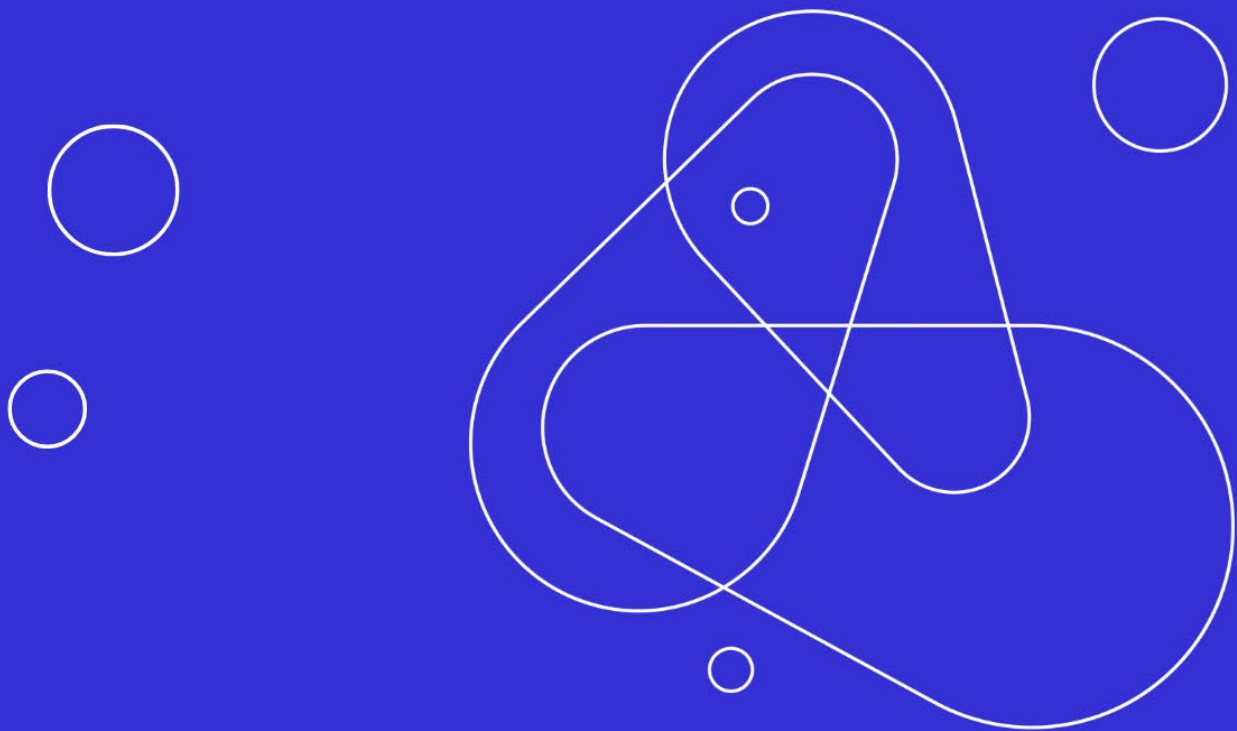


variosystems

# Supplier Code of Conduct



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**This Supplier Code of Conduct is based on the principles of the Variosystems Code of Conduct and the Electronic Industry Code of Conduct from the Electronic Industry Citizenship Coalition (EICC).**

Long-term cooperation, sustainability and social responsibility are important principles for Variosystems. Therefore, these principles are of particular importance in the procurement of raw materials, goods and services. Variosystems expects its suppliers and their employees, agents and subcontractors to adhere to these principles. Variosystems expects all of its suppliers to implement appropriate policies to ensure compliance with this Code and all relevant laws and regulations.

To the extent that this is reasonable and possible, suppliers will actively encourage their sub-suppliers or subcontractors to comply with the guidelines of this Code. Variosystems may explicitly require suppliers to also extend this code to selected sub-suppliers.

## **A. Labor**

Suppliers of Variosystems are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

### **1 Freely Chosen Employment**

Suppliers of Variosystems do not use forced, bonded or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There are no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. All work must be voluntary and workers are free to leave work at any time or terminate their employment.

### **2 Young Workers**

Child labor is not used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including mandated night shifts and overtime.

### **3 Humane Treatment**

There is no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to workers.

## **B. Health and Safety**

Suppliers of Variosystems recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers of Variosystems also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

### **1 Occupational Safety**

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

### **2 Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures focus on minimizing harm to life, the environment and property.

### **3 Occupational Injury and Illness**

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness

cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

## **4 Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are provided with and use appropriate, well-maintained, personal protective equipment.

## **5 Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is identified, evaluated and controlled.

## **6 Machine Safeguarding**

Production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are provided and properly maintained where machinery presents an injury hazard to workers.

# **C. Environment**

Suppliers of Variosystems recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

## **1 Environmental Permits and Reporting**

All required environmental permits, approvals and registrations are obtained and regularly updated. Their operational and reporting requirements are followed.

## **2 Pollution Prevention and Resource Reduction**

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.

### **3 Hazardous Substances**

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### **4 Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterized, routinely monitored, controlled and treated as required prior to discharge. Suppliers of Variosystems conduct routine monitoring of the performance of their air emission control systems or as required by local law.

### **5 Materials Restrictions**

Suppliers of Variosystems adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

## **D. Ethics**

To meet social responsibilities and to achieve success in the marketplace, suppliers of Variosystems uphold the highest standards of ethics including:

### **1 Business Integrity**

The highest standards of integrity are upheld in all business interactions. Suppliers of Variosystems have a zero tolerance policy to prohibit all forms of bribery, corruption, extortion and embezzlement.

### **2 No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or

accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

## **3 Disclosure of Information**

Information regarding the labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## **4 Intellectual Property**

Intellectual property rights are respected; transfer of technology and know-how is done in a manner that protects intellectual property rights. Further, customer and supplier information is safeguarded.

## **5 Responsible Sourcing of Minerals**

When applicable, suppliers of Variosystems develop measures and action items, which according to best knowledge make sure that the tantalum, tin, tungsten and gold in the products suppliers of Variosystems manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.

## **6 Export Control**

Suppliers of Variosystems ensure all national and international trade regulations and import and export control laws that affect their global business transactions.

## **Take Action**

Suppliers are expected to take necessary corrective actions to promptly remedy any identified noncompliance with this Code. Supplier's employees or contractors may report suspected violations of this Code. Variosystems reserves the right to terminate its business relationship with any supplier who is unwilling or unable to comply with this Code.