

## **Code of Conduct based on the Responsible Business Alliance v8.0**

### **A. LABOR**

We are committed to respecting workers' human rights and treating them with dignity and respect. This applies to direct and indirect suppliers, as well as all workers, including temporary, migrant, student, contract, directly employed, and any other type of worker.

The labor standards are as follows:

#### **1) Prohibition of Forced Labor**

Forced labor in any form, including debt bondage, forced labor, involuntary or exploitative prison labor, slavery, or human trafficking, is not permitted. This includes transport, harboring, recruitment, transfer, or receipt of persons for labor or services through threats, force, coercion, abduction, or fraud.

Workers' freedom of movement must not be unreasonably restricted within the workplace, nor should there be unreasonable limitations on their ability to enter or exit company-provided facilities, including dormitories if applicable.

As part of the hiring process, all workers must receive a written employment contract in their native language or a language they understand, outlining the terms and conditions of their employment. Foreign migrant workers must receive this contract before leaving their home country. No changes are allowed upon arrival in the receiving country unless they comply with local law and provide equal or better terms.

All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Participants shall maintain documentation on all workers leaving.

Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits.

Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

#### **2) Young Workers**

Child labor is not permitted at any stage of manufacturing. "Child" refers to anyone under 15 years of age, the legal age for employment, or the age for completing compulsory education, whichever is higher.

Workers under 18 (young workers) must not perform work that could jeopardize their health or safety, including night shifts or overtime. Participants must maintain proper student records, rigorously screen education partners, and protect student rights per applicable laws. They must also implement a mechanism to verify workers' ages. Authorized workplace learning programs that comply with local laws are encouraged. Participants must provide adequate support and training to student workers. Where not governed by local law, student workers, interns, and apprentices must receive wages no less than those paid to entry-level workers performing similar tasks. In cases of child labor, appropriate remedies must be provided.

#### **3) Working Hours**

Working hours must not exceed the legal maximum. A work week should not exceed 60 hours, including overtime, except in emergencies or extraordinary circumstances. All overtime must be voluntary, and workers must have at least one day off every seven days.

#### 4) Wages and Benefits

Compensation must comply with all applicable wage laws, including those related to minimum wages, overtime, and legally mandated benefits. Equal pay for equal work and qualifications must be ensured. Overtime should be compensated at a premium rate. Wage deductions as a disciplinary measure are not allowed. Workers must receive timely and understandable wage statements that enable them to verify the accuracy of their compensation. Temporary work, labor dispatch, and outsourcing must comply with local law.

#### 5) Non-Discrimination/Harassment/Humane Treatment

Participants should commit to workplaces free of harassment and unlawful discrimination. Inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, and verbal abuse of workers, is not permitted. This also includes the threat of such treatment. Workers must not be discriminated against or harassed based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status in hiring and employment practices, such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures to support these requirements must be clearly defined and communicated to workers. Workers should be provided with reasonable accommodations for religious practices and disabilities. Additionally, current and prospective workers must not be subject to medical tests, including pregnancy tests or physical exams, used in a discriminatory manner. This is designed in accordance with the ILO Discrimination (Employment and Occupation) Convention (No. 111).

#### 6) Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to address workplace and compensation issues. Workers and their representatives must be able to openly communicate with management without fear of discrimination, retaliation, intimidation, or harassment. In line with these principles, participants must respect workers' rights to form and join unions of their choice, engage in collective bargaining, and peacefully assemble, as well as their right to refrain from such activities. Where the right to freedom of association and collective bargaining is restricted under law, workers must be allowed to form alternative, legal means of worker representation.

## B. HEALTH AND SAFETY

Participants acknowledge that in addition to minimizing work-related injuries and illnesses, a safe and healthy work environment enhances product and service quality, production consistency, and worker retention and morale. Worker input and ongoing education are essential to identifying and addressing workplace health and safety issues.

The health and safety standards are as follows:

#### 1) Occupational Health and Safety

Potential workplace hazards to workers' safety and health (e.g., chemical, electrical, energy, fire, vehicle, fall hazards) must be identified, evaluated, and controlled through appropriate safety measures. If hazards cannot be adequately mitigated, workers must be provided with well-maintained personal protective equipment and be educated about the risks associated with these hazards.

Gender-specific measures must be implemented, such as ensuring that pregnant or nursing women are not exposed to dangerous conditions, and appropriate accommodations must be provided to nursing mothers.

## 2) Emergency Preparedness

Potential emergency situations and events must be identified and assessed, and their impacts minimized by implementing emergency plans and procedures. This includes emergency reporting, worker notification, evacuation procedures, employee training, and drills.

Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent.

Emergency plans must include fire detection and suppression equipment, unblocked exits, adequate exit facilities, emergency contact information, and recovery plans.

## 3) Occupational Injury and Illness

Procedures and systems must be in place to prevent, manage, track, and report occupational injuries and illnesses. This includes encouraging workers to report incidents, classifying and recording injury and illness cases, providing necessary medical treatment, investigating incidents, and implementing corrective actions to eliminate the causes. Participants shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

## 4) Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the hierarchy of controls. If the hazards cannot be adequately controlled, workers are provided, free of charge, with appropriate, well-maintained personal protective equipment, which they are required to use. Employers provide workers with a safe and healthy working environment, maintained through continuous and systematic monitoring of both employee health and the workplace. Employers offer occupational health surveillance to regularly assess whether workers' health is being harmed by occupational exposures. Workplace health protection programs must be implemented continuously and include educational materials on the risks associated with exposure to workplace hazards.

## 5) Physically Demanding Work

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

## 6) Machine Safeguarding

Production equipment and other machinery must be evaluated for safety hazards. If machinery poses an injury risk to workers, physical guards, interlocks, and barriers must be provided and properly maintained.

## 7) Sanitation, Food, and Housing

Workers must always have access to clean toilet facilities, drinking water, and sanitary facilities for preparing, storing, and consuming food. Dormitories provided by the participant, or a labor agent must be clean, safe, and provide appropriate emergency exits, hot water for showering or bathing, adequate lighting and climate control. Additionally, they must include individually secured spaces for storing personal and valuable items, as well as sufficient personal space with appropriate entry and exit points.

## 8) Health and Safety Communication

We provide workers with appropriate information and training on workplace safety and health in their native language or a language they can understand, ensuring they are fully informed about workplace hazards, including mechanical, electrical, chemical, physical, and fire-related dangers. Health and safety information must be clearly visible and easily accessible to workers within the facility. The health information and training also cover specific risks for relevant demographic groups, such as gender and age, when necessary. All workers must be trained before starting work and regularly thereafter. Employees are encouraged to raise health and safety concerns without fear of retaliation.

## C. ENVIRONMENT

We recognize that environmental responsibility is integral to producing world-class products. We minimize environmental impacts on the community, environment, and natural resources while safeguarding public health and safety.

The environmental standards are as follows:

### 1) Environmental Permits and Reporting

All required environmental permits (e.g. drain monitoring), approvals, and registrations must be obtained, maintained, and kept up to date. Operational and reporting requirements must be followed.

### 2) Pollution Prevention and Resource Reduction

Emissions, the discharge of pollutants, and the generation of waste must be reduced or eliminated at the source or through pollution control equipment, modified production, maintenance, and manufacturing processes, or other measures. The use of natural resources, including water, fossil fuels, minerals, and forestry products, should be conserved. To achieve this, production, maintenance, and facility processes are modified, materials are substituted, reused, conserved, or recycled, or other methods are employed.

### 3) Hazardous Substances

Chemical and other materials posing environmental or human health risks must be identified, labeled, and managed to ensure safe handling, storage, disposal or recycling. Data on hazardous waste must be tracked and documented.

### 4) Solid Waste

We have implemented a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste.

### 5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion by-products must be characterized, monitored, and treated before discharge. Emission control systems must be routinely monitored.

### 6) Materials Restrictions

All applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products must be adhered to, including labeling for recycling and disposal.

### 7) Water Management

As part of our water management, we act in accordance with legal requirements and ensure that discharges into the public wastewater system are within permissible limits and free from contamination, or that sources of pollution are controlled.

### 8) Energy Consumption and Greenhouse Gas Emissions

We are committed to finding ways to continuously improve our energy efficiency and minimize energy consumption and greenhouse gas emissions.

## D. ETHICS

To fulfill our social responsibility and achieve success in the marketplace, we and our representatives adhere to the highest ethical standards, including the following:

### 1) Business Integrity

All business interactions must uphold the highest standards of integrity. We implement a strict zero-tolerance policy regarding all forms of bribery, corruption, extortion, and embezzlement.

### 2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall not 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, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### 3) Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on the Participant's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall 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 shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

### 5) Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld

### 6) Protection of Identity and Non-Retaliation

Confidentiality, anonymity, and the protection of whistleblowers among suppliers and employees must be ensured, unless legally prohibited. Employees should be empowered to raise concerns without fear of retaliation.

### 7) Responsible Sourcing of Minerals

We conduct due diligence regarding the source and supply chain of tantalum, tin, tungsten, gold, and cobalt in the products we manufacture and use. This ensures that they are sourced in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. An appropriate CMRT report is prepared annually for this purpose.

### 8) Privacy

We are committed to protecting the personal data of all business partners, including suppliers, customers, consumers, and employees. We comply with relevant laws regarding data protection and information security when collecting, storing, processing, transmitting, and disclosing personal information.



Thyracont Vacuum Instruments GmbH  
Max-Emanuel-Straße 10  
94036 Passau  
E-Mail: [info@thyracont.de](mailto:info@thyracont.de)  
Website: [www.thyracont-vacuum.com](http://www.thyracont-vacuum.com)