



SUPPLIER CODE OF CONDUCT



1. DECLARATION OF COMMITMENT

FFG Flensburger Fahrzeugbau Gesellschaft mbH (FFG), based in Flensburg, Germany, as an internationally operating company, considers itself fully responsible for recognizing social and ecological standards and is committed to complying with all of the following code of conduct, as well as our own code of conduct. Social responsibility, sustainability and compliance guidelines are of essential importance to us and are deeply integrated into our corporate structure and our success.

The purpose of this Supplier Code of Conduct is to ensure cooperation with our suppliers, sustainable supply chains and the application of applicable laws.

Together with our suppliers, we want to further develop future-proof and sustainable business relations. The following Supplier Code of Conduct defines all internationally recognized requirements for our suppliers.

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We expect our suppliers to recognize the requirements and do their part to implement them. We therefore oblige our suppliers to pass these requirements on to their suppliers.

As humanitarian violations and environmental pollution can occur along the entire supply chain, it is in everyone's interest to pass on the obligations of this Code of Conduct as far up the supply chain as possible.

This Code of Conduct for Suppliers forms the basis for successful cooperation and serves as a guideline for acting with integrity. This Supplier Code of Conduct supplements the General Terms and Conditions of Purchase and thus becomes an integral part of the contract and a binding requirement.

Norbert Erichsen

Max Heimann

Jörg Kamper

Chief Executive Officers

FFG Flensburger Fahrzeugbau Gesellschaft mbH

1. Declaration of commitment
2. Social responsibility
3. Ecological responsibility
4. Compliance
5. Participation of suppliers

The supplier undertakes to recognize the general declarations of human rights of the United Nations and to implement them in practice. Furthermore, the following conventions of the International Labor Organization (ILO) shall be observed. These regulations apply both to the supplier's own employees and to personnel service providers.

- 2.1** You ensure that you prohibit all forms of forced labor in your business operations and at your suppliers. In particular, this includes all forms of modern slavery, human trafficking, illegal employment and undeclared work. Every employee works voluntarily and it must be possible to terminate the employment relationship at any time. This also applies to the commissioning of service providers in your business area. You ensure that none of these violations occur or can occur in your business environment. (ILO Convention Nr. 29 und 105)
- 2.2** You ensure that everyone involved in the supply chain and in your company treats others with respect and fairness. Respectful treatment also includes ensuring that the necessary disciplinary measures are appropriate.
- 2.3** You undertake to prohibit any form of child labor in accordance with ILO standards. Accordingly, you do not employ anyone who has not yet reached the general minimum age of 15 years. Under special circumstances, this age may be reduced to 14 years. Furthermore, you ensure that no children under the age of 18 are used for hazardous work. You also observe the applicable standards on underage work at night. (ILO Convention Nr. 79, 138, 142 und 182)
- 2.4** You ensure that any form of discrimination is precluded. This includes discrimination based on gender, ethnic, social or national origin, age, religious affiliation, skin color, sexual orientation or identity, political opinion, health or disability. You ensure that no one is disadvantaged because of these criteria or in any other way and that equal rights are guaranteed. (ILO Convention Nr. 100 und 111)
- 2.5** You ensure that employees enjoy all rights of freedom of association and unionization. You allow the possibility of collective bargaining and the right to strike and will not discriminate against anyone for taking advantage of these rights. (ILO Convention Nr. 87 und 98)
- 2.6** You ensure that employees are paid in accordance with the statutory minimum requirements. In particular, you ensure that the concept of "equal work, equal pay" is applied. (ILO Convention Nr. 131)

2. SOCIAL RESPONSIBILITY

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- 2.7** You ensure that working hours do not exceed the legally prescribed maximum. You also ensure that break times and the statutory rest periods are observed every seven days. (ILO Convention 1 und 14)
- 2.8** You ensure that all necessary occupational health and safety measures are taken in your business area and that the health and safety of employees is guaranteed. National and international standards are observed when accommodating employees. (ILO Convention 155)
- 2.9** You ensure that employees receive a copy of their employment contract and that access to their personal documents is not denied or restricted.
- 2.10** You ensure that you pay health and social security contributions for all employees and subcontractors. This information must be documented for each employee.



3. ECOLOGICAL RESPONSIBILITY

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The supplier undertakes to apply applicable guidelines for the protection of the environment. They are committed to sustainable and resource-saving development and comply with the following conventions.

- 3.1** You ensure that you comply with the Minamata Convention in every aspect and that every provision governing this Convention is adhered to.
- 3.2** You ensure that you comply with the Stockholm Convention and that all associated bans and restriction measures on the designated pollutants are fulfilled.
- 3.3** You ensure that you comply with the Basel Convention and that no hazardous pollutants are exported.
- 3.4** You ensure that you reduce waste as much as possible and that recyclable materials are used wherever possible.
- 3.5** You ensure that measures are taken to minimize greenhouse gases, in particular measures to reduce CO₂ emissions.
- 3.6** You ensure that measures are taken to minimize water and energy consumption.

4. COMPLIANCE

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In addition to human rights and environmental protection requirements, other compliance guidelines are also of major importance to us, which are aimed at behavior in the business environment.

- 4.1** You ensure that corruption is not tolerated in your business area and that no form of corruption or bribery occurs in your company. You will only pass on gifts and gratuities to our employees that are of a size that does not influence objective business conduct.
- 4.2** You ensure that no money laundering activities are supported or carried out in your business area and that all legal obligations to prevent money laundering are complied with.
- 4.3** You ensure that no activities are carried out in your business area that finance or otherwise support terrorism.
- 4.4** You ensure that there is no bogus self-employment in your business area.
- 4.5** You ensure that you do not infringe intellectual property rights and that you protect customer information and intellectual property.
- 4.6** You ensure that all data protection laws are complied with and that information security is guaranteed.
- 4.7** You ensure that you establish processes to ensure product safety and guarantee product safety to a high degree.
- 4.8** You ensure that you prevent violations of competition and antitrust law and do not commit any such violations. You ensure fair competition and do not enter into any illegal agreements with your competitors.
- 4.9** You ensure that you operate export controls and do not commit any foreign trade violations. This also includes compliance with applicable embargoes and sanctions.

5. PARTICIPATION OF SUPPLIERS

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Your help is needed to ensure the sustainability and therefore future viability of the supply chain. We are therefore dependent on your support. It is also important for us that we do not leave our suppliers alone with the requirements. Please contact us and we will offer you support. The following obligations to cooperate must be observed.

- 5.1** As soon as you become aware of a breach of duty, you are obliged to draw up a remedial action plan indicating when and by what means you intend to counteract this breach of duty.
- 5.2** You are obliged to disclose your direct suppliers to us on request in order to ensure greater transparency in the supply chain.
- 5.3** As soon as one of the guidelines to be complied with is violated in your supply chain, you are obliged to inform us of this violation. Together we will then find suitable remedial measures to remedy the breach of duty.
- 5.4** You are obliged to pass on the requirements and obligations of this Code of Conduct to their suppliers in order to make the supply chain as sustainable as possible right up to its origin.
- 5.5** You are obliged to investigate signs of violations in your supply chain. We encourage all employees to report potential violations without hesitation and without fear of reprisal.

Please use our whistleblower system on our website ([link to the whistleblower system](#)). Further information can be found in the rules of procedure for the whistleblower system.

If you have any questions, please contact us at the following e-mail address:
supplier-compliance@ffg-flensburg.de



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Basis: A-Q-9943LL-01EN; Rev. "-"; 'OFFEN/PUBLIC'