

maxon Supplier Code of Conduct (CoC)

The maxon group (maxon) requires its suppliers to operate in accordance with the principles in this maxon Supplier Code of Conduct (CoC) and in full compliance with all applicable laws and regulations.

This CoC outlines maxon's expectations for supplier conduct regarding labor and human rights, health and safety, environmental protection, ethics and management practices.

The Supplier undertakes to comply with the principles and requirements of the Code of Conduct as well as to contractually oblige its subcontractors to comply with the obligations set out in this document.

maxon informs its suppliers and the public about its supply chain policy and integrates it into contracts and agreements with suppliers.

The supplier declares herewith:

Our Principles

The maxon supplier Code of Conduct is based on the internationally recognized human rights as outlined in the United Nations' International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Labor and Human Rights

The suppliers have to respect the human rights of employees as defined in the international conventions of the United Nations (UN), the International Labor Organization (ILO), the Organization for Economic Cooperation and Development (OECD).

Forced Labor, debt bonded labor, slavery or human trafficking

- to refuse to employ or make anyone work against his or her will
- to be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Anti-discrimination

- to prevent violation of equal opportunities for and treatment of your employees irrespective of ethnical origin, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age unless it is based on the legal requirements of the employment.
- to respect the personal dignity, privacy and personal rights of each individual

Anti-harassment and Abuse

- to prevent any unacceptable treatment of employees, such as mental cruelty, sexual harassment or corporal punishment
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative

Wages and Hours

- to provide fair remuneration at least guarantee the applicable national statutory minimum wage
- to comply with the maximum number of working hours laid down in the applicable laws
- to ensure that workers receive the necessary time off, paid annual leave and holidays as required by local law
- to comply with the maximum number of workdays in a week laid down in the applicable laws

Prevention of Underage Labor

- to refrain from employing individuals under the age of 15 or under 18 for hazardous work in alignment with ILO's Minimum Age Convention (No. 138) and the Convention on the Worst Forms of Child Labor (No. 182).
- to comply with all applicable child labor laws
- to be guided by the guidelines set out in the ILO-IOQ Child Labor Guidance Tool for Business.
- to uphold due diligence measures throughout the supply chain, especially for products or services where child labor is a concern

In cases where child labor risks are detected, maxon uses various instruments to identify, evaluate, eliminate or mitigate child labor risks. This includes on-the-spot inspections, obtaining information from authorities and international organizations, cooperating with experts and use of recognized standards and certification schemes.

Freedom of Association

- to permit workers to exercise their lawful rights to associate with others

Health and Safety

Occupational Health, Safety, and Hazard Prevention

- to provide training and ensure that employees are educated in occupational health and safety issues
- to set up an occupational health and safety management system including worker health and safety, hygiene and sanitation, fire safety and risk protection
- to control hazards and take precautionary measures against accidents and occupational diseases
- to provide workers with appropriate, well-maintained, personal protective equipment
- to provide workers with reasonably accessible and clean toilet facilities, as well as potable water.

Emergency, Prevention, Preparedness and Response

- to post easy-to-follow warning signs and health and safety information signs
- to ensure that there are sufficient, clearly marked and unimpeded exits that allow workers to evacuate in the event of a fire or other emergencies
- to equip production and associate machinery with appropriate operational safety devices and maintain, inspect and service these on a regular basis

Product Safety

- that the products and services supplied must be safe and do not endanger people or the environment
- in particular, that the products and services comply with the agreed specifications and that the legal guidelines applicable to the products and services regarding product safety, labelling and packaging must be complied with

Environment

Management System and Laws

- to maintain an environmental management system
- to comply with all applicable environmental laws, regulations and standards that apply to your business

Pollution Prevention and Waste Reduction

Where applicable by law or contract, the supplier shall implement systems to monitor and reduce environmental impacts, including pollution, waste, and emissions (Scope 1 and Scope 2).

- to minimize environmental pollution and making continuous improvements in environmental protection
- to systematically identify, manage, reduce and responsibly dispose of or recycling of waste.
- to identify, manage, reduce und responsibly control Greenhouse Gas (GHG) emissions from its operations (Scope 1, Scope 2)
- to implement a systematic approach to identify, control and reduce wastewater produced by its operations and to conduct routine monitoring of the performance of its wastewater treatment systems.
- to identify, manage, reduce and responsibly control Air Emissions emanating from its operations that pose a hazard to the environment and to conduct routine monitoring of the performance of its Air Emission control systems.

Hazardous Substances

- to identify and manage hazardous substances
- to store hazardous materials in secure areas and dispose of them in a safe and legal manner
- to have procedures for notifying local community authorities in case of an accidental discharge or release of hazardous materials into the environment or in the case of any other environmental emergency

Material Compliance

- to respect the legislation or regulations applicable in the production countries and in the countries/regions where the product or part is sold e.g. European Union) in terms of prohibition, restriction, registration, authorization and/or traceability of substances of concern for human health or the environment (e.g. REACH, RoHS, ELV, TSCA)

Ethics

Conflict of Interest

- to avoid all conflicts of interest that may adversely influence business relationships

Prohibition of Corruption and Bribery

- to tolerate no form of and do not engage in any form of corruption or bribery
- not to tolerate any form of bribery or corruption and not to offer, promise, grant or authorize, directly or indirectly, undue advantages in dealing with public officials, private individuals, private and public companies to obtain or secure an unlawful or improper performance of tasks or other illegitimate advantages.
- to comply with all applicable anti-corruption laws, including the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and national laws.
- not to accept or offer gifts or benefits that go beyond ordinary practice and with the intention of obtaining preferential treatment.

Fair Competition and Anti-Trust Laws

- to act in accordance with applicable competition laws and not to participate in practices such as price fixing, market or customer allocation, market sharing or bid rigging with competitors

Privacy and Data Protections

- to comply with all privacy, data protection and cybersecurity law that are applicable to maxon or the supplier

Protection of Intellectual Property

- to respect intellectual property rights and safeguard customer documents and knowledge
- to notify maxon immediately, if you become aware of any violation of maxon's intellectual property rights

Anti Money Laundering

- to ensure that the business relationship is not abused for money laundering

Conflict Minerals

- to monitor and report the use of minerals and metals—specifically ores, concentrates, and metals containing tin, tantalum, tungsten and gold, including by-products—classified as "conflict minerals and metals"
- to supply information in form of a conflict minerals reporting template (CMRT) or in form of an extended minerals reporting template (EMRT)

Management Commitment

Compliance with applicable laws

- to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this supplier CoC

Company Statement

- to take the necessary steps to ensure that your employees understand and comply with this supplier CoC, including communicating the details of this supplier CoC to employees regularly in the local language of the business
- to ensure that your suppliers and sub-suppliers comply with the standards set forth in this supplier CoC

Risk Assessment and Management

- to develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics and legal compliance risks associated with its operations. The Supplier shall determine the relative significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

Employees Feedback and Participation

- to have a reporting system, where employees or employees of business partners can place their concerns about any non-compliances of this supplier CoC with immunity from prosecution

Audits and assessments

- to permit maxon to periodically evaluate the supplier's facilities and operations