



FORSCHNER GROUP
Code of Conduct

We know

 **FORSCHNER**
We know.

Code of Conduct
Anti-Corruption Policy
Whistleblowing Policy
Forschner Gruppe

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INTRODUCTION

FORSCHNER is a globally active company with many business units and a long tradition. As such a company, FORSCHNER bears social responsibility towards customers, employees, shareholders, and the public. Our commitment to complying with applicable laws and accepted social and ethical principles. All of this is summarized in written form in the Forscher Code of Conduct Policy.

The Code of Conduct sets a worldwide standard that unites all the locations of the FORSCHNER Group and describes our way of thinking. Hence, it is available publicly at each language where we operate.

The policy can be found under www.forschner.com.

1 | Social Responsibility



1.1 Modern Slavery

1.2 Child Labor

1.3 Equal Opportunities and Non-Discrimination and Women's Rights

1.4 Harassment and Retaliation

1.5 Freedom of Association and Collective Bargaining

1.6 Minimum Wages and Social Benefits and Working Hours

1.7 Diversity, Equity, and Inclusion

1.8 Rights of Minorities and Indigenous Peoples

1.9 Use of Private or Public Security Forces

1.10 Occupational Health and Safety

1.11 Environmental Protection

1.12 Product Safety

FORSCHNER respects and protects the worldwide applicable regulations for the protection of human rights as fundamental and universally valid requirements.

1.1 Modern Slavery

FORSCHNER neither tolerates nor uses forced labor or modern slavery (i.e., slavery, servitude and forced or compulsory labor and human trafficking). According to ILO conventions 29 and 105, all jobs in Forscher Group are chosen freely.

1.2 Child Labor

A group of diverse children, including a young girl with blonde hair, a boy with dark skin, and a boy with red hair, are smiling and looking up at the camera. They are wearing various casual clothing like denim jackets and t-shirts. The background is bright and slightly blurred.

FORSCHNER complies with the provisions of ILO Convention 138 and 182, regarding the legal minimum age for the employment of children, protection of their health and development, and dignity.

1.3 Equal Opportunities and Non-Discrimination and Women's Rights

FORSCHNER does **not discriminate** anyone because of ethnic or national origin, race, gender, religion, ideology, age, disability, sexual orientation, or other legally protected characteristics, unless this is contrary to mandatory law. In this purpose we also promote gender equality and ensures that **women's rights** are protected and respected in all aspects of our operations.

1.4 Harassment and Retaliation

We are committed to providing a workplace that is free from harassment and retaliation of any kind. Harassment and retaliation in any form is unacceptable and will not be tolerated.

Harassment includes, but is not limited to, offensive comments, gestures, jokes, or pictures; physical contact; unwanted sexual advances or attention; bullying, and any behavior that creates an intimidating, hostile, or offensive work environment.

FORSCHNER Group urges each employee to raise their hand and report immediately against any harassment experience on him/herself or when employee witnesses the similar issue to other people.

1.5 Freedom of Association and Collective Bargaining

Forschner Group and related worker organization work together to improve the conditions and maintain long-term relationships.

1.6 Minimum Wages and Social Benefits and Working Hours

FORSCHNER ensures appropriate salaries and social benefits for its employees. The **payment** and **social benefits** are based at least on the minimum wages and social benefits guaranteed by law or collective bargaining agreements and on the respective job market. We also follow relevant national regulations and agreements on **working hours** and on **regular paid vacations**.

1.7 Diversity, Equity, and Inclusion

We believe that a diverse, equitable, and inclusive workplace is essential to our success and to create positive social change in our community. By respecting diversity, we bring different identities, backgrounds, experiences, and perspectives together and enrich our organization. We treat all our employees in the same equity regardless of their identity or background. We stress inclusion to create a workplace culture where each employee feels valued, respected, and included.

By this manner our **hiring process** is fair and transparent. All candidates are evaluated based on their qualifications, experience, and skills. We provide each candidate with equal opportunity to showcase their abilities and make sure that the recruitment process is free from bias and undue influence.

1.8 Rights of Minorities and Indigenous Peoples

FORSCHNER recognizes the importance of consulting and involving **minorities and indigenous people** in decision-making process that affect them. Protecting **land, forest, and water rights** for communities and indigenous people are also vital important for us. Besides, we avoid **forced evictions** and work to build positive relationships with these groups. Before undertaking any activities that may affect land, forest, or water rights, we conduct environmental impact analysis.

1.9 Use of Private or Public Security Forces

FORSCHNER recognizes the importance of security in ensuring the safety of our employees, assets, and operations. We work with private or public security forces where necessary and will adhere to the guiding principles of respect for human rights, transparency, accountability, and training.

1.10 Occupational Health and Safety

FORSCHNER complies with national standards (applicable legal requirements) for a safe and hygienic workplace environment and takes appropriate measures to ensure health and safety in the workplace. We continuously develop and improve the working conditions and thus ensure suitable working conditions and the necessary workplace ergonomics at the site.



1.11 Environmental Protection

FORSCHNER takes responsibility with regards to environmental protection issues. We support initiatives that meet our ecological responsibility and develop environmentally friendly technologies. Our goal relates to the sustainable improvement of

- greenhouse gas emissions, energy efficiency and renewable energy, so decarbonization
- water consumption and water quality and management
- air quality
- the conservation of resources (waste prevention and reduction)
- responsible chemical management
- sustainable resource management
- reuse and recycling
- animal welfare
- biodiversity, land use and deforestation
- soil quality
- noise emission

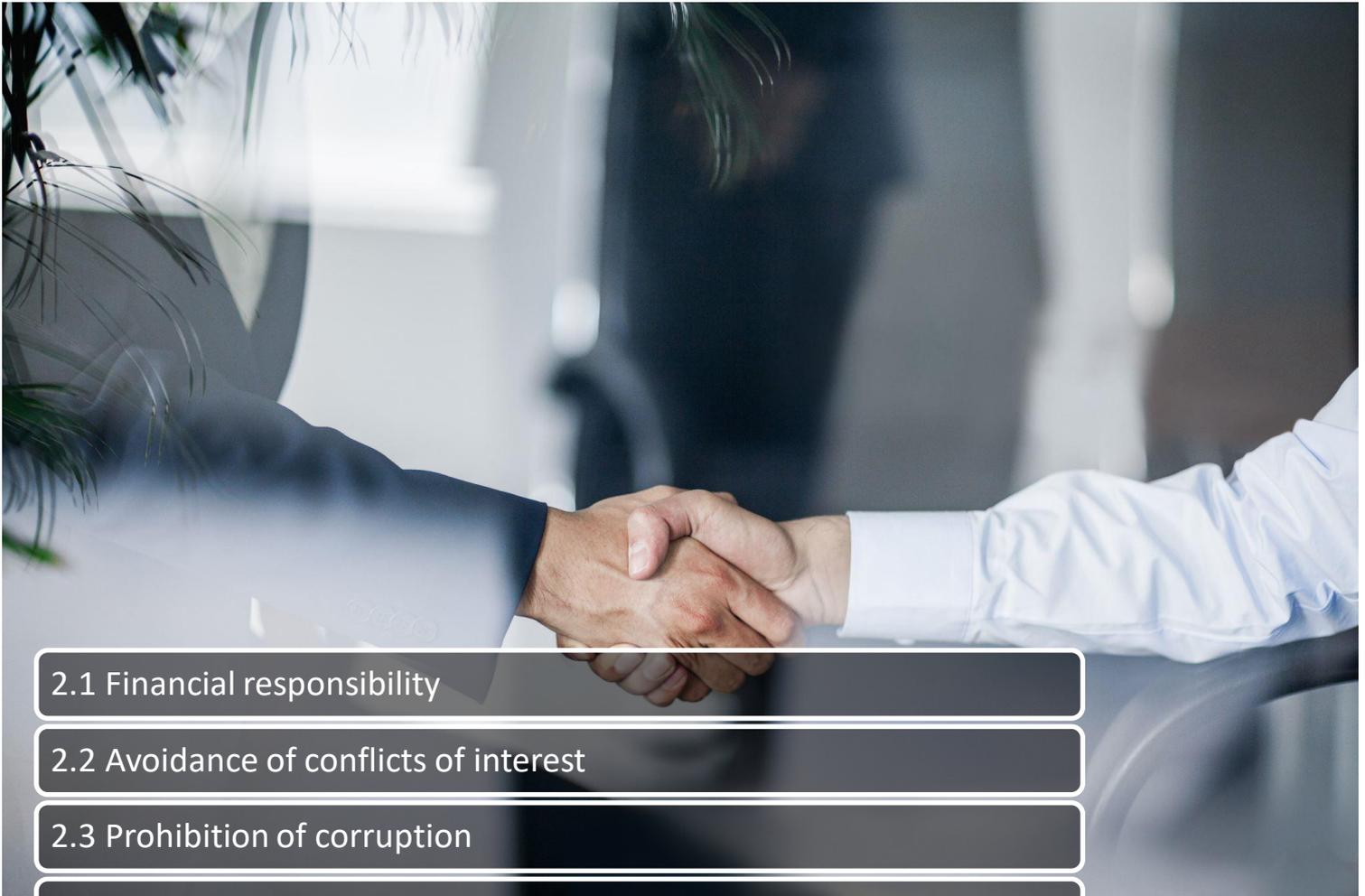
FORSCHNER complies with local environmental laws and uses natural resources sparingly and minimizes environmental impact.

1.12 Product Safety

FORSCHNER observes all applicable product safety regulations and specifications, especially the legal requirements concerning the safety, labelling and packaging of products and the use of hazardous substances and materials.

2 | Transparent Business Relations

Openness and transparency are the key to credibility and trust in business dealings. FORSCHNER therefore aligns its actions on the following basic principles:



2.1 Financial responsibility

2.2 Avoidance of conflicts of interest

2.3 Prohibition of corruption

2.4 Gifts, hospitality, and invitations

2.5 State as Customer and Dealing with Authorities

2.6 Consultant and Mediator

2.1 Financial Responsibility

FORSCHNER is committed to establishing appropriate business continuity plans for the operational activities that support our clients' business. For us, this means promptly addressing critical issues that could negatively impact the quality of our products and services (eye-to-eye communication). This gives us the opportunity to evaluate the sustainability performance after prior notice with a reasonable period of time.

2.2 Avoidance of Conflicts of Interest

FORSCHNER makes its decisions exclusively on the basis of objective criteria and is not influenced by personal interests and relationships.

2.3 Prohibition of Corruption

FORSCHNER does not tolerate corruption and extortion. FORSCHNER ensures that its employees, subcontractors, or representatives do not grant, offer, or accept any bribes, kickbacks, improper donations, or other improper payments or benefits to customers, officials, or other third parties. This also applies to facilitation payments (e.g., illegal payments made to speed up routine administrative matters). FORSCHNER does not tolerate coercion, threats and/or violence in business relations.

2.4 Gifts, Hospitality, and Invitations

FORSCHNER does not offer employees of its suppliers and business partners, either directly or indirectly, inappropriate benefits in the form of gifts, hospitality, or invitations to undue influence. Neither do FORSCHNER employees request or accept such unreasonable advantages.

2.5 State as Customer and Dealing with Authorities

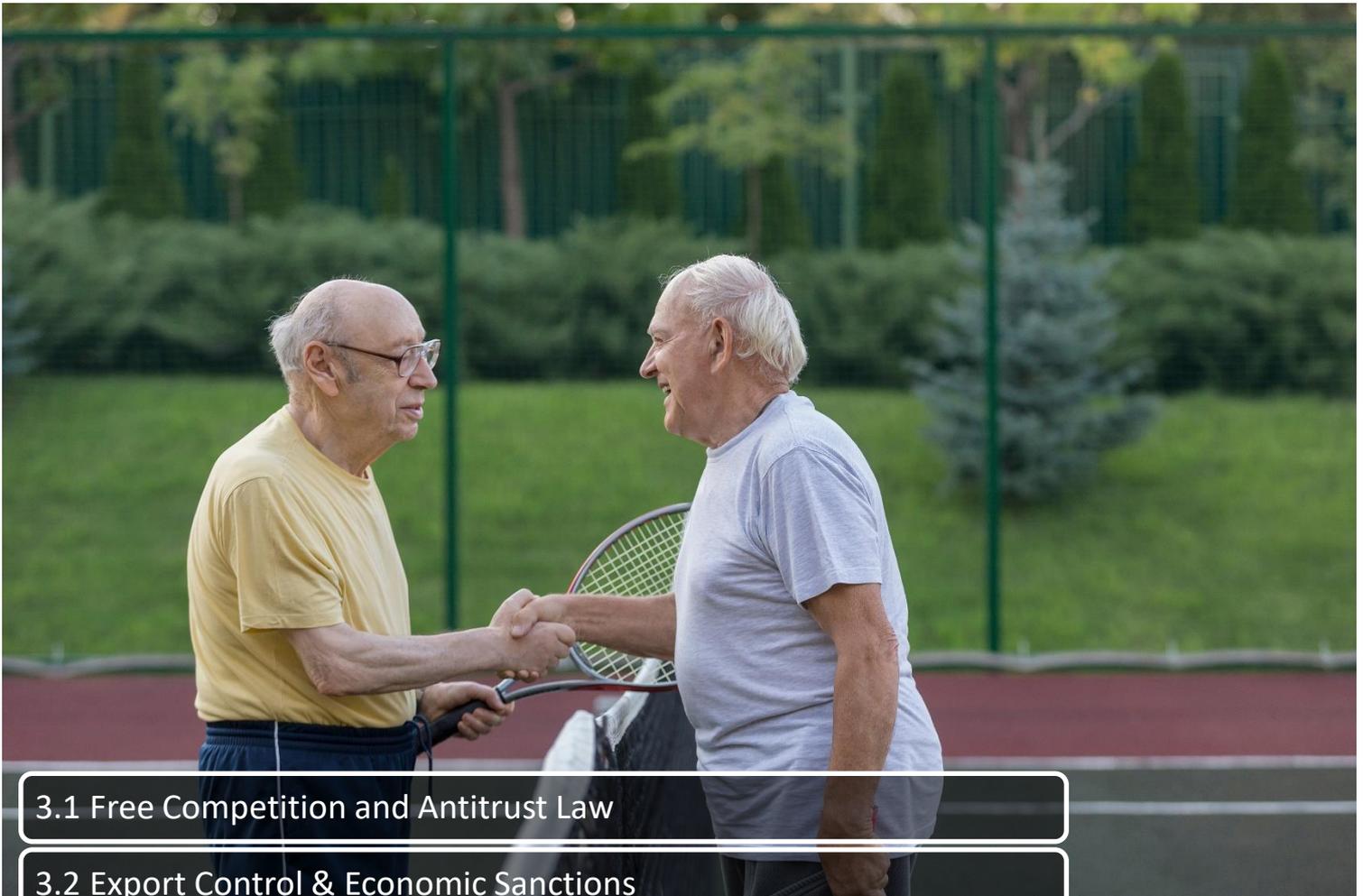
FORSCHNER complies with the strict legal requirements when dealing with governments, authorities, and public institutions.

2.6 Consultant and Mediator

FORSCHNER uses consultants or mediators only in accordance with valid laws. We ensure that the remuneration paid to consultants or mediators is only paid for consulting and intermediary services actually provided and that the remuneration is in reasonable proportion to the service provided.

3 | Fair Market Behavior

FORSCHNER is a fair and responsible market participant and complies with contractual obligations. FORSCHNER therefore bases its actions on the following basic principles:



3.1 Free Competition and Antitrust Law

3.2 Export Control & Economic Sanctions

3.3 Money Laundering

3.4 Business Information

3.1 Free Competition and Antitrust Law

FORSCHNER respects free and fair competition and complies with the applicable competition and antitrust laws. We do not enter into any anti-competitive agreements with competitors, suppliers or customers and do not abuse any dominant market position that may exist.

3.2 Export Control & Economic Sanctions

FORSCHNER commits to comply with all applicable laws such as export control regulations and economic sanctions for the import and export of goods, services, and information.

3.3 Money Laundering

FORSCHNER only maintains business relations with business partners whose integrity we are convinced of. We ensure that the respective valid legal provisions against money laundering are not violated.

3.4 Business Information

FORSCHNER publishes business data and reports on its business activities truthfully and in accordance with the applicable laws.

4 | Protection of Data, Trade Secrets, and Business Assets

Confidential data, trade secrets and business assets must be protected. FORSCHNER therefore bases its actions in particular on the following basic principles:



4.1 Privacy & Data Protection

4.2 Intellectual Properties

4.3 Counterfeit Parts and Plagiarism

4.1 Privacy & Data Protection

FORSCHNER is committed to using confidential information in an appropriate manner and to protecting it accordingly. We comply with all applicable laws for the protection of personal data of employees, customers, suppliers, and other concerned parties. We collect personal information only for legitimate business purposes, use it only in a legal, transparent, and secure manner, and disclose it only to authorized persons. We use, preserve, and protect our information in accordance with the following security regulations / guidelines.

4.2 Intellectual Properties

We respect intellectual property and ensure that sensitive data and applicable intellectual property rights are safeguarded. Our information systems, which contain confidential information or data of employees, customers, and business partners, shall be adequately managed and protected against unauthorized access and use, disclosure and modification or destruction of the data.

4.3 Counterfeit Parts and Plagiarism

Forschner commits itself to implement all necessary and appropriate measures in the areas of responsibility to ensure that neither customer products nor their processed components or raw materials nor the corresponding know-how fall into the hands of counterfeiters, smugglers, thieves or other unauthorized third parties or leave the legitimate supply chain.

5 | Whistleblowing Policy and Protection from Retaliation



5.1 Commitment

5.2 Reporting

5.3 Confidentiality

5.4 Investigation

5.1 Commitment

FORSCHNER is committed to maintaining the highest standards of integrity and ethical conduct in all of its operations. FORSCHNER expects all of its Internal and External Stakeholders to behave in a responsible and ethical manner. As part of this commitment, FORSCHNER encourages their employees (permanent and non-permanent), direct and in-direct suppliers, service providers, business partners, contractors, and local communities to report any suspected violations of laws, regulations, or company policies.

5.2 Reporting

Any internal or external stakeholders who suspect or become aware of any violation of law, regulation, or FORSCHNER policies regarding including but not limited to human rights, environmental and unethical business practices should report it immediately to their supervisor, human resources, or the legal department. If for any reason, any stakeholders do not feel comfortable reporting the matter, they may report the matter directly to whistleblowing@forschner.com. Another possibility for reporting is to contact one of the external ombudsmen, who will treat the information confidential.

5.3 Confidentiality

FORSCHNER recognizes the importance of protecting the identity of whistleblowers. Each report will be treated confidentially to the extent possible, and appropriate steps will be taken to protect whistleblowers from retaliation.

We committed that all evaluators are trained to be impartial, independent, and not bound by instruction.

5.4 Investigation

All reports will be investigated promptly and thoroughly. Each investigation will be conducted in a fair and objective manner, and the company will take appropriate action based on the finding of the investigation.



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