**FFG** 

## FFG Flensburger Fahrzeugbau Gesellschaft mbH

Werftstraße 24 D-24939 Flensburg

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### PREFACE

## Code of Conduct

**FFG Flensburger Fahrzeugbau Gesellschaft mbH** (FFG), based in Flensburg, Germany, as an internationally active company, considers itself fully responsible for recognizing social and ecological standards and is committed to complying with all of the following codes of conduct. Social responsibility, sustainability and compliance are of essential importance to us and are deeply integrated into our corporate processes. Compliance with these requirements is fundamental to our success and has been part of our corporate culture and DNA from the beginning.

Norbert Erichsen Max Heimann Jörg Kamper Chief Executive Officers FFG Flensburger Fahrzeugbau Gesellschaft mbH



## **1**. Declaration of commitment

### Code of Conduct

#### **Importance**

The Code of Conduct exists to establish clearly defined standards of behavior for FFG employees. It serves to promote ethical values and create a respectful and professional environment. This Code of Conduct sets out the expectations for members behavior, helps to avoid misunderstandings and supports compliance with legal regulations and guidelines. It also helps to uphold the reputation and integrity of the organization and promotes a culture of accountability and trust.

#### **Commitment**

All FFG employees are required to comply with this Code of Conduct in order to promote an ethical work environment, protect the organization's reputation, minimize legal risks and strengthen stakeholder trust.

#### Management as a role model

FFG managers act as role models, as their conduct has a significant impact on the organizational culture. By actively living the values, they create credibility, promote uniform standards, motivate employees, earn trust and respect and protect the company's reputation. Ultimately, they help to establish a culture of integrity and responsibility.





Protecting the environment is a central component of our Code of Conduct. We are committed to acting in an environmentally conscious manner and promoting sustainable practices in order to minimize the negative impact of our business activities on the environment. This includes the reduction of waste and emissions, the responsible use of resources such as water and energy, and compliance with all relevant environmental regulations and standards. We recognize that protecting the environment is not only an ethical obligation, but also crucial for the long-term development of our company and the health of our planet. By acting in an environmentally conscious manner, FFG aims to make a positive contribution to the preservation of nature and the sustainable development of our society.

#### 2.1 Energy efficency

We are committed to using energy consciously and continuously striving for improvements. We invest in renewable energies, train our employees and comply with all legal requirements. Through these measures, we are making our contribution to climate protection and promoting the sustainable use of energy.

# 2. ECOLOGICAL RESPONSIBILITY

## Code of Conduct

#### 2.2 Reduction of waste and emissions

We are committed to actively taking measures to reduce waste and emissions in order to minimize our environmental impact. We focus on avoiding waste, recycling and reusing materials as well as reducing emissions through improved energy efficiency and clean technologies. We strive to sustainably reduce our environmental impact through responsible procurement and continuous improvement of our processes.

#### 2.3 Efficient water consumption

Our code of conduct obliges us to use water consciously. We minimize water waste by using economical appliances. Together, we are helping to conserve water resources and preserve them for future generations.







It is important to us that all employees understand and consider the impact of their actions on the organization, the community and the environment. FFG is guided by the International Labor Organization (ILO) standards to ensure compliance with fundamental human rights. This means that we are committed to acting ethically, complying with laws and regulations and promoting sustainable practices. This applies to both internal and external personnel. Furthermore, a sense of responsibility means that we are actively committed to improving the way we work and positively shaping our environment. By acting responsibly, we contribute to the long-term stability and success of our organization.

#### **3.1 Integrity and honesty**

Integrity and honesty are crucial in the Code of Conduct as they promote trust, reduce the risk of fraud, support a positive corporate culture and strengthen the organization's reputation. They are cornerstones of ethical behaviour and help to create a trustworthy and successful organization.

### **3. SOCIAL RESPONSIBILITY**

## Code of Conduct

#### 3.2 Respect and diversity

Diversity encompasses the recognition of different perspectives, experiences and skills of employees, while respect means honoring the uniqueness of each individual. Our organization is committed to fostering an inclusive work environment where every employee is respected and valued. We believe that diversity and respect are the foundation for a creative, innovative and successful organization. Respectful treatment also includes ensuring the appropriateness of necessary disciplinary measures.

#### 3.3 Anti-discrimination and harassment

We are committed to creating a work environment that is free from all forms of discrimination and harassment. Any discriminatory or harassing behavior will not be tolerated and will have serious consequences. We promote a culture of respect and cooperation in which all employees can feel safe and valued. Any behavior that endangers or harasses others will not be tolerated and may result in disciplinary action.

In addition to treating each other with respect, equal rights and equal opportunities between men and women are also respected. The principle of equal work for equal pay applies and fair remuneration is generally important in order to promote the satisfaction of our employees.







Safety in the workplace is of paramount importance and a central component of our Code of Conduct. We are committed to ensuring a safe working environment for all employees. This includes complying with all applicable safety regulations and standards and providing appropriate training and resources to prevent accidents and injuries. Every employee is encouraged to actively participate in workplace safety measures and report potential hazards. We strive to promote a culture of safety that prioritizes the health and well-being of all employees.

#### 3.5 Forced labor and child labor

We strictly reject any form of forced or child labor. Furthermore, no employees are employed without an official work permit. Forced labor is involuntary work or service that is enforced under threat of punishment. Child labor, on the other hand, is work performed by a minor that is harmful to their physical and mental development or prevents them from attending school.

### **4. COMPLIANCE**

In addition to social and environmental responsibility, compliance with the law is another key area of corporate responsibility. Compliance with these laws not only helps to minimize legal risks and potential liability claims, but also promotes employee confidence in the company and strengthens the organization's public image.

#### 4.3 Corruption

FFG works against corruption in any form and prohibits any illegal influence by employees, representatives and others acting on behalf of FFG. Material or immaterial benefits may not be demanded, promised or accepted in order to avoid the impression of influencing business decisions. It is also prohibited to offer personal advantages in order to secure orders or to obtain unjustified advantages. Internal value limits regulate the acceptance and granting of permissible benefits, while facilitation payments to public officials are generally prohibited.

Avoiding conflicts of interest is essential for FFG. Through ethical behavior, FFG demonstrates its commitment to integrity and gains the trust of customers and business partners. Objective decisions are possible because employees can act free of personal motives. This improves the quality of decision-making and supports the long-term success of the company. An ethical working environment contributes to employee satisfaction, increases motivation and promotes loyalty to the company. Overall, avoiding conflicts of interest is a key component of FFG's corporate culture and contributes significantly to its success.

### Code of Conduct







#### 4.1 Know how and business secrets

In addition to the general guidelines for dealing with trade and business secrets, the specific requirements of secrecy protection must also be observed in the defense sector. Secret protection in business serves to protect and maintain the confidentiality of classified information. Classified information are information, objects or findings that require secrecy regardless of their form of presentation and are classified by an official body according to their need for protection. Every employee is obliged to comply with the legal requirements of confidentiality protection in order to protect such information.

#### 4.2 Data protection and information security

The global electronic exchange of information is crucial to our business success and the efficiency of our employees. However, the benefits of electronic communication are associated with risks for information security and data protection. While data protection is intended to protect personal data, the term information security refers to the general protection of information in the context of confidentiality, integrity and availability. Every employee is obliged to act in accordance with internal regulations in order to protect physical and digital information of any kind.

## 4. COMPLIANCE

## Code of Conduct

#### 4.4 Money laundering and terrorist financing

FFG takes all necessary measures to prevent money laundering within its sphere of influence. Our employees do not carry out any activities, either independently or in cooperation with third parties, that could violate applicable money laundering laws. Incoming and outgoing payment transactions are monitored. Transactions that meet certain internal risk criteria are also checked in detail using internal systems and processes. In the event of suspected money laundering, the treasury function liaises with the supervisory authorities, while the compliance organization provides advice and support where necessary. Terrorist financing is closely related to this. FFG defines clear guidelines to combat terrorist financing in order to ensure that financial activities are not misused to support terrorist organizations. In order to prevent money laundering and terrorist financing, customers and suppliers are thoroughly checked, internal control systems are operated, suspicious activities are reported as quickly as possible and regular training is provided for employees.

#### 4.5 Export control and foreign trade

Compliance with export controls and foreign trade regulations (e.g. embargo lists) is of crucial importance to FFG. From a legal perspective, they are required by law and violations can lead to serious consequences. They also serve to protect sensitive technologies and information and to minimize risks from the unauthorized transfer of hazardous materials. Compliance helps to protect a company's reputation and integrity and is crucial for good international relations. Overall, compliance with export controls is essential to meet legal requirements, ensure security, minimize risks and protect FFG's good reputation.



## 4. COMPLIANCE



#### 4.6 Fair competition and cartel law

FFG strictly adheres to the applicable antitrust and competition laws in all its business practices. We condemn agreements with competitors and cartels and are committed to fair competition. Transparency, training and compliance with rules of conduct in business relationships are important to us. We work closely with antitrust authorities and protect whistleblowers.

#### 4.7 Accounting and taxes

Our Code of Conduct requires strict compliance with all applicable tax laws and regulations, including timely payment and accurate filing of tax returns. We maintain transparent accounting in accordance with international standards to provide our stakeholders with a clear view of our financial position. Any form of tax evasion or fraudulent accounting practices are rejected by our organization. We maintain constructive cooperation with the tax authorities and provide all necessary information.

#### 4.8 Labor law

Our employees are the most important part of our value creation. Accordingly, in addition to fair remuneration, compliance with labor law regulations is fundamental to our success. This includes preventing unlawful discrimination within the meaning of the General Equal Treatment Act (AGG), adhering to break and working times and voluntarily promoting the health of our employees.

## **5. CUSTOMERS AND SUPPLIERS**

## Code of Conduct

#### 5.1 Quality and service

The quality of our work is very important to us, as it has a direct impact on the success and reputation of the company. It is an important factor in gaining the trust of new customers and developing long-term relationships. Only through continuous improvement can we remain competitive. We strive to minimize the number of errors and increase customer satisfaction. In doing so, we always focus on the requirements of the market and face up to new challenges. Our qualified employees and an appropriate working environment are the basis for this success. Every employee makes an important contribution to the realization of this claim.

#### 5.2 Honest communication and transparency

Honest communication and transparency are fundamental principles of the FFG Code of Conduct. We are committed to communicating openly and transparently, both within the company and with our customers, suppliers and other stakeholders. Through honest communication, we create a climate of trust and openness that promotes cooperation and commitment from all parties involved. We adhere to the principles of truthfulness, integrity and reliability in all our interactions and strive to communicate all relevant information clearly and comprehensibly. Through honest communication and transparency, we strive to foster a culture of respect, collaboration and accountability that is the foundation of our company.







#### 5.3 Compliance to contracts and agreements

We are committed to fulfilling all contractual agreements and obligations carefully and reliably in order to maintain the trust of our business partners and customers. This includes adhering to delivery deadlines, quality standards and all other contractually stipulated conditions, such as compliance requirements. Contractual compliance is therefore not only a legal obligation, but also an ethical responsibility to which we are committed in order to earn the trust and respect of our stakeholders and build long-term partnerships.

#### 5.4 Respectful interaction with customer and suppliers

Treating customers and suppliers with respect is crucial to FFG's success. Through respect, we show appreciation for their needs and opinions, foster trust and loyalty and strengthen our corporate image. Respect creates a positive working environment in which effective collaboration and problem solving are possible. Ultimately, respectful behavior helps to build relationships and ensure the long-term success of the company.

## 6. WHISTLEBLOWER SYSTEM

## Code of Conduct

#### 6.1 Violations

Violations of these principles of conduct can jeopardize not only the economic success of FFG, but above all the well-being and professional future of each individual employee. For this reason, FFG does not tolerate any violations of the Code of Conduct.

#### **6.2 Reporting of violations**

We encourage all employees to report potential violations without hesitation or fear of retaliation. This can help to identify and correct unethical behavior before it leads to serious consequences. All reports are treated confidentially and seriously investigated. We are committed to fostering a culture of openness and accountability in which everyone helps to protect the integrity and reputation of our company. To report violations or suspected cases, please use the <u>whistleblower system</u>.

If you have any questions, please contact the following e-mail address: <u>compliance@ffg-flensburg.de</u>

#### 6.3 Continous monotoring and updates

Updating the Code of Conduct is a continuous process that ensures that our guidelines and standards of conduct remain relevant and effective at all times. Through regular reviews and adjustments, we respond to changing legal requirements, industry trends, internal developments and information from the whistleblower system.







#### FFG Flensburger Fahrzeugbau Gesellschaft mbH

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