



# Code of conduct Policy

### **Abstract**

This is the Syntronic Group and group related companies Code of Conduct Policy and Guidelines.

### **Purpose**

The Syntronic Group Code of Conduct's main purpose is to protect human rights, promoting fair employment conditions, safe working conditions, responsible management of environmental issues, and high business ethical standards.

# Table of Contents

## 1 Code of Conduct Policy

1.1 Document Information .....	4
1.1.1 Language.....	4
1.1.2 Periodic review .....	4

## 2 General Principles

### 3 Business Ethics

3.1 Accounting .....	5
3.2 Taxation .....	5
3.3 Anti-corruption .....	5
3.4 Anti-bribery.....	6
3.5 Money laundering.....	6
3.6 Conflict of Interest .....	6
3.7 Fair Competition Practices.....	6
3.8 Company property and resources .....	7
3.9 Customer Offering .....	7
3.10 Political involvement.....	7
3.11 Intellectual Property (IP) .....	7
3.12 Conflict Minerals.....	7
3.13 Information Protection .....	8
3.14 Cyber Security.....	8

### 4 Labour Standards

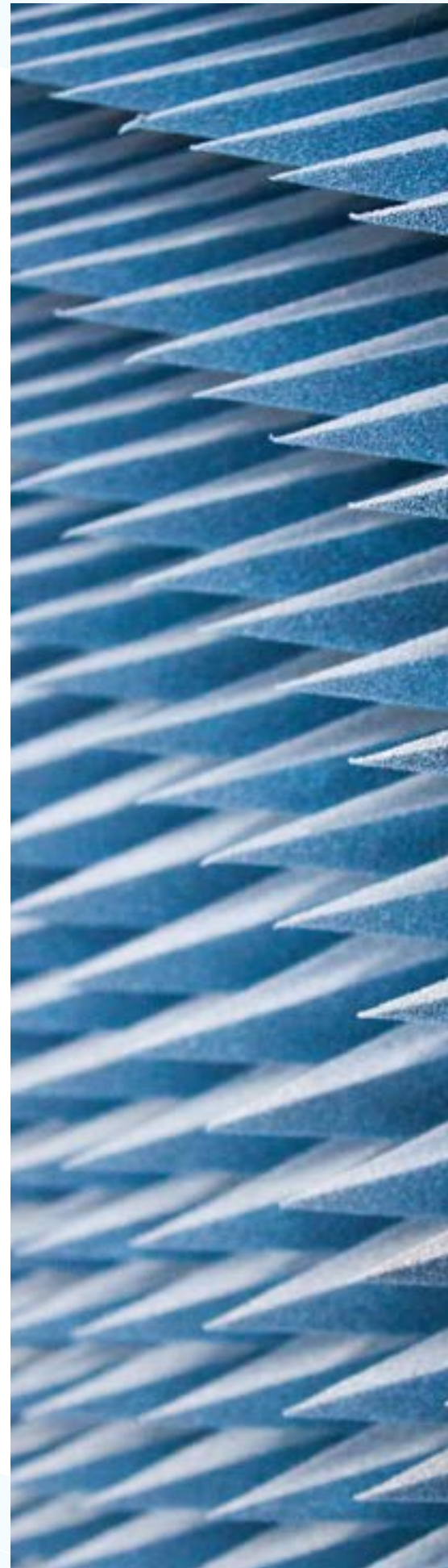
4.1 Human rights .....	8
4.2 Forced labour .....	8
4.3 Child labour .....	8
4.4 Young Workers .....	9
4.5 Freedom of association.....	9
4.6 Non-Discrimination.....	9
4.7 Workplace practice.....	9
4.8 Working hours and compensation.....	10

### 5 Environment and Climate

5.1 Environmental Responsibility .....	10
5.2 Climate Change and Net Zero.....	11

### 6 Code Governance and Reporting

6.1 Responsibility for compliance .....	11
6.2 Report on violation of the Code of Conduct .....	11
6.3 Requirements for business partners .....	11
6.4 Customer Code of Conducts .....	11





# 1 Code of Conduct Policy

The Syntronic Group has earned trust and reputation for corporate trustworthiness around the world, based on conducting business with integrity and in compliance with the laws and regulations governing its activities.

Success in business for Syntronic Group depends on building and maintaining the trust of customers, employees, governments and the general public.

The Syntronic Code of Conduct Policy is based on the Ten Principles of the UN Global Compact. For more specific information and definitions, see [unglobalcompact.org](http://unglobalcompact.org).

## 1.1 Document Information

### 1.1.1 Language

The original language of this document is English. If translated into other languages, the English version shall take precedence in case of disputes.

### 1.1.2 Periodic review

The CEO of Syntronic Group is responsible for ensuring that a review of the document is performed every year.



## 2 General Principles

The Syntronic Group shall:

- Comply with the laws and regulations of each country in which it operates,
- Demonstrate and promote its commitment to responsible business practice in policies, decisions and activities,
- Integrate the principles of this policy into our ways of working.

## 3 Business Ethics

### 3.1 Accounting

All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

### 3.2 Taxation

The Syntronic Group shall comply with the tax laws and regulations of each country in which it operates. Where or if tax laws do not give clear guidance, prudence and transparency shall be the guiding principles.

### 3.3 Anti-corruption

The Syntronic Group operates a zero-tolerance policy toward corruption. The Syntronic Group shall not participate in or endorse any corrupt practices. Representatives of the Syntronic Group shall not offer customers, potential customers, suppliers, sub-contractors, governments or any representative of such entities, any rewards or benefits in violation of applicable laws or established business practices stricter than applicable laws, in order to obtain or retain business or to gain any other improper advantage.

Syntronic Group employees shall not accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions.

### **3.4 Anti-bribery**

The Syntronic Group operates a zero-tolerance policy toward bribery. As an employee within Syntronic Group, You may not offer or accept gifts, benefits, reimbursements or entertainment to or from a third party that would constitute a violation of laws or that could affect, or appear to affect, your professional judgment in the performance of work or duties for Syntronic or a third party.

No employee may, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback or any other unlawful or unethical benefit to employees, or other representatives or associates, of Syntronic or any third party. This also include any kind of facilitation payments demanded by public officials in order to speed up or secure the performance of routine government actions. Any such offer or proposed arrangement must be reported immediately to Group Function President.

### **3.5 Money laundering**

The Syntronic Group shall not accept, facilitate or support money laundering.

### **3.6 Conflict of Interest**

All representatives of the Syntronic Group shall conduct their private and other external activities and financial interests in a manner that does not conflict with the interests of the Group.

Employees' private interests shall not influence their judgement or actions in performing their duties as representatives of the Group.

### **3.7 Fair Competition Practices**

The Syntronic Group shall compete in a fair manner and with integrity.



### **3.8 Company property and resources**

The Syntronic Group's property and resources shall be used for business objectives. The property and resources shall not be used for personal gain, fraudulent purposes, or in any other inappropriate manner.

### **3.9 Customer Offering**

The Syntronic Group shall ensure that its services meet all customer requirements.

As a guiding principle, Syntronic Group shall design products with a focus on quality, safety and environmental care.

### **3.10 Political involvement**

The Syntronic Group shall observe neutrality regarding politics.

### **3.11 Intellectual Property (IP)**

The Syntronic Group must respect the Intellectual Property (IP) rights of all partners, suppliers, and third parties. IP should only be used, shared, or disclosed according to laws, policies, and contracts. Unauthorized use, copying, or disclosure is prohibited and may lead to disciplinary or legal action.

### **3.12 Conflict Minerals**

The Syntronic Group and suppliers shall ensure that the sourcing of minerals does not directly or indirectly finance armed conflict or benefit armed groups. Syntronic Group shall perform due diligence on the source and chain of custody of conflict minerals in the supply chain, adhering to internationally recognized standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.





### **3.13 Information Protection**

The Syntronic Group must handle sensitive information with care, following laws, contracts, and internal policies. Information shall only be used for its intended purpose and never disclosed to unauthorized parties or used for personal gain. Companies within the Group must implement measures to prevent unauthorized access, use, or disclosure. Any breaches must be reported immediately.

### **3.14 Cyber Security**

Cyber security is essential for protecting information and ensuring uninterrupted operations. Syntronic Group shall have robust cyber security practices including threat detection, prevention and incident response. Syntronic Group shall adhere to established cyber security policies which ensures a secure environment, protects data, maintains resilience, and supports a strong supply chain.

## **4 Labour Standards**

### **4.1 Human rights**

The Syntronic Group shall support and respect the protection of internationally proclaimed human rights and make sure the Group is not complicit in human rights abuses.

### **4.2 Forced labour**

The Syntronic Group shall not engage in or support forced, bonded or compulsory labour, nor shall the Syntronic Group require any form of deposit or confiscate identification papers from employees. Employees are free to leave their employment after reasonable notice as required by law and contract.

### **4.3 Child labour**

Child labour is not tolerated. The minimum employment age is the age of completion of compulsory school, but never less than 15 years.

#### 4.4 Young Workers

Syntronic Group must not employ individuals under the age of 18 for hazardous work, which includes any work that could harm their health, safety, or morals. Syntronic Group should also support the education of young workers by ensuring that their work does not interfere with their education.

#### 4.5 Freedom of association

The Syntronic Group respects the right of all employees to form and to join, or not to join, an association to represent their interests as employees, to organize and to bargain collectively or individually. The Syntronic Group shall respect the recognized unions. An employee's right to refrain from joining a union is equally respected. The Syntronic Group shall notify employees' representatives and relevant government authorities, of major changes in our operations as required by law.

#### 4.6 Non-Discrimination

All employees shall have equal opportunities based on competencies, experience and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background or ethnic origin. All employees shall be treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

#### 4.7 Workplace practice

The necessary conditions for a safe and healthy work environment shall be provided for all Syntronic Group employees. This includes adhering to all relevant health and safety regulations and implementing best practices to prevent workplace injuries and illnesses. The safe and healthy working environments shall be maintained through ongoing, systematic monitoring of working environments.  
Emergency Preparedness



Potential emergencies shall be identified and assessed, and impact shall be minimized with plans and procedures for reporting, notification, evacuation, training, and drills. Drills shall be conducted annually or as required by local law. Plans must include fire detection and suppression, clear exits, emergency contact information, and recovery plans, focusing on minimizing harm to life, the environment, and property.

#### **4.8 Working hours and compensation**

The Syntronic Group shall comply with applicable laws, agreements and industry standards on working hours and compensation. The normal work week within Syntronic Group shall not exceed 48 hours. Hours worked beyond the normal work week shall be voluntary, unless exceptional circumstances and/or, if legal, certain conditions require extra hours. Other than in such circumstances, a work week shall not exceed 60 hours and Employees must be provided with at least one day off in every seven-day period. One day off is interpreted as twenty-four consecutive hours. Exceptional circumstances include short-term business demands and natural disaster.

Pay and terms must be fair and reasonable and comply at a minimum with applicable laws or industry standards, whichever is higher. Deduction from base Salaries/Wages as a disciplinary measure is not permitted.

## **5 Environment and Climate**

#### **5.1 Environmental Responsibility**

The Syntronic Group shall comply with environmental laws and regulations and apply the precautionary principle to minimize risks. Sustainable practices shall be implemented to reduce waste, conserve energy, and minimize hazardous materials. Syntronic Group shall continuously assess and mitigate the environmental impact of products and processes and maintain transparency in environmental practices. It is encouraged to use the most sustainable technologies to reduce the environmental footprint.



## 5.2 Climate Change and Net Zero

The Syntronic Group is committed to counteract climate change by integrating sustainable practices into operations and the supply chain, supporting our Net Zero by 2050 strategy. Syntronic Group shall actively work to reduce greenhouse gas emissions, minimize environmental impact, and promote resource efficiency. Through collaboration with suppliers and customers, Syntronic Group shall collectively combat climate change.

# 6 Code Governance and Reporting

## 6.1 Responsibility for compliance

It is the responsibility of the Syntronic Group managers to implement this policy and inform their employees of their rights, duties and responsibilities as well as demonstrate the content and spirit of this document within their respective organization. It is the responsibility of all employees to comply with local law, this Code of Conduct and the Syntronic Group policies.

Explicit or implicit approval of questionable actions that conflict with the Code of Conduct will not be tolerated and may result in disciplinary actions up to and including dismissal and legal proceedings. Deviations from this policy may be approved only by AB Syntronic's Board of Directors.

## 6.2 Report on violation of the Code of Conduct

All employees within the Syntronic Group are encouraged to report suspected violations of this Code of Conduct to their direct superiors or the managers of their superiors, or report anonymously to the Syntronic Group's whistleblowing function without any risk of retaliation.

## 6.3 Requirements for business partners

The Syntronic Group prefers to work with business partners that share the principles expressed in this Code of Conduct.

The Syntronic Group encourages its business partners to apply standards of business conduct consistent with the principles of this Code of Conduct.

## 6.4 Customer Code of Conducts

Any policy content in accepted customer's Code of Conducts that are in addition to the Syntronic Group Code of Conduct are informed by KAM/Assignment responsible to relevant managers for functions and personnel.

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