Policy statement on the Supply Chain Due Diligence Act

Stand: 01.12.2023



Introduction / Preamble

VACOM Vakuum Komponenten & Messtechnik GmbH is committed to ecologically and socially responsible corporate governance in a company-wide code of conduct and expects the same behavior from its suppliers. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. We are constantly striving to further optimize our business activities as well as our products and services in terms of sustainability and encourage our suppliers to contribute to this in the sense of a holistic approach.

VACOM complies with the latest version of the Responsible Business Alliance (RBA) guidelines and requires all business partners to do the same. This is established in the Code of Conduct, which forms the basis of all business relationships. The Code sets out standards for creating working conditions that ensure that the supply chain is safe, that workers are treated with respect and dignity and that business is conducted in an environmentally and ethically responsible manner. Our social responsibility focuses on the exclusion of forced labor, the prohibition of child labor, fair working hours, fair pay, freedom of association, the prohibition of discrimination and the protection of health in the workplace.

Requirements for suppliers

Α Social responsibility

Exclusion from forced labor

No forced labor, slave labor or comparable work may be used. Unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment, must not take place.

Prohibition of child labor

Child labor may not be used at any stage of production. Suppliers are required to comply with the recommendation from the ILO conventions on the minimum age for the employment of children.

Fair working hours

Working hours must comply with applicable laws or industry standards.

Fair Payment

The payment for regular working hours must correspond to the national statutory minimum wage or the minimum standards customary in the industry.

Prohibition of discrimination

Discrimination against employees in any form is prohibited. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

Dealing with conflict materials

For the conflict materials tin, tungsten, tantalum and gold, the company establishes processes in accordance with the Organization for Economic Cooperation and



Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects the same from its suppliers.

В Environmental protection and sustainability

Dealing with energy consumption / efficiency

Energy consumption must be monitored. Economic solutions must be found to improve energy efficiency and reduce energy consumption.

Consumption of raw materials and reduction of natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or avoided.

C Ethical business conduct

Confidentiality & data protection

Suppliers undertake to do appropriate justice to the protection of private information. When storing, processing and transmitting personal information, the applicable legal guidelines on data protection and information security must be observed.

Intellectual property

Intellectual property rights must be respected and processes must be established that quarantee optimum security and data protection.

Implementation of the requirements

We expect our suppliers to identify risks within the supply chain and take appropriate measures where necessary. If a breach of the Code of Conduct regulations is identified, a written notification including an action plan is sent immediately to bring the breach back into line with the regulations.

Acknowledgement and consent

The management undertakes to act responsibly and to adhere to the principles listed. It shall take all necessary precautions to implement the requirements.