Code of Conduct- SEDOTEC GmbH & Co. KG

Our Understanding of Sustainability

For SEDOTEC GmbH & Co. KG, sustainability is a key element of our corporate mission and an integral part of our business strategy. As a company, we develop switchgear systems and solutions for future market and customer needs. To ensure the long-term success of our customers with innovative product and service solutions, we include raw materials, goods, and services in our processes. This is based on responsible corporate governance aimed at long-term value creation. For this reason, we directly integrate suppliers into our sustainability strategy. With this Code of Conduct, we have defined our principles as binding. It serves as a framework for orientation and applies equally to everyone – internally for management, executives, and each individual employee, and externally for all business partners. It is both a commitment to ourselves and a promise to the outside world for responsible behavior toward business partners and the public, as well as respectful cooperation within the company.

In our procurement activities, we consider not only legal, economic, technical, and procedural criteria but also social and environmental aspects such as human rights, working conditions, anti-corruption, and climate and environmental protection. For many years, we have systematically promoted energy and climate efficiency in our production and, together with our customers and suppliers, pursued the development of efficient solutions to reduce greenhouse gas emissions. SEDOTEC has set ambitious goals on the path to climate neutrality. Our long-term goal is to be climate neutral by 2030. A key focus of our sustainability efforts is therefore the reduction of CO_2 emissions along the entire product life cycle – from development and production to recycling. Our supplier network plays a special role in reducing the carbon footprint of our products.

We have firmly integrated responsible conduct into our procurement processes. We make our procurement decisions not only based on legal, economic, technical, and procedural aspects, but also on social, ecological, and ethical criteria. Sustainability thus plays an important role in the selection of suppliers at SEDOTEC.

To this end, we have developed a Code of Conduct at SEDOTEC that clearly formulates our expectations of all employees, suppliers, service providers, and customers. The Code of Conduct is based on the principles of the United Nations Global Compact and the Universal Declaration of Human Rights. Our goal is to work only with partners who follow the principles set out therein and comply with applicable national laws.

If a partner violates these principles and does not agree to or implement appropriate corrective measures, SEDOTEC reserves the right to decide anew on the establishment or continuation of the business relationship. SEDOTEC therefore provides this Code of Conduct to its suppliers with the aim of strengthening a shared understanding of the implementation of the principles listed below in business cooperation.

Note: In our publications, we use gender-inclusive language. To maintain consistent readability, we refrain from using the gender colon and use neutral language wherever possible to address all genders.

Human and Labor Rights
Our shared responsibility is based on the universal rights of every individual. Therefore, whether manager, employee, supplier, or service provider – we are committed to full compliance with the United Nations International Bill of Human Rights. We always take into account the laws and legal frameworks applicable in each country and location. We respect and promote the fundamental labor rights as enshrined in national laws and defined in the core labor standards of the International Labour Organization (ILO). All parties are expected to respect the rights of third parties and to minimize potential violations with regard to international standards.

Child Labor
Any form of child labor contradicts our core values. For this reason, we require all managers, employees, suppliers, and service providers to strictly comply with the ILO core labor standards and prohibit any form of child labor in their operations.

Discrimination
A respectful and fair working environment is the foundation of our shared success. We are committed to ensuring that no one – internally or externally – is disadvantaged, favored, or harassed based on gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation, or identity. This fundamental principle is binding on all of us.

Forced Labor
We strictly reject any form of forced or compulsory labor in all our business areas, whether internal or in collaboration with external partners. All work must be clearly voluntary, and employees must be free to end the employment relationship in accordance with statutory notice periods.

Remuneration and Working Hours
Compliance with the applicable national working time regulations – or, if none exist, the international ILO standards – is essential to us. In addition, we ensure that all employees receive fair and appropriate remuneration that at least complies with the applicable national laws, minimum wage, and social security standards.

Freedom of Expression, Privacy, and Personal Rights
SEDOTEC grants all managers and employees the right to freedom of expression and expects the same from its external partners and their employees. We are also committed to respecting and protecting the personal rights and privacy of all involved – as the foundation of a trust-based working relationship.

Occupational Health and Safety
The well-being of all individuals is our top priority. Therefore, all activities in the area of occupational health and safety must be implemented in accordance with applicable national regulations. By establishing an effective occupational safety management system – including risk analyses, training, provision of protective equipment, and emergency measures – we jointly contribute to avoiding accidents and work-related illnesses as much as possible. SEDOTEC provides this to all employees at all corporate levels and expects the same from its external partners.

Environmental Protection
Responsible use of resources and compliance with environmental standards are fundamental principles of our actions. Managers, employees, suppliers, and service providers are required to comply with applicable national energy and environmental protection laws and to implement appropriate environmental and energy management systems. Particular emphasis is placed on the efficient use of energy, water, and raw materials, as well as on the use of modern technologies to reduce waste, CO_2 emissions, wastewater pollution, and harmful substances. Transparency regarding emissions and continuous improvement, for example through the increased use of renewable energy, are essential in this context.
As part of our risk analysis, we regularly assess whether climate change has an impact on our company. Due to our location, infrastructure, and stable supply chain, there are currently no relevant risks arising from climate-related changes.

Integrity in Business Conduct
Integrity guides our business actions. All executives, employees, suppliers, and service providers of SEDOTEC are required to comply with all applicable laws, regulations, and legal provisions in the countries in which they operate. We take all necessary measures to ensure that this compliance is upheld in daily practice.

Prohibition of Corruption and Bribery
Corruption and bribery contradict SEDOTEC's ethical principles. Therefore, we do not tolerate any form of corruption, theft, embezzlement, fraud, or extortion. Likewise, illegal payments or other benefits to individuals, companies, or public officials intended to influence decision-making processes are not permitted. We expect all parties involved – regardless of their role or whether internal or external – to fully comply with international UN and OECD anti-corruption conventions as well as all relevant anti-corruption laws, including those concerning bribery abroad.

Avoiding Conflicts of Interest
Our decisions are based on objective and factual criteria. It is our responsibility to identify and avoid potential conflicts of interest – whether arising from personal or business relationships with relatives or close individuals – at an early stage, so that decisions always serve the best interests of the company and the community.

Fair Competition – Compliance with Antitrust and Competition Law
Fair competition is the basis of healthy economic cooperation. Therefore, we expect all parties to comply with applicable antitrust and competition laws, avoid illegal agreements, and refrain from abusing a dominant market position or using anti-competitive practices.

Data Protection and Information Security
The protection of personal data and confidential information is our highest priority. We are collectively committed to complying with all applicable data protection laws. All information systems processing confidential company or personal data must be protected by appropriate technical security measures. SEDOTEC expects its suppliers to attach particular importance to the protection of personal data and to comply with applicable data protection laws. Personal data may only be processed where there is a lawful basis for doing so. SEDOTEC expects that information systems used by all parties – at every management level within the company as well as in external relationships – that contain confidential information or SEDOTEC data are properly managed and protected against unauthorized access through appropriate technical safeguards. As part of our cyber security strategy, all employees are required to handle passwords securely, protect confidential data, and use only authorized systems and software. Security incidents or suspicious activities must be reported immediately. IT devices must always be secured, and when working remotely, the SEDOTEC VPN (“Virtual Private Network”) must be used when connecting to company systems. Circumventing security requirements or using unauthorized IT solutions is prohibited. Regular training ensures that all employees are aware of the relevant risks and act responsibly accordingly.

Prevention of Money Laundering and Terrorist Financing
To effectively prevent money laundering and terrorist financing, all legal requirements must be strictly observed. Our internal processes and business relationships with external partners are designed to rule out any involvement in money laundering or terrorist financing activities.

Foreign Trade Law
Compliance with all international and national foreign trade regulations, particularly export control and embargo regulations, is mandatory for SEDOTEC and expected from our suppliers and service providers. It must be ensured that no prohibited business relationships are maintained with sanctioned individuals, companies, or organizations.

Fair Use of External Personnel
Whether through service contracts or temporary work – when using external personnel, legal provisions and respect for human and labor rights must always be observed. This applies equally to suppliers, service providers, and our internal processes.

Supply Chain Requirements and Due Diligence
SEDOTEC relies on a cooperative partnership with its suppliers. Just as SEDOTEC commits to responsible and fair conduct toward employees, customers, suppliers, and the local community, we also expect our suppliers to act in accordance with the principles of our Supplier Code of Conduct and comply with applicable rules. SEDOTEC expects suppliers to comply with national supply chain and due diligence requirements and ensure that their affiliated companies also acknowledge and implement the principles and requirements described here. Suppliers must make reasonable efforts in the upstream supply chain to ensure that their own suppliers also comply with the principles of this Supplier Code of Conduct.

Conflict Minerals and High-Risk Raw Materials
All SEDOTEC suppliers and service providers are required to fulfill their due diligence to promote responsible raw material supply chains. It is essential to strictly comply with all applicable legal regulations regarding conflict minerals. Together, we aim to minimize risks in the supply chain and promote sustainable, ethically sound business practices. The restriction/prevention of hazardous substances is regulated in accordance with RoHS Directive 2011/65/EU (including the declaration on Directive 2015/863 restricting phthalates). The prevention of the use of conflict minerals is regulated via RMI_CMRT and RMI_EMRT (RMI: Responsible Minerals Initiative; CMRT: Conflict Minerals Reporting Template; EMRT: Extended Minerals Reporting Template).

Reporting of Potential Misconduct
Good-faith reports help to identify and address violations at an early stage and reduce potential harm to SEDOTEC, our employees, and our business partners. The opportunity to report concerns is available to all SEDOTEC employees as well as to suppliers, customers, and other third parties via an anonymized email to hinschg@sedotec.de. Where required by law, SEDOTEC expects its suppliers to establish an appropriate whistleblowing system.

Compliance with the SEDOTEC Code of Conduct
Our cooperative partnership is based on shared values and principles. We therefore expect all managers, employees, suppliers, service providers, and other business partners to fully accept and comply with the SEDOTEC Code of Conduct. Through regular due diligence processes, we monitor compliance with these principles, identify potential risks in the supply chain, and consistently take measures to minimize and eliminate them in the long term.

This code is intended as a compass for our joint actions. It not only strengthens our internal standards but also fosters trust and sustainable collaboration with all our business partners – from management and every employee to suppliers and service providers.

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