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

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

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1. General Provisions and Statement of Consistency

This Code of Conduct establishes comprehensive and directly binding rules in the field of ethics, human and labor rights, a decent living wage, environmental, health and safety (EHS), and responsible business conduct for Delta Electronics (Slovakia), s.r.o. (hereinafter "Delta" or "Company"). The rules set out in this document apply directly. If applicable law is stricter than this Code of Conduct, the applicable law shall prevail.

2. Key Principles of the Delta Code of Conduct

Apart from striving for the achievement in the business growth, the **Delta Electronics (Slovakia), s.r.o.** (hereinafter "Delta" or "Company") also values its long-term existence in the market with sustainable growth, which are the highest business goals of the Company. To achieve such a goal, the Company needs to perform its business activities while maintaining a high level of 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. Because we recognize that Delta's reputation is priceless, we have no tolerance for any ethical compromises 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 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 in each country where we conduct business; handling of proprietary data and information; financial reporting; securities trading and reporting of ethical violations.

3. Labor

Delta has a very strong interest to provide its employees the best possible working environment. Therefore, the general approach of the employer fully respects and complies with the Constitution of the Slovak Republic, government regulations and applicable laws. All activities of the Company are carried out in order to comply with the following principles:

3.1. Free Choice of Employment

Delta and any stakeholders will not use any type of forced labor or involuntary labor (e.g., forced, bonded, indentured or involuntary prison labor); nor engage in human trafficking; employment is voluntary.
Delta will respect the right to free choice of employment without exception in accordance with the Constitution of the Slovak Republic and the Labor Code. Employees have the right to terminate their employment in accordance with the law and contractual arrangements without any unlawful sanctions.

3.2. Prohibition of Child labor

Delta will not use child labor. The term "child" refers to any person under the age of 15 or over 15 years of age if still within compulsory school attendance. We support the use of statutory apprenticeship programs in workplaces that comply with all laws and regulations applicable to apprenticeships. However, the employment of youth labor under the age of 18 may only take place in very specific circumstances and never in hazardous or health-damaging work.

3.3. Working Hours and Rest Periods

Delta will not exceed the specified range of working hours determined by government regulations and laws. Overtime work is voluntary and is compensated at least at the level required by law. Delta provides work breaks, continuous daily and weekly rest, days off work and holiday in full compliance with the legal regulations.

3.4. Wages and Benefits and Decent Living Wage

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

In addition, Delta committs to providing all employees with a Decent Living Wage that is sufficient to cover the basic living needs of the employee and their family (including food, housing, healthcare, education, transportation, clothing and other basic needs) and creates an adequate financial reserve for unforeseen life events. The Company regularly evaluates remuneration levels against a decent living wage every year.
Remuneration is fair, transparent and based on equal pay for work of equal value. Wage deductions as a disciplinary measure are strictly prohibited. The company will use temporary workforce, workforce supplied through an agency or outsourcing only in accordance with the legal regulations of the Slovak Republic.

3.5. Decent and Humane Treatment

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

3.6. Non-Discrimination, Diversity and Equal Opportunity

Delta will not directly or indirectly discriminate in hiring, employment and employment-related procedures, including remuneration, promotion and access to education on the basis of discrimination due to sex, maternity, marital and family status, sexual orientation, gender identity and expression, race, color of skin, language, age, health status, genetic characteristics, belief, religion, political or other opinion, trade union activity, national or social origin, affiliation with a nationality or ethnic group, property, birth or other status, except where the difference in treatment is justified by the nature of the activities performed in the employment or the circumstances in which those activities are performed, if this reason constitutes a genuine and decisive requirement for employment as a condition, provided that the objective is legitimate and the requirement is proportionate. Delta promotes equal conditions and accessibility for persons with disabilities and vulnerable groups.

3.7. Freedom of Association and Social Dialogue

Delta will promote open communication and direct dialogue between employees and management as the most effective way of resolving workplace issues. Employees have the right to freely associate, establish trade union organizations, demand representation, or join labor unions in compliance with laws. Employees are able to communicate openly about working conditions without fear of retaliation, intimidation, or harassment.

4. Ethics and Business Integrity

In order to fulfill social responsibilities and achieve success in the marketplace, all Delta employees, including management and stakeholders, must uphold the highest ethical standards and general rules of good governance in all areas of business activity.
Management, as well as each employee, will conduct all activities aimed at supporting and engaging with the community in order to help support social and economic development.
All activities of employees and stakeholders are conducted in such a way that they fully comply with the following:

4.1. Compliance with Laws and Internal Rules

Employees and stakeholders must comply with all applicable laws and regulations and perform their duties with a high degree of integrity.

4.2. Protection of the Company's Assets

Employees must use the Company's assets (including buildings, equipment, financial resources, IT systems, software, data, documentation and know-how) economically, efficiently and securely. Misuse, unauthorized use, theft or intentional falsification of records is strictly prohibited.

4.3. Business Integrity, Anti-Corruption and Anti-Money Laundering (AML)

The highest standards of integrity are expected in all business interactions.
Any form of corruption, bribery, extortion, embezzlement or money laundering are strictly prohibited. Zero tolerance applies to bribery by both public officials and private partners. Facilitation payments are strictly prohibited (except for an immediate threat to life or health, which must be immediately reported and documented). Unusual payment requests, suspicious accounts or non-transparent structures must be escalated to the Human Resources department.

4.4. Prohibition of Improper Advantages and Gifts

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. All employees must be cautious when providing or accepting gifts and hospitality from customers or suppliers or from them in connection with generally accepted ethical standards and business practicies, and such behavior must be presentable without

embarrassment. All employees are prohibited from requesting any gift, payment, special treatment, or form of hospitality from suppliers or customers.

In the event of being offered or provided any advantage to any employee by any partner, it is necessary to either refuse this advantage or immedialy report it directly to the supervisor.

4.5. Conflict of Interest

Employees must avoid situations in which personal, family or financial interests influence objective business decision-making. Conflicts of interest include decisionn-making regarding close persons, financial participation in competition or suppliers, external business activities interfering with the performance of job duties, or direct supervisor-subordinate relationships between close persons. Any actual or potential conflict must be reported immediately to the Human Resources department.

4.6. Confidentiality of Information and Prohibition of Insider Trading

Information relating to working conditions, occupational health and safety, environmental practices, business activities, structure, financial situation and management must be disclosed in accordance with applicable regulations and common industrial practices.
In relation to any party, employees and stakeholders must maintain strict confidentiality about information that is not generally known. Confidential information, trade secrets, financial results and research or technical data must be strictly protected from unauthorized disclosure; this obligation continues even after the termination of the employment relationship or other type of relationship. Employees must not misuse non-public confidential information for personal gain or for Insider Trading.

4.7. Intellectual Property, Personal Data Protection (GDPR) and Information Security

It is necessary to consistently respect intellectual property rights; the transfer of technology and know-how must be carried out in a way that protects these rights, while at the same time safeguarding information about suppliers and customers.
Neither employees nor any other stakeholders may create or store any designs, drawings or records of any type for private purposes. All documents, materials and data carriers related to assigned work are the exclusive property of Delta and the employees and other stakeholders are obliged to return them to the Company immediately upon termination of their employment or other relationship, without the need for special notice.

The Company and all persons who are involved in the processing of personal data within the scope of their responsibilities must comply with legal regulation and standards relating to the protection of personal data (General Data Protection Regulation – GDPR), privacy protection policies and information security rules. Sharing passwords, bypassing IT security or using unlicensed software is strictly prohibited. At the same time, it is essential that everyone who accesses personal data acts in such a way as to prevent any misuse of this data.

4.8. Fair Business, Advertising and Competition

Standard o fair business, advertising and competition are to be upheld. Delta ensures effective protection of information about customers and business partners.
Employees must not use internal information for personal gain or to enable improper profit of third parties. Agreements with competitors on prices, market division, coordination of tenders or improper exchange of sensitive business information are strictly prohibited. Information on financial results and business transactions must not be published without prior consent with the aim of protecting the interests of stakeholders.

4.9. Protection of Whistleblower Identity and Prohibition of Retaliation

No countermeasures or harassment may be taken against any person or employee who has reported possible violations or other offenses. The identity of whistleblowers remains confidential and protected in accordance with the law. Any employee who participates in such countermeasures or harassment will face disciplinary action for a serious breach of work discipline, including possible termination of employment.

4.10. Prohibition of Collusion

Entering into an unfair (secret) agreement with the purpose of embezzling and/or obtaining an unfair advantage against a third party, competitors, consumers or persons with whom negotiations are conducted is considered a collusion that is not permitted and is strictly prohibited. The prohibition of collusion also applies to secret fixing of prices or wages, secret discounts or the pretense of mutual independence, when in fact they act jointly in order to achieve common goals.

4.11. Responsible Supply Chain and Mineral Provenance

Delta is committed to purchasing materials containing tantalum, tin, tungsten, and gold used in its products in accordance with the Organization for Economic Co-operation and Development (OECD) Guidance on Responsible Supply Chains of Minerals. Delta reasonably ensures that these minerals in its manufactured products do 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.

Delta performed risk-oriented due diligence of suppliers in the areas of ethics, human rights, safety and compliance with sanctions.

5. Environment, Health and Safety (EHS) and Sustainability

Delta is committed to protecting the environment and providing a safe and healthy working environment for all employees. All employees must strictly comply with environmental laws, Health and safety (EHS) regulations, and the Company's internal safety procedures. Any hazardous conditions, accidents, or potential environmental hazards must be reported immediately.
Delta is also committed to continuously reducing the environmental impacts of its activities and supply chain in the following areas:

- **Energy and Greenhouse Gas (GHG) Emissions:** Monitoring energy consumption and greenhouse gas emissions (Scope 1, Scope 2 and relevant Scope 3 emissions), setting measurable reduction targets with a base year and implementing energy efficiency measures.
- **Water, Waste and Chemicals:** Effective water use, systematic waste sorting and recycling, as well as safe storage and handling of hazardous chemicals based on current Safety Data Sheets (SDS).
- **Pollution Prevention and Climate Resilience:** Implementation of measures to prevent environmental incidents and assess physical and operational climate risks.

6. Violation of Code of Conduct Rules

Violation of any part of this document by an employee is considered a serious breach of work discipline, which may result in immediate termination of employment and appropriate legal steps.
Violation and breach of any part of this document is unacceptable for any stakeholders as well. Treatment of violating stakeholders and other related regulations are agreed with stakeholders in the relevant type of contract and agreements.

7. Raising Concerns and Reporting Violations

If any of the parties involved (employees or other stakeholders) becomes aware of, or has reasonable grounds to suspect, an illegal or unethical situation, or believes that they are the victim of prohibited conduct in the workplace or in the course of business activities, they shall immediately report this fact through any communication channel within Delta:

If any of the parties involved (employees or other stakeholders) becomes aware of, or has reasonable grounds to suspect, an illegal or unethical situation, or believes that they are the victim of prohibited conduct in the workplace or in business activities, they shall immediately report this fact through any communication channel within Delta:

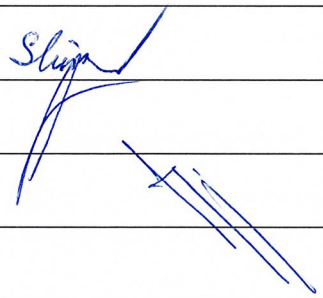
- **Manager** – to use "Open Door Policy" is usually the best place to start
- **Questions & Answers** - intranet application tool
- **Human Resources department** – for any kind of violation
- **Internal audit** – for violations related to financial records and reporting, business process violations, and improper use of assets
- **Security service** – for loss or theft of personal or Delta assets
- **For stakeholder:** +421 42 4661 111 or by e-mail: **podnety@deltaww.com** (e-mail is available 24/7)
- **By post to the employer's address, by fax**
- **Police Force of the Slovak Republic**

In accordance with this document, the protection of the identity of the person who reported the violation of the rules, as well as the confidentiality of the investigation, must be ensured.

Persons who receive any of the described suggestions or reports must decide, together with the Human Resources Department or the General Manager, how to proceed in the respective case.

8. Revision history

Revision	Effective Date	Description of changes
Revision 01	December 16, 2013	Update according to EMEA requirements
Revision 02	April 16, 2015	Update according to EICC requirements
Revision 03	May 2, 2019	Update according to RBA requirements
Revision 04	October 10, 2022	Update of Responsible Supply Chain and Mineral Provenance
Revision 05	September 28, 2026	Compliance with Delta Group Code of Conduct v4.0, incorporation of *Decent Living Wage*, EEC standards, GHG Scope 1/2/3 emissions, conflict of interest, AML and *supplier due diligence*.

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Revision:	**05**	