



FFT Group - Employee Code of Conduct



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Code of Conduct



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Dear Colleagues,

The trust that we receive from our customers, owners, employees and the public depends critically on the conduct of each individual in the company. It is based upon strict compliance with the law and with all of our internal rules (Compliance).

FFT is aware of its responsibility to society, and it acts accordingly. We recognize the duty of our company and our employees to serve the common good. The purpose of this Code of Conduct is therefore to summarize the norms that must be observed by FFT employees worldwide.

The Code of Conduct is also meant to serve as a guide to employees, helping them to act within their own responsibility for the good of the company. This responsibility is both a privilege and a duty. Each employee must ensure that his or her conduct is always in keeping with the rules set forth here. Our managers must not only communicate these rules in an effective manner, they must lead by example and demand compliance from their subordinates.

We trust and expect each of our employees to meet these requirements by taking the "FFT Code of Conduct" and always making it the standard for his or her behavior.

At the same time, the management of the FFT Group would like to use the whistleblower system described in section 5 of this Code of Conduct to provide the opportunity to report violations of the rules of the Code of Conduct or of statutory regulations with operational relevance confidentially and, if requested, anonymously to the whistleblowing offices named therein.

Management of FFT Produktionssysteme GmbH & Co. KG
February 2022

Tristan Pfurr
CEO

Hagen Dickert
CFO

Volker Stark
COO

Note: For reasons of linguistic simplification, we refer to employees, whistleblowers, customers, business partners, etc. in this Code of Conduct. Of course, this refers equally to persons of all gender identities.

Code of Conduct



FFT Group – Employee Code of Conduct

1.1 Preliminary remarks and application

With regard to the company's business activities, FFT has undertaken to treat its employees, customers, suppliers and competitors with honesty and integrity. FFT is aware of the fact that legal and cultural requirements can differ throughout the global market.

The Code describes a minimum standard which can be augmented regionally in accordance with stricter local legal requirements and cultural customs.

In cases where, in addition to this Code, FFT has issued separate corporate guidelines on special matters, they shall remain applicable as supplementary regulations. In case of conflicts such specific regulations shall prevail. References to specific regulations are made on the intranet site of the Legal and compliance Department.

This Code is valid for all employees of the FFT Group worldwide.

FFT offers and expressly encourages its employees to report identified violations of the rules and principles of this Code of Conduct and applicable statutory regulations with operational relevance to the company (anonymously if desired) via the established internal whistleblowing office or alternatively to the external whistleblowing office (ombudsperson). This enables the company to fully clarify identified issues, improve identified weaknesses, sanction misconduct and thus ensure a safe working environment for all employees.

The regulations contained in this code shall be applicable to relationships between each of the companies in the FFT Group and its employees. It shall not constitute a basis of third-party rights.

Code of Conduct



FFT Group – Employee Code of Conduct

2. Cooperation with customers, suppliers and other business partners

Besides expecting high-quality products and services, our customers, suppliers and other business partners expect a high degree of professionalism and integrity in our dealings with them.

Fair competition

FFT observes the rules of fair competition. FFT will therefore not pursue any contract if doing so would violate applicable laws.

All employees are required to obey the laws against restraint of trade. Formal or informal agreements with competitors for the purpose of obstructing competition are therefore prohibited. The same applies to behavior based on tacit understandings.

Accordingly, it is not permitted to demarcate sales areas or divide up customers with a competitor, nor may there be any agreements or exchanges of information with competitors concerning prices, supply relationships, business terms, capacities, market shares, profit margins, costs, customer data, bid contents or bidding behavior.

In the event that FFT achieves a dominant market position, such position must not be exploited in an illegal manner.

Corruption and bribery

FFT will not tolerate corruption or bribery in any form.

As competitors we rely on the quality and performance of our products and services. We therefore do not allow any agreements or supplementary agreements that involve granting benefits, either directly or indirectly, to individuals or organizations in connection with arranging, awarding, approving, implementing or paying for contracts.

This applies in particular to agreements with business partners, their employees and officers, but it extends to third parties as well. The same holds true for the granting of benefits in dealings with public authorities.

Such payments are unacceptable whether they are in the form of money or goods. The granting of benefits to an individual can also be unacceptable if the individual only benefits indirectly, for example if payments are made to a family member or if payments (such as donations) are made to a third party and the individual's social or political standing is enhanced as a result.

Code of Conduct



FFT Group – Employee Code of Conduct

Gifts and invitations are permitted only if they are not large enough in terms of value, financial scope or otherwise to improperly influence the recipient's actions or decisions or to create a state of obligation on the part of the recipient. When issuing invitations to an event or gathering, it must additionally be ensured that the event is of a size and type that is customary in business circles or that it is specifically related to business activities. Especially strict standards must be applied in the case of public officers. Monetary gifts are prohibited under all circumstances.

Compensation to third parties, in particular agents, brokers and other mediators, in the form of commissions or other payments must be plausible and bear a reasonable proportion to the work performed. Such compensation must be provided in an amount which does not suggest that it is being used to circumvent the rules on granting benefits. Agreements with agents, brokers, consultants and other advisors, including all later amendments and must be made fully in writing.

Although it is customary among business partners to exchange gifts of a limited size, the acceptance of gifts can damage the reputation of our company and lead to conflicts of interest. For this reason our employees are strictly prohibited from demanding or accepting personal benefits such as services or inappropriate invitations, whether for their own advantage or for that of individuals or institutions close to them. Occasional gifts of a small value are an exception. Gifts of money are not allowed under any circumstances

Donations

Donations must be made in a transparent manner, which means that the recipient and the intended use must be known. Payments to private bank accounts are not permitted. No donations may be made to organizations that could damage FFT's reputation

Selection of suppliers and service providers

FFT conducts fair and unbiased examinations of all offers submitted by its suppliers. The assessment, awarding and handling of a contract must be based on strictly professional criteria and be carried out in a transparent manner. It is not allowed under any circumstances to give undue preference to a supplier or impede its efforts to win a contract.

When selecting business partners, FFT demands that they too shall respect the values set forth in this Code. FFT's "Sustainability Guideline for Suppliers and Business Partners" shall be valid, published under www.fft.de



The trust of our customers, owners,
employees and the public in our
company depends crucially on the
conduct of each
individual employee.

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3. Management and employees at FFT

Productivity and humanity must go hand in hand to ensure sustained success in an enterprise. FFT's economic success is dependent on the help and co-operation of its employees worldwide.

Leadership and trust

All of our employees are required to adhere to this Code, and our management personnel must set an example. FFT cultivates an atmosphere of trust in which its managers are responsible for providing sufficient supervision to prevent any violations of the Code.

Tolerance and equal opportunities

FFT respects human rights worldwide. As a company with a global reach it works with employees and business partners of many different nationalities, cultures and customs. It does not tolerate unequal treatment (discrimination), harassment or degradation in violation of the law. In particular, it does not tolerate discrimination on account of race, ethnic origin, gender, religion or worldview, political opinions, age or gender identity.

Fair working conditions

FFT gives its employees fair pay and provides fair working conditions in compliance with all statutory requirements. It rejects all forms of forced labor and child labor, and it will not obstruct lawful employee representation.

Avoidance of conflicts of interest

It is important to FFT that its employees do not have conflicts of interest or loyalty in the course of their work. Such a conflict can occur if, for example, there are business transactions between FFT companies and employees or members of their families. Any such transaction shall be avoided. If in exceptional cases based on objective criteria such transaction is necessary, it must be disclosed in advance to the employee's superior.

Political activities

FFT does not participate in activities involving political parties. However, under no circumstances will it deter its employees from taking part in appropriate political activities during their nonworking hours. We expressly welcome our employees' involvement as citizens in the affairs of society and their participation in social and charitable activities. Employees who are engaged in such activities do so as private individuals.

Code of Conduct



FFT Group – Employee Code of Conduct

Protection of assets

FFT requires its employees to protect the tangible and intangible assets of the company. These assets include property, production equipment and inventory stocks; securities and cash; office equipment and supplies; information systems and software; and patents, trademark rights and know-how. Violations of the law such as fraud, theft, embezzlement and money laundering will be prosecuted.

Machinery and equipment may only be used for work-related purposes unless private use is expressly permitted. Internet users must take care not to retrieve or transmit any information that could incite racial hatred, glorify violence or other crimes, or have an offensive content.

Use of information /personal data security

We expect employees to take appropriate care when using company information.

We abide by all valid laws and regulations, and all FFT principles and guidelines on IT security. The FFT's Group's data protection officer supports the technical divisions in this undertaking.

Personal information is only collected, processed or used if it is legally permissible to do so, or with the consent of the person concerned.

Confidentiality

Confidentiality must be maintained concerning in-house matters that have not been disclosed to the public. This also applies to inventions and other kinds of know-how. These are essential to the long-term success of the FFT Group. Employees must therefore not pass information about new discoveries or company secrets in any form to third parties.

All employees must respect valid intellectual property rights of third parties. No employee is allowed to obtain secrets from third parties or make unauthorized use of such secrets.

Code of Conduct



FFT Group – Employee Code of Conduct

Privacy and information security

The global electronic exchange of information is essential for effective work and business success in general. But besides having benefits, electronic communication can pose risks to privacy and data protection. Official documents and data storage media must therefore be protected from access by third parties at all times. Both managers and employees must take effective protective measures against these risks, and this is an important component of IT management.

Insider knowledge

It is not permissible to derive personal advantage or advantages for others through the use of in-house knowledge. The same applies to unauthorized disclosure of such knowledge.

4. Occupational safety, health, environmental protection and sustainability

FFT makes every effort to protect the life and health of its employees and deal responsibly with resources and hazardous materials. All employees must avoid hazards in the workplace, minimize harm to the environment and use resources economically. In developing and manufacturing our products we adhere to the principles of sustainability and environmental compatibility.

5. Whistleblowing office

Every employee has the possibility and the right to report violations of the Code of Conduct and other statutory regulations with operational relevance or corresponding suspicious cases to FFT (hereinafter referred to as whistleblowers).

For this purpose, FFT has established the following whistleblowing offices:

a) External whistleblowing office (ombudsperson)

The external whistleblowing office has been set up at the law firm Cornea & Franz in Fulda. Whistleblowers can contact this ombudsperson's office at the e-mail address ombudsstelle-fft@cornea-franz.de or at the telephone number +49 661-901644-0. The contact person for whistleblowers is Dr. Stephan Wübbelsmann, lawyer (deputy: Christian Semmler, lawyer). If requested by the whistleblower, the external whistleblowing office will anonymise the incoming report.

Code of Conduct



FFT Group – Employee Code of Conduct

b) Internal whistleblowing office

The internal whistleblowing office has been set up in the Legal & Compliance Department.

Whistleblowers can contact this office at the e-mail address whistleblower@fft.de or at the internal telephone numbers of the employees named below. The contact person for whistleblowers is the Head of the Legal & Compliance Department (Tel +49 661 2926- 292) and the deputy: (Tel +49 661 2926- 2921). Only the aforementioned persons or their successors in function have access to the e-mail inbox of the aforementioned e-mail address.

c) Alternative external reporting channels

Whistleblowers should primarily contact the aforementioned whistleblowing offices. Alternatively, every whistleblower is free to contact external reporting channels, such as the Federal Data Protection Commissioner, the Financial Supervisory Authority BaFin or the European Anti-Fraud Office OLAF or other authorities designated by the federal and state governments. FFT provides information on external reporting channels on the intranet site of the Legal & Compliance Department.

A whistleblower who, based on reasonable evidence, believes in good faith that a violation of the Code of Conduct has occurred or may occur and who subsequently exercises his or her right to report such a violation or suspected violation to FFT, will not suffer any disadvantage whatsoever as a result. FFT will take measures in each individual case, as necessary, to protect the reporting employee against such disadvantages.

The whistleblower and the accused (if specified in the whistleblowing report) have the right to confidential treatment of their data. Unsubstantiated information or information not covered by the purpose of the whistleblowing system shall be deleted after examination.

Code of Conduct



FFT Group – Employee Code of Conduct



6. Implementation of the Code of Conduct

Advice

FFT provides its employees with information to help them comply with the law and the Code of Conduct. In particular, this includes training sessions on specific topics and selected areas of risk. If employees nevertheless have questions, they can submit them to the responsible legal or human resources department or his / her direct supervisor.

Complaints and reports of misconduct

Any employee can and has the right to report a violation or suspected violation of the Code of Conduct to FFT. At the employee's discretion, the contact for this purpose can be the direct supervisor, the responsible Head of HR dept., the Management of the company, any member of the Legal dept or or a member of the workers council.

An employee who on the basis of tangible evidence honestly believes that the Code of Conduct has been or might have been violated and who makes use of the right to report this to FFT will not suffer any kind of retaliation. In each such case, FFT will take the necessary steps to protect the employee against such retaliation. To the extent possible and legally permissible, FFT will maintain confidentiality about the identity of any employee who follows this procedure to report a violation or suspected violation of the Code of Conduct. The same applies to the identity of employees who cooperate in the investigation of such violations or suspected violations.

Implementing regulations

The FFT Code of Conduct is available in several languages. In the event of any differences or contradictions between the different versions, the German version shall take precedence.

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IMPRESSUM



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