

## **Company policy on responsibility for people and the environment Code of Conduct PFARR Stanztechnik GmbH (PFARR)**

This Code of Conduct defines the principles and requirements of PFARR for both its own production facilities and of their employees, as well as for its suppliers of goods and services with regard to their responsibilities for people and the environment. PFARR reserves the right to make appropriate changes to this Code of Conduct in line with changing requirements due to external influences and internal principles.

In order to ensure a continuous, responsible way of working within our supply chain, our suppliers are regularly asked to reconfirm their understanding of and compliance with our principles. Where required by law or other legal provisions, PFARR procures materials exclusively from suppliers who confirm that these materials originate from conflict-free sources.

### **Principles**

PFARR hereby declares its:

#### **Compliance with the law:**

- Complies with the laws of the applicable legal system(s).

#### **Prohibition of corruption and bribery:**

- Will not tolerate or engage in any form of corruption or bribery, including any unlawful offer of payment or similar benefit-in-kind to government officials to influence decision-making.

#### **Respect for basic rights of employees:**

- Promotes equal opportunities and equal treatment of the employees disregarding skin colors, nationalities, social background, any disabilities, sexual orientation, political or religious beliefs as well as age or gender.
- Respects the personal dignity, privacy, and human rights of every individual.
- Does not employ or force anybody to work against their will.
- Does not tolerate any unacceptable treatment of workers, such as psychological coercion, sexual and personal harassment or discrimination.
- Will not tolerate any behavior (including gestures, language, and physical contact), that is sexually coercive, threatening, abusive or exploitative.
- Ensures adequate remuneration and guarantees a national minimum wage as laid down by law.
- Complies with the maximum working hours laid down by law in the country concerned.
- So far as it is legally permissible, recognizes the freedom of association of workers and neither prefers nor discriminates against members of workers' organizations or trade unions.

#### **Prohibition of child labor:**

- Does not recruit nor employ children. In this context, "child" means any person under the age of 15, unless national or regional law sets down a higher compulsory school leaving age or minimum age of employability. In countries covered by the exception for developing countries under ILO Convention 138, the minimum age may be reduced in accordance with that Convention.

### **Health and safety of employees:**

- Takes responsibility for health and safety of its employees.
- Eliminates risks and takes the best possible precautions against accidents and prevents occupational diseases.
- Provides training and ensures that all employees are conversant with occupational safety training.

### **Environmental protection:**

- Pays appropriate attention to environmental protection in line with legal and international standards.
- Minimizes environmental pollution and continuously improves environmental protection.
- Maintains an environmental management system according to ISO 14001 or an equivalent.

### **Confidential information and data protection:**

- PFARR requires that all confidential information be treated as such.
- Personal data must be handled in accordance with the currently valid Basic Data Protection Regulations.

### **Supply chain:**

- Promotes compliance with the contents of the Code of Conduct among its suppliers to the maximum possible extent.
- Complies with the principles of non-discrimination in the selection of suppliers and in its dealings with suppliers.

### **Reporting of legal violations (whistleblower system):**

Compliance with laws and other regulations as well as internal behavioural guidelines is a basic prerequisite for all PFARR business activities. Any grievances or suspected violations of the contents of this Code of Conduct or of laws, regulations or ethical standards relating to PFARR's business activities can be reported via PFARR's whistleblower system.

Further information and reporting options can be found at [www.pfarr.de/unternehmen/verantwortung/#compliance](http://www.pfarr.de/unternehmen/verantwortung/#compliance).

Violations of the Supply Chain Act (Act on Corporate Due Diligence Obligations in Supply Chain) can also be reported via the reporting channels listed in the whistleblower system. It is expressly pointed out that PFARR does not currently fall under the scope of application of the Supply Chain Act. Nevertheless, in the interests of legally compliant and ethical behaviour along the supply chain, PFARR has decided on a voluntary basis to investigate possible violations of the law in the event of reasonable suspicion, insofar as the company is legally and feasibly in a position to do so.