

**A vision drives us,
development is our passion,
Partnership is our success,
sustainability is our future!**

- Mission Statement FKT

Sustainability Code of Conduct for Business Partners



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Preface

For FKT GmbH, the principle of sustainability has always been an integral part of the corporate philosophy and, therefore, the foundation for all of our business decisions. We are a medium-sized automotive supplier located in the heart of Bavaria, Germany, and operate globally. We are aware of our social, environmental, and economic responsibilities and expect the same from our business partners.

The following requirements specify these expectations for our business partners and form the basis for successful and long-term cooperation.

1. Objectives and Scope

The following standards outline the requirements for all suppliers, service providers, and other business partners of FKT GmbH concerning sustainability. The term "sustainability" includes, among others, respect for human rights and labor standards, environmental protection, ethically and legally sound business practices, responsible procurement of raw materials, and data and information security.

These requirements apply worldwide and are directed at both manufacturing suppliers and service providers or other business partners of FKT GmbH.

Business partners are encouraged to communicate these requirements to their employees and to their own suppliers, service providers, and business partners. Business partners should also establish appropriate measures to verify the communicated sustainability requirements.

FKT GmbH adheres to the same provisions concerning labor standards, business ethics, environmental protection, and safety in its own business practices. These are documented in our Code of Conduct.

FKT GmbH reserves the right to review the sustainability requirements and take appropriate action in case of violations. The supplier code is available on our website at any time.

<https://www.fkt-gmbh.com/unternehmen/downloads/>

2. Grundlagen

The sustainability requirements are based, among others, on the principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the OECD Due

Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the International Labour Organization (ILO) conventions, the principles of the German Sustainability Code (DNK), as well as fundamental labor rights and the guiding principles of the Drive Sustainability initiative.

Furthermore, this Sustainability Code of Conduct draws on nationally and internationally recognized standards, including the Universal Declaration of Human Rights, which is particularly reflected in the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social, and Cultural Rights.

Other important company-specific principles and guidelines are included the following:

- Code of Conduct
- Self-disclosure questionnaire for business partners

3. General Sustainability Requirements

3.1. General

For FKT GmbH, the commitment of its business partners to meet their social and environmental responsibilities is an essential prerequisite for any future business relationship. Consequently, business partners are urged to align their business and procurement activities with these principles and appropriately address them throughout their supply chain.

The values of this Sustainability Code should be integrated into the day-to-day operations of the business partner through structured and knowledgeable management. Business partners must always comply with the applicable law. If these sustainability requirements go beyond the requirements of applicable law, they should be additionally observed.

3.2. Establishment and Application of Management Systems

FKT GmbH recommends that its business partners certify their production sites according to the international standard ISO 14001 or the EMAS Regulation of the European Union (usually for companies with more than 100 employees). Additionally, for business partners with production sites employing more than 1,000 employees, certification according to the international standard ISO 45001 or an equivalent norm is also recommended. If certification is not possible or appropriate, FKT GmbH still recommends the implementation of adequate environmental and sustainability management, regardless of certification.

3.3. Corporate Declaration

Our business partners are encouraged to create a corporate declaration (e.g., a Code of Conduct, behavioral and/or Sustainability Code of Conduct) committing to social, ethical, and environmental standards. This declaration should be formulated or translated into languages that can be read and understood by employees on-site and business partners.

3.4. Sustainability Officer

Our business partners are encouraged to appoint a sustainability officer or equivalent responsible individual who reports to the management of the respective business partner. The officer should develop and monitor sustainability goals and measures within the company.

3.5. Risk Management

To comply with due diligence requirements for human and environmental rights within its organization and immediate suppliers, the business partner should implement an adequate and effective management system for risk mitigation in the supply chain. This includes, for example, contractual agreements, a supplier policy for sustainable procurement, and audits.

3.6. Monitoring Requirements and Self-Disclosure Questionnaires

To better assess compliance with the standards specified in this document, we use standardized self-disclosure questionnaires with our business partners. These questionnaires can also serve as a template for questionnaire or self-disclosure campaigns by our business partners.

The self-disclosure questionnaires, and if necessary, associated audits, cover more extensive content than those mentioned in this Sustainability Code. Business partners are required to truthfully complete the self-disclosure questionnaire. If needed, we reserve the right to request supporting documents or conduct on-site audits. We generally ask our business partners to cooperate to the best of their abilities and knowledge in adhering to social and environmental aspects in the supply chain.

3.7. Support and Training

To assist its business partners in meeting and implementing sustainability requirements, FKT GmbH may provide support and/or recommend suitable training opportunities or training programs. Business partners can also develop their own training programs to convey sustainability aspects.

4. Social Responsibility

4.1. Respect for Human Rights and Protection of Human Rights Defenders

Business partners are urged to respect internationally recognized human rights and support their observance. In all business activities within their sphere of influence, business partners must work to ensure that they, their business partners, and their suppliers do not commit or participate in human rights violations.

Business partners must not tolerate or engage in any form of threat, intimidation, or violence against human rights or environmental activists, including those exercising their right to freedom of expression, association, peaceful assembly, and protest against the business activities of the business partners. They must ensure access to complaint channels without the fear of retaliation or reprisals.

4.2. Freedom of Employment, No Modern Slavery, No Human Trafficking, and Unethical Recruitment

Debt bondage, forced or compulsory labor, and any form of modern slavery or human trafficking are strictly prohibited within the business operations and/or throughout the supply chain. Employment relationships must be based solely on voluntary agreement, and employees must always have the freedom to terminate their employment voluntarily with reasonable notice. Employees of business partners must receive a contract, complying with the applicable law and appropriately documented, in a language they understand, clearly outlining their rights and obligations truthfully.

Business partners must not deceive potential employees about the nature of work, charge recruitment fees or undue transportation costs to employees, confiscate, destroy, conceal, hide or deny access to government-issued identification documents, or restrict employees' freedom of movement or coerce them to use company-provided accommodations involuntarily, except where operationally necessary.

4.3. Eradication of Child Labor and Protection of Young Workers

Child labor must not be used at any stage of production or processing along the entire supply chain. Business partners are required to comply with the ILO conventions regarding the minimum age for employment and the prohibition of child labor. Children must not be hindered in their development, and their safety and health must not be jeopardized. Young workers and those in need of special protection according to ILO conventions must be given special consideration and

must not be engaged in work that endangers their safety, health, or morals, such as overtime or night shifts.

4.4. Equal Opportunities and Prohibition of Discrimination and Harassment

FKT GmbH advocates equal treatment and does not tolerate any form of discrimination, as specified in the internal Code of Conduct. Business partners are equally obliged to maintain equal opportunities in employment and ensure that any discrimination, intimidation, harassment, or unjustified treatment or unequal treatment of their employees in the workplace is avoided. Discrimination or unequal treatment of employees based on factors such as ethnic or social origin, language, nationality, skin color, religion, physical or mental disabilities, health condition, pregnancy/parenthood, gender, gender identity, sexual orientation, age, worldviews, union membership, or political beliefs based on democratic principles and tolerance towards dissent must not occur. Unequal remuneration for equal work is also considered discrimination.

4.5. Diversity, Equality, and Inclusion, Women's Rights

Business partners should develop and promote an inclusive culture that values diversity. Diversity should be encouraged among all employees and at all hierarchical levels, especially, but not exclusively, cultural, ethnic, and religious diversity. Business partners should ensure that all employees can make their full contribution and reach their full potential while maintaining a healthy work-life balance. Collaboration with diverse business partners led by minorities and women or in their ownership should be encouraged.

4.6. Freedom of Association and Right to Collective Bargaining

Business partners should uphold freedom of association and the effective recognition of the right to collective bargaining. Employees must be able to engage openly with the company management regarding working conditions without fearing retaliation. The right of employees to associate, join a union, appoint representation, and be elected to such representation must be respected as far as it is within the scope of applicable local laws and rights. Any form of discrimination or retaliation against union activities must be excluded.

4.7. Fair Remuneration, Working Hours, and Social Benefits

Remuneration and social benefits must comply with the basic principles of the applicable national legal requirements and/or national requirements prevailing in the respective industry. This includes, among others, locally applicable minimum wage regulations, statutory overtime rules, and social benefits.

Working hours and rest periods must meet at least the applicable laws, industry standards, or relevant ILO conventions, whichever is stricter. Wage payments must be made in a transparent manner and at specified intervals. Unauthorized wage deductions and withholding wages as a disciplinary measure are not allowed.

Business partners must provide employees with toilets and access to clean drinking water. All facilities provided for the consumption and preparation of food and their storage must meet the locally applicable minimum hygiene requirements. If the nature of the work requires the provision of sleeping accommodations, sufficient space, cleanliness, and safety must be ensured. Access to social spaces or facilities should not be unreasonably restricted.

4.8. Health and Safety at the Workplace, Fire Protection

Business partners must ensure workplace safety and health protection, as well as fire protection, at least in accordance with the applicable national regulations. They must support continuous improvement of processes to reduce work-related health and safety risks.

Employees must be informed about identified hazards and the associated preventive and corrective measures for risk minimization in an appropriate language. Adequate qualification measures must be conducted to prevent work-related health problems, avoid accidents, provide first aid, manage chemicals, and ensure fire protection. Protective equipment and clothing for employees must not be charged to the employees.

Business partners must also establish appropriate fire protection measures (technical, structural, and/or organizational) to reduce damage in case of fire and monitor and control work-related health and safety hazards (e.g., chemical, biological, physical, and physiological hazards) and corresponding protective measures. Chemicals must be labeled according to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or the Classification, Labeling, and Packaging (CLP) Regulation in European countries. Chemicals must be stored, transported, and handled in accordance with the applicable legal and contractual requirements.

Business partners must also ensure that appropriate emergency plans are developed and that first aid, fire protection, medical services, and material and adequate transportation for further treatment are provided. Suitable exits, escape routes, and assembly points must be available in the premises, adequately signposted throughout. In the event of an accident, access to first aid and medical treatment must always be ensured.

4.9. Physical Integrity

Business partners attach utmost importance to protecting physical integrity and take appropriate measures to ensure the respect of this legally protected right. Business partners ensure that any involvement, including complicity or

participation in abductions, torture, killings, or similar acts, is excluded and that no physical punishment is used as a disciplinary measure. Business partners also ensure that other serious human rights violations and abuses, such as sexual violence, war crimes, or other serious violations of international humanitarian law, crimes against humanity, or genocide, are also excluded.

4.10. Use of Private or Public Security Forces

Business partners ensure that the hiring or use of private or public security forces, due to inadequate training or control by the company, does not lead to human rights violations, such as torture, cruel, inhuman, or degrading treatment, or otherwise cause harm to life and body. Business partners exclude direct or indirect support to public or private security forces exercising unlawful control over mining sites, transportation routes, and upstream actors in the supply chain.

4.11. Rights of Local Communities, Minorities, and Indigenous Peoples

Business partners shall respect applicable local, national, international, and traditional land, water, and resource rights. In particular, the rights of indigenous peoples and local communities shall be respected, promoted, and protected throughout the supply chain in accordance with the "United Nations Declaration on the Rights of Indigenous Peoples."

Business partners must ensure that they do not cause harmful land degradation, water pollution, air contamination, harmful noise emissions, or excessive water consumption that could significantly impair the natural basis for food and drinking water or human health.

Business partners shall observe the prohibition of unlawful forced evictions and the prohibition of the unlawful deprivation of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters.

In essence, this section emphasizes the importance of respecting the rights and living conditions of local communities, minorities, and indigenous peoples, ensuring responsible use of natural resources, and avoiding actions that harm the environment and people's well-being. It encourages adherence to international standards, particularly those related to indigenous rights and land rights, and discourages any practices that result in the displacement or deprivation of communities from their lands and resources.

5. Ecological Responsibility

5.1. Environmental Responsibility

Suppliers must operate according to the precautionary principle regarding environmental issues, take initiatives to promote greater environmental responsibility, and support the development and dissemination of environmentally friendly technologies.

5.2. Decarbonization

Business partners must take appropriate measures to reduce air emissions that pose a threat to the environment and health, including greenhouse gas emissions. They should proactively reduce greenhouse gas emissions throughout the supply chain, such as by increasing the use of carbon-neutral and/or renewable energy sources. Business partners supplying products to FKT GmbH must provide information upon request about total energy consumption and CO₂ emissions (Scope 1, 2, and 3) to improve environmental metrics in the value chain.

5.3. Resource Efficiency

Business partners must take appropriate measures to ensure efficient use of energy, water, and raw materials, promote the use of renewable resources, and minimize environmental and health impacts.

5.4. Registration, Assessment, and Restriction of Substances and Raw Materials

Business partners shall implement suitable measures to avoid or minimize the use of substances and materials with adverse effects on the environment or health, such as carcinogens, mutagens, or reprotoxic substances, within the framework of applicable law. They are required to comply with the requirements of international conventions and other legal instruments concerning the manufacturing, use, handling, and disposal of certain substances (especially the Minamata Convention on Mercury of October 10, 2013, and the Stockholm Convention on Persistent Organic Pollutants (POP) of May 23, 2001) and the corresponding applicable implementing regulations at the national and supranational levels. Tin, tungsten, tantalum, and gold smelters or refineries used by business partners must only use raw materials that meet the requirements of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and have been audited by the Responsible Mineral Initiative (RMI) or similar organizations.

Business partners must take appropriate measures to exclude resources obtained from deep-sea mining from their supply chains.

5.5. Environmentally Friendly Production

Environmental protection must be ensured in all stages of production. This includes a proactive approach to avoid or minimize the consequences of accidents that may negatively impact the environment. Emphasis should be placed on the application and advancement of energy- and water-saving technologies, as well as strategies for emission reduction, reuse, and recycling.

5.6. Environmentally Friendly Products

All products produced along the supply chain must meet the environmental standards of their market segment. This includes considering the complete product lifecycle and all materials used. Chemicals and other substances that may pose a risk to the environment upon release must be identified, and hazard substance management should be implemented to handle, transport, store, recycle, or reuse them safely using appropriate practices.

5.7. Circular Economy and Waste Management

Business partners are expected to take suitable and appropriate measures to achieve waste reduction, resource reuse, recycling, and the safe and environmentally friendly disposal of residual waste, chemicals, and wastewater. Such measures may be implemented during development, production, product lifecycle, and end-of-life recycling, among other activities. International agreements on the transboundary movement of hazardous waste, particularly the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989, and the corresponding applicable implementing regulations at the national and supranational levels, must be adhered to.

5.8. Water

Business partners must take suitable and appropriate measures to minimize water consumption at their sites and/or along their own supply chains, always respecting the right to water.

5.9. Noise Emissions

Business partners must take suitable and appropriate measures to minimize harmful noise emissions that endanger the environment at their sites and/or along their own supply chains.

5.10. Biodiversity

The protection of natural ecosystems and the prevention of changes, deforestation, or damage to natural forests and other natural ecosystems is expected from business partners. Regarding biodiversity, business partners should strive to establish supply chains that do not involve deforestation and forest degradation according to applicable law and international regulations. These international regulations include resolutions and recommendations on biodiversity from the Center for Biological Diversity (CBD), the International Union for Conservation of Nature (IUCN), and guidelines from the High Conservation Value Resource Network (HCV) and the High Carbon Stock Approach (HCSA). The preference is given to suppliers and business partners committed to certified and sustainable land or forest management practices.

5.11. Animal Welfare

FKT GmbH aims to consider animal welfare in its business activities. Therefore, relevant suppliers and business partners processing animal products are expected to implement standards and best practices for ensuring animal welfare throughout the supply chain. Additionally, where possible and not legally required, alternative non-animal testing methods are preferred. In any case, the supplier must comply with national and international regulations concerning animal welfare and animal testing, such as the German Animal Welfare Act or the Directive 2010/63 of the European Union (the so-called Animals in Science Directive).

The mentioned ethical principles include the "3R Principle for Animal Testing (Reduction, Refinement, Replacement)," the "Five Freedoms of the Farm Animal Welfare Committee (FAWC) for Assessing Animal Welfare," and the principles of the World Organisation for Animal Health (OIE) for animal welfare (Terrestrial Animal Health Code).

6. Sustainable Supply Chain and Communication with Business Partners

The business partner must communicate the contents of this document to its suppliers, service providers, and other business partners, ensure their compliance with sustainability requirements, and verify the adherence to sustainability provisions throughout the supply or value chain.

6.1. Transparency

To identify and minimize sustainability risks in the supply chain, FKT GmbH's business partners must disclose information about their supply chains upon request. It is also recommended that business partners impose a corresponding

disclosure obligation on their suppliers, which should be passed on further. This may require business partners to disclose their supply chain, including interfaces such as smelters and refineries, to FKT GmbH and provide evidence of management systems and/or third-party verifications that exclude or minimize sustainability risks in the supply chain.

6.2. Responsible Procurement of Materials

In general, business partners are expected to use materials that do not contribute to human rights violations, health and safety issues, unethical business practices, compliance violations, or negative impacts on the environment or society.

Business partners must exercise due diligence in their supply chains to ensure that the materials they use are responsibly sourced and traded.

Business partners must ensure that all potential conflict minerals contained in their raw materials or products are sourced from validated conflict-free mines and smelters, particularly for tin, tungsten, tantalum, gold (3TG), and cobalt. For this purpose, tools and resources provided by the Responsible Minerals Initiative (RMI), including the Conflict Mineral Reporting Template (CMRT) and Cobalt Reporting Template (CRT), are recommended.

Business partners are expected to fully inform FKT GmbH upon request about their due diligence measures according to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" to support efforts towards full traceability and transparency in the supply chain.

6.3. Product Safety and Quality

All products and services must meet the contractually defined criteria for quality, as well as active and passive safety, and be safe for their intended use upon delivery.

7. Business Ethics and Compliance

7.1. Compliance and Laws

Integrity is expected in all business activities and relationships. Suppliers are required to refrain from any form of fraud, embezzlement, insolvency offenses, corruption, bribery, or favoritism. Business partners are obligated to comply with all applicable national laws and regulations related to their business relationship with FKT GmbH. All products sold by business partners to non-OEM customers must be compliant with the law.

7.2. Fair Competition

Laws and regulations that protect and promote free and fair competition, especially antitrust laws, must be adhered to. Companies must respect fair competition and refrain from engaging in anti-competitive agreements or arrangements with competitors, suppliers, customers, or other third parties, and must not abuse a possible dominant market position. Business partners must ensure that no exchange of competitively sensitive information or other behavior that may unduly restrict competition takes place within their business area.

7.3. Avoidance of Conflicts of Interest

Suppliers are encouraged to make decisions based solely on objective criteria in their dealings with business partners and not be influenced by personal or by own financial interests.

7.4. Prohibition of Corruption

Business partners prevent and reject any form of corruption. They ensure that their employees, subcontractors, or agents do not offer, give, or accept bribes, kickbacks, unlawful donations, or other illicit payments to public officials or third parties.

7.5. Import and Export Controls

Business partners strictly comply with all applicable laws related to the import and export of goods, services, and information. They also consider and comply with applicable sanctions lists. Business partners also ensure that all taxes, duties, and license fees levied in connection with the extraction, trade, and export of minerals in conflict-affected and high-risk areas are remitted in accordance with applicable law.

7.6. Protection of Business Secrets

Business partners are required to treat all non-public commercial and technical details that they become aware of through their business relationships as business secrets. They must respect intellectual property rights and protect relevant data.

7.7. Counterfeit Goods

It is expected from our business partners to develop, implement, and maintain appropriate methods and processes to minimize the risk of counterfeit goods and materials entering the entire supply chain. Effective procedures should be

established to identify counterfeit goods or materials. If identified, they should be isolated, and the Original Equipment Manufacturers (OEMs) and/or, if necessary, law enforcement authorities should be notified.

7.8. Data Protection

Business partners are expected to process protected data (trade secrets and personal data) in a proper and lawful manner. When collecting, handling, processing, or storing personal data, business partners are required to protect such data from unauthorized access, disclosure, theft, sharing with third parties, or misuse. If there is reasonable suspicion of violations of our policies, we expect disclosure of relevant information.

7.9. Use of Artificial Intelligence (AI)

Data protection and data security are fundamental requirements for the use of artificial intelligence (AI). Business partners ensure that all AI-based developments comply with applicable laws and regulations. AI systems must be reliable and free of discrimination. The control of AI applications must be carried out by humans.

7.10. Anti-Money Laundering

Business partners ensure compliance with the applicable legal provisions against money laundering in the course of their business operations.

7.11. No Support to Armed Groups

Business partners ensure that their business activities do not contribute directly or indirectly to the support of non-state armed groups.

7.12. Disclosure and Information

Business partners collect information about their business activities, practices, health, safety, and environmental protection measures. This information should be made available to FKT GmbH upon request to advance their sustainability efforts, to the extent that the disclosure does not violate legal requirements.

7.13. Reporting Misconduct and Compliance

To protect employees, business partners, third parties, and FKT GmbH, misconduct must be identified, investigated, and promptly addressed. This

requires the attention of all parties involved and the willingness to report potential serious violations of rules when there are concrete indications. Business partners must establish a suitable complaint process for their company. The system should allow concerns regarding business ethics, human rights, or the environment to be raised anonymously, confidentially, and without fear of retaliation, by both their employees and other potentially affected individuals. Business partners shall not take actions that hinder, obstruct, or impede access to the complaint process. They commit to contractually pass on the obligations mentioned in the preceding sentence to their suppliers and, to the extent possible and reasonable, ensure that these obligations are passed on in the supply chain.

7.14. Whistleblowing at FKT GmbH

FKT GmbH values relevant information from business partners, customers, and other third parties.

In case of specific indications of potential misconduct by employees of FKT GmbH, business partners, or business partners of the business partner in collaboration with FKT GmbH, we offer all involved parties the opportunity to report this through the Whistleblowing System of FKT GmbH. In principle, all serious complaints, indications, or grievances related to our company or connected with our business activities can be reported anonymously..

All information, contact details, and access to our complaint system can be found on our website www.fkt-gmbh.com.

Business partners commit to providing their employees with unimpeded access to the whistleblowing system established at FKT GmbH and refrain from any actions that hinder, block, or complicate access. Business partners undertake to contractually pass on the obligations mentioned in the preceding sentence to their suppliers and, to the extent possible and reasonable, ensure that these obligations are passed on in the supply chain. In cases where individual contractual obligations deviate from these principles, the contractual obligations with the business partners take precedence.

8. Implementation of Requirements and Violations

We aim to continuously develop the sustainability requirements together with our business partners, suppliers, and service providers and overall, promote their implementation. This sustainability code for business partners will evolve over time, and we welcome improvement suggestions from our partners.

In the event of justified reasons (e.g., concrete suspicion of non-compliance, failure to meet requirements, specific reports), FKT GmbH will approach the respective business partner, supplier, or service provider and initiate a dialogue. We may request information or evidence and may also require self-disclosure

from the business partner, supplier, or service provider, conduct interviews, on-site inspections, or audits, or employ other suitable methods to verify compliance with the sustainability requirements.

A violation of this code of conduct may lead us to review business relationships, request clarification and corrective actions. If a business partner, supplier, or service provider fails to initiate appropriate improvement measures within a reasonable period or if the violation is so severe that continuing the business relationship becomes untenable for us, it may lead to the termination of the business relationship.

We reserve the right to decide on a case-by-case basis how to address violations, but we will always engage in open, honest, and direct communication with the respective partner.

9. Acknowledgment and Consent

Relevant business partners, suppliers, and service providers will be informed about this supplier code of conduct when initiating a new business relationship and will receive this document.

By entering a business relationship, relevant business partners, suppliers, and service providers confirm that they have taken note of the sustainability code of conduct for business partners and that they respect the principles and sustainability requirements stated therein, and also enforce and promote them in their own supply chains. Existing business partners, suppliers, and service providers will be informed about the updates in this document and are also required to implement the requirements contained therein.



Josef Karrer
Geschäftsführer



Manuel Karrer
Bereichsleiter Beschaffung