



# Foreword by the 3F GmbH Management

The stable basis of every decision and all business activities are our values and our commitment to the applicable laws and general social and ethical principles. Only in this way can we create and maintain the trust of our employees, customers, business partners and the public.

This Code of Conduct summarizes and lays down the existing principles of conduct at 3F GmbH. They underline our values: Quality, Integrity and Responsibility. The Code of Conduct serves the purpose of manifesting and communicating the principles of conduct to all who work with us and for us. For the benefit of value-oriented management. For the benefit of our community, our competitiveness and thus our future security, and especially for the benefit of our customers and business partners.

The Code of Conduct is a guideline for all employees including the management for their daily actions and represents a promise to our customers, our business partners and the public on which everyone can rely.

The management of 3F GmbH

N. Schurr M. Younas

#### Introduction

Dear colleagues,

3F GmbH combines economic success with social responsibility and the protection of the environment. We act as one company. Therefore, our standards of conduct are basically the same at both locations, Plüderhausen (D) and Charlotte/NC (USA). To be successful and to implement our 3F strategy, it is essential that everyone in the 3F team understands and lives our corporate values.

3F is standing for: FAIR

**FLEXIBLE** 

**FORWARD** 

Nothing is more important than our integrity as a company and as individuals. 3F GmbH is strictly committed to compliance with legal regulations as well as ethical principles and expects all employees to adhere to them. Such a commitment must be firmly anchored in the entire organization, because every employee is also an ambassador of our company. Compliance-oriented behavior is always a priority for us. There can be no compromises here.

We therefore expect you to take personal responsibility for compliance with all

- applicable laws,
- · basic international standards and
- · internal company guidelines and regulations.

The 3F GmbH Code of Conduct summarizes important laws and internal company rules that govern the conduct of all 3F GmbH employees in their dealings with business partners, public officials, other employees and society.

Ensuring compliance is an essential part of our daily work. We must maintain and further develop a culture of honesty in which the management is a role model in promoting business ethics and acting lawfully and in which legally compliant behavior is the personal responsibility of each individual.

3F GmbH will provide you with all necessary information and support to enable you to fulfill your obligations. If you have any doubts, please ask. We thank you very much for your commitment.

#### About this Code of Conduct

This Code of Conduct is binding for all employees of 3F GmbH at both locations. It defines basic, globally valid standards of conduct and describes the behavior expected of you. It does not describe every single law or internal guideline that might be valid for the individual.

Please ensure that you understand the standards of the Code of Conduct as well as the corresponding local laws and internal company guidelines, always act accordingly and participate in all mandatory and necessary training measures. It is the responsibility of management to assist its employees in this regard.

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### Human Rights, Labor and Social Standards

3F GmbH wants to ensure that all employees act in accordance with recognized human rights as well as the essential labor and social standards. These standards include the Universal Declaration of Human Rights, the Guidelines for Internationally Operating Companies and the International Labor Organization (ILO) Declaration of Principles concerning International Business and Social Policy.

We act in accordance with internationally recognized human rights, labor and social standards and strictly comply with the laws applicable to our business.

# Environmental Protection, Health and Safety

At 3F GmbH we drive sustainable solutions and take on economic, ecological and social responsibility. We always give priority to safety. For us, economic considerations never lead to compromises in safety, health and environmental protection. Compliance with all laws for the protection of people and the environment is one of our fundamental principles. This applies both to our products and to our procedures and work processes.

You have the duty to handle natural resources responsibly and to protect the environment in your working area. Health and safety are of fundamental importance to us. We act responsibly in accordance with the principles of sustainability to protect and maintain the health of our employees, neighbors and business partners.

Every employee is co-responsible for the protection of people and the environment in his working environment.

#### Antitrust Law

It is our business policy to promote fair competition. We therefore expect all employees to strictly comply with the applicable antitrust laws. Violations are subject to severe penalties or fines and may lead to the invalidity of the agreement concerned.

Antitrust law prohibits agreements between competitors, vertical agreements and the abuse of a dominant position.

#### Corruption

Our business partners, in particular our suppliers, customers and dealers, must be treated fairly. 3F GmbH expects the same from its business partners. Our relationships with all business partners should be based solely on objective criteria, in particular quality, reliability, competitive prices, as well as compliance with ecological and social standards and the principles of good corporate governance.

Anti-bribery laws in most countries of the world prohibit bribery of domestic and foreign public officials and employees of domestic and foreign private sector companies.

They must never accept or grant material advantages that could give the impression of (attempted) improper influence.

#### Gifts and Invitations

Gifts and invitations in business life are handled much more restrictively today than they were a few years ago. We welcome and support this development. For this reason, gifts and invitations may only be granted or accepted if they are a gesture of courtesy in accordance with general business practice and the improper influencing of a business decision or an official act can be ruled out from the outset.

Only accept gifts or invitations that can only be understood as a gesture of courtesy.

#### Conflicts of Interest

You are expected to act in the best interests of our company and to protect its reputation. To this end, conflicts of interest must be avoided. Personal relationships or interests must not influence your business activities. This means that your personal interests must not conflict with the interests of 3F GmbH or influence your decision making, nor must they create such an impression.

Private and business interests must be strictly separated. In case of doubt:
Ask for more information!

## Privacy

3F GmbH is committed to respecting the privacy and integrity of its employees and business partners. We adhere to strict standards when we process personal data of our employees or business partners. All personal data that 3F GmbH collects and stores are processed exclusively for the intended purpose, in a comprehensible and careful manner and in accordance with the applicable data protection laws.

We attach high importance to data protection. Personal data is only processed for a specific purpose and in accordance with the applicable data protection laws.

### Imports and Exports

Various national and international trade control laws restrict or prohibit the import and export of goods or services. These restrictions relate not only to the type of product, but also to the country of origin or destination and in some cases to the person of the customer (embargo). Similar restrictions may also apply to the export of technology or software country-specific embargos exist for certain countries.

All employees must comply with trade control laws when purchasing and selling, producing or marketing goods and technologies.

# Protection of company property and property of business partners

Every employee must handle company property responsibly and protect 3F's assets against loss, damage, theft, misuse and unauthorized use. Intangible assets such as proprietary knowledge, intellectual property rights and copyrighted works are also company property.

Handle company property with care.

#### Changes to the Code of Conduct

The management of 3F GmbH is responsible for the approval and publication of the Code of Conduct. The Code of Conduct is regularly reviewed by the management of 3F GmbH to determine whether revisions are necessary in light of changes in the law and to ensure that our employees meet the high ethical and legal standards we expect. The management of 3F GmbH is responsible for approving any changes to the Code of Conduct.

#### Contact

This Code of Conduct is available for download at www.3f-gmbh.de/downloads.

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