

COMSIT – GLOBAL CODE OF CONDUCT

1. Preamble

The ComSIT Group has operated internationally for more than 30 years in the electronics and electromechanical components sector. Our locations in Europe, the United States and Asia/China face diverse legal, environmental and social frameworks. We commit to integrity, transparency, responsible conduct, the protection of human rights, data and the environment, and sustainable business operations. This global Code of Conduct is binding for all employees, managers, suppliers and business partners.

2. Scope of Application

This Code applies worldwide to all employees, facilities, subsidiaries and business units, as well as all suppliers, agents and service providers. Regional specifics are set out in Addenda (USA, China). Where local laws are stricter, they prevail.

3. Values & Conduct Principles

Our global values include integrity, responsibility, respect, transparency, compliance and safety. These apply across all locations.

4. Cooperation with Customers, Partners and Suppliers

We maintain fair, respectful and professional relationships. Partners must comply with applicable laws, protect human rights and the environment, ensure fair labor conditions, maintain transparency and adhere to anti-corruption principles. Due diligence includes EU CSDDD, UFLPA, UK Modern Slavery Act and OECD guidelines.

5. Global Compliance, Export Control & Customs

We comply with AWG/AWV/EU Dual-Use, EAR/ITAR/OFAC, Chinese export control law and UN/WCO standards. Prohibited: sanctions evasion, false end-use statements, illegal re-exports, unauthorized technology transfers. Export processes include classification, screening, end-use checks, licensing analysis and documentation.

6. Data Protection, Information Security & Confidentiality

Relevant laws: GDPR/BDSG, CCPA/CPRA/State Acts, PIPL/DSL/CSL. We ensure secure data processing, encryption, need-to-know access and IT security aligned with ISO 27001/NIST. Confidential information must be protected – even after employment ends.

7. Anti-Corruption & Integrity

Standards: UN, OECD, UK Bribery Act, FCPA. Prohibited: bribery, kickbacks, concealed payments, facilitation payments, improper gifts. Allowed: low-value, transparent hospitality.

8. Conflicts of Interest

Conflicts may involve financial interests, family relationships, secondary employment or private use of internal information. Disclosure required.

9. Human Rights & Working Conditions

We uphold human rights, fair labor conditions, health and safety, equal treatment and prohibit harassment, forced or child labor.

10. Environment, Sustainability & ESG

We follow ISO 14001, EU Green Deal objectives, RoHS/REACH, emission reduction, circular economy and responsible waste management.

11. Anti-Money-Laundering (AML)

We prevent money laundering, terrorist financing and unclear financial flows. KYC, documentation and transparent payment routes are mandatory.

12. Whistleblowing & Non-Retaliation

We provide protected, anonymous reporting channels. Protection under EU Whistleblower Directive, US Dodd-Frank and Chinese reporting safeguards. Retaliation is prohibited.

13. Governance & Responsibilities

Roles: Global Compliance Officer, regional Compliance Leads, Data Protection and Export Control Officers, annual training, audits and management duties.

14. Documentation Requirements

Compliance-relevant documentation must be kept as required by local law.

15. Final Provisions

This Code is reviewed and updated annually.