

# **Code of Conduct**

### Foreword

Our Code of Conduct is intended to be a guideline for the entire faytech AG and therefore applies equally to all of us. It is specifically addressed to the top management, the executives and all our employees and suppliers. On the one hand, it represents the demands on ourselves to live up to the values and principles listed therein and, at the same time, signals to the outside world responsible behavior towards our business partners, customers, and employees.

#### 1. Commitment of the Management

faytech AG considers it its duty to act economically, socially, and environmentally conscious. faytech AG strives to conduct its business competently and on an ethical and moral basis, as well as to compete fairly in all markets in which it operates. This includes compliance with applicable laws and acceptance of anti-trust prohibitions or restrictions on competition. We want to avoid gaining undue advantages over customers, suppliers, or competitors.

## 2. Team Spirit and Constructive Cooperation

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we promote constructive teamwork among our employees. Their interests and demands on us are decisive for our work and further development. We are successful in our cooperation thanks to the diversity of our employees and their commitment to the business areas.

## 3. Standards of Cooperation

We expect all our employees to act in accordance with the highest professional standards and company guidelines at all times. If employees violate existing policies, rules, or regulations in the course of their work or through their conduct, they will be subject to disciplinary action.

## 4. Open Communication with Employees

We do not cover up misconduct. If our employees report actual or suspected misconduct in good faith, we do not tolerate any attempts at intimidation or reprisals against these individuals. We understand "in good faith" to mean that our employees are convinced that their account is true. This applies whether, or not, a subsequent investigation confirms the employee's version of events.

#### faytech AG

Bischhäuser Aue 10 D-37213 Witzenhausen Tel.: +49 5542/ 30374-0 Fax.: +49 700/ 27639323 www.faytech.de sales@faytech.de Commercial register: Eschwege HRB 3221 VAT Number 25/233/02123 VAT ID.: DE226699282 WEEE-Reg.No.: DE26241296 Managing Directors Peter Trosien (Vors.) Arne Weber

Chairman of the Board Christian Damjakob



## 5. Dialog with Cooperation Partners

All business information of our partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Required documents are properly created, stored or, if necessary, destroyed after the end of the cooperation.

## 6. Customer Orientation

We behave fair and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners to ensure a targeted implementation in products, services, or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners based on trust.

## 7. Acceptance of Gifts and Donations

#### a) Gifts to our Employees

Our employees do not demand or accept personal benefits from customers or suppliers that influence or could influence their own behavior regarding their own work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or favor (promotional gifts with the logo of the donating company, such as calendars or ballpoint pens).

In the case of gifts whose value exceeds the customary amount, the Compliance Officer or management must be informed. If this is not possible, these gifts must generally be rejected.

#### b) Gifts by our Employees

Gifts on our part may also only be offered within the scope customary for the business relationship and to a materially appropriate extent. The person receiving the gift must not be able to associate it with any obligation that would influence his or her business decisions.

#### c) Donations

As a matter of principle, faytech AG does not donate to political parties, to individuals or to organizations whose goals contradict our corporate philosophy or that might damage our reputation. The allocation of donations is always transparent.

## 8. Bribery and Corruption

We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties. We have control mechanisms in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

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Our employees are prohibited from accepting or giving favors of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (order placement, project award, etc.). Our business partners are also required to avoid conflicts of interest that involve a risk of corruption.

## 9. Avoidance of the Collision of Private and Business Interests

Each employee must ensure that his or her private interests do not conflict with the interests of the company. In particular, the following rules must be observed:

- The conclusion of contracts and the awarding of contracts for the company must be carried out exclusively under competitive aspects.
- The taking up of sideline activities requires prior approval. Employees may not pursue sideline activities or other business interests of their own that could lead to a conflict with the interests of the company.

As a rule, any personal interest of an employee that is related to the performance of his or her official duties must be disclosed to the respective superiors, should there be a risk of a conflict of interest or damage to the company's reputation.

## 10. Data Protection

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obligated to take all measures to secure the data, which are suitable to protect our IT system against internal as well as external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially of inappropriate material from the Internet.

## **11. Protection of the Environment**

The protection of the environment and climate protection are of utmost importance to us. Our employees are required to treat all natural resources used in our company (e.g., energy, water surfaces) with care. Our employees are expected to act responsibly in the manufacture and sale of our products and/or services. To protect our employees, we comply with all laws and regulations relating to health and safety in the workplace. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

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## 12. Compliance with Applicable Law

We require our managers to familiarize themselves with the laws, regulations, and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in complying with the Code of Conduct.

The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export and domestic trade in goods, technologies, or services, but also to payment and capital transactions.

Violations of economic embargoes and trade, import and export control regulations by our business partners must also be prevented, as must the financing of terrorism.

## 13. Fair Competition

We are committed to fair competition and comply with these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies, and dealers that hinder fair competition. We do not participate in any anti-competitive boycotts.

#### 14. Prohibition of Discrimination

Any form of discrimination is prohibited in principle. This applies regardless of nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability, religion, or belief. Promotions and new hires are always made free of discrimination.

## 15. Handling of Internal Company Information

We attach importance to the careful and responsible handling of the manufactured products, the working materials used and the intellectual property of the company.

## 16. Protection against Child- or Forced Labor

We strictly reject child or forced labor without exception and expect the same from our business partners. Children of compulsory school age (younger than 15 years) may not be employed even if the legal requirements of the respective country of our supplier would allow this.

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Managing Directors Peter Trosien (Vors.) Arne Weber

Chairman of the Board Christian Damjakob



## **Implementation and Enforcement**

faytech AG is committed to making the necessary efforts to live up to the principles and values described in this Code of Conduct:

Witzenhausen, March 22<sup>nd</sup>, 2021

First name, Last

name

Signature

Place, Date

faytech AG

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**Chairman of the Board** Christian Damjakob **Bank Details** 

HypoVereinsbank IBAN DE40302201900364089023 BIC HYVEDEMM414