

## **Code of Conduct**

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### **Declaration on compliance with sustainability standards for SFI GmbH and its business partners**

The present standards formulate requirements regarding human rights and labor standards, business ethics as well as environmental protection and safety to which SFI GmbH is committed. We also require our business partners to conduct themselves in accordance with our principles. All customers and suppliers of SFI GmbH must ensure that their business partners and suppliers also recognise these principles in all business activities within their own sphere of influence.

We expect all business partners to comply with applicable rules and laws and to act in accordance with ecological, economic and social aspects. Furthermore, we and our business partners respect the cultural, social, political and legal diversity of societies and nations.

SFI GmbH has a functioning and certified quality and environmental management system in accordance with the requirements of ISO9001, ISO14001 and VDA6.4. In addition, an occupational health and safety management system is maintained in accordance with the requirements of ISO 45001 and the BGHM seal of approval "Safe with system".

#### **1. Working conditions, remuneration, working hours and social benefits**

Remuneration and social benefits are in line with the basic principles regarding minimum wages, applicable overtime regulations and statutory social benefits. Working hours and non-working hours comply with applicable laws and industry standards. Health and safety at work is guaranteed within the framework of the applicable national regulations and supports a constant development and continuous improvement of working conditions.

#### **2. Child labor**

Child labor is not used in any phase of order processing. The ILO conventions on the minimum age for admission to employment and the prohibition of child labor are observed. Children are not inhibited in their development and their safety and health is not impaired.

#### **3. Non-discrimination**

Equal opportunities in employment are maintained and any discrimination is avoided. Discrimination against employees on the basis of, for example, descent, origin, nationality, skin color, religion, ideology, political and trade union activity, gender, sexual orientation, age, disability, illness or pregnancy will not be tolerated and will therefore not take place.

#### **4. Freedom of association and collective bargaining**

Freedom of association and the effective recognition of the right to collective bargaining are respected. It is ensured that employees can openly discuss working conditions with management without fear of disadvantages. The right of workers to associate, join a trade union, appoint a representative and be elected to such a body is respected.

## **5. Human rights**

Internationally recognized human rights and their observance are respected and promoted. In all business activities, no human rights violations are committed and we do not participate in any human rights abuses. This includes in particular the protection of employees from physical, psychological and sexual harassment and violence, and protection from retaliation and the preservation of identity.

## **6. Forced labor**

Forced or compulsory labor is not permitted. Employees are free to terminate the employment relationship with a reasonable notice period.

## **7. Business conduct and business relations**

The highest level of integrity is expected in all business activities and relationships. Any form of fraud or embezzlement, bankruptcy offences, corruption, granting of advantages, extortion, bribery or corruptibility are prohibited and cannot be tolerated.

Financial responsibility and thus compliance with the legal requirements of proper accounting and disclosure regulations must be a matter of course for every business partner.

All applicable laws and regulations are complied with. Laws that protect and promote competition, in particular antitrust laws, are complied with. Fair competition is respected and thus the prohibition of collusion with competitors and other measures that impeded the free market will be respected.

When dealing with business partners, decisions are made solely on an objective basis and are not influenced by personal and own financial interests. All conflicts of interest are thus avoided.

There is open and cooperative communication between business partners. However, strict secrecy must be maintained about trade secrets and business information of all partners. All commercial and technical details not in the public domain that arise from the business relationship are treated as trade secrets and must be kept properly.

The obligations under applicable data protection regulations must be respected. Protected personal data may not be disclosed, made accessible or used without authorization.

Business partners have the duty to respect copyrights and in particular to refrain from all kinds of plagiarism. Intellectual property or so-called intellectual property rights must be observed and preserved.

Furthermore, all commercial law regulations and laws on import and export controls are observed. This also includes the currently valid embargo regulations and sanction lists.

## 8. Environmental protection and safety

With regard to environmental problems, the prevention and precautionary principle is applied. Environmental responsibility and the development and dissemination of environmentally friendly technologies are promoted. In all phases of production, optimal environmental protection is ensured and environmental pollution is reduced as far as possible, e.g. in terms of:

- Emissions to air (air quality)
- Emissions to water (water quality)
- Disposal
- Hazardous substances

Resources are used sustainably, for example through:

- responsible handling and protection of (natural) resources
- Energy efficiency through low energy consumption and greenhouse gas emissions
- Material efficiency by avoiding unnecessary waste
- Careful water treatment

The consequences of accidents that could have a negative impact on the environment are avoided or minimized. All products manufactured and materials used along the supply chain meet environmental standards.

Responsible chemicals management ensures appropriate procedures for handling, transporting and storing hazardous substances.

A waste management system regulates the reusability and disposal of waste.

## 9. Privacy

The obligations under applicable data protection regulations must be respected. Protected personal data may not be disclosed, made accessible or used without authorization.

The company policy is in line with a continuous improvement process, product safety and quality, occupational health and safety and environmental responsibility in the ecological, economic and social sense.

The frame of reference is the Declaration of Human Rights and the United Nations Global Compact, the guidelines for multinational companies of the Organization for Economic Development and Cooperation (OECD) and the conventions of the International Labor Organization (ILO).

Kornwestheim the 10.08.2020

  
Signature CEO