



GLOBX GMBH / COMPANY POLICY

Code of Conduct

Business conduct and supplier standards for electronic component distribution

This Code sets out the standards GlobX applies to its own business conduct and the minimum standards expected from suppliers, service providers and other business partners where relevant to their work with us.

SCOPE The Code is written for the activities of an independent electronic-component distributor. It therefore places particular emphasis on lawful sourcing, product authenticity, accurate documentation, trade compliance, responsible handling of components and proportionate supplier due diligence.

PUBLIC - INTERNAL AND EXTERNAL USE

1. Purpose, scope and application

GlobX GmbH operates as an independent distributor of electronic components and semiconductors. Our work connects customers with manufacturers, distributors, brokers, logistics providers, testing partners and other sources in an international supply chain. This creates responsibilities that are different in some respects from those of a manufacturer: we must understand where material comes from, describe it accurately, protect it while it is in our control and avoid making claims that cannot be supported.

This Code applies to GlobX management, employees and persons acting on behalf of the company. The sections dealing with suppliers and business partners describe the standards we expect from external parties to the extent relevant to the goods or services they provide. Contractual terms, customer-specific requirements and mandatory law remain applicable in addition to this Code.

Applicable requirements

All activities must comply with the laws and regulations that apply to the country, transaction and persons involved. Where a customer agreement, export licence, regulatory requirement or other binding rule is stricter than this Code, the stricter requirement must be followed. No employee or business partner is expected to proceed with a transaction when an important legal, product or documentation question remains unresolved.

This Code is intended to support responsible business practice. It does not replace legal advice, regulatory licences, contractual quality requirements or product-specific technical standards.

2. Legal compliance and business integrity

GlobX expects lawful conduct in every market in which it operates. The same expectation applies to distributors, suppliers, agents, consultants, logistics providers and other third parties acting in connection with GlobX business. An improper business advantage must not be offered, requested, given or accepted, directly or indirectly, in exchange for preferential treatment.

Anti-bribery and anti-corruption

Bribery, kickbacks, facilitation payments and other improper payments are prohibited. This applies in dealings with private companies and with public officials. Payments must have a legitimate business purpose, be properly documented and be made to the correct contractual party or an otherwise verified payee.

GlobX follows applicable German and European anti-corruption law and, where relevant to the transaction or parties involved, other anti-bribery regimes such as the U.S. Foreign Corrupt Practices Act, Canada's Corruption of Foreign Public Officials Act and the U.K. Bribery Act 2010. The principles of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions are also reflected in our approach.

Third parties must not be used to do something that GlobX could not lawfully do itself. Unusual commissions, unexplained success fees, payments to unrelated accounts or requests to disguise the purpose of a payment require clarification before any commitment is made.

Gifts, hospitality and conflicts of interest

Reasonable business hospitality and modest gifts may be acceptable where they are lawful, transparent and not intended to influence a decision. Cash, cash equivalents and gifts that create an

obligation or appear to buy favourable treatment are not acceptable. Additional caution is required when public officials or public-sector customers are involved.

Employees must disclose situations in which a personal, financial or family interest could influence, or reasonably appear to influence, a business decision. Management will determine how the conflict should be handled. The purpose is to protect the integrity of the decision, not to prohibit ordinary personal relationships.

Political and charitable payments

Company funds or resources may not be used for political contributions, political candidates or political organisations unless the payment is lawful and expressly authorised by management. Charitable donations and sponsorships must have a genuine purpose and must not be used as a route for bribery or improper influence.

Anti-money laundering and counter-terrorist financing

GlobX does not knowingly participate in transactions involving criminal proceeds, money laundering, terrorist financing or attempts to conceal the identity of a payer, payee or beneficial owner. Commercial teams must pay attention to payment instructions and transaction structures that do not match the business relationship. Examples include unexplained third-party payments, unusual routing through unrelated jurisdictions, inconsistent company information or a request to misstate the nature or value of goods.

Where a concern cannot be reasonably resolved, the transaction is not to proceed until management has reviewed it and any required legal or compliance checks have been completed.

Import, export, sanctions and anti-boycott rules

Electronic components may be subject to export-control, customs, sanctions, end-use and end-user restrictions. GlobX therefore considers the parties to a transaction, destination, product classification and intended use where such checks are required. Shipping documents and customs information must be accurate and must not be manipulated to avoid duties, licences, restrictions or sanctions.

Applicable import and export controls must be respected, including European Union and German requirements and, where legally applicable, U.S., U.K. or other national export-control and sanctions rules. Applicable U.S. anti-boycott rules and similar restrictions must also be observed when they apply to a transaction. Any request for an unusual destination, end user, re-export route or document wording that could conceal the true transaction must be escalated before shipment.

Fair competition

GlobX competes on availability, service, quality, technical understanding, delivery capability and price. We do not agree prices with competitors, allocate customers or territories, coordinate bids, create artificial shortages or exchange competitively sensitive information in a way that restricts competition. Resale restrictions, exclusivity arrangements and other commercial conditions must comply with applicable competition law.

Books, records and truthful communication

Offers, purchase orders, invoices, credit notes, shipping records, product descriptions, test records and other business documents must reflect the actual transaction. Material facts must not be hidden from customers, suppliers, banks, customs authorities, auditors or other parties who are

entitled to receive them. Records are retained in line with applicable legal, contractual and business requirements.

3. Responsible sourcing, product authenticity and quality

For an independent component distributor, responsible sourcing is one of the main controls against commercial, quality and compliance risk. The level of review may differ depending on the source, product, age of the material, customer requirement and transaction risk, but the underlying principle is the same: the identity and condition of the goods must not be represented more favourably than the available evidence supports.

Counterfeit and suspect material

GlobX does not knowingly purchase or sell counterfeit, stolen, fraudulently altered, re-marked or otherwise misrepresented electronic components. Suppliers are expected to provide genuine goods that match the agreed manufacturer, part number, quantity, condition and other relevant order requirements.

If there is a reasonable concern about authenticity, markings, packaging, documentation or origin, the material may be placed on hold while the issue is reviewed. Depending on the order and customer requirement, that review may include document verification, visual inspection, additional technical inspection or independent third-party testing. A product is not released merely because a commercial deadline is urgent.

Source information and traceability

Supplier identity and available source information must be recorded accurately. GlobX does not state that manufacturer traceability, authorised-distribution traceability or manufacturer warranty exists unless the available documents support that statement. Where traceability is limited, the limitation must not be concealed by wording that could reasonably give the customer a different impression.

Suppliers must not create false chain-of-custody documents or provide altered certificates intended to make open-market material appear to have manufacturer or franchise traceability. If a document is unavailable, the correct response is to state that it is unavailable rather than to recreate it.

Correct product description

Manufacturer name, manufacturer part number, quantity, date code, lot code, country of origin, package condition and other relevant product attributes must be stated correctly to the extent known and required. Photos, labels and packing information used in an offer or inspection must relate to the material being represented. Known discrepancies must be disclosed before acceptance or shipment.

A customer order must not be fulfilled with a different manufacturer, part number, revision, grade, package, condition or other materially different item without the customer's approval where approval is required. Suggested alternates may be offered as alternates, but they must not be presented as the ordered part unless the equivalence has been properly established and accepted by the customer.

Storage, handling and packaging

Electronic components are to be stored, handled and packed in a way that protects their condition and identification. Original manufacturer or supplier packaging should be retained where practical. If

packaging is opened for inspection, counting or testing, the condition of the goods and any subsequent repacking must be controlled. ESD-sensitive, moisture-sensitive or otherwise sensitive components must be handled in accordance with applicable product or customer requirements when such requirements are known.

Inspection, testing and certificates

Inspection reports, certificates of conformity, material declarations and laboratory reports must be genuine and must not be edited in a way that changes their meaning. When GlobX provides a statement based on supplier documents or third-party testing, the basis of that statement should be clear. Third-party test results do not become manufacturer certificates merely because they accompany the shipment.

Testing requirements may differ by customer, component type, source and risk. No employee or supplier should promise a particular inspection or test level unless it has actually been agreed and can be performed.

Customer-specific, restricted and controlled material

Components produced for a specific customer, programme or restricted channel can be subject to resale, warranty, licensing or contractual limitations. Such material must not automatically be treated as ordinary open-market stock. Where a restriction is known or reasonably indicated, the seller's right to sell and any relevant restrictions must be clarified before the material is offered onward.

RoHS, REACH and other product-compliance information

GlobX requests and transmits RoHS, REACH and other product- or material-compliance information when it is available and relevant to the customer or transaction. Supplier declarations must be passed on accurately. GlobX does not manufacture technical compliance data or change a supplier declaration to make a product appear compliant where the supporting information is absent.

Conflict minerals and responsible mineral sourcing

Where relevant to a customer, product or supply-chain requirement, GlobX supports responsible sourcing expectations concerning tin, tungsten, tantalum and gold (3TG) and other minerals such as cobalt. As a distributor, GlobX does not operate mines, smelters or refineries. Our role is therefore to request and pass on available upstream declarations and to avoid overstating what those declarations prove.

Suppliers are expected to support reasonable requests for information based on recognised due-diligence frameworks, including relevant OECD guidance for minerals from conflict-affected and high-risk areas. Information supplied about smelters, refiners or mineral origin must be accurate to the best of the supplier's knowledge.

4. Human rights, labour standards and workplace conduct

GlobX expects people working for the company and people working in our supply chain to be treated lawfully and with respect. These expectations are informed by applicable labour law and internationally recognised principles, including relevant International Labour Organization standards and the UN Guiding Principles on Business and Human Rights. They are applied proportionately to the nature and location of the business relationship.

Forced labour, slavery and human trafficking

Forced labour, bonded labour, slavery, human trafficking and other forms of involuntary work are not accepted. Employment must be entered into voluntarily, and workers must not be subjected to threats, unlawful retention of identity documents, recruitment-related coercion or other practices that prevent them from leaving employment in accordance with applicable law. Security personnel must not be used to intimidate, abuse or unlawfully restrict workers or communities.

Child labour and young workers

Suppliers must not use unlawful child labour. Minimum-age rules at the place of employment and applicable ILO principles must be respected; as a general rule, employment must not begin below the age at which compulsory schooling ends and in any event not below the minimum age permitted under applicable law and recognised ILO exceptions. Persons under 18 must not perform work that is hazardous or otherwise prohibited for young workers.

Pay, working time and employment conditions

Wages, statutory benefits, working time, rest periods, overtime and leave must comply with applicable law. Workers must receive understandable information about the main terms of their employment and compensation. Deductions from pay must not be used as an unlawful disciplinary measure. Where local law or binding industry rules establish more protective standards, those standards are to be respected.

Equal treatment, dignity and freedom of association

Unlawful discrimination, harassment, threats, degrading treatment and sexual harassment are not accepted. Employment decisions should be based on legitimate job and business requirements rather than protected personal characteristics. Workers' lawful rights to organise, join or not join worker organisations and participate in collective bargaining must be respected in accordance with local law. Where such rights are legally restricted, suppliers should not create additional unnecessary barriers to lawful worker representation or communication.

Health and safety

GlobX is responsible for maintaining safe conditions in its own offices and warehouse activities. Employees must follow applicable safety rules, use equipment as intended and report hazards, accidents and near misses. Suppliers are expected to provide a safe and healthy working environment appropriate to their operations, including suitable protective measures, training, access to drinking water and sanitary facilities where relevant.

Land, water and community impacts in the upstream supply chain

Where supplier activities involve manufacturing, extraction or major industrial projects, the supplier should avoid unlawful eviction, unlawful deprivation of land, forests or water resources, and pollution that creates serious risks to health or access to safe water and sanitation. This requirement is particularly relevant where business activities may affect communities beyond the supplier's own workforce.

5. Data protection, confidentiality, intellectual property and systems

Confidential business information

Customer requirements, prices, supplier sources, contracts, drawings, technical files, forecasts, test information, business plans and other non-public information are to be protected against unauthorised use or disclosure. Access should be limited to people who need the information for legitimate work. Confidentiality obligations continue after employment or the end of a business relationship where required by law or contract.

Personal data

Personal data is collected and used only for a legitimate business or legal purpose and is handled in accordance with applicable data-protection law, including the GDPR where applicable. Data should be limited to what is needed, protected against unauthorised access and retained only as long as there is a legitimate or legal reason to keep it. Suppliers processing personal data for GlobX must follow the applicable contractual and legal requirements for that processing.

Intellectual property

Patents, trademarks, copyrights, designs, software licences, technical drawings, customer-owned information and other intellectual-property rights must be respected. Technology, product data and know-how may only be used or transferred when there is a lawful basis to do so. Supplier or customer documentation must not be copied, altered or distributed beyond what is permitted for the transaction.

Information security and company systems

Company accounts, devices, passwords and systems must be used responsibly. Employees and service providers must protect credentials, follow access controls and report suspicious emails, payment-change requests, unauthorised access or other security incidents promptly. A request to change bank details or payment routing should be independently verified using an appropriate contact method before funds are sent.

6. Environmental responsibility

GlobX is not a component manufacturer; our direct environmental footprint is concentrated mainly in offices, warehousing, packaging and transport. Environmental controls are therefore focused on areas where our activities can have a practical effect, while manufacturing-related environmental expectations are addressed through our supplier standards.

GlobX operations

We seek to reduce unnecessary packaging, printing, energy use and avoidable transport. Packaging materials should be reused or recycled where this can be done without compromising product protection. Electronic waste, damaged components, batteries and other regulated waste must be handled through appropriate disposal or recycling routes. Transport planning should consider consolidation and practical alternatives when they do not conflict with urgent customer requirements or product safety.

Supplier environmental practices

Suppliers are expected to comply with environmental laws that apply to their operations and to manage significant environmental impacts in a controlled manner. For manufacturing or processing activities, this can include emissions to air and water, hazardous substances, waste, energy and resource use. Where chemicals or hazardous materials are used, they should be identified, stored, transported, recycled and disposed of in a manner that protects workers and the environment.

Where relevant, suppliers should observe applicable international requirements concerning hazardous waste, mercury and persistent organic pollutants, as implemented in the jurisdictions in which they operate. Requests for environmental declarations or evidence should be answered accurately; unsupported environmental claims are not acceptable.

7. Suppliers and business partners

GlobX relies on a varied international supplier base. A single approval method is not appropriate for every source or transaction, so supplier oversight is risk-based. Commercial availability is important, but it does not override concerns about legitimacy, product authenticity, sanctions, documentation or serious ethical misconduct.

Supplier selection and ongoing review

Depending on the relationship and risk, GlobX may consider company identity, trading history, product source, quality information, documentation, payment details, geographic risk, customer requirements and previous performance. Additional information may be requested when the material is high risk, the source is new or a customer has specific compliance requirements.

Suppliers are expected to provide complete and truthful information. A change in company name, ownership, bank account, ship-from location or other material transaction detail should be communicated when it affects the order or due-diligence information previously provided.

Supply-chain due diligence

Where the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG), customer due-diligence requirements or comparable rules are applicable to GlobX, a customer or a transaction, suppliers are expected to cooperate with reasonable requests for information and proportionate preventive or remedial measures. This may include information needed to understand country, labour, environmental or sourcing risks.

Suppliers are expected to address significant risks appropriately within their own supply chain. This Code does not automatically require every supplier to impose identical contractual wording on every sub-supplier regardless of risk. The appropriate approach depends on the supplier's influence, the nature of the risk and the legal framework involved.

Self-assessments, documents and audits

GlobX may use supplier questionnaires, document checks and other risk-based reviews to confirm relevant requirements. Where an audit is justified and contractually agreed, its scope should be proportionate to the identified risk and conducted with reasonable notice, respect for confidentiality, data-protection requirements and operational safety. Nothing in this Code creates an unrestricted right of access to a supplier's premises or confidential information.

Serious breaches and corrective action

If a breach is identified, GlobX may request additional facts and a corrective-action plan with an appropriate timeframe. Where a problem can be remedied, the objective is to correct it and reduce the likelihood of recurrence. Depending on severity, orders or the business relationship may be temporarily suspended while the issue is addressed.

Deliberate counterfeiting or falsification, bribery, sanctions evasion, forced labour, serious theft or other intentional and severe misconduct may justify immediate suspension or termination where legally and contractually appropriate. For other breaches, termination is considered in light of severity, recurrence, the feasibility of remediation and applicable contractual rights.

8. Raising concerns and complaints

Employees, suppliers, customers and other business partners may raise concerns through their normal GlobX contact, a manager or company management. A concern should describe the known facts as clearly as possible; the person reporting it is not required to prove a violation before raising the issue.

Reports are handled as confidentially as reasonably possible, taking account of the need to investigate and any legal obligations. Retaliation against a person who raises a concern in good faith or assists with a review is not accepted. Knowingly false allegations made to harm another person are also inconsistent with this Code.

Where a complaint relates to a supplier's own workforce or affected communities, suppliers should maintain or provide access to an appropriate grievance mechanism consistent with applicable law and the nature of their operations. Workers should be able to raise concerns without unlawful disadvantage.

9. Implementation, training and review

Management is responsible for approving this Code and for ensuring that it is communicated within GlobX. Training or practical guidance is provided where a role creates particular exposure, for example in sourcing, sales, payments, shipping, export-controlled transactions, quality documentation or personal-data handling.

The Code is reviewed when there are significant changes to the business, applicable legal requirements, customer expectations or the main risks identified in GlobX operations and supply chains. Updates are approved by management and communicated as appropriate.

Failure by an employee to follow this Code may result in corrective or disciplinary action in accordance with applicable employment law. Failure by a supplier or business partner may lead to additional controls, corrective-action requirements, suspension or termination depending on the circumstances and contractual rights.

PRACTICAL REQUIREMENT When the source, product identity, document, payment route, end user or legal basis of a transaction is unclear, the issue must be resolved before the transaction is represented as compliant or the goods are released.

Approval

Approved by

Management of GlobX GmbH

Version / effective date

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