

TCA's Code of Conduct

TCA affirms its Corporate Social Responsibility as a part of its global business activities (internationally known as 'CSR'¹). TCA's Code of Conduct for Corporate Social Responsibility (hereinafter called 'CoC') is an expression of TCA's collective core values as they are defined in TCA's vision and mission statements and especially as they are affirmed in the social market economy. A CoC allows TCA to assume responsibility for the environment, for society and consequently, for the future.

1. Basic Understanding

A mutual, basic understanding of social responsibility in corporate management forms is the basis of this CoC.

We, the undersigned company, accept responsibility for the consequences of our business decisions and activities in respect of the legal, economic, technical, social and environmental implications as far as possible within our available scope of action. We thus contribute to the societal and economic development of the countries and regions in which we operate.

Our actions are consistent with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and honesty, as well as respect for the dignity of human beings as set out in the principles of the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for Multinational Enterprises, the Core Labour Standards of the International Labour Organisation and the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct defines the basic principles of our actions, and we actively demand that it is observed by our employees worldwide. Its standards apply in all branch offices and business units within our company.

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TCA 行为准则

TCA 确认, 企业社会责任构成其全球业务活动的一部分(国际上称为“CSR”¹)。TCA 关于企业社会责任的行为准则(下称“行为准则”)体现了 TCA 的集体核心价值观, 这种价值观在 TCA 的愿景和使命宣言中已得到明确, 尤其是在社会市场经济中获得了肯定。TCA 通过执行行为准则承担起对环境、社会乃至未来的责任。

1. 基本理解

对企业管理中的社会责任达成基本的共识构成了本行为准则的基础。

我们, 即以下签署公司会在制定公司决策和行为时考虑到对法律、经济、技术以及社会和生态方面的影响, 并根据自身能力和行为方式承担相应责任。我们通过这种方式为我们经营所在国家和地区的社会与经济发展做贡献。

我们的行为应符合相关法律规定。我们以《联合国世界人权宣言》、《经合组织跨国企业准则》和国际劳工组织(ILO)的核心劳工标准以及《联合国商业与人权指导原则》中规定的道德价值观和原则, 尤其是关于正直与正义、尊重他人尊严等方面的价值观和原则, 作为行为指导方针。

本《行为准则》规定了我们的行为基本原则, 我们积极推动我们分布在世界各地的员工遵守这些原则。本公司旗下各分公司及各业务部门也会严格遵守这些规定。

我们希望我们的业务合作伙伴也有同样的基本理解, 但这并非是为了确立有利于第三方的权利。

Bank Information

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Account No. 2010024909200021668 (CNY)
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We expect the same basic understanding from our business partners. It is not intended to constitute a basis for third-party rights.

2. Compliance with legislation

It is a matter of course for us that we will comply with current laws and other legal requirements in the countries in which we operate. In cases where local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. Where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, the local laws shall take precedence. Nevertheless, we endeavor to comply with the content of this Code of Conduct.

3. Integrity and compliance

3.1 Adherence to Laws

We do not tolerate corruption, bribery or blackmail; they impede fair competitive conditions. Gifts made with the intention of influencing business decisions or which could give the appearance of doing so or to obtain some other undue advantages are neither promised, offered, granted, requested nor accepted in our business relationships. Nor do we allow these to be promised to us. Especially strict standards must be applied when dealing with people for whom particular rules apply under criminal and liability law (e.g. public officials).

3.2 Fair competition

We operate in compliance with national and international competition and anti-trust legislation and do not participate in price agreements, sharing markets or collusion in respect of customers, markets and bids.

3.3 Prevention of money laundering

Money laundering is the term used for bringing money obtained illegally or from illegally acquired assets into the legal financial and economic system. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to

2. 遵守法律

遵守我们经营所在国家/地区的适用法律和其他法律规定对我们而言理所当然。如果当地法律规定限制较少，我们将按照本《行为准则》行事。如果当地强制性法律与本《行为准则》之间存在直接冲突，则以当地法律为准。但我们仍会尽力遵守本《行为准则》中的规定。

3. 诚信合规

3.1 腐败

我们对腐败、贿赂和欺诈采取零容忍态度；这些行为严重阻碍了公平竞争。在我们的业务关系中我们既未承诺、提供、给予、要求或接受意图或可能影响业务决策或其他方面而给予不当优势的好处，也未要求他人承诺这样的好处。在与适用特殊刑事和责任规定的人员（例如公职人员）打交道时，将采用特别严格的标准。

3.2 公平竞争

我们会按照本国和国家的竞争和反垄断法行事，不参与价格垄断、市场划分，或是客户、市场或要约协议。

3.3 防止洗钱

洗钱是指将非法产生的资金或非法获得的资产融入合法的金融和经济流通渠道中。我们遵守防止洗钱的法律义务，不参与任何隐藏或融合非法所得资产的交易。

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disguise or integrate criminal or illegally acquired assets.

3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property; transfers of technology and know-how must be made in a way that protects intellectual property rights, customer information, business secrets and information that is not in the public domain. We observe the current laws to protect business secrets and treat our business partners' confidential information accordingly.

3.5 Data protection

We process, store and protect personal data in compliance with statutory regulations. Personal data is therefore treated confidentially and only collected for legal, previously defined purposes in a transparent manner. We only process personal data if it is protected against loss, modification and unauthorized use or disclosure using appropriate technical and organizational measures.

3.6 Export controls

We undertake to comply with legal standards relevant to export controls – including but not limited to approval requirements, export bans and support bans – in the course of shipping and exporting our goods.

3.7 Avoidance of conflicts of interest

We avoid internal and external conflicts of interest which could illegitimately influence business relationships. Where this is not successful, we disclose these conflicts.

4. Health and safety

We protect our employees' health by taking suitable measures in relation to health and safety at work (e.g. the implementation of a company health and occupational safety management system) that provide appropriate cover in the following areas:

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3.4 保护信息和知识产权

我们会保护机密信息并尊重知识产权。技术和专有知识的转让必须在保护知识产权和客户信息、商业秘密和非公开信息的前提下进行。我们会遵守相应适用的商业秘密保护法，严格按照规定处理业务合作伙伴的机密信息。

3.5 数据保护

我们会按照法律规定处理、存储和保护个人数据。采取透明的方式收集个人数据，对收集到的个人数据予以保密，数据将仅用于合法和预定的目的。我们仅会在采取适当的技术和组织措施，防止数据丢失、被更改和未经授权的使用或披露的前提下，处理个人数据。

3.6 出口管制

我们承诺遵守货物运输和出口中有关出口管制相关的法律规范，尤其是许可要求、出口和支持禁令等方面的要求。

3.7 避免利益冲突

我们会避免可能非法影响业务关系的内部和外部利益冲突。如未能避免，我们会公开披露这些利益冲突。

4. 健康与安全

我们会采取适当的健康和职业安全措施（例如构建企业内部健康与职业安全管理体系）来保护员工的健康，这些措施充分涵盖以下几方面的内容：

- 遵守与健康 and 职业安全相关的适用法律与国际标准²；

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- Compliance with current laws and guidance set out in international standards relating to health and safety at work²;
- Suitable workplace design, safety regulations and provision of suitable personal protective equipment;
- Implementation of preventive checks, emergency measures, an accident reporting system and further suitable measures for continuous improvement;
- Provision of access to adequate quantities of drinking water and access to clean sanitary facilities for employees.

We ensure that our employees have received adequate instruction.

5. Remuneration and hours of work

Remuneration is based on current laws and, if applicable, current binding collective agreements and is supplemented by the relevant national legislation on minimum wages. Employees are given clear, detailed and regular information on the composition of their remuneration.

We comply with current laws and local legal requirements in respect of the maximum permissible working hours and ensure that working time, including overtime, does not exceed the relevant legally permissible maximum limits.

6. Observance of human rights

We pay attention to and support compliance with internationally recognized human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and uphold the right to freedom of speech and freedom of expression;
- do not tolerate unacceptable treatment of employees such as physical and psychological hardship, sexual and personal harassment or discrimination.

- 设计合适的工作场所、制定安全规定，提供合适的个人防护装备；
- 采取预防控制措施、应急措施，构建事故报告制度，采取有助于持续改进的其他措施；
- 为员工提供充足的饮用水和洁净的卫生设施。

我们会确保所有员工都能接受相应的培训。

5. 薪酬及工作时间

薪酬基于适用法律和任何现有的、具有约束力的劳资协议，并辅以相关的国家最低工资法。企业定期详细、明确向员工介绍其薪资构成。

我们遵守有关最长允许工作时间的适用法律和当地法规，并确保工作时间（包括加班时间在内）不超过相应的法定最长限制。

6. 尊重人权

我们尊重并支持遵守国际公认的人权以及

- 尊重每个人的人格尊严、隐私和个人权利；
- 保护并给予言论和表达自由的权利；
- 绝不容忍对员工造成身心伤害的行为，绝不容忍性骚扰和个人骚扰、歧视等行为。

Bank Information

6.1 Prohibition of child labour

We do not tolerate any child labour³. We do not employ any employees who cannot prove that they are at least 16 years old, and we require proof of age to be submitted. For countries which fall within the exception for developing countries according to ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not hire employees for dangerous work who, according to ILO Convention No. 182, cannot prove that they are at least 18 years old.

6.2 Prohibition of forced labour

Forced labour, modern slavery or comparable acts that involve the deprivation of liberty are forbidden⁴. All work must be voluntary, and it must be possible to end the employment relationship.

6.3 Freedom of association and collective bargaining

We respect the right of employees to freedom of association, freedom of assembly and to engage in collective bargaining and pay negotiations⁵, providing this is legally permissible and possible in the relevant country in which we are operating. If this is not permissible, we look for appropriate compromises for our employees.

6.4 Promotion of diversity, equal opportunities

We encourage equal opportunities and do not tolerate discrimination⁶. We treat all people equally regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, worldview or other personal attributes.

6.1 禁止童工

我们绝不容许使用童工³。我们不雇用任何未满 16 岁的员工，我们要求所有员工提供年龄证明。根据国际劳工组织第 138 号公约，经济水平低于发展中国家的国家，雇佣劳工的最低年龄可降至 14 岁。根据国际劳工组织第 182 号公约，我们不会雇用未满 18 岁的员工从事危险工作。

6.2 禁止强迫劳动

禁止强迫劳动、现代奴隶劳动或实施剥夺员工自由的类似措施⁴。所有劳动必须是员工自愿提供的，并且员工可以终止雇佣关系。

6.3 结社自由与集体谈判的权利

我们尊重员工结社自由、集会自由和集体谈判的权利⁵，前提是我们经营所在国家/地区的法律允许这些行为，并且这些行为可行。如果不被允许，我们将为员工寻求折中解决办法。

6.4 促进多样性和机会均等

我们提倡机会均等，不容忍歧视。⁶对所有员工一视同仁，不论性别、年龄、肤色、种族、性别认同和性取向、残疾与否、宗教信仰、世界观或其他个人特征。

Bank Information

7. Environment, energy and climate protection

We act in compliance with current legislation and are guided by international standards⁷ in order to minimize negative impacts on the environment and continuously improve our activities in respect of environment and climate protection.

All employees are made aware of environmental issues and the necessary training is offered.

We have implemented appropriate environmental protection measures (e.g., the implementation of a company environmental management system) that cover the following topics appropriately:

- Setting objectives, defining and implementing measures and ensuring the continuous improvement of these;
- Environmental aspects such as the reduction of CO2 emissions, increasing energy efficiency, using renewable forms of energy, safeguarding the quality of water and reducing water consumption, safeguarding air quality, encouraging resource efficiency, reducing waste and disposing of waste in the proper way and responsibly handling substances that are dangerous to human beings and the environment.

8. Dealing with conflict minerals

We exercise the necessary care to take measures to avoid using conflict minerals in our products in order to prevent human rights violations, corruption and financing armed groups or similar via this route.

9. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply comparable codes of conduct. Furthermore, we encourage them to implement the criteria in this Code of Conduct in their own supply chains.

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7. 环境、能源和气候保护

我们按照适用的法律行事并遵循国际标准⁷，尽量减少对环境的负面影响，不断改进我们的环境和气候保护活动。

我们会为员工提供必要的培训，所有员工都会意识到环境保护的重要性。

我们已采取必要的环境保护措施（例如构建企业内部环境保护管理系统），这些措施充分涵盖以下几方面的内容：

- 设立目标、定义目标、执行措施、持续改进；
- 环境方面，例如减少二氧化碳排放、提高能源效率、使用可再生能源、确保水质和减少用水量、确保空气质量、提高资源效率、减少废物量和正确处置废物以及负责任地处理对人类和环境有害的物质。

8. 冲突矿产

我们会采取必要的措施避免在我们的产品中使用冲突矿物，以防止侵犯人权、造成腐败和资助武装团体等。

9. 供应链

我们希望供应商也能遵守本《行为准则》中的原则或采用等效的行为准则。此外，我们鼓励供应商在他们的供应链中也遵守本《行为准则》。

我们保留全面或随时审查供应商对本《行为准则》遵守情况的权利。可能采用问卷调查、评估或审计等形式。

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We reserve the right to systematically apply this Code of Conduct with our suppliers and to carry out checks as warranted. This may take the form of questionnaires, assessments or audits. Should this cause doubts as to whether this Code of Conduct is being followed, the supplier is requested to take suitable measures to counter this and to notify its contact in our company of the course of action. If required, the cooperation arrangement will be ended.

10. Consumer interests

Where the interests of consumers are affected, we follow consumer protection provisions and appropriate sales, marketing and information practices. Special attention is paid to groups that require particular protection (e.g., young people or pregnant women)

11. Execution and implementation

We make suitable and reasonable efforts to continuously implement, document and apply the principles and values in the Code of Conduct. All employees are made aware of what this Code of Conduct contains and receive training on relevant topics as required. Violations of the Code of Conduct are not tolerated and can have consequences under employment law.

11.1 Communication

We communicate openly in dialogue with employees, customers, suppliers and other interest and stakeholder groups regarding the requirements of this Code of Conduct and its implementation.

11.2 Information on infringements

We offer our employees and business partners access to a protected mechanism that will allow them to confidentially report possible violations of the principles of this Code of Conduct.

If you would like to pass on any information, please contact the following person/office directly or anonymously

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如果质疑供应商没有遵守本《行为准则》，则会要求供应商采取适当的对策并将过程进度报告给本公司相应联络人。如有必要，还可能会终止合作关系。

10. 消费者利益

涉及消费者利益时，我们会遵守消费者保护法规以及适当的销售、营销和信息实践。需要特别保护的群体（例如青少年或孕妇）受到越来越多的关注。

11. 实施和执行

公司会采取适当且合理的措施，持续实施、记录和运用本《行为准则》中的原则和价值观。所有员工都了解本《行为准则》的内容并根据个人需要接受相关主题的培训。绝不容许违反本《行为准则》规定的行为，严重违规行为可能导致劳动法制裁。

11.1 沟通

我们会主要采取对话的方式，就本《行为准则》的要求及实施，与员工、客户、供应商和其他利益相关者群体进行公开交流。

11.2 发现违规迹象

我们为员工和业务合作伙伴提供保护机制，以便他们能够秘密举报可能违反本《行为准则》的行为。

如果发现违规迹象，请直接或匿名联系以下负责人员/部门。

Dongguan, March 27, 2023

The Board of Directors



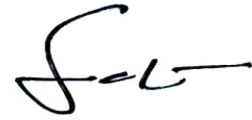
Meike Schmidt
Director



Ulrich Schmidt
Director



Andreas Reschke
Director



Albert Sadoine
Chairman of the Board

¹ CSR = Corporate Social Responsibility

² See ILO work and social standards (ILO Guidelines on Occupational Safety and Health); SA 8000 Social Accountability or ISO 45001 Occupational Health and Safety Management, etc.

³ ILO Convention Nos. 79, 138, 142 and 182

⁴ ILO Convention Nos. 29 and 105

⁵ ILO Convention Nos. 87, 135 and 154

⁶ ILO Convention No. 111

⁷ ISO 14001 and Standards of OECD Guidelines/COP21

¹ CSR = 企业社会责任

² 参见国际劳工组织职业与社会标准（《国际劳工组织职业安全健康指南》）、《国际劳工组织工作场所安全健康指南》、

《SA 8000 社会责任标准》、《ISO 45001 职业健康安全管理体系》等。

³ 国际劳工组织第 79 号公约、第 138 号公约、第 142 号公约和第 182 号公约

⁴ 国际劳工组织第 29 号公约和第 105 号公约

⁵ 国际劳工组织第 87 号公约、第 135 号公约和第 154 号公约

⁶ 国际劳工组织第 111 号公约

⁷ ISO 14001 和 OECD 指南标准/COP21

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Bank Information

Account Name Lutronic TCA Electronics Dongguan Co., Ltd.
Bank Name ICBC Industrial and Commercial Bank of China,
Dongguan Branch, Guangdong, China
Bank Address 18 Shenghe Section Guantai Road, Dongguan,
Guangdong, China
Account No. 2010024909200021668 (CNY)
Account No. 2010024919144201076 (USD)
Account No. 2010024919384201061 (EUR)
Account No. 2010024909134203152 (HKD)
Swift Code ICBKCNBJDGN