

Independent.
Innovative and creative.
Trusting partnerships.

The PHOENIX CONTACT Group Code of Conduct





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1 Why do we need a Code of Conduct?

Dear colleagues,

We are a globally active, internationally leading, and independently operating family-run business with deep roots and an excellent corporate culture that drives us every day. We employ staff and drive our business forward with innovation, independence, and strong partnerships across more than 100 sites throughout the entire world. We operate 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 has been at the core of our participation in the ZVEI Code of Conduct for a long time, and which continues to apply without limitations. We would now like to build upon this basis and place it on an even broader foundation with the supplementary Phoenix Contact Code of Contact. It defines the legislative and moral

guidelines for our actions and also helps us to apply our values within our everyday operations.

We are doing this because it is not just the results of our work that we hold dear, but also the ways we go about achieving them.

Through appropriate conduct, we have developed an exceptional image, which we consider to be a prerequisite for our corporate success. This is both to the credit of and also the responsibility of each and every one of us. 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 Executive Board



Roland Bent



Gunther Olesch



Frank Stührenberg



Axel Wachholz



2 What you should know in advance

2.1 The Code of Conduct: What is it?

The Phoenix Contact Code of Conduct is binding for all of us. It provides the central guidelines for our everyday operations within the company and our external transparency, and answers the question of how we are to conduct ourselves in everyday business. Along with legislative considerations, it also includes our expectations on integrity and morality.

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

Furthermore, the Code of Conduct is both the core and the superstructure of our corporate-wide Compliance Management System. Important topics will be addressed here in the core and will be elaborated upon in the detailed regulations.



For reasons of readability, sometimes only the masculine form is used in this document. If gender is used, it should be interpreted as including all genders. In this document, gender is used for editorial purposes only and is without prejudice.

2.2 What is the relationship between the Code of Conduct and our Corporate Principles?

Our mission, our vision, and the cornerstones of our corporate culture have been enshrined in the Corporate Principles for a long time. They continue to apply without limitation, and are also reflected in our Code of Conduct.

Corporate Principles

Mission

**We create progress
with innovative and inspiring solutions.**

Vision

**Phoenix Contact
is a corporation achieving
a globally important and
technologically leading position
in each of its business fields.**

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 the future; thus we pro-actively develop our company.

Trusting Partnership

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

Our relations to customers and business partners are oriented towards a common, sustained benefit.

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 position or other personal attributes. It applies during working hours. Beyond working hours, we should uphold the same standards whenever we are acting as employees or representatives of Phoenix Contact.

Various points of contact are available for any questions or concerns regarding the Code of Conduct. This is also the case if you are of the opinion that the Code of Conduct is being breached. The points of contact are listed at the end of this document.





3 Upon which principles are our actions based?



In addition to the principles laid out in our Code of Conduct, we have also subscribed to the ZVEI Code of Conduct and, since 2005, the Global Compact Principles of the United Nations.

We have openly published the respective declarations on our website:

phoenixcontact.com/codeofconduct

3.1 Fair working conditions and social responsibility

Our corporate decision making does not end at the factory gates. We are aware of our social responsibility and take the interests of our shareholders, our employees, and the wider community into consideration when making decisions.



- As a company, we are committed to respecting human rights. This includes in particular the core labor standards of the International Labour Organization (ILO), as well as the United Nations Conventions on the Rights of the Child and on Human Rights. Among other issues, we advocate for the abolishment of forced and child labor.
- We comply with the relevant European and local regulations and social standards with regard to working hours, employee rights, vacation time, minimum wage, occupational health and safety regulations, etc., and co-determination and participation rights.
- In addition to ensuring that our company respects the fundamental rights of employees, we also work toward compliance with the appropriate standards throughout our supply chain.
- We assume our social responsibility in particular by enabling solid growth and therefore creating secure jobs. In addition, we place great importance on training and continuing education to qualify skilled workers.



3.2 Respect and integrity in everyday business

A respectful, fair, and honest approach is the basis of our everyday interactions.

- Our interactions are characterized by a fair, respectful, and considerate approach, equal rights, and equal opportunities.
- We respect the dignity of every single individual. We are strongly opposed to inappropriate behavior towards others, for example bullying or disrespect.
- We will not tolerate any discrimination based on race, ethnic origin, gender, religion or beliefs, disability, age, sexual identity, or any other reason.

3.3 Occupational safety and the protection of health

Together, we ensure a safe and healthy working environment.

- As a company, we maintain and promote health and occupational 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 regulations and safety provisions, such as those laid out in the Phoenix Contact GmbH & Co. KG Work 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 potential for improvement.





3.4 Environmental protection and ecology

We practice the economical and considerate use of resources out of conviction.



- As a 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 are given high priority in our considerations and activities.
- We use natural resources responsibly and operate proactive energy and environmental management programs.

3.5 Data protection

We protect all of those that trust us with their personal data.

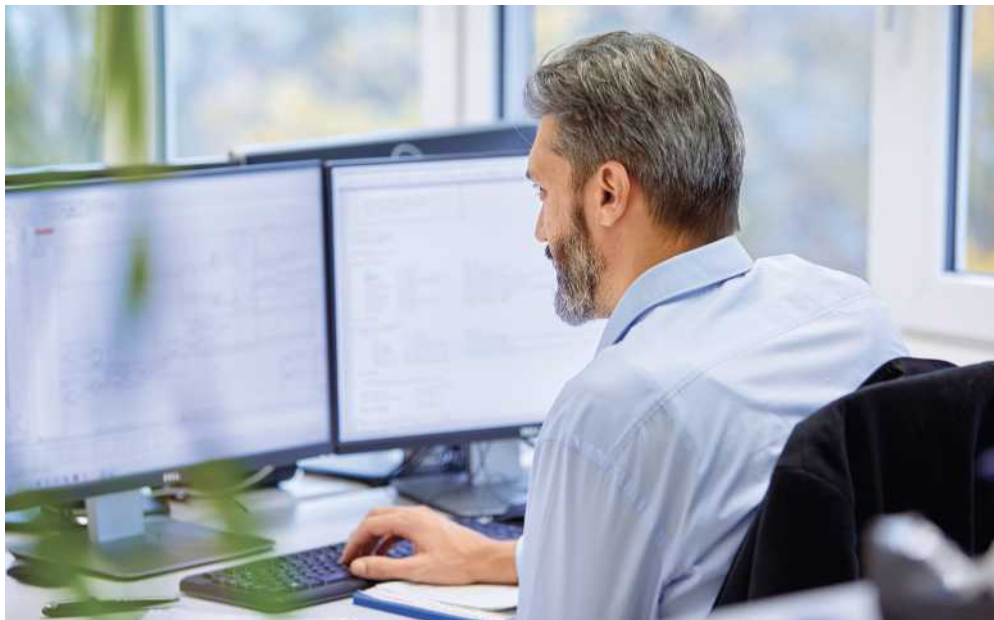


- Data protection is, among other issues, firmly established within the German constitutional rights and in the principles of European Union law, and serves to protect general privacy rights. Therefore, we consider protecting personal data to be of great importance.
- To ensure it is protected, we have 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 take the interests of all parties into account. While doing so, in the event of doubt, we give a higher priority to the informational autonomy of individuals.

3.6 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 governed 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. Even beyond these systems, we will always conduct ourselves with the required sensitivity.



Innovation
den Brückenschlag in die Zukunft
wir vorausschauend das Unternehmen

Partnerschaftlich vertrauensvoll

Unser Tun

von wechselseitig verpflichtendem Geist,
Freundlichkeit und Aufrichtigkeit getragen.

Unsere Beziehungen

zu Kunden und Geschäftspartnern sind
beiderseitig nachhaltigen Nutzen ausgerichtet.

Unsere Unternehmenskultur

Vertrauen und die Entwicklung der Mitarbeiter
Erreichen vereinbarter Ziele.



3.7 Integrity and fairness in business dealings

We respect and protect the integrity of free competition.

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





3.8 Working with conflicts of interest

We will attempt to avoid any conflicts of interest, or we will at minimum 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.
- If any conflicts of interest are unavoidable, we will make these transparent in advance and ensure that we deal with them appropriately.

3.9 Quality and product safety

Our guiding principle is the satisfaction of our customers and their enjoyment 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. In this respect, it is not just the quality that we focus on, but also innovation – which we consider to be a ground-breaking path to the future. We create solutions that do not just 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 highly important to us.
- Our aim is also to ensure a comprehensive and effective quality management system which stretches from our production processes and the business processes involved right through to aftersales services.



3.10 International trade

When trading internationally, we comply with national and international regulations.



- The regulations on export control, sanctions, and embargos are a significant factor within the framework of international trade.
- We ensure that our international business activities do not violate any of the relevant regulations.

3.11 Protection of information and expertise

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

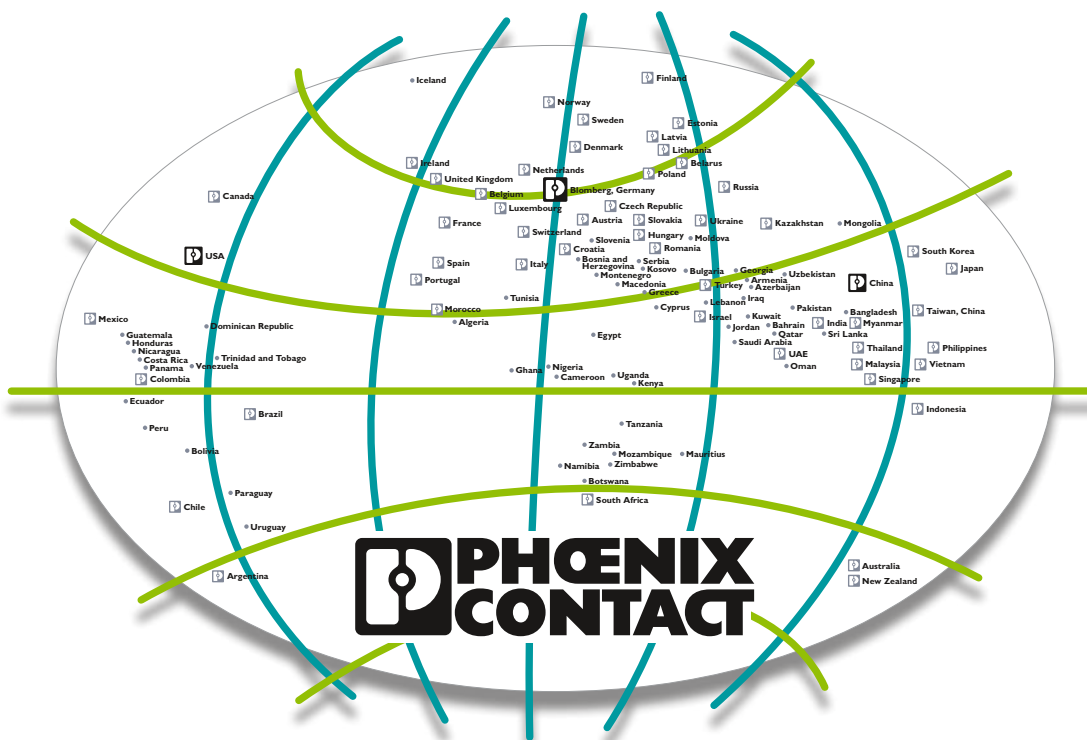


- Information, expertise, and intellectual property play a very important role in the success of corporate activities. We therefore place significant importance on the necessary diligence when dealing with the respective information and take appropriate protective measures.
- In particular, we adhere 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 the Phoenix Contact GmbH & Co. KG Work Regulations.
- We also respect the confidential information, expertise, and intellectual property of third parties. We will neither procure nor use these without appropriate prior permission.





4 Your contacts



Do you have any questions regarding the Phoenix Contact Group Code of Conduct? 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 point of contact 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. Naturally, this will not be possible in all cases because selecting the suitable contact depends closely on the type of the individual concern. Selecting the contact should, ultimately, be down to you.

4.1 Contacts at Phoenix Contact

Our management team and General Managers

You can approach your direct superior with your concern at any time. Furthermore, you can also voice your concern to our General Managers.

The Compliance Organization

If there is a person responsible for Compliance in your area, this Compliance Organization contact is available for you to voice your concern. Centrally, you can contact Corporate Compliance Management.



The HR department

Contacts for a large number of issues are available in the Human Resources Management department. Key points are available on the corresponding Intranet page.

The legal department

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

Corporate Facility Management

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

The whistleblower system

Furthermore, Phoenix Contact also provides a whistleblower system for cases where the confidentiality surrounding your concern is of great importance.

The Executive Board (left to right):
Frank Stührenberg
Axel Wachholz
Roland Bent
Gunther Olesch

4.2 Protection of whistleblowers

We consider whistleblowers to be people who wish to contribute to the observation of the central guidelines of our company by providing objective and appropriate information. We will therefore protect them and their concerns, particularly against prejudice and reprisals. We will respect any request for confidentiality.



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