Independent. Innovative and creative. Trusting partnerships.

Code of Conduct of the Phoenix Contact Group

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1 Why do we need a Code of Conduct?

Dear Colleagues and Readers,

We are a globally active, internationally leading, and independently operating family-run business with deep roots and an excellent corporate culture that guides us every day. We employ people and drive our business forward with innovation, independence, and strong partnerships at more than 100 locations worldwide. We move in a large number of cultural circles and have daily contact with a wide range of different people.

This diversity and variety demands a common basis, which is why we have subscribed to the ZVEI Code of Conduct for a long time. We continue to apply this Code without limitations. We would now like to build upon this basis and place it on an even broader foundation with the supplementary Code of Conduct of the Phoenix Contact Group. It defines the legal and moral guidelines for our actions and also helps us to apply our values within our everyday operations. We are doing this because both the results of our work and the way we go about achieving those results are important to us.

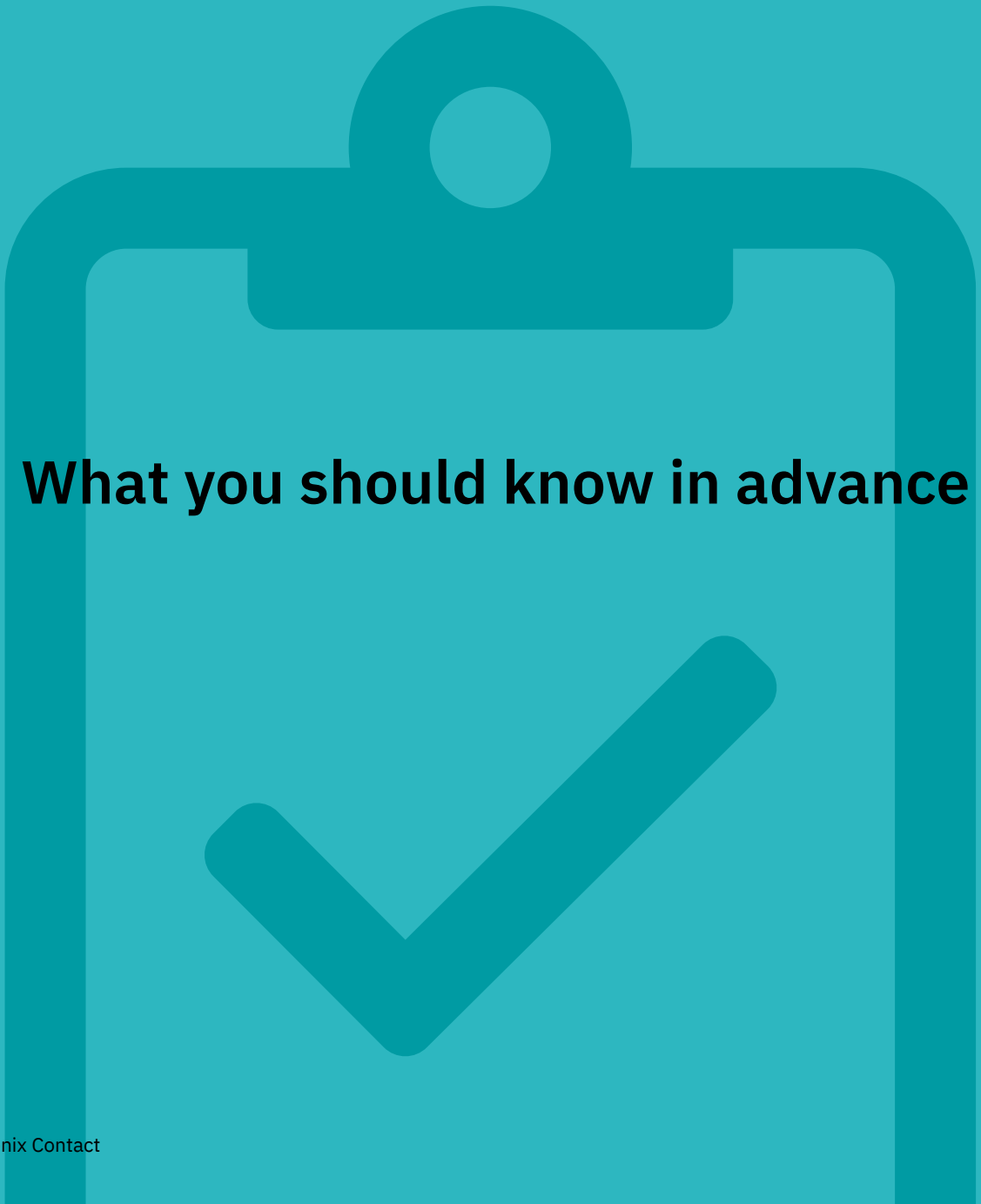
Through appropriate conduct, we have developed an exceptional image, which we consider to be a prerequisite for our corporate success. Each and every one of us should take credit but also responsibility for this success. Join us in making an active contribution to the continual development of our good reputation in the future so that we can ensure sustainable corporate growth and our long-term corporate independence.

Your Group Executive Board

Dirk Görlitzer **Torsten Janwlecke** **Ulrich Leidecker**

Dr. Frank Possel-Dölken **Axel Wachholz** **Stephan Volgmann**

2 What you should know in advance



2.1 What is the Code of Conduct?

The Phoenix Contact Code of Conduct is binding for all of us. It makes the central guidelines for our everyday actions inside and outside the company transparent, and answers the question of how we are to conduct ourselves in everyday business. Along with legal aspects, it also covers our expectations for integrity and moral conduct.

We will always give these guidelines priority if a conflict of objectives with our business interests arises – even if this results in lost business transactions. Acting with integrity and our excellent reputation will always be a priority for us.

Further, the Code of Conduct is both the core and the superstructure of our company-wide compliance management system. Important topics are addressed here in the core and then elaborated upon in the detailed regulations.

2.2 What is the relationship between the Code of Conduct and our corporate principles?

Our purpose, our mission, and the cornerstones of our corporate culture have long been embedded in the corporate principles.

They continue to apply without limitation, and are also reflected in our Code of Conduct.

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Together,
we are creating a sustainable world
based on our passion
for technology and innovation.

Mission

Solutions
for electrification, networking and automation
are our contribution
to a world in which renewable energy is available
for the benefit of everybody.

Culture

Independent

We always act in a way to ensure
our entrepreneurial freedom.

Innovative and Creative

We consider innovation
as a path-breaking bridge to a sustainable future;
thus we pro-actively develop our company.

Partnerships of Trust

Our actions
are based on a mutually committed spirit,
on friendliness and honesty.

Our relations
to customers and business partners focus
on sustainable benefits for both sides.

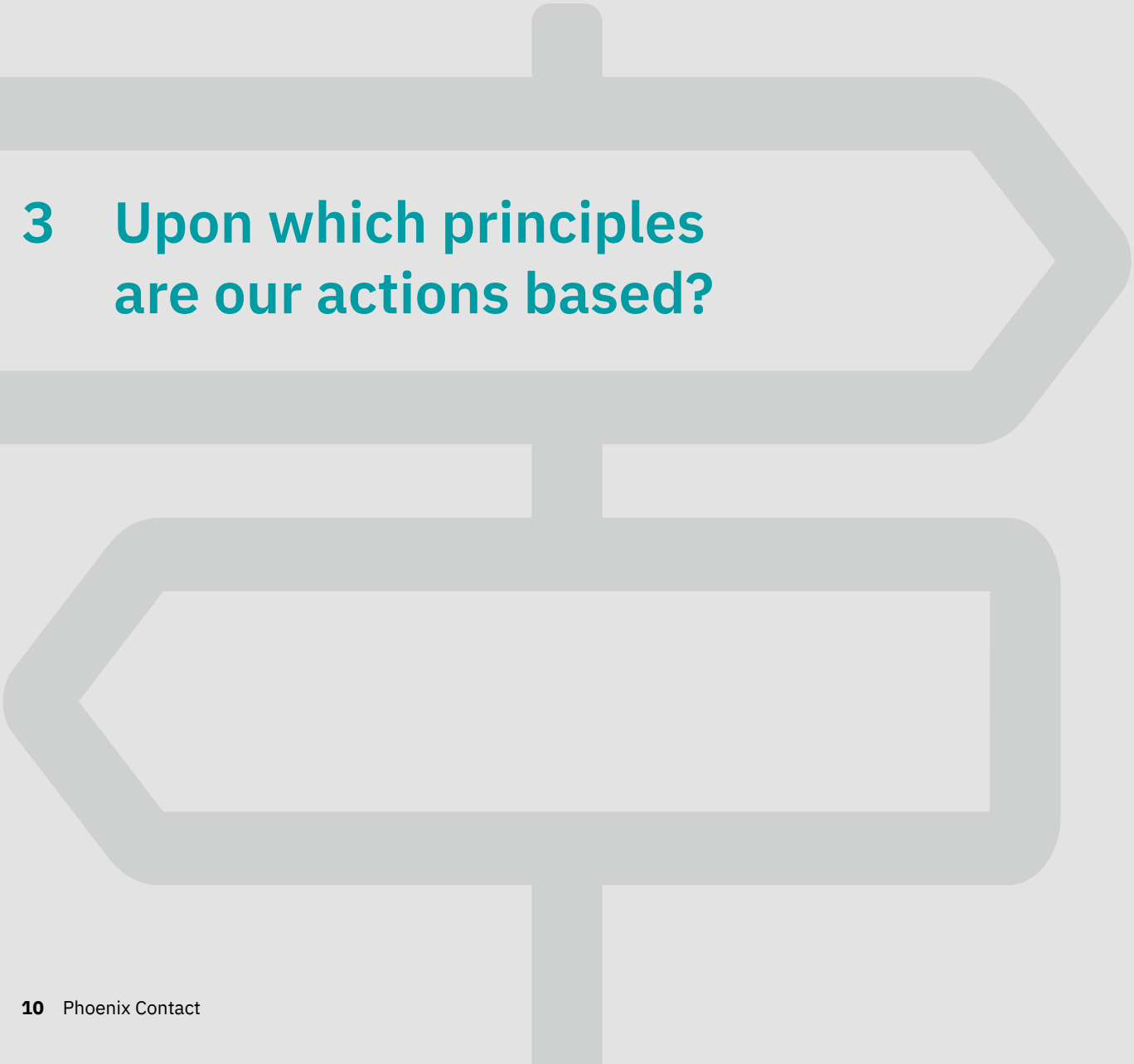
Our corporate culture
encourages trust
and supports employees' development
for achieving agreed targets.

2.3 One Code of Conduct. For everybody.

Our Code of Conduct applies to all Phoenix Contact employees, regardless of their function or other personal attributes. It applies during working hours. Outside of working hours, we should uphold the same standards whenever we are acting as employees or representatives of Phoenix Contact.

If you have any questions or concerns regarding the Code of Conduct, there are various ways to contact us. This also applies if you believe that the Code of Conduct is being breached. The contact options are listed at the end of the document.

3 Upon which principles are our actions based?



3.1 Compliance with laws

Complying with the legal provisions of the countries in which we operate is our top priority. If local legal provisions fall short of the regulations of our Code of Conduct, in each case we will follow the stricter regulations described here.

“Complying with legal, social, and corporate-internal regulations is one of the top priorities of our company”.

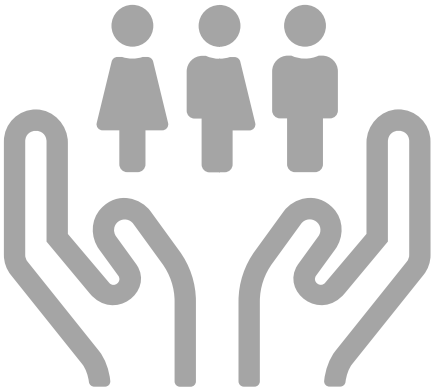
Dirk Görlitzer, CEO

3.2 Human rights and corporate due diligence

Human rights are irrevocable. They are a right for all people worldwide in equal measure.

As a company, we are committed to respecting human rights. This includes in particular:

- The ban on child labor (ILO Conventions No. 138 and 182)
- The ban on forced labor and all forms of slavery (ILO Conventions No. 29 and 105)
- The ban on disregarding the occupational health and safety obligations applicable under the law of the place of employment (see also Section 3.5)
- The ban on disregarding freedom of association (ILO Conventions No. 87 and 98)
- The ban on unequal treatment in employment (see also Section 3.4)
- The ban on withholding appropriate wages
- The ban on destroying the natural basis of life through environmental pollution
- The ban on unlawful violation of land rights
- The ban on the hiring or use of public or private security forces, unless adverse effects may arise due to a lack of instruction or control
- The ban on any other action or omission in breach of duty which is directly capable of impairing a protected legal position in accordance with § 2 Para. 1 German Supply Chain Act (GSCA)



Our due diligence does not stop at our factory gates. We also use the available legal framework in our supply chain in order to work toward compliance with relevant standards or to safeguard them within the legal framework.

Human rights are closely linked to our corporate due diligence, which we implement consistently within the Phoenix Contact Group. We also fulfill our corporate due diligence appropriately in our supply chain. The basis and legal framework for this is currently provided by the German Supply Chain Act (GSCA).

We publish the details of the relevant activities transparently and openly within the legally defined time frame as a policy statement on our homepage. The corresponding obligations and prohibitions are part of this Code of Conduct, and elsewhere, so that they are transparent for all employees and other stakeholders. In addition to the human rights issues mentioned above, this includes further due diligence related to the environment.

Our expectations are also set out in our Supplier Code of Conduct. This means that we set out our expectations regarding our own company, our supply chain, potentially affected communities and groups, and other relevant stakeholders in the same way.

3.3 Sustainability

Harmony among environmental, social, and governance aspects is the framework for sustainable management and corporate responsibility at Phoenix Contact. It is important to us to make our contribution to a sustainable world.

At Phoenix Contact, we live and breathe sustainability. As part of our 10-year strategy, sustainability was included as a key aspect of our corporate principles.

- In conformity with the relevant standards, sustainability at Phoenix Contact involves three dimensions: the environment, society, and governance. Our activities and decisions are made within the framework of these three dimensions.
- As an independent family-owned company, we see sustainability as the foundation for our future development.
- We implement sustainability through our existing organization. We continuously roll out progress monitoring based on the three dimensions across the entire Phoenix Contact Group worldwide.

› Further information on our corporate responsibility and commitment is published transparently on our homepage:

phoenixcontact.com/compliance

3.4 Anti-discrimination as well as respect and integrity in everyday business

Respectful, fair, and honest conduct is the basis of our everyday interactions.

- Our interactions are characterized by fair, respectful, and considerate conduct, equal rights, and equal opportunities.
- We respect the dignity of every single individual. We strongly oppose inappropriate behavior toward others, for example, bullying or disrespect.
- We do not tolerate discrimination or unequal treatment in employment on the basis of, for example, national or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, worldview, or any other grounds, insofar as it is not justified by the requirements of the employment (including but not limited to ILO Conventions No. 100 and 111).

3.5 Occupational health and safety

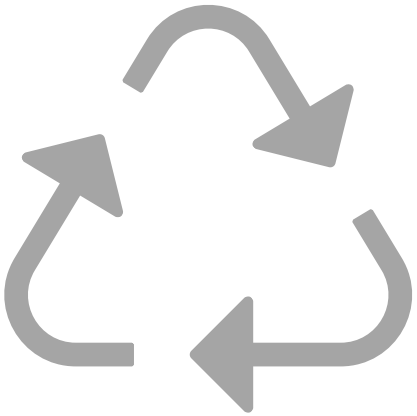
Together, we ensure a safe and healthy working environment. In particular, we observe the occupational health and safety obligations applicable under the law of the place of employment.

- As a company, we maintain and promote occupational health and safety in order to prevent accidents and injuries and to help keep employees healthy.
- As employees, we make an active contribution toward ensuring and promoting a healthy and safe working environment. In particular, we observe general order and safety regulations and take care of ourselves and our colleagues.
- We draw attention to inadequate safety standards, dangerous working conditions, and violations of the occupational health and safety regulations so that preventive measures can be taken.
- We proactively draw attention to any areas where there is potential for improvement.

3.6 Environmental protection and ecology

Protecting our environment and, in turn, the health of our fellow human beings, for example, is an important goal for us. A careful and considerate approach to using resources informs everything that we do.

- Our corporate due diligence also includes environmental aspects. It encompasses both complying with prohibitions and restrictions on substances in our products and treating waste in accordance with the relevant provisions of the GSCA (Minamata Convention, Stockholm Convention on Persistent Organic Pollutants – POP Convention – as well as the Basel Convention).
- As part of maintaining a sustainable business, we meet the relevant environmental protection standards and regulations.
- Moreover, environmental compatibility, the efficient use of resources, and climate protection have high priority in our considerations and activities.
- We use natural resources responsibly and operate proactive energy and environmental management programs.
- We comply with the applicable international, European, and national legal requirements, as well as the internal mandatory regulations, guidelines, and standards that define material requirements for our products.



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3.7 Data protection

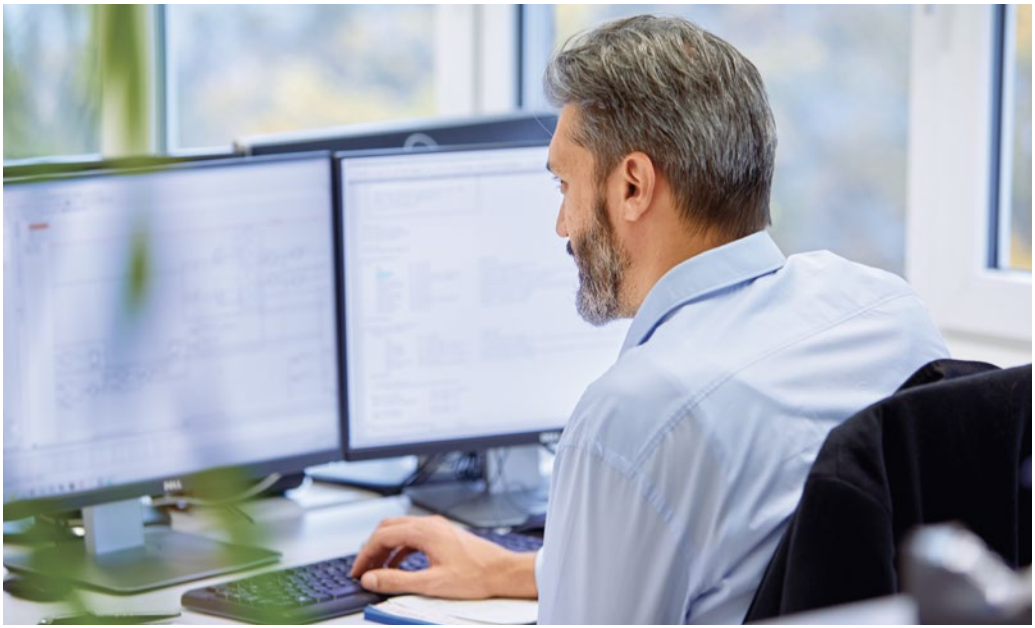
We protect everyone who entrusts their personal data to us.

- Data protection is, among other issues, firmly established in the German constitutional rights and the principles of EU law, and serves to protect general privacy rights. Therefore, we consider protecting personal data to be of great importance.
- To ensure our protection, we have created internal regulations with the aim of securing and further developing exemplary and appropriate data protection within our Group companies.
- Rather than considering data protection in isolation, we take solution-oriented actions which consider the interests of all parties. While doing so, in case of doubt, we give higher priority to the informational autonomy of individual persons.

3.8 Information security

Information security is essential for ensuring an adequate level of protection for our company and the data that we process.

- Operating powerful IT systems is indispensable for our day-to-day work and, furthermore, is a matter of course for a company that offers innovative solutions in the field of digitalization. Therefore, the protection of our infrastructure is equally important.
- The principles for the security of our IT systems and our business data are stated in our directives on information security and our international IT standards. We therefore understand and follow them.
- Information security is not limited to the use of electronic systems alone. Beyond such systems, we will always conduct ourselves with the required sensitivity.



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Mit Leidenschaft
für Technologie und Innovation
schaffen wir gemeinsam
eine nachhaltige Welt.
Mission
Lösungen für Elektrifizierung, Vernetzung
und Automatisierung
sind unser Beitrag für eine Welt,
in der regenerative Energie
zum Nutzen aller zur Verfügung steht.
Culture
Unabhängig
Wir handeln stets so, dass unsere
unternehmerischen Entscheidungsfreiräume
gesichert bleiben.
Innovativ gestaltend
Wir verstehen Innovation
als wegweisenden Brückenschlag
in eine nachhaltige Zukunft;
so entwickeln wir vorausschauend das Unternehmen.
Partnerschaftlich vertrauensvoll
Unser Handeln
wird von wechselseitig verpflichtendem Geist,
von Freundlichkeit und Aufrichtigkeit getragen.
Unsere Beziehungen
zu Kunden und Geschäftspartnern sind
auf beiderseitig nachhaltigen Nutzen ausgerichtet.
Unsere Unternehmenskultur
fördert Vertrauen und die Entwicklung
der Mitarbeitenden
zum Erreichen vereinbarter Ziele.

3.9 Integrity and fairness in business transactions

We respect and protect the integrity of free competition.

- We do not accept any corruption or bribery. In particular, this includes accepting or granting unjustified benefits or monetary bribes.
- When dealing with our business contacts, we will avoid giving even the appearance of corruption or dishonest business practices.
- We do not use our business connections for personal gain.
- We firmly reject any type of business practices that are designed to restrict free competition. To this end, we fully subscribe to the regulations of antitrust law in particular.
- We will also maintain respectful and fair dealings with our competitors. This also applies to the way in which we promote Phoenix Contact.

3.10 Dealing with conflicts of interest

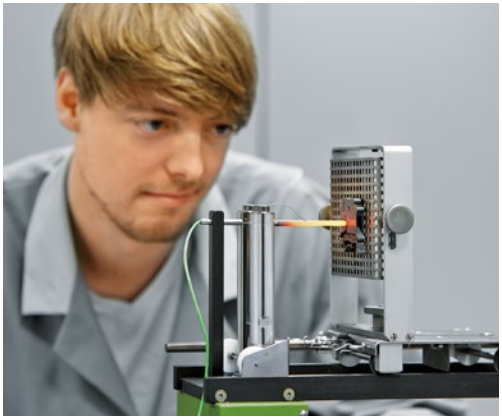
We will attempt to avoid any conflicts of interest, or we will at least disclose them.

- We will always attempt to avoid any conflicts between private and business interests.
- To avoid conflicts of interest, we ensure that there are clear decision-making processes and a clear separation of differing interests.
- When conflicts of interest are unavoidable, we will make them transparent in advance and ensure that we deal with them appropriately.

3.11 Quality and product safety

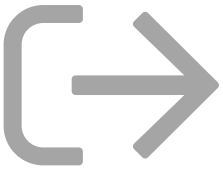
Our guiding principle is the satisfaction of our customers and their pleasure in working with us. This does not just apply to the quality of our products.

- We set high standards for the products and solutions that we offer. We do not focus on quality alone, but also include innovation – which we consider to be a ground-breaking bridge to the future. We create solutions that do not merely satisfy – they inspire.
- Our customers have the right to source high-quality and flawless solutions and products from us. We consistently align our processes with this goal. Here, the safety of our products in particular is very important to us.
- Of course, we comply with all relevant product safety laws and the directives and standards embedded in them. This is how we ensure both the high quality of our products and solutions and their compliance with all relevant international regulations and standards.
- We also aim to ensure a comprehensive and effective quality management system that covers our production processes and the business processes involved right through to our aftersales services.



3.12 International trade

Our success is based on global collaboration and the exchange of goods all over the world. When trading internationally, we comply with national and international regulations.



- We ensure that our international business activities do not violate any of the relevant regulations.
- In foreign trade, we always check for possible restrictions or prohibitions based on country embargoes, for material-related sanctions (dual-use), and for any critical end-use of our products.
- We also ensure that all business partners are vetted using the applicable sanctions lists for both domestic and international transactions.

3.13 Protection of information and expertise

Information and expertise are the cornerstones of corporate success. Both in relation to ourselves and to third parties.

- Information, expertise, and intellectual property play a very important role in the success of corporate activities. We therefore place significant importance on the necessary diligence when dealing with the relevant information and take appropriate protective measures.
- In particular, we adhere to the regulations relevant to the transfer of information, as well as to the obligation to maintain confidentiality with regard to operational and business secrets as laid out, for example, in our know-how protection directive.
- We also respect the confidential information, expertise, and intellectual property of third parties.

4 Your contact options

Do you have questions about the Code of Conduct of the Phoenix Contact Group? Do you need help in evaluating a particular issue? Do you have a particular concern in connection with the topics described or with something further? We want to put you in touch with the appropriate contact option for any concern.

Within the framework of our open communication culture, we should first attempt to address our concerns directly with a matter-of-fact approach. Of course, this will not be possible in all cases because selecting the suitable contact option really depends on the nature of the individual concern. The contact option you select should, ultimately, be your own decision.

4.1 Your contact options at Phoenix Contact

Our management team and Group Executive Board
You can approach your line management team with your concern at any time. Further, you can also voice your concern to our Group Executive Board.

The compliance organization
If there is already a local compliance management team for your area, it is available as a contact option. Centrally, you can contact Corporate Compliance Management.

The Legal department
Particularly in cases where legal advice is needed, you can also contact our Legal department.

The HR department
Contacts for a large number of issues are available in the Corporate Human Relations department. Key points are available on the corresponding Intranet page.

Corporate Facility Management
Corporate Facility Management is available for any questions or concerns regarding environmental protection and ecology.

The whistleblower system
Phoenix Contact offers a whistleblower system that can be used in particular to report potential violations of legal regulations. Our whistleblower system is also available as a complaint procedure in accordance with the GSCA.

Product Compliance
The Product Compliance department is available to answer any questions you may have regarding product-related legal regulations.

The Group Executive Board of the Phoenix Contact Corporate Group: CDO Frank Possel-Dölken, COO and Spokesman of the Group Executive Board Ulrich Leidecker, CEO Dirk Görlitzer, CSO Stephan Volgmann, CFO Axel Wachholz, and COO Torsten Janwlecke (from left)

4.2 Protection of whistleblowers

We consider whistleblowers to be people who wish to contribute to the compliance with legislation and the central guidelines of our company by providing objective and appropriate information.

In accordance with the relevant legislation, we protect whistleblowers against reprisal. We will respect any request for confidentiality.

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