

Code of Conduct

infodas guideline

A. Publisher

Organisation	Finance	Consulting	Solutions	Sales Nat.	Sales Intern.	Internal IT
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Publisher: Board of Directors

B. Scope of Application

All Employees	Organisation	Finance	Consulting	Solutions	Sales Nat.	Sales Intern.	Internal IT
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C. Aim and purpose of the Document

The Code of Conduct of INFODAS GmbH (Code) formulates principles that are intended to ensure safe working conditions in the supply chain, respectful and dignified treatment of employees, and environmentally and ethically justified business processes.

The essential basis for this Code is the clear commitment of the management to adhere to the applicable laws, guidelines and rules and to ensure that the company complies with them throughout the company, both internally and externally.

An important objective of this Code is to require direct suppliers to recognize and implement this Code. For this purpose, infodas has formulated a supplier agreement.

This Code is not intended to establish any new or additional rights of third parties, including the workforce. Infodas pursues the goal of adhering to internationally recognised standards over and above the legal requirements and of promoting a sense of social and ecological responsibility and ethical business conduct.

Infodas is committed to continuously developing and implementing this Code of Conduct.

The Code comprises four sections that in each case lists standards for the areas of labour, health and safety as well as environment and business ethics.

D. Document Information

Version	3.0
Last Change	08.10.2021
Changed by	Leutloff, Carsten
Approved by	Ecke, Thorsten

Digitale Freigabe im pdf

E. Applicable Documents

This document should be seen in the context of the entire quality management system of infodas
In addition, it is to be applied in connection with administrative processes and the operational regulations of infodas

F. Change History

VERSION	DATE	CHANGED BY	CHANGES
1.0	16.05.2018	Franken	First Edition
1.1	12.03.2019	Franken	Addition to Chapter 4.3 „Impartiality“
2.0	20.04.2020	Leutloff	Adaption of Formatting
3.0	08.10.2021	Leutloff, Ecke	Addition of chapter 4.2 Export control

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1 Labour

In accordance with the view of international community of states, infodas and its participating suppliers undertake to uphold the human rights of the workforce and to treat them with dignity and respect. This refers to all employees, including temporary and migrant workers, student assistants, temporary workers, permanent employees and any other type of workers. Reference has been made in the preparation of this Code to recognised standards as listed in the reference. If necessary, these can be consulted for further information.

In addition, infodas and its participating suppliers undertake to apply and comply with all relevant laws concerning labour and social security.

Our standards in the area of labour are:

1.1 Free Choice of Employment

No forced labour, servitude (including debt bondage), compulsory labour, involuntary prison labour, slave labour or labour based on trafficking in human beings shall be used. This includes the transportation, harbouring, employment, transfer or reception of vulnerable persons under threat, coercion, force, abduction or fraud for exploitative purposes. All work is voluntary, and the workers may terminate their work or employment at any time in accordance with the legal deadlines. It is not a condition of employment that workers must provide a government issued ID document, passport or work permit. Disproportionately high fees are not permitted. Any fees charged to workers will be disclosed.

1.2 Prevention of Child Labour

The use of child labour is prohibited at every stage of the production process. The term "child" refers to any person under the age of 15 (or under the age of 14, depending on the law of the country) or to persons of school age or persons who have not yet reached the minimum age for employment applicable in that country. The highest age limit applies in each case. Approved training programs that meet all laws and regulations are encouraged. Workers under the age of 18 must not perform work that could endanger the health and safety of young workers.

1.3 Adequate Working Hours

Studies of business practices clearly show that overworked workers are less productive, change jobs more often and are more likely to be injured or ill. The working week must not exceed the maximum number of hours laid down by law. Furthermore, the weekly working time should not exceed 60 hours, including overtime. Exceptions are made for emergencies and exceptional circumstances. Workers must be allowed at least one day off in a seven-day week. Infodas has committed itself in its employment contracts as well as through company agreements to comply with all labour law regulations.

1.4 Adequate Salaries and Social Benefits

The remuneration paid to workers complies with all relevant laws on remuneration, including laws on minimum wages, overtime and statutory social benefits. Deductions from wages as a disciplinary measure are not permitted. The basis for calculating the remuneration of the workforce is provided promptly in the form of a pay slip or similar document.

1.5 Humane Treatment

Workers will not be treated with disproportionate severity or inhumanely, including sexual harassment, sexual abuse, physical reprimand, physical and mental abuse and verbal abuse. This also applies to the threat of such treatment. The disciplinary measures and guidelines corresponding to these requirements are clearly defined and communicated to the employees.

1.6 Prohibition of Discrimination

Infodas and its participating suppliers undertake not to tolerate harassment or unlawful discrimination within their workforce. Infodas and its participating suppliers may not discriminate against employees on the basis of race, colour, age, gender, sexual orientation, ethnic origin, disability, pregnancy, religious or political beliefs, trade union membership or marital status in their recruitment and employment practices, such as promotion and remuneration or access to training opportunities. In addition, current and future employees must not be subjected to medical tests that could be used in a discriminatory manner.

1.7 Freedom of Association

Open communication and direct dialogue between workers and management are the most effective ways to resolve workplace problems and pay-related controversies. The right of workers to form associations, join trade unions, seek worker representation and join works councils in accordance with local laws is respected. Workers are able to communicate with management openly and without fear of reprisals, intimidation or harassment, and to raise grievances regarding working conditions and management practices. Infodas adheres to the statutory co-determination and other participation rights of the works council.

2 Health and Safety

Infodas recognises that, in addition to striving to minimise work-related injuries and illnesses, a safe and healthy working environment contributes to increasing the quality of products and services, the consistency of the production process and the retention and morale of the workforce. Infodas also agrees that the continuous exchange of information with the workforce and their ongoing training are fundamental to the identification and resolution of health and safety problems in the workplace.

In drawing up this code, reference was made to recognised management systems such as OHSAS 18001 / ISO 45001 and the ILO guidelines on health and safety at work. If necessary, these can be consulted for further information.

Infodas employs certified specialists for occupational safety, maintains an occupational safety committee that meets quarterly, accompanied by a company physician, and offers its employees all legally required company examinations.

Our health and safety standards are:

2.1 Safety at Work

Where workers are exposed to potential safety risks (e.g. hazards from electricity and other energy sources, fire, vehicles and falls), these risks shall be reduced by the appropriate design of work equipment and by administrative control mechanisms, preventive maintenance, safe working procedures (including maintenance blocking systems) and regular safety training. Where adequate risk control cannot be achieved by such measures, workers shall be provided with appropriate, well-maintained personal protective equipment. Workers who raise safety concerns will not be subject to disciplinary action.

2.2 Emergency Precautions

The following provisions have been made for potential emergency situations and events:

Notification of emergencies, notification of workers and evacuation measures, appropriate fire detection and extinguishing equipment, adequate escape routes and rescue plans.

2.3 Prevention of Accidents at Work and Occupational Diseases

Procedures and systems are in place to prevent, manage, track and report occupational accidents and diseases. These include the following measures: encouraging workers to report such incidents, classifying and recording accidents and illnesses, investigating incidents and taking action to address the causes and facilitate the return of workers to work.

2.4 Hygiene at the Workplace

If workers are exposed to chemical, biological or physical risks, these substances and effects must be identified, evaluated and monitored. Design and administrative measures are used to control overloads. Where such measures cannot adequately reduce the risk, the health of workers shall be protected by appropriate personal protective equipment programmes.

2.5 Protection of Physically Demanding Work

Where workers are required to perform physically demanding work, including manual handling of materials, heavy or continuous lifting, long periods of standing work, and repetitive or strenuous assembly work, such work shall be identified, assessed and monitored.

2.6 Machine Safety

Production facilities and other machines must be checked for safety risks. Machinery where there is a risk of injury to workers must be fitted with physical protection devices, interlocks and locks and properly maintained.

2.7 Sanitary Facilities, Catering

Clean washrooms and toilets, clean drinking water and facilities for hygienic preparation, storage and consumption of meals are always provided to the employees.

3 Environment

Infodas recognises that responsible treatment of the environment is an integral part of manufacturing world-class products. During the manufacturing process, negative impacts on the community, the environment and natural resources must be minimized. At the same time, the health and safety of the public must be protected.

Reference has been made to recognised management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) when drafting this Code. If necessary, these can be consulted for further information.

Our standards in the area of environmental protection are:

3.1 Environmental Permits and Reporting

All necessary environmental permits (e.g. monitoring of wastewater discharges), approvals and registrations are obtained and kept up to date. The respective operational requirements as well as notification and reporting requirements are followed.

3.2 Prevention of Pollution and Reduction of Resources used

All forms of waste, including water and energy, shall be reduced or avoided, either directly at source or through procedures and measures such as changes in production and maintenance processes or company procedures, use of alternative materials, savings, recycling and reuse of materials.

3.3 Dangerous Substances

Chemicals or other materials that pose a risk when released into the environment are identified and must be handled in such a way that their handling, transport, storage, use, recycling, reuse and disposal are safe.

3.4 Wastewater and Solid Water

Wastewater and solid waste from operating procedures, production processes and sanitary facilities are monitored, checked and subjected to the necessary treatment before being discharged or disposed of.

3.5 Air Emission

Emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals or by-products of combustion from operational processes shall be monitored, verified and subjected to the necessary treatment before discharge.

3.6 Restrictions on Product Ingredients

Infodas complies with all applicable laws, regulations and customer specifications regarding the prohibition or restriction of specific substances. This also includes the obligation to label for recycling and disposal.

4 Ethics

Infodas and its representatives adhere to the highest ethical standards in order to fulfil their social and societal obligations and for a successful positioning on the market. These include:

4.1 Integrity

All business interactions are governed by the highest standards of integrity. Infodas shows no tolerance for bribery, corruption, extortion and embezzlement (including promises, offers, payments or acceptance of bribes) and prohibits it in any possible form. All business processes are transparent and can be correctly traced in the participant's business documents. Procedures for monitoring and enforcement are in place to ensure that anti-corruption laws are complied with.

4.2 Export control

Export control is an indispensable instrument for preventing and responding to foreign and security policy risks. As the centrally responsible administrative and licensing authority, the Federal Office of Economics and Export Control (BAFA) implements the security concerns and foreign policy interests of the Federal Republic of Germany in the field of foreign trade law within the framework of the political guidelines of the Federal Government.

INFODAS GmbH is committed to the objectives of export control and acts exclusively in accordance with them. All requirements of the BAFA and other laws and regulations are implemented and accepted.

The high security products of INFODAS GmbH are partly subject to export control by BAFA, as they are so-called dual-use goods of export list item No. 5A002A1 (Regulation (EC) No. 428/2009). In the case of export from the European Union, a corresponding application is required; a shipment within the Community territory does not require a license. In general, all high security products of INFODAS GmbH are presented to BAFA and evaluated by BAFA before an export transaction. No high security product of INFODAS GmbH has been and will ever be exported without BAFA approval.

To ensure compliance with all requirements, an export officer has been established within infodas at management level.

4.3 Prohibition of Taking Advantage

Bribes or other means of obtaining an improper or inappropriate advantage will not be offered or accepted.

4.4 Impartiality

Infodas follows the principle of impartiality in its analyses and consulting activities. It takes care to identify potential risks to impartiality and to eliminate and communicate these risks as required. To this end, appropriate measures are taken in affected processes and business procedures.

4.5 Disclosure of Information

Information about the company's business activities, structure, financial situation and performance is disclosed in accordance with the relevant regulations and standard industry practice. Falsifying records and misrepresentation of conditions and procedures in the supply chain are unacceptable.

4.6 Intellectual Property

Intellectual property rights are respected; technology transfer and transfer of know-how are carried out in such a way that intellectual property rights are protected.

4.7 Fair Business Conduct, fair Advertisement and fair Competition

The standards of fair business conduct, fair advertising and fair competition are observed. Adequate means are available to protect customer information.

4.8 Responsible Procurement of Raw Materials

Infodas draws up measures which, to the best of its knowledge and belief, ensure that the tantalum, tin, tungsten and gold used in the products it manufactures is not used directly or indirectly to finance or support armed groups guilty of serious human rights violations. Infodas exercises due diligence with regard to the origin and chain of custody of these minerals and discloses these due diligence measures to its customers on request.

4.9 Privacy

Infodas undertakes to meet the reasonable expectations of its business partners, including participating suppliers, customers, consumers and employees, with regard to the protection of private information. Infodas observes the applicable data protection laws and official regulations when personal information is collected, stored, processed, transmitted or passed on.

4.10 Waiving of Reprisals

Infodas is committed to ensuring that its employees can address any concerns without fear of reprisals and that this has been clearly communicated to them.

5 References

The following standards have been used in the preparation of this Code. If necessary, they can be consulted for further information. Each participant is free to apply the following standards.

Universal Declaration of Human Rights

<http://www.un.org/depts/german/menschenrechte/aemr.pdf/> / 03.04.2020 12:00

British Standard OHSAS 18001 "Occupational Health and Safety Management"

<https://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/> / 03.04.2020 12:00

ISO 45001 "Occupational Health and Safety Management"

<https://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/ISO-45001/> / 03.04.2020 12:00

Dodd-Frank Wall Street Reform and Consumer Protection Act

<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf/> / 03.04.2020 12:00

Ethical Trading Initiative

www.ethicaltrade.org/ / 03.04.2020 12:00

Electronic Industry Citizenship Coalition

www.eicc.info/ / 03.04.2020 12:00

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf/

ILO Occupational Safety and Health

[https://www.ilo.org/safework/lang--en/index.htm /](https://www.ilo.org/safework/lang--en/index.htm/) 03.04.2020 12:00

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.html/

[https://www.ilo.org/global/standards/lang--en/index.htm /](https://www.ilo.org/global/standards/lang--en/index.htm/) 03.04.2020 12:00

ISO 14001:2015: "Environmental management systems -- Requirements with guidance for use"

<https://www.iso.org/standard/60857.html/> / 03.04.2020 12:00

OECD Due Diligence Guidance

[http://www.oecd.org/document/36/0.3746,en_2649_34889_44307940_1_1_1_1,00.html /](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html/)

OECD Due Diligence Guidance For Responsible Business Conduct

<http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf> 03.04.2020 12:00

OECD Guidelines for Multinational Enterprises

[http://www.oecd.org/corporate/mne/ /](http://www.oecd.org/corporate/mne/) 03.04.2020 12:00

UN-Convention against corruption

http://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf/ / 03.04.2020 12:00

United Nations Global Compact

www.unglobalcompact.org/ / 03.04.2020 12:00

SA 8000:2014

<http://www.sa-intl.org/> / 03.04.2020 12:00