

## Code of Conduct



## **Our obligations**

### **We comply with all laws and regulations**

We recognise all local, national and international laws, directives and standards and comply with them to the full. In addition, all employees are personally responsible for compliance with internal directives.

### **The integrity and reputation of the company are important to us**

No employee will act in a way that could be detrimental to the trust placed in Friothers by our business partners or the public. We will put the long-term prosperity of the company at the forefront of our thinking and our actions, not our personal interests. We will avoid situations in which there is a conflict between our personal interests and those of Friothers.

### **Employee satisfaction is very important**

We strive to achieve a high level of employee satisfaction. We believe that only satisfied employees will result in satisfied customers. We undertake to survey employee satisfaction on a regular basis and take action in case required.

We pay our employees fair market rates for their work. To ensure this, we systematically compare the tasks and qualifications of all employees against internal and external benchmarks. Employees share in the financial success of the company through appropriate bonus schemes. We guarantee equal opportunities to all our personnel. In addition, we foster the personal and professional development of employees.

### **We take health and safety seriously**

All employees are responsible for their own health and safety and for that of their co-workers. All companies in the Friothers Group will take the appropriate precautions for their line of business in accordance with the particular risks involved. We comply fully with all relevant legislation and safety standards, and we conduct occupational safety analyses in order to make continual improvements.

We attach great importance to prevention and education. We provide a workplace and a working environment that facilitate the mental and physical well-being of our employees. In cases of illness, accidents, difficult situations or social need, we will support our employees to the fullest extent possible.

### **We do not tolerate discrimination**

None of our employees may be discriminated against, either by the company or by other employees, in any form because of their ethnic origin, nationality, religion, age, gender or sexual orientation. Our employees are free to join a trade union. We are aware of our responsibility to support people with a physical or mental disability, both internally and externally in partnership with others.

There is no place for sexual harassment and mobbing in our company. We encourage our employees to report any incidents, regardless of whether they are victims or witnesses.

**We do not accept favours or bribes**

Management and employees are not permitted to make or accept gifts of money. This also applies to non-monetary gifts exceeding a value that is reasonable and customary in the country concerned. With respect to business expenditure and hospitality, we adhere strictly to local expense rules.

No individual, organization or company should profit from a relationship with individual employees of the Friothers Group. Any conflicts of interest should be avoided and laid open from the outset.

We do not tolerate active or passive bribery. We do not provide financial support to political organizations or individuals who wish to stand for political office or political posts.

**We respect the rules of fair competition**

We are committed to fair competition with no place for price fixing, cartels or other activities that impede competition. Our employees are prohibited from entering into unlawful or ethically questionable transactions or agreements. All employees comply with antitrust laws and regulations and are committed to good business practices. Given the complexity of these issues, experts must be consulted in cases of doubt.

**We keep our property and proprietary secrets safe**

We exercise great care with our equipment, resources and proprietary information. Commercial and proprietary secrets must not be disclosed to third parties, either inside or outside the company, without permission. In particular, technical or commercial knowledge, drawings, customer information and other sensitive information and documents must be protected against loss or access to unauthorized persons.

When using information technology such as e-mail, messaging services or other web-based tools, all employees must comply with the respective rules in order to prevent information being inadvertently lost or passed to third parties.

All employees are obliged to comply in full with our internal rules governing confident information.

**We are committed to ecological sustainability**

We are an environmentally conscious company committed to the careful and considerate use of energy and natural resources. By our forward-looking actions, we make a contribution to minimizing the consumption of energy, water and chemicals of all types, as well as to dealing with the problem of emissions. We strive to continually improve the environmental performance of our products and services. We train and raise awareness among our employees, and also encourage our customers and suppliers to behave in an environmentally responsible manner. We do not condone irresponsible profit-seeking and cost-cutting at the expense of the environment and people. On the contrary, we endeavour to ensure sustainability by creating a balance between economic, environmental and social aspects.

## How do we ensure that our Code of Conduct is followed?

### Implementation and monitoring

All employees of the Friothers Group undertake to uphold the principles of the Code of Conduct of Friothers as one of their conditions of employment. Managers are obliged to inform and train their staff accordingly. Infringements of these principles are punished appropriately, even up to instant dismissal and criminal prosecution.

Regular monitoring is essential in an internationally operating company to ensure that procedures and directives are followed, and to provide employees with the necessary support.

Employees who become aware of contraventions of this Code of Conduct or other ethical guidelines and principles are urged to report these to their line manager or their respective Human Resources manager. Such reports will be handled in confidence and may not be misused as an excuse for sanctions.

### Supportive documents

The documents listed below are the foundation for this Code of Conduct. They form part of Friothers's integrated quality management system.

- IMS 0.1.0.0 Leitbild (Mission statement)
- IMS 0.1.1.0 Qualitätspolitik (Quality policy)
- IMS 0.1.1.1 Sicherheits und Gesundheitspolitik (Health and work safety policy)
- IMS 0.1.1.2 Umweltpolitik (Environmental policy)
- IMS 0.1.1.3 Betrügerische Produkte-Politik (Fraudulent items policy)
- PB 1.0.0.0 Vision, Leitbild, Strategie (Vision, mission, policy)
- PB 1.0.1.0 Unternehmensführung (Corporate governance)
- PB 3.0.0.5 Lieferantenmanagement (Supplier management)
- WE 4.1.1.0 Arbeitsvertragliche Bestimmungen (Employment contract provisions)
- WE 4.1.2.0 Arbeitszeitreglement (Working hours regulation)