

Code of Conduct

of Delta Electronics (Slovakia), s.r.o.

Valid for employees and other stakeholders of Delta Electronics (Slovakia), s.r.o..



Key Stones of Delta Code of Conduct

Apart from striving for the achievement in the business growth, the **Delta Electronics (Slovakia), s.r.o.** (hereinafter referred to as the Delta or the Company) also values the long term survival with sustainable growth as the company's ultimate business goal. In order to attain such objective, the company needs to perform its business with high ethics and integrity in order to gain trust and support from its stakeholders including customers, suppliers, employees, shareholders and society.

Our policies and practices require our employees to conduct business lawfully and ethically wherever we operate.

Delta demands the highest business and personal standards of ethics. Recognizing that Delta's reputation is priceless, we lack tolerance for any ethical compromise in our operations as well as in service to all involved stakeholders. We formalize our requirements in the **Code of Conduct of Delta Electronics (Slovakia), s.r.o.**, a set of policies and practices that defines standards for every Delta employee in his or her business practices.

Delta's leaders continuously communicate the roles and responsibilities of employees on the full scope of ethics-related issues, including compliance with the laws, rules and regulations, and accepted practices of each country in which we do business; handling of proprietary data and information; financial reporting; securities trading; and reporting of ethical violations.

Labor

Delta has very strong interest to provide its employees the best possible working environment, therefore general approach to of the employer fully adhere and honor constitution, government regulations and laws. Especially are all company's activities conducted in order to fully adhere following:

1) Freely chosen Employment

Delta or any other stakeholders will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor); employment is voluntary.

Delta will observe without any exceptions right for freely chosen employment according to Constitution of Slovak Republic and Labor Code.

2) Child labor avoidance

Delta will not use child labor. The term "child" refers to any person under the age of 15, or over the age of 15 if is still completing compulsory education. We support the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs. However the employment of youth labor under age of 18 can be done only under very specific circumstances.

3) Working hours

Delta will not exceed prevailing work hours determined by government regulations and laws and will appropriately compensate overtime, at least on state required minimum level.

Delta will provide working breaks and continuous daily rest during the day, day offs per week and holiday leave fully according to legal regulations.

4) Wages and benefits

Delta will, at least at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

5) Humane treatment

Delta will treat all employees with respect and dignity and will not use corporal punishment, threats of violence or other forms of physical and psychical coercion or harassment.

6) Non discrimination

Delta will not directly or indirectly discriminate in hiring and employment practices on grounds of gender, marital status and family status, race, color of skin, language, age, state of health, belief and religion, political or other conviction, trade union activity, national or social origin, national or ethnic group affiliation, property, lineage or other status, with the exception of case established by law, or in the case of real reason for the performance of the work consisting in preconditions or requirements and the nature of work which the employee is to perform.

7) Freedom of association

Delta will support in with any applicable means open communication and direct engagement between workers and management as the most effective ways to resolve workplace and compensation issues. Stakeholders are to respect the rights of workers to associate freely, join labor unions, seek

representation and or join workers' councils in accordance with laws. Employees are able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

Ethics

To meet social responsibilities and to achieve success in the marketplace, all Delta's employees including management team and board of directors are to uphold the highest standards of ethics and general good practice conduct in all business areas. The management team as well as every employee shall conduct all activities towards to encourage **community engagement** to help foster social and economic development.

Especially are all employees' and stakeholders' activities conducted in order to fully adhere following:

1) Compliance with Laws and Company's Regulations

Employees and stakeholders must comply with all governing laws and regulations and perform their duties with high integrity.

2) Protection of Company's Assets

Employees must use the company's assets in an economical and efficient way and avoid any damage or loss. Misuse or illegal use of Delta assets is strictly prohibited.

3) Business Integrity

The highest standards of integrity are to be expected in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited.

4) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. All employees must exercise care in providing or receiving gifts and

entertainment to or from customers or suppliers in consistence with generally accepted ethical standards and business practice and such behavior can be disclosed without embarrassment. All employees are forbidden to request any gift, payment, special treatment or entertainment from suppliers or customers.

In case of any advantage has been offered or provided to any employee by any of the stakeholders, this advantage must be either declined or reported to direct superior immediately.

5) Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

In relation to any party, employees and stakeholders must preserve strict confidentiality regarding information that is not generally known. This liability applies also to the time after the relation cessation.

6) Intellectual Property

Intellectual property rights are to be respected; transfer of technology and knowhow is to be done in a manner that protects intellectual property rights.

The employee and any other stakeholder is not permitted to hold or make for his private purposes any designs, drawings or records of any type whatsoever. Any basic materials and data carriers relating to the work entrusted is the property of the Delta and without any obligation to require them, these must be returned to the company after the employment and other type of relation expiration.

7) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

Employees should not take advantage of the inside information to profit third parties or to obtain personal benefits. Financial results and business transaction information should not be released without prior authorization in order to protect shareholders' interest.

8) Protection of Identity

There shall be no retaliation or harassment of employees who report possible violations or other concerns. Any employee who engages in such retaliation or harassment will be subject to serious disciplinary action, including possible termination of employment.

9) No Collusion

To enter into a deceitful (secret) agreement, with purpose to defraud and/or gain an unfair advantage over a third party, competitors, consumers or those with whom they are negotiating is considered as Collusion that is strictly forbidden and prohibited.

Prohibition of collusion also includes secret price or wage fixing, secret rebates, or pretending to be independent of each other when actually conspiring together for their joint ends.

10) Responsible Sourcing of Minerals

The company Delta reasonably assure that the tantalum, tin, tungsten and gold in the products they 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.

11) Privacy

The company and all related parties (including Employees) who will get in touch with personal data processing are to comply with privacy and information security laws and regulatory requirements.

It is important that anyone who process personal data must take such protective measures to avoid any possible data misuse or abuse.

Violation Against Code of Conduct

Employee's violation against any part of this document is considered as severe breach of working discipline that might result in immediate termination of employment contract and legal actions.

Violation and breach of any part of this document is not acceptable for any stakeholder, too. Treatment of violating stakeholder and other related regulations are agreed with stakeholders in related type of contract and agreements.

Raising Concerns and Reporting Violations

If any of involved party (employee or other stakeholder) knows of, or has good reason to suspect, an unlawful or unethical situation or believe that this person is a victim of prohibited workplace and business conduct, immediately reports the matter through any of Delta communication channels:

- **Manager** – to use “Open Door Policy” is usually the best place to start
- **Questions & Answers** intranet tool application
- **Human Resources department** (for any kind of violation)
- **Internal Audit** (for violations related to financial recording and reporting, business process violations and inappropriate use of assets)
- **Security service** (for loss or theft of personal or Delta assets)

- For stakeholder **+421 42 4661 111** alebo na e-mail : podnety@deltaww.com (e-mail is available 24/7)
- **By mail to company address, telefax**
- **Police forces**

The protection of identity of “whistleblower”, as well as confidentiality of “investigation” must be ensured according to this document.

The ones, who receive any of described concerns or reports, have to decide together with Human Resources department or Managing Director how to proceed in current case.

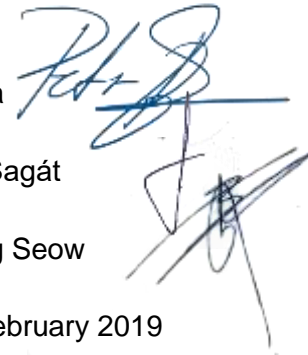
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