

Febrotec GmbH	Code of Conduct		
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This declaration has been drawn up by machine, it is therefore not signed by hand and is deemed to be a declaration of commitment within the meaning of Article 63 (3) of the DVO (EU) No. 2015/2447.

Best regards

Dipl.-Ing Jens Schlabach (Managing Partner) Jesper Dietrich, M.Sc. (Managing Director)

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# I. Code of Conduct

Febrotec GmbH is a leading distributor of technical springs and engineered components in Germany with an extensive product range, shipping to more than 70,000 customers worldwide.

We see it as our duty to help protect our environment and to promote sustainable development. Our decisions and daily activities are based on transparent and ethical behaviour, always considering the well-being of society and respect for our environment.

We act in accordance with a binding Code of Conduct that is based on the principles of the United Nations Global Compact and internationally recognised standards to promote social, ethical and environmental responsibility.

We deliver our products exclusively to our terms and conditions and we expressly object to any additional or different terms and conditions of sale. As a matter of principle, we will neither sign nor accept any other documents, contracts or agreements.

### Contact

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# II. Social Responsibility

### I. Respect for human rights

Febrotec respects and upholds internationally recognised human rights as fundamental values.

### II. No child and hard labour

We do not tolerate child labour, forced labour or other involuntary labour in accordance with the International Labour Organisation (ILO) Conventions.

### III. No discrimination and gender

Febrotec respects cultural differences and treats all employees equally, regardless of gender, nationality, age, skin colour, religion, political opinion, marital status, sexual identity, origin or physical or mental disabilities.

## IV. Health and safety in the work place

We take appropriate measures and ensure occupational safety and health protection in the workplace in compliance with applicable laws and regulations. We support continuous development to improve occupational safety.

## V. Livable income

Febrotec complies with the maximum working hours set by law. All employees have employment contracts that specify working hours and remuneration. All remuneration is paid without delay and in accordance with the respective applicable laws, and social benefits are deducted.

### VI. Freedom of assembly and the right on collective enforcement is respected

We respect the right of our employees to freedom of assembly and the right on collective enforcement within the framework of applicable laws and ILO conventions.

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# III. Environmental Responsibility

### VII. Responsibility for the environment

We see it as our duty to ensure that all raw materials are used responsibly in the production of our springs. All our standard springs comply with the legal environmental and health requirements and do not contain any materials that have been used to fund or support armed groups in conflict areas through mining and trade.

We work continuously to minimise emissions and water consumption, improve air and water quality and reduce waste. Environmental protection measures are being further developed.

# **IV. Ethical Business Conduct**

### VIII. Ethics

Our employees separate business and private interests and avoid conflicts of interest that could affect business relationships or decisions.

### IX. No corruption and granting of advantages

Febrotec respects fair competition and does not tolerate any form of corruption, including extortion, fraud or bribery. Our employees may not accept gifts or other benefits of value from our business partners so that we remain independent in our decisions.

## X. Free competition

Our employees are obliged to comply with the rules of fair competition. In principle, all agreements and arrangements with companies or persons that influence prices, conditions, strategies or customer relations to restrict competition are prohibited.

### XI. Money laundering

Our employees are obliged to comply with the applicable laws, regulations and directives on combating money laundering.

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### XII. Protection of intellectual property

Febrotec respects and honours the intellectual property of competitors, business partners and other third parties. In particular, we pay attention to information concerning technical know-how, patents, trade and business secrets and protect them very carefully.

### XIII. Privacy und data protection

Febrotec handles personal data confidentially and has a responsible, secure and transparent approach to data. We collect, process, use and store personal data only in accordance with legal requirements. We protect the personal data of customers, employees, applicants, suppliers and partners against loss, alteration, unauthorised use, inspection and disclosure.

## XIV. Supply chain

Febrotec undertakes to observe and comply with the values and principles set out in this Code of Conduct and to transfer these requirements to third parties commissioned by it.

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