

Fey Elektronik GmbH – Storchenweg 3 – D-21217 Seevetal



CODE OF CONDUCT OF FEY ELEKTRONIK GMBH

INTRODUCTION

Fey Elektronik GmbH (hereinafter referred to as "Fey"), as a Group company of the Addtech Group (hereinafter referred to as "Addtech"), is a supplier in the product area of battery and charging technology.

The Code of Conduct formulated here applies to both Fey and its subsidiary Cellcon Batterie- und Kabelkonfektionierung GmbH at the same location and is consistent with Addtech's Code of Conduct <https://www.addtech.com/sustainability/code-of-conduct-and-sustainability-policy>.

GENERAL PRINCIPLES

The fair dealing with all interested parties of our company, the observance of the principles of fair competition and the compliance with international rules for anti-corruption, are - in addition to the economic, ecological and social aspects - essential components of our business philosophy.

The Managing Director is responsible for the implementation of the principles of equal treatment for all employees, the prevention of any form of abuse and the observance of the International Covenant on Civil and Political Rights.

The related necessary legal measures are implemented by the management, such as the nomination and appointment of appropriate representatives, who are assigned the exercise of related corporate duties.

Fey has established codes of conduct, which should apply to the relationships with the customers, suppliers and all other interested parties. Fey expects its suppliers to establish and realise these or comparable principles in their own companies as the basis for their business activities.

HUMAN RIGHTS

Compliance with laws and social standards

At its location, Fey undertakes to comply with at least all applicable laws and regulations as well as the Addtech Group policies. Compliance with ILO core labour standards is binding on our company.

Child labour

Fey respects the UN Convention on the Rights of the Child, ILO Minimum Age Convention No. 138 on the Minimum Age for Admission to Employment, ILO Convention No. 182 on the Prohibition and Immediate Action to Eliminate the Worst Forms of Child Labour, and the other international legal regulations regarding child labour.

Forced labour

Fey condemns human trafficking, slavery, child labour, forced labour, and all other forms of involuntary labour. Fey, following ILO Convention No. 29, does not engage in any such form of involuntary labour. No employee may be kept at work against his or her will.

Respect and dignity

Fey treats its workforce with respect and does not engage in physical or psychological harassment or violence. It refrains from and prevents bullying and all other forms of discrimination in the workplace, in particular on the basis of age, gender, ethnic origin, religion, political views, sexual orientation, disability or other distinguishing features. Fey excludes inhuman working conditions at her location.

Code of Conduct of Fey Elektronik GmbH

Wages and other benefits

Fey complies with all mandatory applicable laws and regulations regarding the employee's wages and working hours especially laws and regulations, which settle the minimum wages, overtime, piecework wages and other remuneration. It provides respective statutory benefits.

Right of codetermination

Following the IAO conventions no. 87 and 98 Fey respects the right of its employees to become a member of employee's organisations, especially trade unions. They have the right to take part in designing of appropriate working conditions and in realising a free exchange of information and experiences among themselves.

Political Involvement

Fey maintains political neutrality. Neither the name of Fey, Addtech or any of their group companies, nor any resource controlled by Fey, Addtech or any of their group companies may be used to promote the interests of any political party or candidate.

Occupational safety and health protection

Fey shall ensure compliance with all legal and regulatory requirements relating to occupational safety. It is responsible for health and safety in the workplace to its employees. Fey minimizes risks for accidents at work and occupational diseases and offers trainings to avoid these risks to its employees.

BUSINESS ETHICS

Ethical values, prevention of corruption and bribery

The Fey will comply with applicable anti-corruption laws and regulations.

Fey not participate in any form in corruption, bribery, anticompetitive agreements or other unfair business practices. Fey monitors the compliance of these principles through its employees and, as far as possible, through their subcontractors and suppliers and takes appropriate measures to respond to and effectively prevent such known violations.

Fey makes its decisions solely based on factual and professional criteria. Employees are not guided by personal relationships or interests.

Fey will not, directly or indirectly, send any goods of value to natural or legal persons, government authorities and officials or to other third parties in order to obtain or retain business or business advantages or to unfairly influence any actions or decisions directed to them.

Employees of Fey are not allowed to demand gifts, entertainment or other benefits from suppliers and suppliers may not offer such services for the purpose of obtaining or continuing business.

Regulations for import and export

Fey complies with the applicable national and international regulations of embargoes, export and import.

Conflict zones

Fey must ensure that its businesses do not in any way support war, conflict, extremism, money laundering, drug trafficking, or the slave trade.

This also includes the use of conflict minerals.

Company property and resources

Fey respects the assets of other companies and protects its own tangible and intangible assets from loss, theft or damage. Fey and Addtech property and resources may not be used for personal gain, for fraudulent purposes or in any other improper way.

Customers and suppliers

Fey strives to provide products and services that meet or exceed the expectations of its customers. We base our relationships with business partners on sound business and market practices, high ethical standards and clear and fair agreements.

Impartiality and conflicts of interest

Fey business relationships shall be impartial and all business decisions must be made based on what is best for Fey and Addtech and their Group companies, regardless of personal connections or benefits.

Code of Conduct of Fey Elektronik GmbH

Conflicts of interest between employees and Fey, Addtech or the other Group companies are to be avoided. Employees may not participate in activities that conflict with the interests of Fey, Addtech or the other companies in the Group as part of their official duties.

Healthy competition

Fey supports fair and free competition in all areas of its business activities.

All types of price fixing or market sharing between competitors, maintaining resale prices, hindering innovation, exchanging trade secrets, or other anti-competitive activities are prohibited. Fey employees are not permitted to discuss market sharing, price fixing, or other price-sensitive conditions or costs in their contacts with competitors.

If any company in the Group is contacted with proposals concerning such collaboration, or if a situation arises, where it is difficult to assess whether or not something is permissible, this should be reported to the recipient's immediate superior or higher management.

In the case of an unannounced inspection by a competition authority, employees must cooperate with the authority's representatives and in any way must not obstruct the inspection.

Accounting and reporting

All financial transactions must be accounted for in line with generally accepted accounting principles.

SOCIETY

Environmental responsibility

Products, processes and procedures are developed or used in an environmentally friendly manner and with the lowest possible CO2 footprint and impact on ongoing climate change according to the current state of the art. According to these guidelines, Fey as an ISO 14001 certified company complies with all applicable environmental laws, environmental specifications and standards.

An essential part of our environmental policy is the responsible and economical use of natural resources and the avoidance or minimization of waste. Both are subject to continuous monitoring.

Whenever possible and permitted by the international transport regulations for dangerous goods, Fey uses recyclable packaging materials or pendulum packaging to ship its products.

The minimisation of the use of hazardous substances is a development criterion for our products.

The handling of hazardous substances that must be used in the manufacture of our products only takes place after the employees have been thoroughly instructed in order to keep health and environmental risks as low as possible.

All Group companies, including Fey, shall comply with Addtech's sustainability policy <https://www.addtech.com/sustainability/code-of-conduct-and-sustainability-policy>.

Data protection and handling of confidential information

Fey complies with the applicable regulations regarding the handling of personal data, which it obtains for the realisation of the business activities. This refers to data from customers, suppliers and their own employees. All personal data are always kept confidential and secure.

Fey limits the exchange of confidential information, knowledge and documents with all interested parties to the purpose of fulfilling contractually agreed services and endeavors to regulate how they are dealt with by means of appropriate non-disclosure agreements. Confidential information will only be passed on to third parties if the source of this information has given permission to do so.

Use of social media

All Fey employees should use social media carefully and avoid postings anything that can have a negative effect on work relations or business interests. Employees should never give the impression that they are speaking on behalf of the company in personal conversations or on social media.

Code of Conduct of Fey Elektronik GmbH

IMPLEMENTATION AND COMPLIANCE

Implementation of the Code of Conduct

We require all employees to comply with the Code of Conduct. The Managing Director is responsible for the implementation of the Code of Conduct, for informing his co-workers about their rights and obligations and for ensuring that all employees comply with the Code of Conduct.

The Fey management is responsible for documenting and reporting to the Addtech Board of Directors once a year how we ourselves and our suppliers meet the requirements.

Compliance with the Code of Conduct

Every Fey employee is responsible for reporting any case of fraud or other criminal behaviour. Any infringements of our Code of Conduct that come to Company's attention will be followed by immediate disciplinary action being taken, which may include dismissal and/or court proceedings in the most serious cases of non-compliance. Employees who are uncertain as to whether a specific behaviour may breach the Code of Conduct should consult their immediate superior for guidance.

We encourage our employees to report relationships that may conflict with the Code of Conduct to their immediate superior or to higher management. If for any reason the employee is unable to approach these individuals, Addtech's anonymous whistleblowing procedures are to be followed. For more information, see <https://report.whistleb.com/de/addtech>. There will be no penalties or other negative consequences for people who provide information in good faith and in line with the aims of the Code of Conduct.

Seevetal, 2024/03/07

Best regards

Fey Elektronik GmbH



Michael Witte
Managing Director