

fischer Maschinentechnik-GmbH • fischer Edelstahlrohre GmbH • fischer Rohrtechnik GmbH • fischer Power Solutions GmbH

# Company policy

Applicable to employees and business partners

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## Foreword

The fischer group operates as one of the leading manufacturers of stainless steel tubing and components worldwide. The group is represented in Germany by fischer Maschinentechnik GmbH, fischer Edelstahlrohre GmbH, fischer Rohrtechnik GmbH and fischer Power solutions GmbH as well as by fischer Hydroforming GmbH in Menden. Worldwide, the group of companies also includes the national companies in Austria, Canada, USA, Mexico, Uruguay, South Africa and China (hereinafter referred to collectively as "fischer").

The corporate activities of fischer are based on globally applicable standards, in particular the ten principles of the Global Compact Initiative ([www.globalcompact.org](http://www.globalcompact.org)) of the United Nations, the core labour standards of the International Labour Organisation (ILO) and the German Supply Chain Act. We encourage our employees (hereinafter referred to neutrally as "Employees") to uphold the principles and conduct guidelines listed below.

fischer expects its business partners to comply with this guideline and to ensure compliance with fundamental human rights in their business activities in accordance with the applicable national legal system.

## Code of Conduct

### ► Compliance with laws, standards and guidelines

All fischer Employees must comply with the applicable laws, standards, guidelines and principles. As a customer-oriented company, this also includes customer-specific requirements.

The uniform guiding principles apply:

- We treat each other with respect, fairness and loyalty.
- We act responsibly.
- We assume social responsibility.
- We maintain a close relationship with our customers and suppliers.
- We respect everyone's values.
- We work together.
- We act in a resource-conscious manner and treat resources with care.

## Non-disclosure, ethics and business conduct

### ► Non-disclosure and data protection

Within the limits of business confidentiality, open and transparent communication is practised. The internal regulations on company and business secrets must be observed. The Data Protection Act and the internal regulations on information security and prototype protection must be observed and complied with. Information from our business partners is subject to special protection and is only communicated in a restricted manner between defined and discussed partners. The rules for the protection of data and information are regulated via the information management system.

### ► Protection against corruption

Any form of corruption, bribery and venality, i.e. any criminal or unethical influence on decisions by unlawfully offering, granting, demanding or accepting advantages to or from business partners, must be refrained from and combated.

### ► Intellectual property

Intellectual property rights shall be respected; technology and know-how transfers shall be made in a way that protects intellectual property rights and customer information.

### ► Money laundering

Relevant legal provisions for the prevention of money laundering are observed and the reporting obligation is duly fulfilled.

### ► Avoidance of Conflicts of Interest

All fischer Employees make their decisions based on factual considerations and are not guided by personal interests in an inadmissible way.

### ► Whistleblowing and Protection from Retaliation

All employees are encouraged to immediately report information about known or suspected violations of laws and regulations to their manager or the relevant specialist department. Employees need not fear retaliation for sharing information.

### ► Customs and export regulations

International customs and export control regulations are monitored and a proactive exchange of information relevant to foreign trade is ensured with the aim of a secure supply chain.

### ► Plagiarism

Plagiarised products may not be circulated or acquired and must be reported immediately to the management. Theft of intellectual property from others is strictly prohibited.

### ► Export controls and economic sanctions

In the spirit of corporate ethics, we ensure that export controls and existing economic sanctions are always checked and complied with by fischer.

### ► Dealing with property of the company and business partners

All fischer Employees treat the property of the company as well as the property of business partners with care. Theft or wilful destruction will be reported and will have criminal consequences.



► Standards in the supply chain

Our suppliers are aware of the fischer corporate guidelines and are obliged to observe them equally and to pass them on in the supply chain accordingly.

Sustainability aspects

► Prohibition of discrimination

fischer cultivates respectful, fair and loyal dealings with each other. The personality of each individual Employee is to be respected and any discrimination of Employees in hiring and employment is to be opposed.

► Working hours

The respective statutory provisions and company regulations on working hours must be complied with.

► Wages and social benefits

fischer generally bases its remuneration on current industry standards. Additional social benefits such as a company pension scheme, group accident insurance, occupational disability pension, cost coverage for personalised hearing protection or orthopaedic insoles, etc. are concluded or offered for each Employee.

► Freedom of association

Employees' freedom of association shall be upheld in accordance with applicable national legislation.

► Child and forced labour

Any form of illegal employment and forced labour as well as child labour is strongly criticised by fischer and is not supported and is opposed where possible.

► Land acquisition

When acquiring land, fischer does not participate in unlawful evictions or other forms of unlawful deprivation of land, forests and waters, the use of which secures the livelihood of others.

► Modern slavery

We are committed to acting ethically and correctly in all our business activities and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery does not occur in our business.

► Deployment of security forces

fischer is committed to discouraging the use of extensive force when using private or public security forces for company purposes.

► The imperative of fair competition and the prohibition of cartels

The applicable rules of competition and antitrust law as well as the requirement of fair competition shall be complied with.

► Information and communication

All fischer Employees have direct access to this company policy. Partners and suppliers are provided with the company policy on the web site.

► Dealing with conflict minerals

In dealing with the conflict minerals tin, tungsten, tantalum, cobalt and gold, fischer is guided by the Organisation for Economic Co-operation and Development (OECD) Guiding Principles on Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas and expects the same from its supplier. Smelters and refiners without adequate, audited due diligence processes should be avoided.

► Notes and queries

Suspected violations of this policy can be reported to the fischer group at any time.

### Quality management

Our goal is to manufacture products that meet the requirements and expectations of our customers. All phases of product development are carefully planned and executed in compliance with standards, regulations, legal provisions and customer requirements. The necessary resources to achieve the quality objectives are made available. Trained and qualified personnel carry out the necessary work in all areas of the company. We achieve the quality of our products by planning all necessary measures before and during order processing and by systematically monitoring all processes during product creation. In the foreground of all activities is the zero-defect strategy with preventive measures to prevent the occurrence of defects.

An objective and systematic procedure is used to determine and evaluate customer satisfaction as part of market monitoring. Trends in customer development and satisfaction are documented, evaluated and, if possible, compared with the competition. Every Employee is obliged to observe and implement the rules and specifications of the quality management system.

### Health, occupational safety, environmental protection and energy management

► Handling waste and hazardous substances

fischer follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment are identified and managed in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing and disposing of them.

► Health and safety

The health and safety of our Employees is one of the top priorities at fischer. As occupational health and safety is a fundamental value of our company, we strive to minimise the risks for our Employees, contractors and third parties and to achieve the goal of zero accidents.

► Risk assessment and ergonomics

We rely on external and internal experts for occupational safety and health protection. Topics such as work equipment, ergonomics, health hazards, order and cleanliness, activities and work procedures as well as PPE are continuously monitored and improved. Regular workplace risk assessments ensure safe and healthy workplaces. Each manager is responsible for the protection of their Employees and must instruct, train and supervise them. Appropriate protective measures are also taken to ensure the safety of visitors.



► Emergency management

The emergency plan regulates emergency preparedness for occupational accidents, fire, explosion, natural disasters, environmental accidents, pandemics as well as information security events and first aid. Immediate measures can be coordinated by trained first aiders and fire protection assistants.

► Fire protection

All buildings of the fischer are monitored via a state-of-the-art fire protection system with direct connection to the local fire brigade control centre. In addition, fire alarms can be triggered via house alarms or emergency systems. Areas requiring special protection, such as server rooms, are additionally equipped with automatic gas extinguishing systems. Special machines are equipped with flushing and extinguishing devices to prevent the rapid spread of fire sources. Hand-held fire extinguishers and water hydrants are installed throughout the company premises for direct fire-fighting intervention.

Specially trained staff monitor the fire safety precautions and regular contact is maintained with the local fire brigade. Regular fire safety training and evacuation drills take place or are simulated.

Fire brigade plans and rescue plans are visible throughout the company premises.

► Handling fresh and waste water

Waste water from operations, manufacturing processes and sanitary facilities is typified, monitored, inspected and, if necessary, treated in a waste water treatment plant before discharge or disposal. In addition, measures are introduced to reduce the consumption of fresh water and the generation of waste water.

► Dealing with air emissions

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions are typified, routinely monitored, verified and, if necessary, treated before they are released.

► Climate protection

We participate in sustainable and active climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources. This involves creating transparency about our CO<sub>2</sub> emissions and setting ambitious CO<sub>2</sub> reduction targets.

► Environment and energy

By using natural resources and energy sparingly, we contribute to minimising the environmental impacts associated with the manufacture of products and services. An environmental and energy management system anchored in the organisation serves to implement our environmental and energy policy, monitors compliance with the environmental and energy targets and controls the relevant operational processes. Every fischer Employee undertakes to comply with the environmental and energy management specifications.

We actively involve our suppliers in our environmental and energy management and work towards ensuring that they comply with the same standards. When planning, introducing and operating new procedures and processes, we are guided by the state of the art in order to keep the environmental impact and energy consumption as low as possible.

By informing and training our Employees in environmental protection and energy efficiency, we promote awareness for environmentally oriented and energy-saving actions.

## Responsible procurement

### ► Responsible raw material sourcing

fischer supports activities that ensure the responsible procurement of raw materials. The procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures are avoided. The use of raw materials such as conflict minerals, which are affected by embargoes or other import restrictions, is excluded. We are committed to identifying these raw materials in the supply chain and disclosing the origin to sources of the raw materials they use.

### ► Avoiding hazardous substances

Substances whose release poses a risk to humans and the environment are avoided. We maintain and live a hazardous substance management system that ensures safe use and transport as well as safe storage, reprocessing, reuse and disposal.

### ► Environmentally friendly products

When developing products, we ensure that their use is economical in terms of energy and natural resources. The products are suitable for reuse, recycling or safe disposal.

Our products do not contain any substances of concern covered by the REACH regulation. If necessary, affected ingredients must be reported in advance to fischer. Materials or purchased parts that do not comply with the RoHS specifications are substituted.

### ► Subcontractors

fischer ensures that the regulations contained in this point are complied with by means of suitable contractual arrangements with subcontractors.

### ► Management systems

fischer maintains management systems to ensure compliance with the principles set out in this sustainability policy.

fischer prefers suppliers who actively implement a quality management system according to DIN EN 9001, an environmental management system according to ISO 14001, an information security management system according to ISO 27001 or VDA TISAX, as well as ISO 45001 for occupational safety or equivalent systems.

## Compliance with company policy

### ► Controls

fischer regularly reviews compliance with this corporate policy. External enquiries and requests for information are answered in a reasonable time and in compliance with specified formalities within the framework of the applicable data protection laws.

### ► Remedial action

Violations, especially of human rights-related or environmental obligations, are stopped immediately. Measures initiated are documented and checked for their effectiveness. Furthermore, in the event of a suspected violation, possible violations are immediately clarified and the management is informed about the clarification measures taken.

► Consequences and violations

These corporate guidelines are binding for fischer and we commit ourselves and our Employees to comply with them. We expect the same from our business partners. If, in the course of the business relationship, fischer determines that business partners do not behave according to the same guidelines or violate points from these guidelines, fischer will consider this to be a significant impairment of the business relationship and reserves the right to reconsider, if not terminate, the business relationship.

If our business partners discover violations of these guidelines by Employees of fischer, these can be reported to the management of fischer at any time.

These binding corporate guidelines come into force on 01 August 2022.

A handwritten signature in blue ink, appearing to read "H. P. Fischer", written over a horizontal line.

Hans-Peter Fischer

A handwritten signature in blue ink, appearing to read "R. Fischer", written over a horizontal line.

Roland Fischer