction of such records. Such measures are only to be carried out in accordance with company policy, company standards and procedures and current legal requirements.

4.7. Counterfeit parts

The circulation of counterfeit parts represents a high security risk and causes high economic damage. For this reason, every suspicious part must be reported to the relevant authorities.

4.8. Export controls and economic sanctions

Applicable laws for the import and export of goods and services must be strictly followed. Therefore, prior to any collaboration or transaction with third parties and prior to any export, re-export or transfer of regulated items, it must be ensured that the export control laws of the relevant jurisdictions are complied with.