

Anti-Corruption Policy of the Speck | Circutec Group

Introduction

The companies of Speck | Circutec Group always adheres to the legal framework and is committed to fair competition and the avoidance of conflicts of interest. Corruption and bribery distort competition, prevent development and innovation, and ultimately harm everyone.

This anti-corruption guideline refers to the principles of business dealings already defined in the Code of Conduct and formulates them in more detail.

The Speck | Circutec Group With this anti-corruption policy, the defines a group-wide uniform regulation that is intended to provide employees with orientation in their behavior towards customers, suppliers or other business partners.

Scope of application

This policy applies to all companies in Speck | Circutec group of companies and can be used worldwide. The employees (all employees of Speck | Circutec Group) are obliged to comply with or implement the requirements.

Some countries may have stricter laws or regulations. These must be complied with as a matter of priority and replace the principles described in this Directive.

Definitions

In the following, terms are defined that are repeatedly referred to in the Principles.

Public officials: (1) persons who are in a public service relationship, in particular civil servants and employees of the public service, (2) elected or appointed executives or employees of governments, government agencies or international public organizations, (3) members of parliament, politicians and candidates for political office.

Employees: Management as well as employees and employees of all companies of Speck | Circutec Group of Companies.

Third: Any person except an employee of Speck | Circutec Group of Companies.

Invitations: Hospitality and other invitations Gifts: Material benefits for which no consideration is provided.

Advantage: Any material or immaterial advantage that is objectively intended to improve the recipient's position and is not based on a legal claim.

Unfair consideration: Illegitimate, commercial or other advantages.

Principles

Corrupt behavior is prohibited. This applies both to the acceptance (passively) and to the granting (actively) of advantages aimed at unfair consideration. The following principles summarize the different behaviors.

Advantages may not be demanded or accepted for oneself or third parties (passively),

nor may advantages be actively offered, promised or otherwise granted, insofar as these are aimed at obtaining unfair consideration or rewarding past unfair consideration. This applies to the extent that there is a business connection. To accept or grant the benefits, intermediaries, such as sales partners or consultants, may not be used.

The acceptance or granting of benefits, for example in the form of gifts or invitations/entertainment, must be appropriate with regard to the purpose, occasion, persons and circumstances and may only be granted to individual recipients on an occasional basis. Cash and gifts of value (e.g. shopping vouchers) are never permitted.

Gifts or invitations/hospitality may not be accepted or granted if there is a direct business connection or if they could be regarded as unfair influence.

If the employee has doubts about the appropriateness of accepting or granting an advantage, it is always necessary to consult with the supervisor or the management.

The granting or acceptance of a benefit is prohibited in any case if it violates applicable local or international regulations or laws.

The granting of advantages vis-à-vis a public official is prohibited in any case if there is a direct business connection.

Donations may only be granted if the Speck Group does not receive any concrete consideration and if the impression does not arise that the Speck Group expects anything in return.

Sponsorships may only be granted if the Speck Group does not obtain any unfair economic advantages in return or such an impression arises.

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