



# Code of Conduct

(Code of Conduct)

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## 1 Foreword

### 1.1 Purpose and scope of application

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 the age of 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 Non-discrimination, equal opportunities and ethical recruitment

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

Our employees are hired and promoted on the basis of their qualifications and skills. We do not deceive or cheat potential employees about the nature of the work. We do not charge them recruitment fees or steal their identity documents. At the beginning of the recruitment process, applicants receive a written employment contract that clearly and honestly sets out their rights and obligations. The 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 7.

### 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 top 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 7.



## 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 employees to peacefully assemble and organise at all levels. They are free to form or join an employee representative organisation.

## 2.8 Rights of minorities and indigenous peoples

We respect the rights of local populations, minorities, indigenous peoples and other vulnerable groups and endeavour to avoid negative impacts on them.

We do not hire or employ private or public security forces to protect projects if the use of security forces may lead to human rights violations.



### 3 Occupational health and safety

#### 3.1 Letter of intent

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

It is important to us to maintain and promote the health and safety of our employees. This includes regulated fire protection, monitoring electrical safety, maintaining machine safety through preventive maintenance and servicing as well as measures for the personal protection of employees. 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:

- Employees are encouraged to identify actual and potentially unhealthy and unsafe conditions, take action and make suggestions and recommendations for improvement.



- The assessment of 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 employees 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.
- Employees are provided with suitable personal protective equipment and an ergonomic workplace.

### 3.3 Fire protection

fka GmbH complies with the 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 and corporation 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, plagiarism 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. For this reason, the use of plagiarised or counterfeit materials is prohibited.



## **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.

### **5.5 Financial responsibility**

Financial responsibility and compliance with the legal requirements of proper accounting and disclosure regulations are a matter of course for us.

### **5.6 EU Whistleblower Directive**

fka GmbH has implemented the guideline (EU) 2019/1937 (EU Whistleblower Directive) and the requirements of the Whistleblower Protection Act (HinschG) and implemented a whistleblower system. With the publication of the fka Whistleblower Protection Guideline and the nomination of the responsible case managers, fka offers whistleblowers the (anonymised) opportunity to report grievances and violations within the company.



## 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, which should be exceeded wherever possible. In this way, we contribute to the preservation of natural resources, biodiversity and the protection of our climate for future generations.

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

We endeavour to reduce our energy consumption, greenhouse gas emissions and adverse effects on water quality to the absolute minimum, to promote good air quality and to avoid negative impacts on soil quality. In addition fka GmbH ensures that any noise caused does not exceed the legal requirements. 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.

Suppliers are required to communicate the contents of this Supplier Sustainability Policy to their own suppliers (definition and implementation of similar standards towards own tier-1 suppliers), require them to observe similar standards, and verify adherence throughout their own supply chain (binding requirements towards tier-1 suppliers to pass on standards along the supply chain).

### 6.1 Waste prevention and handling of chemical and/or biological substances

In our services, we pay attention to the avoidance of waste, reuse, recycling and the safe, environmentally friendly disposal of residual waste and wastewater. Substances that are hazardous to the environment and health, such as chemicals, must be avoided or their use has to be reduced.

### 6.2 Natural resources and 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 CO<sub>2</sub>-neutral mobility (e.g. JobRad). We want to firmly anchor environmental protection as a matter of course in the actions of every employee.

Our primary goal is to establish effective greenhouse gas management. To define our greenhouse gas reduction targets, we are currently analysing our emissions. We are using the Greenhouse Gas Protocol (Scope 1, 2, 3) as a guide. We have already successfully implemented a number of smaller targets that contribute to reducing greenhouse gases. Examples for this are the complete replacement of fluorescent tubes with LEDs and the smart control of lights and radiators. Another of our goals to reduce greenhouse gases is the installation of a photovoltaic system on our roof.

### 6.4 Land, forest and water rights and forced eviction

We avoid forced evictions and the seizure of land, forests and waters when acquiring, developing or otherwise utilising land, forests and waters.



## 7 Animal welfare

The responsible treatment of living creatures is an important part of our values. We expect our employees to comply with national and international legal standards on animal protection.



## 8 Help / Contact / Whistleblower protection (whistleblowing)

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](mailto: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.

21.05.2024

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Place/date

A handwritten signature in blue ink that reads 'J. Kotte'.

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Dr Jens Kotte

Managing Director