

Traco Electronic AG Code of Conduct

This Code of Conduct defines the basic requirements Traco Electronic AG [hereafter "Traco"], places on itself and its Subsidiaries ¹, concerning its responsibilities towards stakeholders and the environment. Traco reserves the right to modify these Code of Conduct requirements subject to reasonable Traco compliance program changes.

Traco herewith declares:

Legal compliance

- to comply with the laws of the applicable legal system(s).

Prohibition of corruption and bribery

- to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

Respect for the basic human rights of employees ²

- to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his will;
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- to provide fair remuneration and to guarantee the applicable national statutory minimum wage;
- to comply with the maximum number of working hours laid down in the applicable laws;
- to recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.

Prohibition of child labor ³

- to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

Health and safety of employees

- to take responsibility for the health and safety of its employees;
- to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- to provide training and ensure that employees are educated in health and safety issues;
- to set up or use a reasonable occupational health & safety management system.

Environmental protection ⁴

- to act in accordance with the applicable statutory and international standards regarding environmental protection;
- to minimize environmental pollution and make continuous improvements in environmental protection;
- to set up or use a reasonable environmental management system.

Supply chain

- to ensure with reasonable efforts compliance by its suppliers of goods and services with this Code of Conduct;
- to comply with the principles of non discrimination with regard to supplier selection and treatment.

¹ "Subsidiaries" means for the purpose of this Declaration Traco Electronic AG and all entities which are controlled by Traco Electronic AG, whether directly or through one or more intermediaries, except Traco Power North America, Inc. whose Code of Conduct is US aligned.

² UNHCR Declaration of Human Rights in Resolution 217 A (III) dated 10.12.1948

³ Declaration of the International Labour Organisation on basic labour principles and rights dated January 1, 2003

⁴ Measures for implementing sustainable development which emerged from the United Nations Rio Conference on 20-22 June 2012