

## CODE OF CONDUCT / VERHALTENSKODEX

We base our content on the Code of Conduct on Social Responsibility of the ZVEI [as of 2008]. VISUALYS has added some points to this document [as of 2020].

### Preamble

ZVEI and its member companies affirm their Corporate Social Responsibility as a part of their global business activities (internationally known as “CSR”<sup>1</sup>). “ZVEI’s Code of Conduct for Corporate Social Responsibility” (hereinafter called “CoC”) acts as a guideline in the industry, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust. Developed and agreed to by ZVEI and its member companies, the content of this CoC is an expression of ZVEI’s collective core values as they are defined in ZVEI’s vision and mission statements and especially as they are affirmed in the social market economy.

ZVEI recommends this CoC to be implemented by the member companies. It is designed as a self-imposed obligation that can be signed by the member companies. By providing this CoC, ZVEI assists them in responding to different general conditions in a global market, in facing challenges and social expectations that are coming from intensified collaborations of the value chain.

### 1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means VISUALYS assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social, healthy and environmental levels and brings about an appropriate balance of interests. VISUALYS voluntarily contributes to the wellbeing and long-term development of a global society at every point it is possible, for all locations where it is in business. It is geared towards universal ethical values and principals, especially integrity, honesty and respect of human dignity.

### 2. Where the CoC applies

- 2.1. This CoC is in effect for all of VISUALYS branches and business units worldwide.
- 2.2. VISUALYS commits to follow the rules of this CoC even for its suppliers and in other parts of the value chain, wherever it is possible.

### 3. Core values for social responsibility in Corporate Management

- 3.1. VISUALYS will proactively work to ensure that the values mentioned below are turned into practice and observed from this point.

#### 3.2. Adherence to laws

VISUALYS will comply with laws and other legal requirements of the countries where it is in business. For countries with a weak institutional framework, the company will carefully examine which good company practices from their home country should be applied to enable a supportive and responsible company management.

VISUALYS abides by the law. In cases where the law does not provide any code of conduct, VISUALYS will elaborate its own rules and regulations corresponding to its corporate culture and values. In case of any conflicts between law, rules and regulations set out below, law should always take precedence.

---

<sup>1</sup> CSR = Corporate Social Responsibility

### 3.3. Integrity and organizational governance

3.3.1. VISUALYS gears its activities towards universal ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination regarding to religious belief, skin color, race, nationality, ethnicity, political affiliation, any disability, age, origin, worldview, gender, sexual identity and orientation and ethnicity.

3.3.2. VISUALYS rejects corruption and bribery as stated in the relevant UN Convention<sup>2</sup>. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability. VISUALYS employees may not accept any payments, gifts or any other type of donation from third parties.

3.3.3. VISUALYS pursues clean and recognized business practices and fair competition. It acts in accordance to international competition law by not participating in price fixing, division of markets or customers neither market or quotation agreements. In regard to competition, it focuses on professional behavior and high standards of quality for work. It forces partnership and trusting interaction with the supervisory authorities. Additionally, it sticks to the parameters of the "Guide for our Association Activity – Instructions for Compliance with Competition Law in the ZVEI"<sup>3</sup>. Intellectual property rights are respected. The principles of none-discrimination in case of supplier selection and dealings with suppliers are forced.

3.3.4. Managers and employees of VISUALYS must ensure that their private, other external activities and financial interests will never conflict or appear to conflict with the interests of VISUALYS. In particular there should not be any form of "nepotism", the award of contracts to individuals or companies who/ which are connected personally or economically with each other. In Case of such a conflict the individual who is exposed to the conflict has to report it to his direct superior. Employees of VISUALYS are not permitted to be involved with any customer or supplier of VISUALYS. We also require to report about any private participation of VISUALYS employees with customers or suppliers of VISUALYS.

### 3.4. Consumer interests

If extent consumer interests are affected, VISUALYS abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

### 3.5. Communication

VISUALYS will communicate in an open way and is oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced (in particular in the case of financial transactions). They will not be unfairly changed or destroyed. They will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

### 3.6. Human Rights

Das VISUALYS is committed to the promotion of human rights and ensures that all internationally proclaimed human rights are respected by causing and investing in avoidance of human rights abuses. Increased attention has to be paid to the observance of human rights by particularly vulnerable people, judge rights holders or groups of rights holders, such as women, children, guest workers or (indigenous) communities. It respects human rights stated in the Charter of the United Nations<sup>4</sup>, especially those named in the following:

---

<sup>2</sup> UN Convention against corruption in 2003, in force since 2005

<sup>3</sup> Link to Guide: [https://www.zvei.org/fileadmin/user\\_upload/Verband/Compliance/ZVEI-Guide-for-our-Association.pdf](https://www.zvei.org/fileadmin/user_upload/Verband/Compliance/ZVEI-Guide-for-our-Association.pdf)

<sup>4</sup> General explanation of human rights, UN Resolution 217 A (III) from 1948

Rechteinhabern oder Gruppen von Rechteinhabern, wie etwa von Frauen, Kindern, Gastarbeitern oder von (indigenen) Gemeinschaften zu richten. Es hält die Menschenrechte gemäß der UN-Menschenrechtscharta ein, insbesondere die nachfolgend genannten:

### **3.6.1. Privacy**

Protection of privacy.

### **3.6.2. Health and safety of employees**

Ensuring health and work safety, especially the guarantee of a safe and health promoting work environment, to avoid accidents and injuries. In accordance with the applicable legal and international standards related to health and safety at work, VISUALYS has to ensure safe working conditions. In order to ensure this, it should offer (mandatory) training courses for all employees on the topics of health and occupational safety. An appropriate health and safety management system must be set up and applied.

### **3.6.3. Harassment**

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

### **3.6.4. Freedom of Speech**

Protection and guarantee of the right to freedom of opinion and freedom of expression.

## **3.7. Working conditions**

VISUALYS abides by the following core work standards from ILO<sup>5</sup>

### **3.7.1. Child labour**

Das The prohibition of child labour, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted<sup>6</sup>

### **3.7.2. Forced labour**

The prohibition of forced labour of any kind<sup>7</sup>. Neither use nor contribute to slavery, bondage, forced or compulsory labor or human trafficking.

### **3.7.3. Remuneration**

Work standards concerning remuneration, especially in regards to the level of remuneration as stated in the laws and requirements that are in force<sup>8</sup>. In the case of cross-border staff development, all applicable legal provisions must be complied with, especially with regard to minimum wages.

---

<sup>5</sup> ILO = International Labour Organization

<sup>6</sup> ILO Convention No. 138 from 1973 and ILO Convention No. 182 from 1999

<sup>7</sup> ILO Convention No. 29 from 1930 and ILO Convention No. 105 from 1957

<sup>8</sup> ILO Convention No. 100 from 1951

#### **3.7.4. Employee rights**

Die Respect for the right of workers to freedom of association, freedom of assembly, collective bargaining and collective bargaining, insofar as this is legally permissible and possible in the respective country<sup>9</sup>.

#### **3.8. Data Protection**

VISUALYS keeps personal data confidential, processes responsible and ensures that personal data is effectively protected and used only for legitimate purposes.

#### **3.9. Prohibition of Discrimination**

Treatment of all employees in a non-discriminatory fashion<sup>10</sup>. According to 3.2.1 of this declaration.

#### **3.10. Working Time**

Das VISUALYS complies with the applicable labor standards worldwide with regard to the maximum permitted working hours.

#### **3.11. Money laundering, terrorist financing**

Money laundering or terrorist financing are neither directly nor indirectly promoted.

#### **3.12. Export control and customs**

VISUALYS complies with the applicable export control and customs regulations.

#### **3.13. Environmental protection**

Das VISUALYS fulfils the legal norms and regulations and international environmental protection standards that affect its respective companies and acts in an environmentally conscious manner at all locations. It also handles natural resources responsibly, in accordance with the principles of the Rio Declaration<sup>11</sup>.

VISUALYS supports the principle of caution by avoiding materials and methods that pollute the environment and poses health risks, provided that suitable alternatives are available. VISUALYS audits, improves and reports on his environmental protection with special emphasis on an assessment of potential risks of future products and processes. VISUALYS operates an appropriate environmental management system, continuously improves environmental protection and minimizes environmental pollution by avoiding and reducing waste and improving processes.

#### **3.14. Responsible sourcing of minerals**

VISUALYS endeavors to take appropriate measures to avoid the use of raw materials in its products that come from conflict and risk areas and contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

#### **3.15. Civic engagement**

VISUALYS contributes to the social and economic development of the country and the region in which it operates and promotes corresponding voluntary activities by its employees.

---

<sup>9</sup> ILO Convention No. 87 from 1948 and ILO Convention No. 98 from 1949

<sup>10</sup> ILO Convention No. 111 from 1958

<sup>11</sup> The 27 principles from the “Rio Declaration on Environment and Development“ from 1992 as the result from the UN Conference on Environment and Development in Rio de Janeiro

### **3.16. Political influence**

VISUALYS is neutral towards political parties. Neither the assets nor the name of VISUALYS may be used to promote the interests of political parties or their candidates. Direct or indirect donations to political parties are not permitted.

### **3.17. Complaint mechanism**

VISUALYS offers its employees access to a protected procedure to report possible violations of the principles of this code of conduct.

## **4. Implementation and enforcement**

Das VISUALYS makes all suitable and reasonable efforts to continuously implement and apply the principles and values described in this CoC and to ensure that its suppliers comply with the basic principles of this CoC. Contractual partners should be informed of the essential measures on request and within the scope of reciprocity, so that it is understandable how their compliance is fundamentally guaranteed. There is no entitlement to the disclosure of trade and business secrets, competition-related information or information worthy of protection.

Geisenheim, 11<sup>th</sup> November 2021

VISUALYS GmbH



**Robert VISUALYS**

Managing Director