



# Code of Conduct

For employees



Patrick Hupperich  
CEO FEV Group

FEV's Code of Conduct provides guidance for our actions and decisions in our daily work. Often, it is not immediately apparent which behavior is correct. In these situations, we want to behave with integrity. Completely independent of the area of responsibility, location or hierarchical level. This means: We adhere to internal and external rules, act in accordance with our corporate values and also listen to our inner compass.

This set of values is laid down in our FEV Group Policy (i.e. the entirety of all Group Policies and Guidelines). The FEV Group Policy specifies this Code of Conduct in more detail. The detailed regulations of the FEV Group Policy apply with priority. Every manager is required to ensure that all employees are aware of these rules and that they understand and comply with them. Each and every one of us has a responsibility to follow them – toward our customers, toward our colleagues, toward society. And towards all those who, like us, have high expectations of technological evolution and ecological change, as well as towards themselves.

***Dear  
employees,***

It's up to us: Let's work together to develop sustainable solutions for society and lead by example – every day.

## Basis of our actions – our corporate principles

Our actions, the way we work and the way we make our decisions are characterized by fairness and mutual respect. It is our responsibility to ensure a climate of appreciation and tolerance in our everyday work. It is essential to respect others in their individuality, to always act openly and honestly, and to promote individual and cultural diversity.



# Acting responsibly

Respect for human rights and protection of the environment are central elements of responsible corporate governance for us at FEV. The company's management expressly stands by its responsibility for the protection of human and employee rights, for the respect of the rights of employee interest groups and for the protection of the environment, as enshrined in this policy statement.

## Principles for our actions

### Human rights

Within this framework, we at FEV are committed in particular to the values of the following international standards:

- The United Nations Universal Declaration of Human Rights
- The basic principles of the International Labor Organization (ILO) Declaration of Principles concerning Multi-national Enterprises and Social Policy (MNE Declaration).
- The principles of the United Nations Global Compact (UNGC)
- The Charter of Fundamental Rights of the European Union

Where local law and international human rights are not aligned, we act in accordance with the higher standard.

At FEV, we are committed to preventing and minimizing any negative impact on human rights within our business operations worldwide whenever possible, as we believe that social responsibility is the elementary basis for long-term corporate success.

### Compliance with laws

At FEV, we follow the law as a matter of principle and comply with applicable law without exception. Respecting human rights and assuming social responsibility is part of our self-image.

### Our principles of conduct in the workplace

Our actions, the way we work and the way we make our decisions are characterized by fairness and mutual respect. It is our responsibility to ensure a climate of appreciation and tolerance in our everyday work.

### Trustful cooperation, equal opportunities and respect

At FEV, we treat each other with respect – even across all hierarchical levels. We work together with each other and with our business partners in a spirit of trust. Our cooperation is characterized by mutual understanding, openness, transparency and equal opportunities. We grant professional opportunities according to appropriate criteria.

### Occupational health and safety

At FEV, occupational health and safety is a high priority. We comply with the legal requirements for occupational health and safety as well as safety laws and often go beyond them.

We take the necessary precautionary measures against accidents and damage to health that may arise in connection with the activities of employees (hereinafter "employees"),

also taking into account the interests of the employees. Physical or mental fatigue is prevented by appropriate measures. In addition, employees are regularly informed and trained about applicable health and safety standards and safety measures.

### Protection of personal data

In the course of its business activities, FEV processes personal data of employees, customers, suppliers and other business partners. FEV takes the protection of personal data very seriously. The processing of personal data (such as the collection, use, disclosure, publication and storage) is only permitted in compliance with the statutory provisions and the Group Policy "Data Protection". All employees must handle personal data carefully and conscientiously.



*Employees can find detailed information on the subject of [data protection on the intranet under G-CL Group Legal/Data Protection](#)*

# Acting responsibly

## **Fair working conditions (incl. child labor, forced labor, remuneration, working hours, freedom of association, collective bargaining and inclusion)**

FEV is committed to ensuring that applicable labor and social laws are observed. We reject any form of child and forced labor. At FEV, we respect the dignity, privacy and personal rights of employees, suppliers and business partners, and promote diversity and inclusion. We reject any form of discrimination or harassment on the basis of ethnic or national affiliation, gender, religion, ideology, age, disability, sexual orientation, skin color, political views, social origin or other legally protected characteristics.

At FEV, we do not allow sexual harassment or personal insults. Violations will not be tolerated and will be punished under labor law.

FEV ensures fair compensation and compliance with working time regulations.

We respect the right of employees to form and join employee representative organizations and to engage in collective bargaining and strike. In cases where freedom of association and the right to collective bargaining are restricted by law, we grant alternative possibilities of independent and free association of employees for the purpose of collective bargaining.

Employees shall not be discriminated against on the basis of forming, joining or being a member of such an organization. Employee representatives shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

## **Handling of business information/ Confidential information**

The protection of confidential business information of customers and business partners has the highest priority. The same care must be applied to information concerning FEV's own business. Such information may not be used for personal gain or for the benefit of third parties – even after termination of the employment relationship. Prior to any disclosure of information to third parties, it must be clarified whether there is authorization to do so and whether the information is protected at the third party by an appropriate confidentiality agreement.

Information provided to FEV by our customers and suppliers will be protected according to the agreed protection requirements and will only be used by FEV for the agreed purpose.

## »Respect for human rights and protection of the environment are central elements of responsible corporate governance at FEV.«

### **Protection of assets and property**

Equipment, facilities, materials and other supplies owned or possessed by FEV shall be treated with care and appropriately to prevent loss or damage.

### **Managers as role models**

The success of our company depends crucially on all of us, i.e. management, executives and each individual employee, behaving honestly, with integrity and ethically. The management and each manager set an example with their own behavior and must ensure a working environment free of discrimination and harassment. They should prevent and avoid irregular behavior in the company and protect their employees and the company with integrity both internally and externally.

### ***Our principles of conduct in dealing with business partners***

#### **Competition and antitrust law**

FEV is committed to free and fair competition. The regulations on national and international competition and antitrust law must be observed.

## Acting responsibly

In particular, agreements or other conduct with competitors that prevent or restrict competition are prohibited. Verbal agreements and concerted practices are punished in the same way as written agreements. They can result in heavy fines and compensation payments, and in some countries even imprisonment for employees.

In the course of business, all employees must comply with the following in particular:

- No agreements may be made with competitors on business issues that determine or influence competitive behavior. This applies in particular to agreements and arrangements which have as their objective or effect the fixing of prices, price components or capacities, the sharing of markets or customers or the boycott of a customer or other market participants.
- In discussions or other contacts with competitors, such as association meetings, no information may be exchanged – even merely unilaterally – on confidential matters such

as prices, price components, terms of sale, costs, capacities, capacity utilization or similar confidential information.

 *Employees can find detailed information on [competition and antitrust law on the intranet under G-CL Group Legal/Compliance – Antitrust](#)*

### Fighting corruption


Any form of corruption is prohibited. In the case of business contacts, the legal regulations on bribery and the granting of advantages must be observed. Violations of national or international regulations may have serious consequences for FEV and the employees concerned.

In the course of business, all employees must comply with the following in particular:

- All employees are prohibited from offering or accepting benefits, either directly or indirectly, if this is intended to influence business relationships in an improper manner or could even create such an impression. Gifts may only be used for the general maintenance of business relationships.
- Gifts are all services that improve the financial, legal or personal situation of a person. These include gifts in

cash and in kind as well as invitations to events, trips or the purchase of goods at a discount.

- The value and frequency of a gift must take into account the position of the recipient and the business practices in the specific situation, i.e. the gift must be "socially customary" for the recipient. Gifts worth approximately €50 or more must be approved by the person responsible for management.

 *Employees can find detailed information on [anti-corruption on the intranet under G-CL Group Legal/Compliance – Anticorruption](#)*

# Acting responsibly

## voiding conflicts of interest

Business decisions shall be made in the interest of FEV and shall not be influenced by private or other special interests.

If, in the course of business, an employee's personal interest comes or may come into conflict with the interests of FEV, the employee must act solely in the interests of FEV.

FEV employees are obligated to deal with such situations in a transparent manner. Every employee must disclose actual or potential conflicts of interest – even if only the appearance of such a conflict of interest could arise – to the respective supervisor immediately and in full without being asked.

Conflicts of interest may arise in particular as follows:

- Secondary employment – especially with competitors, business partners, customers or suppliers – is prohibited. Employees should contact their manager and the responsible compliance manager.
- Economic activity – in particular with competitors, business partners, customers or suppliers – is prohibited. Exceptions to this rule are minor shareholdings in listed companies, provided no insider information is available.



*Employees can find information on [anti-corruption on the intranet under G-CL Group Legal/Compliance – "Anti-corruption"](#).*

## Dealing with insider information

The disclosure of insider information to third parties or use for own purposes is prohibited. Insider information is information from listed customers or business partners that is not publicly known and is relevant to the stock market price. Examples of such information include planned corporate acquisitions, changes in the company's personnel management, inventions, new products or processes and major orders.

In particular, it is prohibited to acquire or sell securities for one's own account or for the account of a third party by means of insider information, or to recommend such action accordingly, Section 14 of the German Securities Trading Act (WpHG).



*Employees can find detailed information on the topic of [insiders on the intranet under G-CL Group Legal/Compliance – "Insider"](#).*

## Intellectual property rights

FEV respects know-how, inventions, patents, trademarks, copyrights and other intellectual property rights of customers or third parties, and uses such rights only when entitled to do so. FEV recognizes that its own intellectual property rights are essential to FEV's business today and in the future. Where advantageous, FEV protects its intellectual property, for example through patents.

The use, further processing or placing on the market of counterfeit products will not be tolerated by FEV.

## IT security/Information security

Information in our possession is protected from unauthorized access, damage or corruption, or loss and destruction as part of our Information Security Management System (ISMS). Our Chief Information Security Officer ("CISO") has overall responsibility for the ISMS.

Our suppliers undertake to continuously establish, maintain and further develop information security and cyber security standards and to protect data processed in IT systems in the best possible way, but at least in compliance with the law.

# Acting responsibly

## **Accounting/Bookkeeping and financial reporting/ Tax returns**

FEV observes the regulations on proper accounting and bookkeeping and duly submits tax returns. Information on business activities and the financial position is published regularly in accordance with legal requirements.

## **Export control and customs**

FEV strictly complies with import and export regulations for the movement of goods, services and information. FEV observes domestic as well as foreign restrictions on trade or payment transactions for individual countries, regions or individuals.

## **Supplier selection**

With sustainable procurement, FEV ensures compliance with social and ecological requirements throughout the entire supplier chain. To ensure this, FEV integrates sustainability aspects into its procurement criteria. When selecting products, services and suppliers, we pay attention to their impact on the environment and society.

We expect our suppliers to align their own procurement activities with these principles. We give preference to suppliers who promote responsible procurement within their sphere of influence by identifying and assessing potential human rights and environ-

mental risks throughout the supply chain and taking measures to avoid or mitigate them.

## ***Our Code of Conduct on social responsibility***

### **Quality assurance/Quality management**

With our professionalism, we aim to achieve the highest quality in all areas.

Despite generic approaches to solutions, we view each individual project holistically and individually and, through regular checks along the entire development process ensures high quality.

As part of our project business and equally anchored in our ISO 9001 quality management system, we take into account all aspects that are relevant when recording and processing our customers' requirements. We implement further specific management systems for the areas of environmental protection, occupational safety and information security. Project-specific opportunity and risk management is performed using specially developed project management tools and a regular project evaluation.

Even without a certificate, there are internal company specifications and principles that we adhere to as binding Group-wide standards, particularly with regard to service and meeting customer requirements.

Our project management is carried out in a systematic manner according to the defined "Project Management Gate Process". We divide the project process into six sections - from acquisition to completion. Each section ends with a gate that queries the quality of the project management via checklists. An external person checks and approves these according to the dual control principle.

## **Research and development**

FEV's employees are committed to contributing to the continuous improvement of the environmental compatibility of transportation and energy technologies and to supporting a rapid transformation to climate neutrality through their own work, taking into account high ethical standards. In doing so, the research and innovations produced are also aimed at permanently securing the supply of people in cities and rural areas through resilience of passenger and freight transport as well as the generation, storage and distribution of sustainable energy.

## **Product conformity and safety**

Regulations for FEV's development activities as well as quality assurance measures in the handling of components are implemented throughout, thus ensuring the conformity and safety of project results and products.



# Acting responsibly

## Environmental protection

FEV complies with all locally applicable environmental laws and regulations.

Responsible chemical management in the form of storage, use, labeling and disposal of toxic or environmentally hazardous substances, etc. is carried out exclusively in compliance with the applicable environmental and chemical regulations. FEV supports its customers in developing environmentally friendly mobility solutions for the future. For this reason, resource-saving processes are also used in internal processes, taking into account economic efficiency. FEV strives through the economical use of energy and resources (e.g. fuels, gas, electricity and water),

- Reduce greenhouse gas emissions
- Increase energy efficiency
- Conserve water resources (water consumption)



## Acting responsibly



The share of renewable energies in total energy consumption is continuously increased. FEV uses recycled material wherever possible. In this way, the company makes an active contribution to maintaining the quality of air and water.

FEV avoids harmful contamination and alteration of soils, waters and the air, forced clearing and deforestation, and promotes biodiversity and soil quality.

The company presents these measures transparently with the help of its regularly published sustainability report.

# Implementation



## ***Compliance in the supply chain***

Business partners, suppliers, subcontractors and other third parties working for FEV shall be required to comply with the standards or comparable values set forth in this Code of Conduct.

## ***Compliance with the Code of Conduct***

FEV expects all employees to comply with this Code of Conduct. Supervisors play a particularly important role in this regard through their function as role models and provide the appropriate answers to questions. Further information can be found in the relevant Group Policies and Guidelines. At regular intervals, employees are made aware of current issues relating to this Code of Conduct. In addition, training is provided for individual specialist topics. The Code of Conduct is binding for FEV Group GmbH and all companies under the management of FEV Group GmbH.

## Hints

Sometimes it is not possible or appropriate to report violations of our Code of Conduct, Policies and Guidelines or the law to the foregoing. If this is the case, you can use FEV's whistleblowing hotline. This has been established for serious matters that you do not want to or cannot report through normal reporting channels.

All reports of misconduct will be reviewed and investigated. FEV is committed to maintaining the confidentiality of the person making the report to the best of its ability.

Information about a report will be shared only with those who have a legitimate reason to know about it.

FEV does not tolerate harassment, retaliation, intimidation, victimization or reprisals against whistleblowers. In addition, in some countries, the law provides special protection for individuals who raise concerns. In this case, stricter legal protections apply.

### **Contact person**

Questions concerning this Code of Conduct or conduct in compliance with the rules will first be directed to the supervisor or the appropriate department identified in this Code of Conduct.

Possible violations of this Code of Conduct may be reported to the supervisor as well as the responsible general manager.

The Compliance Department of FEV Group GmbH and the Chief Compliance Officer are available for this purpose ([compliance@fev.com](mailto:compliance@fev.com)).

The Compliance Department and the Chief Compliance Officer can also be contacted by third parties outside the company.

The German version is authoritative.

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