SIPRIN Code of Conduct
for Suppliers and Third-Party Intermediaries for Siemens Group

This *Code of Conduct* defines the basic requirements placed on the Suppliers and 3rd party intermediaries of SIPRIN, s.r.o., which is a part of Siemens group concerning their responsibilities towards their stakeholders and the environment.

The Supplier and/ or 3rd party intermediary declares herewith to:

Legal Compliance

- comply with the laws and regulations of the applicable legal systems.

Human Rights and Labour Practices

To ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations. Heightened attention shall be paid to ensuring respect of human rights of rights holders or groups of rights holders which are specifically vulnerable, such as women, children, migrant workers, or of (indigenous) communities.

- Prohibition of Forced Labour
  - Neither use nor contribute to slavery, servitude, forced or compulsory labour, suppression, exploitation, and human trafficking.
- Prohibition of Child Labour
  - Install no workers under the age of 15 or, in those countries subject to the developing country exception of the *ILO Convention No. 138*, install no workers under the age of 14.
  - Install no workers under the age of 18 for work which is likely to harm the health, safety, and morals.
- Non-Discrimination and Respect for Employees
  - Ensure equal treatment of employees, irrespective of skin colour, race, nationality, ethnicity, social background, disabilities, gender, sexual identity and orientation, marital status, political or religious conviction, or age and promote equal opportunities amongst them.
  - Refuse to tolerate and unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language, and physical contact, that is sexual coercive, threatening, abusive or exploitative.
- Freedom of Association
  - Recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining; neither disadvantage nor prefer members of employee organizations or trade unions.
- Working Hours, Wages & Benefits for Employees
  - Adhere to all applicable working-hours regulations globally.
  - Pay fair wages for labour and adhere to all applicable wage and compensation laws globally.
  - In the event of cross-border personnel deployment adhere to all applicable legal requirements, especially with regard to minimum wages.
- Occupational Health & Safety, Security Forces
  - Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
  - Provide training to ensure employees installed are educated in health & safety issues.
  - Establish a reasonable occupational health & safety management system.
  - In the event of use of private or public security forces ensure that human rights of employees and other rights holders are respected (no use of unlawful physical or mental violence).
- Grievance Mechanism
  - Provide access to a protected mechanism for their employees to report possible violations of the principles of this *Code of Conduct* and ensure protection of whistleblowers or complainants against retaliation.

Environmental and Climate Protection, Protection of Natural Resources

- Act in accordance with the applicable statutory and international standards regarding the environment.
- Minimize environmental pollution and make continuous improvements in environmental protection.
- Establish a reasonable environmental management system.
- Reduce the emission of air pollutants and Greenhouse Gas (GHG), and reduce harmful soil change, water pollution and harmful noise emission to the fullest extent as possible.
- Increase energy efficiency, use renewable energy, and fully reduce water consumption as possible.
- Cause no unlawful taking of land, forests, and waters.
- Reduce waste and ensure their proper treatment and disposal.

Fair Operating Practices

- Anti-Corruption and Bribery
  - Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.
- Fair Competition, Anti-Trust Laws and Intellectual Property Rights
  - Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
  - Respect the intellectual property rights of others.
- Conflicts of Interest
  - Avoid and/ or disclose internally and to Siemens all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.
- Anti-Money Laundering, Terrorism Financing
  - Not directly or indirectly facilitate money laundering or terrorism financing.
- Data Privacy
  - Process personal data confidentially and responsibly, respect everyone´s privacy and ensure that personal data is effectively protected and used only for legitimate purposes.
- Export Control and Customs
  - Comply with the applicable export control and customs regulations.

Responsible Minerals Sourcing

- Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

Supply Chain

- Use reasonable efforts to make its Suppliers comply with the principles of this *Code of Conduct* and check their compliance on a risk-based approach.
- Comply with the principles of non-discrimination with regard to Supplier selection and treatment.

Further information under http://www.siemens.com/code-of-conduct