



FEINMETALL

Contact Technologies

FEINMETALL CODE OF CONDUCT FOR BUSINESS PARTNERS

FEINMETALL is a leading technical consultant, developer and manufacturer of contacting solutions for the automotive, electronics and semiconductor industries.

As an internationally active company, we are aware of our moral and ethical responsibility towards our employees, business partners and society.

It is very important to us that the values on morals, ethics and sustainability set out in legal and internationally recognized standards are observed and practiced throughout our entire supply chain.

The principles described in this Code represent our expectations and the minimum requirements that FEINMETALL's business partners must comply with and implement.

We expect our business partners to pass these requirements on to their employees and direct suppliers. It is therefore important that our rules are known and observed.

Herrenberg, Oktober 2023.

Patrik Dinsler, CEO

Thorsten Kern, CEO



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1. Business Ethics & Compliance

1.1 Integrity in dealing with our partners

We expect our business partners to place great value on integrity and ethically correct behaviour when dealing with customers, suppliers and authorities. All applicable national, European and international laws against bribery, corruption, extortion, embezzlement, money laundering and other unfair business practices must be respected. We will not accept violations of these principles without exception.

1.2 Avoiding conflicts of interest and anti-corruption policy

Conflicts of interest with other business partners must always be avoided. No employee of the involved business partners may accept or offer an inappropriate level of private benefit as part of their business activities in order to influence their position.

1.3 Information security, intellectual property

When passing on information, care must be placed to ensure the accuracy and security of the information. As a matter of principle, information is only passed on if this is done on the basis of a legal or official order or if this is necessary for the provision of services. In principle, the recipient of the information is also obliged to take appropriate security measures to protect it from loss or unauthorized access. The business partners give great importance to the protection and respect of intellectual property and only grant access if this is necessary for the provision of services. Systems and mechanisms must be in place to regulate the granting of access within the organization.

1.4 Financial activities and transparency

The financial accounting of our business partners is always carried out in accordance with the principles of proper accounting. Business partners are carefully checked and selected. No activities that could be associated with money laundering are supported.

Documents on financial activities are secured and stored in a structured manner. When passing on information on financial activities, all parties involved are obliged to be truthful. Information to business partners and authorities is prepared and transmitted in accordance with the principles of transparency.

**1.5 Data protection**

The principles of data protection in accordance with the applicable national regulations must be observed. Personal data will only be used for authorized purposes and only within the scope of personal consent. Unauthorized access must be avoided.

1.6 Competition and antitrust law

Business competition between rival companies is an important driver of the economy. The business partners are required to be fair and respectful and therefore observe all national, European and international laws and rules against unfair competition, cartelization and all types of corruption. In particular, the following principles must be respected:

- Business partners are not selected or excluded without a proper and comprehensible reason
- No market sharing or improper market shortages prohibited by antitrust law take place
- Agreements with competitors on prices, conditions or other information relevant to competition law are not permitted.
- No fictitious bids are submitted in tenders.

1.7 Product counterfeiting

Our business partners ensure that no counterfeit products can enter the supply chain. Raw materials and semi-finished products are therefore only to be purchased directly from manufacturers or via distribution partners approved by the manufacturer.

1.8 Quality and product safety

A consistently high standard of quality is essential for the success of the industry. The business partners therefore organize and certify their sites in accordance with at least the ISO 9001 standard. All products must meet the contractually agreed quality and safety requirements upon delivery and be safe to use for their intended purpose.

1.9 Publicity and social media

The business partners respect the principles of freedom of opinion and information as well as free media. When employees appear in public, they use only legal means. This also applies to the use of social media.



2. Human rights

2.1 Social responsibility

Healthy, satisfied and motivated employees are the business partners' most important asset. They are therefore committed to treating each individual employee responsibly. They ensure that no violations of human rights are committed or knowingly tolerated. This applies to all forms of employment, i.e. full-time, temporary and contract workers alike.

2.2 Working conditions

Our business partners respect and promote all locally applicable laws that protect the basic social rights of all employees as well as the internationally recognized principles of human rights, in particular the UN Global Compact. When applying disciplinary measures, they fundamentally respect human dignity and do not apply them arbitrarily and only within the legal framework. If private or public security forces are deployed for operational security, it must be ensured that they also respect internationally recognized human rights.

2.3 Equal opportunities, diversity, avoidance of discrimination

Our business partners value equal treatment and equal opportunities, regardless of ethnic, national or social origin, skin colour, gender, state of health, ideology, religion, sexual orientation, age or membership in an employee organization. Employees are selected, hired and promoted based on their professional qualifications and individual skills. Discriminatory, violent or harassing behaviour by employees towards other employees or business partners will not be tolerated. All national laws against discrimination, bullying, violence, coercion and sexual harassment are observed.

2.4 Individual- and collective labour law

Our business partners observe the nationally applicable laws and standards regarding pay, working hours and social benefits. They also respect national laws regarding freedom of association and collective bargaining. You have the right to organize employees into unions in your company and the establishment, joining and membership of such unions must not lead to discrimination or retaliation. Our business partners recognize the right to strike. Working hours and overtime generally take place within the legally permissible limits.

**2.5 Child labour and underage employees**

Underage employees enjoy special protection and may only be employed within the legally stipulated framework. Our business partners guarantee youth labour protection and do not tolerate any form of child labour in accordance with national laws and ILO conventions. Underage employees may not be deployed for dangerous work, night work, overtime or other types of physically or psychologically stressful work.

2.6 Pay for performance / remuneration

Our business partners offer all employees competitive, performance-related and appropriate remuneration. This also includes fair and legally compliant compensation for overtime worked and the provision of legally prescribed social benefits. Wages must at least comply with national minimum wage regulations and ensure a living wage. Wages are paid on time and in full. All employees are entitled to a transparent pay slip.

2.7 Forced labour

Our business partners do not tolerate any form of unauthorized exploitation of employees. All forms of involuntary forced or compulsory labour and all forms of employment that violate the dignity of employees or general human rights are prohibited. All employees receive an employment contract in a language they understand and have the right to terminate their employment relationship within the framework of legal regulations and contractual agreements. Personal documents such as employee ID cards are not withheld, manipulated or destroyed.

2.8 Occupational health and safety

Protecting and promoting the health of their employees is a top priority for our business partners. It must be ensured that all employees always have a healthy, safe and hygienic workplace. In addition, our business partners observe all relevant standards and regulations on health care, occupational safety and fire protection and take the necessary measures to prevent damage to health. Emergency plans must be drawn up and emergency drills carried out. Safety equipment must be made available to all relevant employees and checked regularly.



3. Environment and energy

3.1 Sustainability and environmental protection

Acting sustainably requires efficient and responsible use of our planet's finite resources. Our business partners therefore develop and manufacture their products with environmental and climate protection in mind. This includes in particular the design for a long product lifespan as well as a recyclable design of the products and packaging.

3.2 Resource consumption, CO² emissions

We expect our business partners to continually improve environmental protection in their area of influence and thus contribute to reducing environmental impact and minimizing the consumption of resources such as electricity, gas, water and raw materials. Our business partners use efficient technologies and – where possible – rely on renewable energy sources. We expect our business partners to know their direct and indirect CO² emissions (Scope 1 – 3) and to have defined a constant reduction in their corporate goals. The collection, calculation and evaluation of the relevant CO² data should be carried out in accordance with the standards of the Greenhouse Gas Protocol (GHG Protocol).

3.3 Waste management

Our business partners constantly reduce their residual waste. Unavoidable residual waste is recycled or disposed of in a professional and environmentally friendly manner.

3.4 Permits, inspections and maintenance

Our business partners ensure that all necessary environmental permits are available and that prescribed inspections are carried out on time.

3.5 Material Compliance

The business partners comply with and provide evidence of the regulations on declarable and prohibited substances, which are defined in the RoHS and REACH regulations, for example. They regularly check their supply chain for conflict materials in accordance with the requirements of the EU Conflict Minerals Regulation and the Dodd-Frank Act and provide up-to-date information in the form of a Conflict Minerals Reporting Template (CMRT) on request.



3.6 Handling of chemicals

Our business partners ensure that chemicals and other hazardous substances are stored, used and transported correctly. For products containing hazardous substances, all necessary documentation is available and accessible to users.

3.7 Biodiversity

We expect our business partners to ensure that their business activities do not lead to unauthorized alteration, damage or deforestation of natural forests or other natural ecosystems.

4. Supply Chain

4.1 Responsibility in procurement

Integrity must be practiced throughout the entire supply chain.

Our business partners therefore select their own subcontractors carefully and set high standards for correct business practices. The conditions under which raw materials are obtained are also taken into account.

This means that our business partners do not knowingly supply materials whose raw materials are obtained under circumstances that violate human rights, are corrupt or are ethically questionable.

4.2 Export control, sanctions, military equipment, dual use

In cross-border trade relations, our business partners observe the applicable national import and export restrictions, sanction regulations and trade bans.

5. Due diligence

5.1 Risk management

Our business partners are obliged to determine and assess the human rights and environmental impacts of their business activities and to set up a risk management system with appropriate measures for remediation and prevention.

We also expect our business partners to pass on the requirements described in this Code to their suppliers.



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5.2 Whistleblower protection

Our business partners set up a transparent complaints procedure that allows employees and other persons - anonymously if desired - to report potential violations of defined requirements, criminal offenses and unauthorized methods or indications of ethical concerns.

Anyone who correctly or in good faith reports a suspected case may not be subject to any disciplinary or labour law sanctions or be disadvantaged in any other way. If our business partners identify confirmed violations of the requirements of this Code in their business or supply chain, we expect appropriate remedial action to be taken immediately.

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10_2023