

Code of behaviour on occupational safety, environmental protection, data privacy and information security for external companies and their employees

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1. General

The regulations and guidelines listed in this bulletin are an integral part of our orders and become legally binding with your order acceptance.

As a contractor you are especially obliged to support all measures that serve health and safety at work and environmental protection in order to avoid damage to persons or property, the risk of fire or any other potential dangers.

You are required to comply with the legal requirements, internal guidelines and instructions given by the contracting body and to assure adherence by deployed personnel. Offenders can be ordered off the workplace or site immediately by the contracting body.

Your employees must be able to speak and understand the german language.

Please contact our person in charge (coordinator) before starting work. The coordinator is authorizing officer concerning occupational health and safety and environmental protection. However this does not liberate you from your responsibility for your deployed personnel. The coordinator is appointed by the purchase order.

2. Housekeeping

Employees of external companies are obliged to see that both their workplaces and the staff rooms (break rooms, dining rooms, toilets etc.) are kept clean and tidy. The workplace or construction site must always be kept clean and left neat and tidy on completion of the work.

Prior authorisation of the contracting body is required for the storage of building materials, other materials etc. and for the erection of makeshift constructions, construction vehicles or containers.

Any damage to or breakdown of our equipment must be reported to the contracting body immediately.

3. Plant security

Visitor Badges

On entering the plant premises, you will receive a visitor's badge and a visitor's registration note by the plant security. The badge must be worn visibly for the duration of the visit to the plant and must be returned at the main gate together with the visitor's registration note signed by your host on leaving the plant premises.

External companies are not permitted to take sub-suppliers with them as visitors into the plant premises. In exceptional cases permission must be obtained from the contracting body. Neither are external companies authorised to sign visitor registration notes.

Business Partner Badge

Should your stay on site be required for longer than 4 weeks, you will receive a personalized permanent badge with a photograph. Its validity is limited in accordance with the whole length of the visit. The badge entitles you to enter the premises of the OSRAM Opto Semiconductors GmbH plant in Regensburg. On entering the plant premises and access restricted areas the personal badge must be held against the badge reader without touching it. While on the plant premises the badge must be worn openly and clearly visible.

The visitor badge or business partner badge must be kept personally and may not be passed to third party, even not for a short period of time.

If you should lose your visitor or business partner badge, contact the contracting body without delay.

Persons and property, in particular vehicles, are subject to our customary controls on entry and on leaving.

Entry of our factory plant outside of normal working hours as well as on Sundays and public holidays, whether on foot or in a vehicle, is allowed if written permission has been given and in which the workplace or construction site is stated.

Company policy concerning the entry of vehicles, tools, equipment, materials or suchlike must be observed. It is strictly prohibited to bring in or use any audio or image recording equipment. Special permission may only be granted by our plant security or company management.

The Highway Code is valid on the factory premises and in the parking areas. The speed limit applicable for the factory premises must be observed without fail at all times. It is only permitted to drive into the factory premises for loading and unloading purposes. It is prohibited to park in front of hydrants, driveways, gateways or any similar narrow roadways. Unloaded vehicles must be parked in the prescribed parking areas outside of the factory premises. It is imperative that instructions given by the plant security staff are observed.

It is prohibited to deposit or store articles of any kind in the emergency access roads for the fire brigade or ambulances or to block the area to be kept clear for these. Other roads are to be kept

clear as far as possible. Articles deposited or stored in the immediate vicinity of roads must be safeguarded against accident.

All safety plates, safety and information signs in the plant such as prohibition and mandatory signs, warning signs, emergency and first aid signs must be observed and may not be removed. It is prohibited to enter any parts of the plant other than those that fall within the scope of the contracted work.

Additional instructions exceeding provisions recorded in this leaflet have to be observed (e.g. content of visitor's registration note).

4. Occupational safety and fire protection

The OSRAM Opto Semiconductors person in charge (coordinator, see 1.) is contact person for all issues concerning occupational health and safety. In case of doubt the contractor turns to him/her.

The contractor's responsible person on site is responsible for carrying out risk assessments and defining protective measures. He/she is responsible for implementation of protective measures to the full extent and ensures that the work task is unambiguous. Endangering of third parties has necessarily to be considered.

Work may only be started after a work permit has been issued by OSRAM Opto Semiconductors. If required the "[approval certificate for hazardous work](#)" has to be filled out by both contractor and contracting body. Every unforeseen occurrence or obstacle during work has to be reported immediately to our coordinator.

The contractor's risk assessment has to consider use of hazardous materials. The contractor is responsible for safe usage right down to their disposal (remaining quantities/empty containers).

Prior authorisation from the OSRAM Opto Semiconductors person in charge is required before plant safety devices may be deactivated. The resulting danger spots must be safeguarded with appropriate protective measures.

Appropriate fire protection measures must be taken in the case of work involving the risk of fire (e.g. welding, cutting, soldering, grinding, moulding, cutting-off, melting, heating and tarring). A written order release (order release certificate for fire protection) must be obtained before the work is started, whereby attention should also be paid to other proximate areas requiring notification.

The contracting body must be compensated by the contractor for all costs or diseconomies incurred as a result of non-observance or deficient fulfilment of these protective measures on the part of the contractor. In each individual case, however, the contractor is obliged to make a lump sum payment of at least € 1,000.

Before earthworks are started, the site engineer or the contracting body must be consulted concerning the layout of underground supply and return pipes or any similar facilities to avoid these being damaged. Any unexpected obstacles encountered during the work must be

reported immediately. Trenches, shafts, floor openings etc. must be secured in such a way that nobody can be injured. This applies in particular before leaving the work site. The danger spot must be covered, barriers must be erected or it must be safeguarded in any other reliable fashion.

Ladders, scaffolds and temporary work platforms etc. must be in perfect condition and be used in compliance with the regulations. In cases where there is a risk of falling, safety provisions must be made, e.g. working with safety belts and lifelines.

The applicable safety and clean room regulations specific to clean rooms must be observed when working in a clean room.

Young persons, trainees and other persons requiring special protection must be kept under observation while working on our plant premises and must not be allowed to perform any dangerous work nor to work in danger spots.

To ensure individual and general safety, the consumption of alcoholic drinks is prohibited anywhere on our site, nor is it allowed to enter our production plant while under the influence of alcohol, medication or narcotics.

The whole plant premises is a no smoking area. Exceptions to this prohibition are the break rooms that are clearly marked as smoking areas and the areas in the open air in Burgweinting also marked as smoking areas.

5. Environmental protection and energy management

OSRAM Opto Semiconductors is certified in accordance with the international standard ISO 14001 for environmental protection as well as ISO 50001 for energy management. "We are committed to achieve high standards of environmental quality and to provide a safe and healthful workplace for our employees, contractors and communities.

We are also committed to practicing responsible environmental management and to use resources and energy efficiently ..." (see OSRAM Policy for Environmental Protection, Health Management and Safety: <https://www.osram-group.com/en/sustainability/downloads>).

The contractor must guarantee that all employees are aware of the environmental aspects of their activities and that all mandatory environmental regulations are observed during the performance of the contractual work.

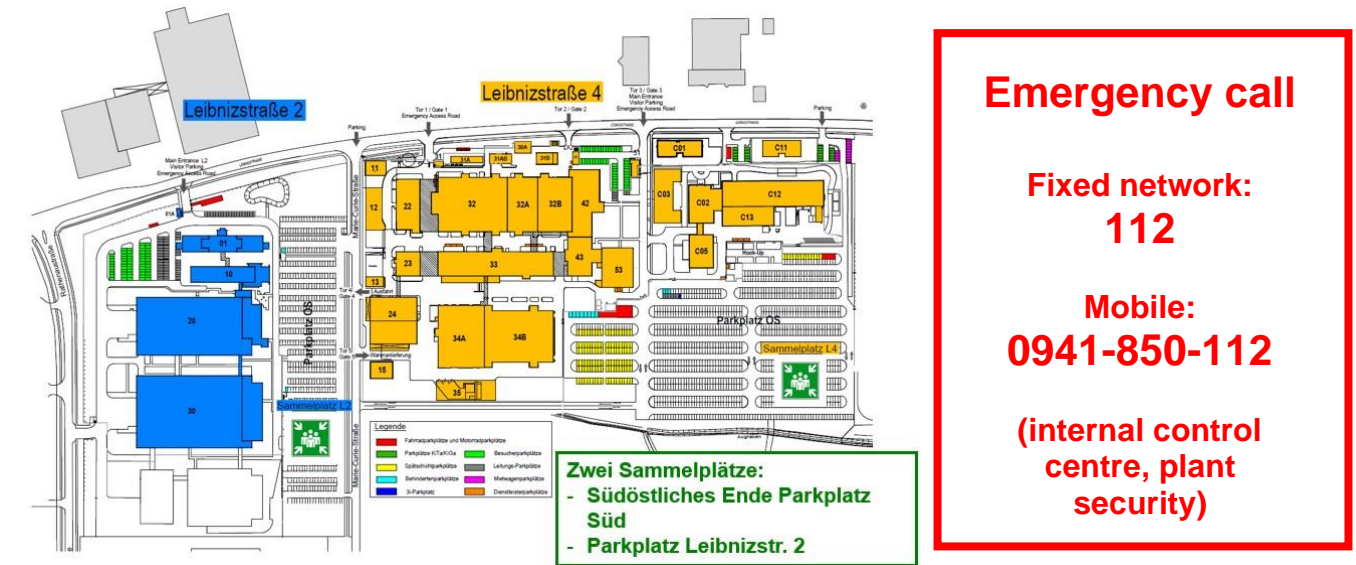
This implies for example:

- storing of hazardous substances only at appropriate and labelled places
- approved disposal of waste
- no dumping of any substance into drains or our waste water treatment plant
- adherence to all regulations applying to transportation of dangerous goods
- energy-saving behaviour, use of energy efficient tools, etc.

Prior to performance of the contractual work the concrete environmental requirements have to be harmonized with the OSRAM Opto Semiconductors person in charge.

6. Alarm regulations

Gathering places if evacuation of buildings or plant (triggered by acoustic signal) is necessary:



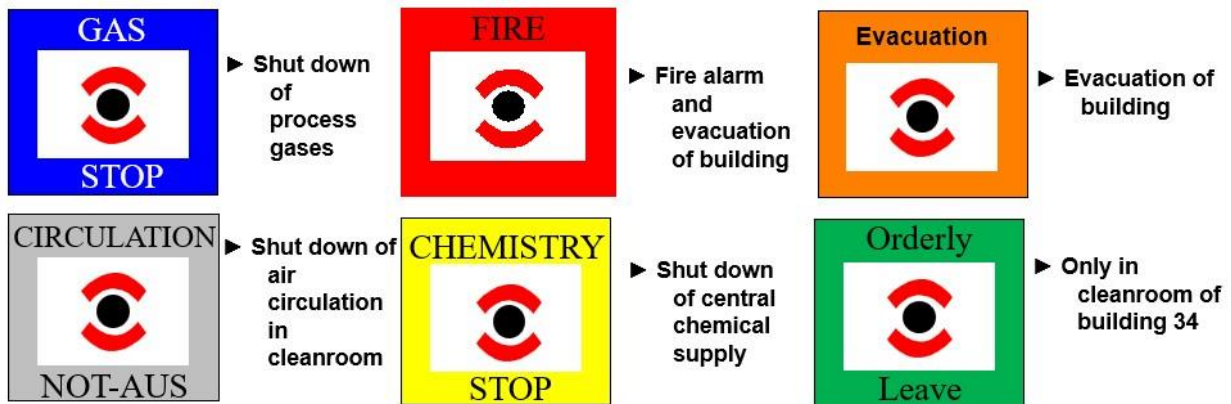
Alerting:

Permanent supervision of all functions and states which are safety related by safety systems like fire alarm systems and gas- and leakage detection systems.

Errors or alerts will be transmitted to the internal control centre.

If applicable, automatic shut down will occur and acoustic and visual signals will be activated.

Additionally, triggering of alerts and/or safety functions can be done manually by buttons:



Evacuation alert (no acoustic signal in Leibnizstrasse 2):

Acoustic signal (repeated decrease of frequency within 1s). Basements of buildings 32 and 34 have additionally a blue lamp for visual alerting.

You have to obey the alert immediately.

- Stop working.
- Leave rooms and buildings on marked means of escape.
- Make sure that your colleagues also leave (check toilets and meeting rooms which are on the way)
- If you are working in cleanroom areas: Use the emergency exits!
- Don't use the elevator.
- Go to the gathering place.
- Return to your working place is not possible before site manager gives the allowance.

Only in cleanroom building 34: Orderly leave (activated by buttons in cleanroom):

- Voice message via loudspeakers
- Leave building via standard exits

7. Data Privacy

Based on OSRAM “Binding Corporate Rules” and local Data Protection legislation, you are obligated to comply with the data protection requirements of the European General Data Protection Regulation (GDPR). The principles for the processing of personal data are laid down in Article 5 of the GDPR and mainly contain the following obligations.

Personal data shall be

- a. processed lawfully, fairly and in a transparent manner in relation to the data subject
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

Violations of this obligation may be subject to fines and/or be punishable by imprisonment. At the same time, a violation can be a breach of the terms of your employment contract or specific confidentiality obligations. Culpable violations may also result in civil liability.

You confirm that, in relation with your assignment at OSRAM Opto Semiconductors, you have a written commitment from your employees

- to ensure the security of information and information-processing systems, to which they have access at OSRAM Opto Semiconductors, and to strictly follow the valid guidelines for information security at OSRAM, particularly the rules regarding Business Partners (see section 8),
- to access only such confidential information and / or personal data as is strictly necessary to perform the contractually agreed services and to refrain from accessing any other information even if such access was technically possible,
- to keep confidential any information, transmitted by OSRAM Opto Semiconductors or become known during the business with OSRAM Opto Semiconductors, whether labeled as confidential or not,
- to perform any processing of personal data as laid down in Article 5 of the European General Data Processing Regulation (as required by OSRAM Binding Corporate Rules on Data Protection).

These obligations shall continue after the termination of services at OSRAM Opto Semiconductors. Newly hired employees shall be bound by the same commitments as set forth above. You shall impose the same obligations on subcontractors deployed by you.

8. Business secret, postal secrecy, data protection and information security

All staff must maintain confidentiality of the company's internal affairs. This obligation shall continue at least for two years after termination of the contractual relationship. For business associates and employment agency workers this equally applies in relation to their employer.

Taking along or the removing of company objects or business documents of any kind is not permitted without the consent of the responsible OSRAM internal supervisor.

Creating extracts, copies, drawings or preprints also requires the consent of the supervisor.

Sealed mail or mail marked as "personal" or "confidential"/"strictly confidential" must not be opened by anyone other than the addressee.

All staff members with access to the company's IT and network infrastructure are required to make themselves familiar with the valid guidelines on information security and to comply with them.

External computers and other hardware are not to be connected to the OSRAM network. Any exceptional solutions are only allowed after consultation and with approval by the IT department.

At end of work and when leaving the workplace for longer periods, all documents, files, notebooks and mobile work devices have to be locked in secure places. The computer has to be locked, a password has to be used.

9. Code of Conduct for OSRAM Supplier, Security in the Supply Chain

1. The Supplier is obliged to comply with the laws of the applicable legal system(s). In particular, the Supplier will not engage, actively or passively, nor directly or indirectly in any form of bribery, in any violation of basic human rights of employees or any child labor. Moreover, the Supplier will take responsibility for the health and safety of its employees, the Supplier will act in accordance with the applicable environmental laws and will use best efforts to promote this Code of Conduct among its suppliers.

2. The Supplier shall provide the necessary organizational instruction and take measures, particularly with regard to the following security: premises security, packaging and transport, business partner, personnel and information – in order to guarantee the security in the supply chain according to the requirements of respective internationally recognized initiatives based on the WCO SAFE Framework of Standards (e.g. AEO, C-TPAT).

The Supplier shall protect the goods and services provided to the Customer or provided to third parties designated by the Customer against unauthorized access and manipulation. The Supplier shall only deploy reliable personnel for those goods and services and shall obligate any sub-suppliers to take equivalent security measures.

3. In addition to other rights and remedies the Customer may have, the Customer may terminate the contract and/or any purchase order issued thereunder in case of breach of these obligations by the Supplier. However, provided that Supplier's breach of contract is capable of remedy, Customer's right to terminate is subject to the proviso that such breach has not been remedied by the Supplier within a reasonable grace period set by Customer.