

ComS.I.T. Code of Conduct

Our good reputation with customers, suppliers and partners is a key of our success. In more than 30 years, ComS.I.T. has built its reputation in the global market of electronic components by doing sustainable business and advocating for our products. For this reason, it is important that we maintain our credibility and continue doing our business ethically and legally correct. We operate in different locations and countries around the world, we sharing the brand ComS.I.T.. Our global presence subjects our business to a wide range of legal regulations and standards. In order to meet the requirements of ourselves, our customers, suppliers and partners, and to continue to build our success, we can never disregard our values and must always do our business in compliance with all laws, regulations and standards, including ethical, social and environmental standards.

1. Cooperation with customers, partners and suppliers

As a service provider in the procurement of electronic and electromechanical components, we rely on sourcing our goods from all regions of the world. We have contact and build relationships with many different cultures, but also with different business models. We select our suppliers and partners not only based on their products and services, but we also consider business relationships on an equal level as a high value. In our procurement policy, we pay attention not only to economic and technical features, but also to social and environmental aspects, including human rights, working conditions and environmental protection. We expect everyone who does business with us to set international social and ethical standards and to comply with and respect applicable laws.

2. Compliance with laws, export control and customs

ComS.I.T. and all employees are obliged to comply with all applicable national and international laws. This includes the payment of owed duties and taxes owed, the necessary obtaining of official orders, compliance with labor and environmental protection laws. Our Company is required comply with regulations restricting the free movement of goods in its global business operations. Various national and international laws, regulations and embargoes restrict or prohibit the trade, export or import of technologies, goods or services, as well as the movement of capital and payment transactions. These restrictions and prohibitions may arise from the type of the goods, the country of origin or usage, or the identity of the business partner. The relevant laws and regulations of the countries in which we operate are completed by internal company restrictions regarding the intended purpose.

3. Fair competition and antitrust law

ComS.I.T. believes in and lives fair competition. The rules for fair competition are respected by all employees in our company within the legal framework in the countries in which they are located. Regardless of all situations, price fixing agreements or agreements for offers, business conditions, production schedules, sales quotas or market shares with competitors is not allowed. Unofficial meetings, coordination, exchange, or publication of commercially sensitive information about

competitors, customers or suppliers may also violate current competition law. Even the appearance of unfair competition must be avoided.

4. Security, data protection and handling of confidential information

Our data and information systems are among the greatest assets that we must protect from hostile acts and from competitors. The sustainable business success of ComS.I.T. depends on how confidential information and data are handled and kept secret. Even after an existing employment relationship, confidential information of any kind must not be disclosed to unauthorized persons. Confidentiality agreements are assured with our employees and business partners to protect these data. Processing of personal data is also subject to strict legal regulations (e.g. General Data Protection Regulation GDPR). ComS.I.T. strictly follows the applicable data protection laws. Telecommunication networks, facilities and spaces have to be maintained in order to provide our employees and visitors space to perform their tasks.

5. Avoiding conflicts of interest

Regardless of any possible personal interest, business conduct is guided exclusively by the interests of the company. As a matter of principle, our employees should avoid conflicts of interest. If this is not possible, the employee must inform his or her supervisor and the HR department in order to find a fair and transparent solution.

6. Social and ethical responsibility

A part of our corporate philosophy is the commitment to social, ethical and ecological responsibility. ComS.I.T. respects and protects the personal dignity of each employee and maintains a corporate culture of mutual respect and fairness. ComS.I.T. respects and follows international social and ethical standards, which prohibit any form of harassment or discrimination against our employees, e.g. based on nationality, origin, religion, gender, age, sexual orientation or similar. An employee may never be discriminated for the practice of his or her personal rights. This includes the ban of child labor, forced labor, discrimination, mobbing and corporal acts of punishment, as well as compliance with safety regulations and occupational health and safety in the workplace, compliance with working time regulations, fair pay.

7. Sustainability and environmental protection

Sustainability and environmental protection are a central focus of our ComS.I.T. Group. Preventive measures and the avoidance of environmental pollution are very important to us in the execution of our business processes. The effort to environmental protection and a careful usage of resources is part of the code of conduct for all employees.

Our goal is the protection of natural resources, the responsible use of raw materials, avoiding or reducing waste, promotion of recycling and the proper disposal of pollutants and waste, the expansion of energy supply through renewable energies and the best possible prevention of environmentally hazardous incidents. We aim to remain certified to the internationally environmental management

standard ISO 14001 in the long term. Regarding the responsible use of raw materials, we target conflict-free production of the relevant raw materials. About employee safety, we are committed to maintaining the highest standards of health and safety. We are familiar and comply with all internal and external quality and safety policies, procedures and laws.

8. Violation of the Code of Conduct

Each ComS.I.T. employee is responsible for compliance with our Code of Conduct. In cases of doubt, a supervisor, the HR department and/or the management must be consulted.

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