

# Code of Conduct





Dear Ladies, Gentlemen and Employees,

The success and reputation of **FORTEC Elektronik Aktiengesellschaft** and all companies associated with the company largely depend on each of us always behaving lawfully and honestly and committing ourselves to our corporate values: integrity, respect and openness.

Our new Code of Conduct, which was adopted by the executive board and the supervisory board, is based on these corporate values and is intended to serve as a uniform guideline to help us overcome the challenges that arise in our daily cooperation with colleagues, customers, suppliers, other business partners and third parties. FORTEC Elektronik AG expects the members of its executive and supervisory boards, managing directors, executives and all employees around the world to comply with the code as a matter of course, and to promote implementation of the code to the best of their ability.

We have full confidence in your capability to make the right decisions when faced with difficult situations. Nonetheless, you should also know that support and assistance is available to you if you have the slightest doubt.

Please speak to your manager, the compliance team, the executive board, the supervisory board or a person within the company that you trust if you require any assistance, or if you observe a possible violation of this Code of Conduct. Our new whistle-blower system is also designed to support you in this.

Germering, October 2021



**Christoph Schubert**  
Chair of the supervisory board



**Sandra Maile**  
Chair of the executive board



**Bernhard Staller**  
Executive board

## Foreword



With this Code, the executive and supervisory boards, the entire management team and all employees of the FORTEC Group undertake to comply with all legal provisions incumbent on us and also with the Group's internal guidelines. This commitment is a matter of course for every individual.

The Code of Conduct applies to all subsidiaries and business units of FORTEC Elektronik AG and its affiliated companies worldwide (hereinafter referred to as the FORTEC Group).

Every employee, regardless of their position, role and level of employment within the organisation, receives the Code of Conduct by email. Employees are therefore considered to be familiar with it. Furthermore, it is available in up-to-date form on the intranet and internet.

We pursue our business activities in several countries and as such local laws, regulations or customs may conflict with our Code of Conduct. If conflicts or differences arise between the applicable legal regulations and our Code of Conduct, the stricter standard must be observed.

We only wish to work with business partners who share our interest in matters of safety and security, integrity and compliance, and we also expect all employees of our customers and suppliers to behave in a manner consistent with our Code of Conduct. The FORTEC Group will take appropriate measures if it appears that business partners are not satisfying the expectations placed in them or their contractual obligations.

We may dispense with gender-neutral differentiation in some places for ease of readability. In such cases, the corresponding terms apply to all genders in equal measure.

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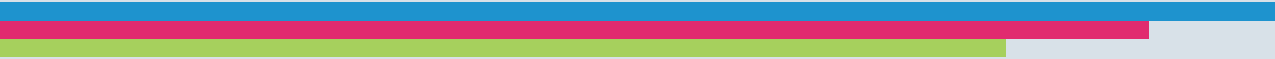
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# Our business conduct



## Our business conduct



### Establish and maintain solid relationships with suppliers and business partners

We (meaning all employees of the FORTEC Group regardless of position, role and level of employment within the organisation) work honestly, respectfully and responsibly with our business partners. We are a company that others can rely on.

Suppliers and business partners of the FORTEC Group are of the utmost importance to our business activities and our goal of meeting the expectations of as many stakeholders as possible, including our shareholders. As such, we are guided in our selection by thoroughness, integrity and objectivity.

We only wish to work with individuals and companies who share our commitment to safety and security, ethics and compliance.

We fulfil our due diligence obligations and our duties to act with regard to internationally recognised human rights and environmental standards throughout the supply chain and take appropriate action when we identify infringements.

We are clear and unambiguous in communicating our respective expectations of suppliers and business partners and we agree on contractual obligations and possible sanctions where necessary.

### Ban on corruption

The FORTEC Group does not tolerate corrupt behaviour in its business environment.

In our relationships with business partners and public officials, we never grant or accept gratuities that are intended to - or could appear to - influence business decisions or official decisions, or to gain any other improper advantages. This also applies to so-called facilitation payments, which are made in return for the processing of routine procedures without a discretionary decision by a public official.

We also expect our business partners to refrain from giving, offering, promising or accepting bribes, back-handers, improper donations or other improper payments or any extraneous benefits to or from customers, public officials or other third parties.

Corruption is intensively pursued by the authorities worldwide and can lead to fines or imprisonment and, in the case of the FORTEC Group, loss of employment. Furthermore, this may result in a „blacklisting“ of the FORTEC Group which would cause serious damage to the company. In such cases, the Group would also pursue and assert these damages against the individuals concerned.

## Our business conduct



### Ban on money laundering

The FORTEC Group only maintains business relationships with partners whose integrity it is convinced of.

We expect our business partners to comply with the applicable legal provisions designed to prevent money laundering and combat the financing of terrorism, and we expect them to furnish us with the necessary information in this regard.

Possible indications - such as unusually high payments, the receipt of payments from third parties who are not identifiably involved in a business relationship, the refusal of a business partner to disclose complete and truthful contact information - will be carefully reviewed by us and the business relationship will be suspended until clarification where necessary.

### Fair competition

Violations of prohibitions under competition and anti-trust law can have far-reaching consequences, e.g. monetary penalties or imprisonment, high fines and civil liability claims.

The FORTEC Group supports fair and unbiased competition. All FORTEC Group employees are required to comply with the rules of competition and antitrust law, both nationally and internationally.

We do not abuse a dominant market position where such a situation exists, and we expect our business partners to be committed to the principles of a free market economy and fair competition.

We do not engage in discussions with competitors in which prices or services are agreed or other forms of prohibited coordination of market behaviour is undertaken, and we do not enter into agreements with business partners or third parties that are designed to prevent competition or to share customers and territories.

We endeavour to ensure that the opportunities presented at association meetings and other industry gatherings are not used to exchange confidential market and company information. This also applies to the exchange of information within the framework of market research and benchmark projects. The economic freedom of action of all partners must be guaranteed in our supplier networks.

## Our business conduct



### Customs checks and export controls

The FORTEC Group always acts in accordance with the legal provisions and trade regulations relevant to us, in the spirit of responsible business practice. We comply with the applicable laws and regulations governing export control, sanctions and customs clearance in all regions and countries in which we operate. These do not only relate to the movement of goods; they may also have an impact on financial transactions and the use of technology, for example, as well as the purchasing or hiring of staff.

### Gifts, hospitality and invitations

The FORTEC Group does not offer third parties any improper advantages in the form of gifts, hospitality or invitations for the purpose of influencing them - either directly or indirectly.

FORTEC Group employees, regardless of their position, role or level of employment within the organisation, do not accept gifts, invitations or benefits that could compromise their independence within their official capacity. In case of doubt, such gifts, invitations or benefits are always made transparent to the respective manager and communicated to the compliance team.

Only symbolic occasional or promotional gifts of low value are acceptable. Business lunches and dinners must take place within a framework that is conventional and appropriate for business purposes, must serve a legitimate professional purpose, must be properly accounted for within the framework of tax regulations and the associated accounts must be transparently documented.



## Our business conduct



### Avoiding conflicts of interest

FORTEC Group employees, regardless of their position, role or level of employment within the organisation, make decisions solely on the basis of objective criteria and are not influenced by personal interests and relationships.

Nonetheless, conflicts of interest may arise in individual cases due to special circumstances that influence the ability to make objective decisions, such as:

- Secondary employment roles and affiliations with competitors, customers or suppliers
- Working together with close relatives in any manner, in particular with relatives who are public officials
- Close personal relationships with an employee who is connected with decisions concerning salary, performance assessment or promotion; an unbiased person acting responsibly for the FORTEC Group is always consulted in such cases
- Participation as a body in other companies

Where situations arise that could lead to a conflict of interest or even simply the appearance of a conflict of interest, the FORTEC Group encourages its employees at all levels of employment, as well as all other persons acting responsibly for the FORTEC Group, to approach the respective manager or the compliance team, to transparently set out the respective facts, and to clarify these in relation to the FORTEC Group and according to the principles laid down here.

### Dealing with governments, authorities and public institutions

Business relationships with government agencies are often subject to particularly strict requirements. We always act honestly and transparently and in accordance with applicable law when dealing with governments and authorities. This applies e.g. to our contact with authorities in day-to-day business (for necessary licences, permits or the conclusion of contracts), in the representation of political interests and in the case of official enquiries.

## Our business conduct



### Our public image

We always want to be perceived as a trustworthy company in the communities where we operate. As such, it is important that our public communication is clear, precise, consistent and responsible.

Respect, tolerance, honesty and integrity towards employees, customers, suppliers and the general public form the basis for our dialogue with third parties, while we also apply these principles in social media. As company employees, we therefore always express ourselves respectfully and professionally. The misuse of intellectual property or the publication of confidential or internal data and information is prohibited.

When giving external presentations, we make sure that the publication of contents has been approved in advance by the management of the FORTEC Group and that this takes place in line with the Group's corporate, marketing or sales policy.

We are aware that comments on social media are not anonymous and that they can have a detrimental effect on the reputation of our company, which is to be avoided.

## Work and social principles



## Work and social principles



### Occupational health and safety

The health, safety and protection of employees at every level of employment within our organisation are of top priority at FORTEC Group.

We therefore strictly comply with the applicable legal requirements for health and safety at work and support the further development and improvement of working conditions.

All employees of the FORTEC Group are requested to familiarise themselves with the correct conduct in the event of an emergency.

Accidents and occupational illnesses must be reported to the site health and safety officer immediately.

### Working hours and remuneration

We comply with legal regulations at all of our sites to ensure fair working conditions, including the provisions governing pay, working hours and privacy.

### Equal opportunities and non-discrimination

Equal opportunities are a matter of fairness, respect and dignity. We therefore treat all individuals fairly, respectfully and with dignity. The FORTEC Group does not make decisions in the workplace based on ethnicity, nationality, skin colour, origin, religion, gender, age, sexual orientation, marital status, disability or other legally protected characteristics or attributes. Employees are hired and promoted based on their qualifications and skills.

Abusive language and harassment are not tolerated in any form within the FORTEC Group. This includes actions that may be considered offensive, intimidating or discriminatory, as well as any form of sexual harassment.

### Human rights

The FORTEC Group respects the globally applicable regulations for the protection of human rights. We expressly reject any form of forced labour and child labour.

## Work and social principles



### Political activities

The FORTEC Group respects the decision of employees to actively participate in political life outside of their professional activities.

If employees of the FORTEC Group are politically active, regardless of their position, role and level of employment within the organisation, they make it unmistakably clear that all statements are personal opinions or actions and do not reflect those of FORTEC Elektronik AG. Any such activities must not take place at the workplace during working hours.

Company funds and resources are not used to support political candidates or parties.

Speak to your direct manager or the compliance team if you or any of your close family members are running for public office or engaging in any other political activity that could affect the Group or your position of employment.

### Freedom of association and the right to negotiate collective working conditions

The FORTEC Group respects the fundamental right of all employees to form or join trade unions and representative bodies in accordance with local law.

## Handling information and protecting company assets



# Handling information and protecting company assets



## Correct and complete reporting

Shareholders and business partners of FORTEC Elektronik AG, as well as the public, rely on accurate and complete disclosure of our business results.

FORTEC Elektronik AG therefore publishes business data and reports on its business activities correctly, completely and truthfully in accordance with the applicable laws. Only authorised individuals are permitted to speak to the press or members of investor communities.

## Protection of company assets and trade secrets

The FORTEC Group is responsible for taking care of its own assets and resources.

Assets include facilities, buildings and equipment, such as computers, IT systems, funds and internal company information.

The protection of confidential information, expertise and trade secrets is very important when working with customers, suppliers, development partners or other business partners.

All FORTEC Group employees, regardless of their position, role or level of employment within the organisation, are obliged to use data and information of which they become aware within the scope of their work exclusively within the permitted framework and, in the event of disclosure within and outside the company, to check whether the respective recipient is entitled to receive the information.

Depending on the importance of the information, additional security measures such as confidentiality obligations or audits must be agreed.

Computer equipment, telephones, email and internet are provided for business purposes and are regularly monitored against third party attacks to protect the FORTEC Group from cyber-attacks and malicious attacks. All employees are obliged to observe the protection regulations issued by the IT department and to actively promote compliance with them, for example: attachments to emails, downloads from the internet or files placed on storage media must not be opened or installed without being checked.

# Handling information and protecting company assets



The protection and correct use of company property and other corporate assets of the FORTEC Group is also the responsibility of all employees. Work equipment and other company objects (e.g. tools, spare parts, office material, documents, computers, data carriers) shall only be used for business purposes. These items must be protected from loss, theft, damage or misuse.

## Insider knowledge

FORTEC Elektronik AG satisfies the notification obligations for price-relevant company information in accordance with the statutory provisions.

As a public limited company listed on the stock exchange, we are obliged to publish information that has a significant potential to influence the share price (insider information, insider knowledge) that directly affects our company and is not publicly known (so-called ad hoc announcement).

Anyone who has knowledge of insider information must not use or disclose it when trading in securities.

Indirect trading in securities - for example by family members or other persons - is also prohibited, as is the dissemination of „tips“ if employees are in possession of insider knowledge. The guidelines issued in this regard must therefore be strictly followed.

These provisions shall continue to apply after the end of employment with the FORTEC Group.



# Handling information and protecting company assets



## **Protecting expertise, patents, trade and business secrets of our business partners**

The FORTEC Group respects the expertise, patents and trade and business secrets of its business partners. We only use external knowledge insofar as it is known to us legally or from generally accessible sources. Industrial property rights of third parties (patents, designs and trademarks) may only be used with the permission of the respective property right holder.

Confidential information provided to us will be kept confidential and will not be disclosed to unauthorised persons unless required by law, or if the owner has expressly consented in writing to such disclosure.

We also continue to observe our duty of confidentiality to the respective extent required once the underlying business relationship or the employment contract has ended. The direct or indirect use of confidential business information for personal gain or the advantage of third parties, and therefore possibly to the detriment of the FORTEC Group, is prohibited.

# Data protection, environmental protection and product safety



# Data protection, environmental protection and product safety



## Data protection

The FORTEC Group only uses personal data insofar as this is necessary for efficient processing or if the legal provisions permit this.

We comply with all applicable laws governing the protection of the personal data of employees, customers, suppliers and other data subjects. This is continuously checked and ensured by a data protection officer.

## Environmental and climate protection

The FORTEC Group complies with all legal requirements applicable to it and is committed to protecting the environment and to sustainability. Our actions are therefore largely determined by minimising the impact of our business activities on the environment and the climate.

We use natural resources sparingly and in doing so minimise environmental impacts in production processes and products. For example, we participate in online conferences to avoid business trips and therefore also contribute to reducing energy consumption and CO<sub>2</sub> emissions.

## Product safety

One of the top priorities of the FORTEC Group is to develop and distribute products of the highest quality that satisfy health and safety requirements and the legal regulations.

We comply with all applicable product safety regulations and requirements, in particular the legal requirements concerning the safety, labelling and packaging of products and the use of hazardous substances and materials.

That is why our products are evaluated and controlled through strict quality management processes. We are responsible for identifying, reporting and escalating potential safety issues. Where necessary, we report defects to the responsible authorities and take the necessary measures to ensure the safety of our products.

## Dealing with the Code of Conduct



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The FORTEC Group demands that its work is always carried out safely, ethically and in compliance with applicable laws and regulations.

All FORTEC Group employees, regardless of their position, role or level of employment within the organisation, are therefore obliged to inform themselves of the guidelines applicable to their respective area of responsibility and to base their own actions on the principles set out above.

Managers support their employees to the best of their ability by informing them about the content and meaning of this Code of Conduct and by raising their awareness and working towards compliance with it.

### Questions and indications of infringements

The FORTEC Group is grateful for any information that reveals irregularities, inappropriate behaviour or infringements in connection with this Code of Conduct. Any relevant questions or indications of legal infringements can be communicated by letter, email or telephone to the direct manager, the compliance team, the executive board or the supervisory board. This also applies if situations are identified that could lead to violations of the law.

If it is not possible to approach the parties directly, infringements can also be reported via the internet-based notification system.

All reports should contain as much detail and factual information about the infringement as possible, so that the information can be followed up to the extent necessary in an internal investigation.

Employees of the FORTEC Group will not suffer any disadvantages as a result of reporting a compliance infringement if they report a suspected compliance infringement in good faith and to the best of their knowledge.

However, in the event of an abusive tip-off, i.e. if processes are reported that contain allegations that are recognisably without merit, the FORTEC Group reserves the right to take legal action or disciplinary measures against the whistle-blower.

## Dealing with the Code of Conduct



Following receipt of any such notification, this will first be checked for its conclusiveness and credibility. Insofar as both points are satisfied, an investigation of the incident will then be initiated. Government agencies will also be involved if necessary.

Whistle-blowers will be informed of the outcome of the proceedings after the investigation has been completed, insofar as this is possible within the framework of the protection of confidential data.

All employees are asked to cooperate fully with any investigation or audit conducted by the company or government agencies.

Culpable violations of the law by employees of the FOR-TEC Group may result in sanctions under employment law, up to and including termination of the employment contract.

If damages are incurred due to violations of the law, this may also result in personal liability on the part of the employee. Similarly, penalties or fines may be imposed by state authorities.

If, as a manager or employee, you are unsure whether a decision is in accordance with the requirements of the Code of Conduct, you can review the decision for yourself by answering the following questions:

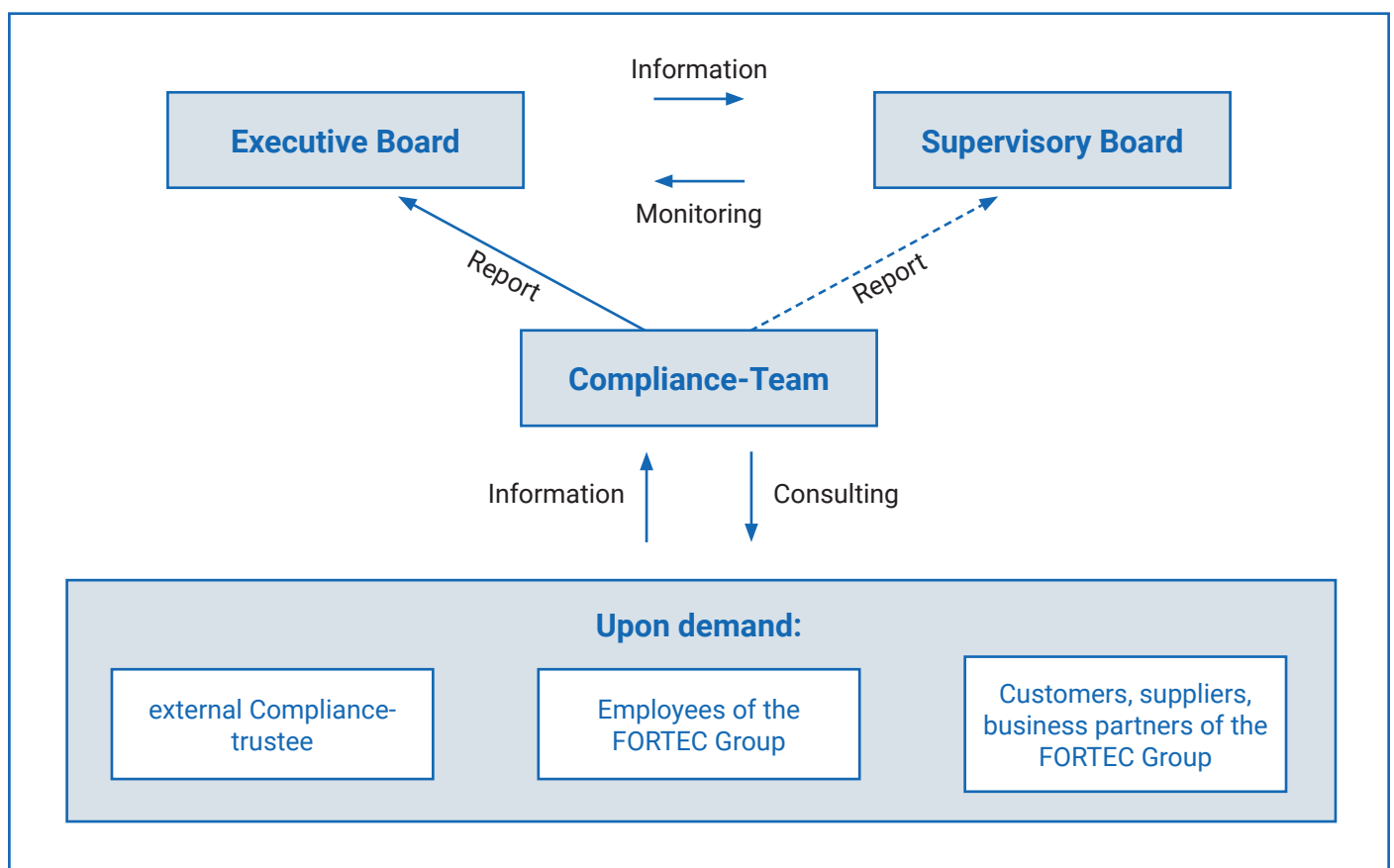
- Is my decision legal and does it comply with the company's rules?
- Am I able to make the decision in the best interest of the company and free from competing self-interest?
- Am I able to reconcile the decision well with my own conscience?
- Am I readily able to publicly disclose the decision? Would it also stand up to scrutiny by a third party?
- Will my decision preserve the good reputation of the company?

If the answer to each of these questions is „yes“, your decision is in all likelihood entirely justifiable. If you are in doubt about the answers to any of these questions, seek qualified advice.

# Dealing with the Code of Conduct



## Our reporting and consulting structure:



# Contact



The following points of contact are available for questions, tips or information on the topic of compliance:

## **Compliance team**

Telephone: + 49 89 894450-256

Email: [compliance@fortecag.de](mailto:compliance@fortecag.de)

## **Whistle-blower system**

The user-friendly whistle-blower system allows individuals to anonymously report a compliance infringement or an indication of a possible infringement if it is not possible to address the compliance team, a manager, the executive board, the supervisory board or the compliance ombudsman directly. The whistle-blower system has been certified several times. The confidentiality of the identity of the whistle-blower and secure storage of the information are guaranteed. All data is processed in accordance with the GDPR.

Link: <https://fortecgroup.integrityline.com>

## **Compliance trustee (external)**

Professor Stefan Siepelt (lawyer)

Telephone: + 49 221 55400 130

Email: [fortec.vertrauensanwalt@llr.de](mailto:fortec.vertrauensanwalt@llr.de)



