

Code of conduct for corporate responsibility, anti-corruption policy and ethical compliance of Fischer Fertigungstechnik GmbH & Co. KG - Gütersloh



For ease of readability, the designation „employee“ is used in the code of conduct synonymously for male as well as female employees.

Only legally and ethically correct behavior ensures sustainable business success!

Today, there are only a few companies who have managed to overcome the challenges of harsh economic reality like our company has. The key to this sustainability lies in our corporate culture, which is characterized by our corporate values of precision, quality, performance and character. The corporate value of character also includes the commitment to integrity and honesty as well as the commitment to consistent compliance with legal and regulatory requirements. Both our employees as well as our business partners adhere to this standard.

The trust shown to us by our customers, business partners and investors is confirmed not only by the high qualitygeschäf, but also by the integrity of our entire operation. Violations of the laws, rules or our ideals result in corresponding consequences and sanctions.

Our corporate values are the guiding principle for our legally and ethically correct behavior in business life. We expect each employee to implement our values responsibly and that we together thereby create the basis for a successful economic and personal future.

Our goal is to efficiently utilize the global economic challenges in a value-oriented manner as an opportunity to solidify and further expand our successful market position together.

Executive Board of Fischer Fertigungstechnik GmbH & Co. KG

Definition and scope

Fischer Fertigungstechnik has created a code of conduct that contains the compliance policies of our company and the guidelines for behavior in day-to-day work. This content is not exhaustive and will be supplemented by tailored-to-suit guidelines and special work orders.

The code of conduct is equally valid in all strategic business segments.

The Fischer Fertigungstechnik code of conduct is always to be applied in compliance with the respective national laws and regulations. In the event that the code of conduct deviates from mandatory national law, the national law shall take precedence. Compliance with all relevant laws and regulations requires a high level of personal attention and, in cases of doubt about the legal situation, is to be clarified through professional consultation.

Every employee, every manager and every executive board member is bound by this code of conduct. The top executives confirm once annually in writing the conformity of their business behavior with this code of conduct. The confirmation is entered into the personnel file.

Objective

This code of conduct should be a guide for all employees of Fischer Fertigungstechnik to behave correctly in daily business life in the sense of the law, our internal rules and our moral concepts. It offers assistance as to how to proceed correctly on one's own authority in certain situations of business life in a proper legal and ethical manner.

All employees are encouraged to meet this code of conduct on a daily basis. The top executives and members of the executive board exercise a role model function, are aware of their special responsibility as supervisors and actively exemplify the content of our code of conduct.

All employees outwardly shape the company's reputation through their appearance and their behavior. They therefore understand that they are representatives of Fischer Fertigungstechnik and pay attention to an appropriate and positive outward image.

A business transaction that contradicts our compliance guidelines that are represented in this code of conduct or in other company policies does not result in any sustainable benefit for our company, but rather can lead to considerable damage for the entire Fischer Fertigungstechnik.

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1. Behavior compliant with the law and rules

The employees of Fischer Fertigungstechnik consistently and responsibly observe the respective national and international laws and regulations that apply to them as well as the group's internal guidelines and rules, including this code of conduct.

In cases of doubt regarding the scope or the meaning of certain provisions, the respective supervisor, HR, the executive board or, where appropriate, an external legal advisor are to be consulted.

2. Integrity

Under integrity, Fischer Fertigungstechnik understands the conformity of our external action with our inner values based on righteousness and fairness. Integrity represents a kind of inner moral compass and offers – for example in the case of loopholes – an aid for decisions and actions that correspond to our moral concepts and coincide with a general understanding of righteousness.

The employees, top executives and executive board members of Fischer Fertigungstechnik always ensure integrity in everyday work behavior.

3. Fairness, general non-discrimination precept and behavior towards each other

A working atmosphere characterized by fairness promotes motivation and efficiency. The relationships between board members, top executives and employees at all levels in all strategic business segments and all regions are guided by fairness, mutual respect, openness and the common understanding of trustful co-operation.

Any form of discrimination has no place in our corporate culture. We do not discriminate against or favor anyone based on gender, race, religion, age, disability, sexual orientation, national origin or other legally protected characteristics and do not tolerate any discrimination in this respect. The measure for assessing employees is their professional skills, their performance and their ethical behavior.

Every employee is emphatically encouraged to actively contribute to an atmosphere of respectful cooperation in which any kind of personal harassment is prohibited. In particular, this includes workplace harassment, unwanted sexual advances, unwanted body contact, immoral propositions, humiliation of any kind as well as abusive, offensive or degrading jokes, comments and actions. Violence in any form, assaults at work, including threats and intimidation, as well as workplace bullying are prohibited in our company.

Violations of these laws in particular result in corresponding measures and sanctions.

4. Confidentiality and trade secrets

The employees of Fischer Fertigungstechnik may not pass on to third parties confidential information without authorization, unless the information is not already known to the public. In particular, this includes technical data, financial data, operating data, customer information, file notes and other information that relates to the business of our group and its operational activities and future plans.

Our know-how is of fundamental importance for the long-term success of our company. This is why the employees of Fischer Fertigungstechnik must protect intellectual property against unauthorized access and knowledge by third parties. The intellectual property in particular includes trade secrets and confidential information as well as customer lists and product specifications.

5. Anti-corruption

No employees may claim, promise or accept benefits – in particular invitations, gifts and other benefits – that, according to objective assessment, are likely to cause an unfair influence on business behavior.

The same applies for offering, promising or granting personal benefits – in particular invitations, gifts and other benefits – to third parties, especially to business partners and customers, that, according to objective assessment, are likely to cause an unfair influence on business behavior.

Even the appearance of such dishonest, passive or active influence is to be avoided. This is especially true when dealing with public officials or public employees.

Violations of these laws in particular result in corresponding measures and sanctions.

6. Anti-trust and competition law

Fischer Fertigungstechnik is in business competition with many other companies within and also outside of our industry. We are committed to fair and unrestricted competition in compliance with the requirements of the anti-trust and competition law. All employees are required to comply with the anti-trust and competition law. This includes the prohibition of agreements that are not anti-trust as well as the prohibition of the abuse of a market dominating position.

In particular, employees shall refrain from agreements or understandings with competitors both inside and outside of our industry regarding the prices of our services. This applies both for purchasing as well as for sales prices. Employees are also aware of the fact that exchanging competitively sensitive information violates the applicable law.

As regards suppliers and dealers, price fixing, exclusive supply or exclusive purchasing obligations, abusive discounts as well as imposed linkages of different products or services upon purchase or supply (packages) are not permitted.

The prohibited abuse of a market dominating position as a provider or consumer of a certain type of goods or commercial services can, for example, be reflected in the determination of inflated prices, forced linking of different products or services upon purchase or supply (package deals), price discriminations or other unfair discrimination against third parties.

Upon participation in a tender, no consultation shall take place with other participants of this tender.

7. Prevention of money laundering

Money laundering refers to the channeling of money or other assets that were acquired through prior criminal acts into the legal economic cycle. Employees shall distance themselves from businesses through which such a channeling is made possible or supported, for example, in the form of the receipt, exchange or transfer of illegally acquired money or assets.

The employees of Fischer Fertigungstechnik shall observe compliance with national and international laws and regulations to prevent money laundering.

8. Avoiding conflicts of interest

Employees and executive board members are aware that mixing professional and private interests can be problematic. That is why employees and executive board members ensure a clear separation of professional and private interests. Business or personnel decisions may not be made based on private interests or relationships. Possible conflicts of interest are to be immediately disclosed to the competent supervisor or to be resolved appropriately.

9. Data protection

Data protection refers the protection of the individual against the misuse of personal data. The basis for this is the individual's right to informational self-determination, which expresses that every person can in principle always decide which parts of his personal data should be accessible to whom and when.

Employees must follow the relevant laws and company regulations with regard to personal data. The processing of personal data may only take place based on a legitimizing basis in compliance with the applicable laws.

Identified violations of data protection regulations are immediately to be communicated to the supervisor or HR.

10. Environmental protection

Fischer Fertigungstechnik is aware of the ecological impacts of its business activity and feels committed to improving its environmental balance through preventative environmental measures and the use of environmentally friendly technologies. Every employee should protect natural resources and endeavor in his work to reduce to a minimum the load on the environment through material savings, energy-saving planning as well as by avoiding, reducing and recycling waste.

11. Health and operator safety

Employees deserve a safe and healthy working environment. Fischer Fertigungstechnik therefore places the utmost importance on compliance with the health and occupational safety directives. Fischer Fertigungstechnik strives to foster the physical and psychological well-being of its employees.

The health and occupational safety policy also includes the prohibition of illegal drugs in the workplace.

12. System and product safety

Our systems are regularly examined and maintained. Our employees are thoroughly instructed, trained and supervised. Operational disturbances, accidents or faults can only be avoided if these measures are implemented.

13. Compliance with the code of conduct

Each employee is to be given this code of conduct. The top executives are responsible for ensuring that the content of this code of conduct is understandable by all employees.

The code of conduct forms the basis for all internal regulations by Fischer Fertigungstechnik that specify the code of conduct and therefore are also to be observed.

Violations of the code of conduct may result in disciplinary action as well as civil or criminal action.

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14. Providing information

Information about violations of legal or internal regulations is to be addressed to the respective superior, the HR, to the anonym postbox, which the HR empties or the executive board.

Abusive or deliberately false provided information shall result in corresponding measures and sanctions.

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15. Entry into force

This code of conduct shall enter into force on 1 March 2018.

Self-check for employees on the topic of integrity

A quick self-check could offer assistance if you are unsure about whether a certain action could be critical from compliance considerations. In such a situation, the employee may ask the following questions:

- „Do I have a good feeling about this or am I concerned?“
- „What would happen if it was in the newspaper tomorrow?“
- „What would my family and my friends say about it?“

While the responses to these questions cannot replace informed legal consultation, they can provide an initial assessment of the situation. In the case of uncertainty, the employees should consult their supervisors, the HR or the executive board.