



Code of Conduct

(Code of Conduct)

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1 Foreword

1.1 Purpose and scope

The following principles of conduct represent a collection of guidelines that fka GmbH is committed to upholding. Every employee of fka GmbH is obliged to act in accordance with the principles of conduct. The rules thus asserted show that we are aware of the social, ecological and economic effects of our actions and always align them with sustainability.

fka GmbH is aware of its responsibility as a member of society. In particular, the well-being of people and the environment spur our efforts towards sustainable development. As a partner to the automotive industry, we have been developing innovative solutions since 1981. Together with our customers and partners, we develop concepts for the sustainable mobility of tomorrow. We do justice to the different interests of our customers by acting with integrity, honesty and fairness.

2 Working conditions

2.1 Child labour and young workers

We reject any form of child labour. This applies within our company as well as to cooperation with business partners.

We respect the prohibition of employment of children below the legal minimum age. In addition, we ensure that young workers (under 18) do not work at night or overtime and are protected from working conditions that are/would be harmful to their health, safety and development.

2.2 Modern slavery

We are expressly committed to the abolition of all forms of modern slavery as well as forced and compulsory labour (e.g. compulsory overtime, withholding of identity papers). None of these forms of work are applied at fka GmbH. All employment relationships are based on voluntariness and can be terminated by employees subject to a fixed period of notice.

2.3 Prohibition of discrimination and equal opportunities

fka GmbH rejects any kind of discrimination such as on the basis of ethnic origin, skin colour, gender, religion, sexual orientation, social origin, age, physical or mental limitations.

Our employees are hired and promoted on the basis of their qualifications and skills. This principle of non-discrimination is also applied when working with customers and project partners.

If breaches of equal treatment are observed, or if you are even affected by them yourself, they must be reported immediately to the contact person named in Chapter 6.

2.4 Harassment

The working environment at fka GmbH is free from harassment. A social and respectful working environment, free from brutal and inhumane treatment is our highest priority.

If a form of harassment is observed or if you are even affected by it yourself, this should be reported immediately to the contact person mentioned in chapter 6.



2.5 Wages and benefits in kind

We comply with the legal requirements on basic / minimum wages or salaries. Remuneration is paid contractually, regularly, punctually and in full to employees in accordance with applicable laws. The remuneration and other benefits enable our workers and their families to have an adequate standard of living.

2.6 Working hours

Our working hours comply with national, legal requirements. The maximum permitted daily and weekly working hours, including overtime, are regulated by national laws and in accordance with the conventions of the International Labour Organisation.

2.7 Freedom of association

fka GmbH respects the fundamental right of all workers to assemble and associate peacefully at all levels. They are free to form or join a workers' representation.

3 Occupational health and safety

3.1 Memorandum of Understanding

The safety, health and welfare of employees should be considered first in all decisions made by fka GmbH. Striving to provide a safe and healthy working environment adds value to our business - it contributes to both quality and productivity, increases engagement and improves the well-being of our employees.

Our health and safety policy is based on the belief that accidents, incidents, injuries, near misses, work-related illnesses and unsafe acts and conditions can and should be prevented. At fka GmbH, we expect all employees to behave in a trusting and open manner. They are trained and informed about the risks to health and safety and the work procedures to avoid them.

Furthermore, workers should be involved in continuous improvements of the working environment.

3.2 Accident and incident management

3.2.1 Responsibility

We expect every employee to contribute to and maintain a safe and healthy working environment. Managers are responsible for implementing fka GmbH policies and other applicable requirements as well as work procedures. They are expected to share information and monitor the implementation and improvements of health and safety at work. Employees are responsible for understanding the principles of this policy and acting accordingly. It is also their responsibility to behave in a manner that ensures their own health and safety as well as that of others.

An externally appointed occupational safety specialist advises and supports fka GmbH together with a company doctor in the field of "occupational safety, health protection and humane work design".

3.2.2 Arrangements for health and safety

In order to create and maintain a safe and healthy working environment, opportunities for continuous, systematic improvement have been created and the following arrangements made:

- Workers are encouraged to identify actual and potentially unhealthy and unsafe conditions, take action as well as make suggestions and recommendations for improvements.

- The assessment of the risk potential in the work areas is regulated in one of the QM procedural instructions.
- General potential hazards are pointed out to the employees in an internal QM training.
- Persons responsible for areas of activity are obliged to draw the attention of newly hired or untrained employees to potential hazards in the specific areas.
- Hazard briefings must be repeated annually.
- An occupational health and safety committee has been formed to plan, coordinate and evaluate measures to improve occupational health and safety in the company, which meets at least once a quarter.
- All workers must ensure that all visitors or contractors for whom they are responsible are informed of the local safety rules and regulations applicable to their stay

3.3 Fire protection

fka GmbH complies with national fire protection laws. This includes, for example, the presence of suitable fire protection equipment (fire detectors, extinguishing equipment). We also provide emergency plans and first aid material. Signposting to emergency exits, escape routes and assembly points is also provided.

4 Compliance with laws

4.1 White-collar crime

fka GmbH observes the national and international regulations on economic activity and the corresponding sanction regulations.

4.2 Tax and customs regulations

A transparent tax policy serves the common good. fka GmbH observes the provisions of tax and customs law, in particular the laws and regulations in the area of wage tax, value added tax, corporate income tax. When importing goods, fka strictly adheres to the payment of customs duties and excise taxes.

fka GmbH rejects tax avoidance schemes and ensures that tax returns are submitted on time and correctly.

4.3 Money laundering prevention

fka GmbH complies with all EU money laundering prevention requirements and thus assists in the prevention of terrorist financing.

4.4 Competition law

Illegal collusion and correspondingly high pricing slow down healthy market development and prevent the spread of modern goods to consumers. fka GmbH actively promotes fair competition and observes the relevant provisions of competition/antitrust law.

4.5 Foreign trade

When exporting goods and services, the responsible employees inform themselves about the respective applicable foreign trade regulations and observe the export restrictions.

4.6 Intellectual property and copyright protection

The intellectual property of fka GmbH is an important entrepreneurial asset and provides the company with a corresponding market position. fka GmbH actively protects its own and third-party intellectual property, copyrights and patents.

5 Business ethics

5.1 Human rights

fka GmbH is expressly committed to upholding human rights within its sphere of influence. We undertake not to participate in any form - either directly or indirectly - in human rights violations.

5.2 Data protection

fka GmbH strictly adheres to the basic regulation on the protection of personal data (DSGVO) and the applicable national data protection laws. The collection, storage, processing and other use of personal data is only carried out, for example, with the consent of the person concerned, in accordance with contractual regulations or other legal foundations. fka GmbH is committed to appropriate data and IT security measures.

5.3 Corruption, extortion and bribery

The fka rejects abuse of power for personal gain in any form.

Employees are prohibited from offering bribes, improper payments or donations or accepting them (possibly conditioned by a threat).

5.4 Conflicts of interest

We respect the private lives of our employees and safeguard their personal interests. Nevertheless, conflicts between private and business interests shall be avoided. Decisions are only made during working hours on the basis of factual criteria. Personal interests or relationships do not play a role.

6 Environmental protection

fka GmbH sees environmental protection as an essential factor for sustainable value creation, both for our company and for society. The guiding principle of our actions is to counter environmental risks and opportunities as effectively as possible. As an environmentally conscious company, we regard all existing environmental laws and guidelines as minimum standards to be complied with and exceeded wherever possible.

Our catalogue of measures is regularly updated and adapted to our environmental goals. We see environmental protection not as a status quo, but as a process that is continuously reassessed and improved.

When purchasing, we pay particular attention to the country of manufacture, manufacturing conditions and energy efficiency. We take environmental aspects into account when selecting our suppliers, partners and subcontractors.

6.1 Waste prevention

In our services, we pay attention to the avoidance of waste, reuse, recycling and the safe, environmentally friendly disposal of residual waste and wastewater.

6.2 Natural Resources & Renewable Energy

fka GmbH pays attention to the economical use of natural resources such as energy, water and other raw materials in all its work. The use of renewable resources and the associated minimisation of environmental and health damage are important environmental goals for us.

6.3 Greenhouse gas emissions

We regularly inform our employees about environmentally friendly measures and support our employees in implementing them, for example by financially promoting CO₂-neutral mobility (e.g. JobRad). We want to firmly anchor environmental protection as a matter of course in the actions of every employee.



7 Help / Contact

Our first point of contact for questions or uncertainties about the Code of Conduct is the supervisor. In addition, the following general compliance advisory service is also available for further enquiries:

E-mail: compliance@fka.de

If employees discover a possible violation of the Code of Conduct or other serious breaches of the rules in their working environment, they can report this to the specified advice centre.

14.06.2022

Place/Date

Dr.-Ing. Jens Kotte
Managing Director