



**New
Media AV**

A MIDWICH GROUP Company

Code of Conduct

New Media AV | Bauer und Trummer GmbH

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Preamble

We are committed to ecologically and socially responsible corporate management, particularly to respecting human rights. We expect our suppliers to adhere to these principles as well. We also expect our employees to adhere to the principles of ecological, social, and ethical behavior and to integrate them into the company culture. Furthermore, we strive to continually optimize our business practices in the spirit of sustainability and encourage our suppliers to contribute to this holistic approach.

The code of conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) as well as international conventions such as the Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's international labor standards, and the United Nations Global Compact.

1 Requirements for our suppliers

1.1 Social responsibility

1.1.1 Prohibition of forced labor

There shall be no use of forced labor, slavery, or any similar forms of labor. All work must be voluntary and carried out without the threat of punishment. Employees must be able to terminate their work or employment relationship at any time in accordance with the applicable labor laws. Furthermore, there shall be no unacceptable treatment of workers, such as psychological abuse, sexual harassment, or humiliation. The engagement or use of security forces shall be prohibited if their deployment results in inhumane or degrading treatment, or if it impairs the freedom of association.

1.1.2 Prohibition of child labor

Under no circumstances shall child labor be employed at any stage of production. Suppliers are urged to adhere to the recommendations from the ILO conventions on the minimum age for the employment of children. Accordingly, the age shall not be less than the age at which general compulsory education ends under the law of the employment location and, in any case, not less than 15 years. If children are found working, the supplier must document the measures to be taken to provide remedy and enable the children to attend school. Young workers under 18 years of age shall not be employed for work that is harmful to the health, safety, or morals of children. Specific protective measures must be observed.

1.1.4 Fair working hours

Working hours must comply with applicable laws or industry standards. Overtime is only permissible if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive workdays. The weekly working hours must not regularly exceed 48 hours.

1.1.4 Fair wage

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the customary minimum industry standards, whichever amount is higher. If the remuneration is insufficient to cover the cost of living and to build a minimum level of savings, the supplier is obliged to increase the remuneration accordingly. Employees are entitled to all legally mandated benefits. Deductions from wages as a disciplinary measure are not permissible. The supplier must ensure that employees receive clear, detailed, and regular written information about the composition of their remuneration.

1.1.5 Prohibition of discrimination

Any form of discrimination against employees is prohibited unless it is justified by the requirements of the job. This particularly applies to discrimination based on gender, nationality, ethical, or social origin, skin color, disability, health status, political beliefs, worldview, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and personal rights of everyone are fully respected.

1.1.6 Freedom of association

The right of employees to establish organizations of their choice, to join them, to conduct collective bargaining, and to strike must be respected. In cases where the freedom of association and the right to collective bargaining are legally restricted, alternative options for independent and free association of employees for the purpose of collective bargaining should be provided. Employees must not be discriminated against based on the establishment, joining, or membership in such an organization. Employee representatives must be granted free access to their colleagues' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

1.1.7 Health protection; safety at work

The supplier is responsible for a safe and healthy working environment. By establishing and implementing appropriate occupational safety systems, necessary precautions against accidents and health hazards that may arise in connection with the work are taken. Excessive physical or mental fatigue is to be prevented through suitable measures. In addition, employees are regularly informed about and trained in applicable health and safety standards and measures. Employees are provided with free access to an adequate amount of drinking water and access to clean sanitary facilities.

1.1.8 Preservation of natural resources

The supplier must not, in violation of legitimate rights, deprive land, forests, or waters whose use secures the livelihood of individuals. Harmful soil changes, water and air pollution, noise emissions, and excessive water consumption must be avoided if they harm people's health, significantly impair the natural foundations to produce food or prevent people's access to clean drinking water or sanitary facilities.

1.1.9 Complaints mechanism

Even where legal systems are effective and well-equipped, grievance mechanisms can offer advantages, such as rapid access and remedies, reduced costs, and transnational reach. The supplier is required to appropriately communicate to its

its employees the information received from New Media AV regarding accessibility, jurisdiction, and the implementation of a grievance procedure. The grievance procedure must be accessible to employees while maintaining the confidentiality of their identity and providing effective protection against reprisals. In the absence of such guidance, the supplier itself is responsible, at the operational level, for establishing an effective grievance mechanism for individuals and communities that may be affected by negative impacts.

1.1.10 Social media

In dealing with social networks and media, the supplier, when commenting on topics that affect New Media AV or its business partners, should clearly indicate that it is acting as a company. The supplier should also always consider the interests of New Media AV and its business partners. Accordingly, the principles of confidentiality and data protection should also be observed in this context.

1.1.11 Whistleblowing

The supplier is expressly encouraged to use our whistleblower form in case of suspicion, misconduct, or even a specific violation of obligations from this code of conduct or a violation of applicable law. The whistleblower form can be accessed via New Media AV's website. For any questions about the form or if you prefer to inform us of your concerns by phone, you can reach our internal reporting office at the following telephone number: +49 40 572014 699.

1.2 Ecological responsibility

1.2.1 Treatment and discharge of industrial wastewater

Wastewater from operational processes, manufacturing operations, and sanitary facilities must be characterized, monitored, checked, and, if necessary, treated before being discharged or disposed of. In addition, measures should be introduced to reduce the generation of wastewater.

1.2.2 Dealing with air emissions

General emissions from operating processes (air and noise emissions) as well as greenhouse gas emissions must be characterized, routinely monitored, checked, and, if necessary, treated before their release. The supplier also has the responsibility to monitor its exhaust gas purification systems and is encouraged to find cost-effective solutions to minimize any emissions.

1.2.3 Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of any type of waste, including water and energy, must be reduced, or avoided. This can be achieved either directly at the source or through procedures and measures such as changing production and maintenance processes or company procedures, using alternative materials, making savings, recycling, or reusing materials.

1.2.4 Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economic solutions should be found to improve energy efficiency and minimize energy consumption.

1.2.5 Dealing with conflict minerals

For conflict minerals such as tin, tungsten, tantalum, and gold, as well as other resources such as cobalt, New Media AV will establish processes in the future in accordance with the guidelines of the Organization for Economic Cooperation and Development (OECD) to fulfil due diligence for promoting responsible supply chains for minerals from conflict and high-risk areas and expects this from its suppliers. Smelters and refineries without adequate, audited due diligence processes should be avoided.

1.3 Ethical business conduct

1.3.1 Fair competition

The standards of fair business practices, fair advertising, and fair competition must be adhered to. In addition, the applicable national and European cartel provisions and antitrust laws must be applied, which, in dealings with competitors, particularly prohibit agreements and other activities that influence prices or conditions. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to autonomously determine their resale prices and other conditions.

1.3.2 Prohibition of insider trading & handling of insider information

Confidential and market-sensitive information about Midwich Group PLC or any company belonging to the group may only be disclosed if authorized to do so. Those in possession of such information must not, in accordance with national or European regulations for handling insider information, either engage in transactions in securities or other financial instruments whose price could be influenced by the aforementioned information or recommend them to others.

1.3.3 Confidentiality/data protection

The supplier is committed to meeting the reasonable expectations of its contracting entity, suppliers, customers, consumers, and employees regarding the protection of private information. The supplier must comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting, and disclosing personal information.

1.3.4 Integrity/bribery, taking advantage

The highest standards of integrity must be applied in all business activities. The supplier must pursue a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion, and embezzlement. Procedures for monitoring and enforcing standards should be implemented to ensure compliance with anti-corruption laws.

1.3.5 Intellectual property

Intellectual property rights must be respected; technology and know-how transfer must be carried out in a manner that protects intellectual property rights and customer information.

2 Implementation of the requirements

We expect our partners to identify risks within their supply chains and take appropriate measures. In the event of suspected violations and to secure supply chains with heightened risks, the partner will promptly and if necessary, regularly inform New Media AV about the identified violations and risks as well as the measures taken via email at **ccc@nmav.de**.

New Media AV reserves the right to verify compliance with the standards and requirements outlined in this document with questionnaires and risk-based audits at the partner's production sites and/or branches.