

1. Underlying concept

This Code of Conduct is based on a common underlying concept of socially responsible corporate governance in accordance with the following guidelines.

We, the signatory company

FISCHER Elektromotoren GmbH
Schützenstraße 19
D-74842 Billigheim-Allfeld



assume responsibility within the scope of our respective possibilities and scope of action by considering the consequences of our business decisions and actions in legal, economic, technological as well as social and ecological terms. This is how we contribute to the social and economic development of the countries and regions in which we operate.

Our actions comply with the relevant legal regulations. We adhere to ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as laid down in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the core labour standards of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct defines the basic principles of our actions, and we actively require our employees worldwide to observe them. The contents apply to all branches and business sections of our company.

We expect our business partners to share the same basic principles. This shall not create any rights in favour of third parties.

2. Compliance with the laws

It goes without saying that we comply with the applicable laws and other legal provisions of the countries in which we operate. If the local laws and regulations are less restrictive, our actions will be guided by the principles of this Code of Conduct. If there is a direct conflict between binding local law and the principles contained in this Code of Conduct, local law shall prevail. However, we will strive to comply with the contents of this Code of Conduct.

We have taken the appropriate compliance² measures to ensure that the following topics are appropriately covered:

² Compliance stands for the compliance with legal requirements, regulatory standards, voluntary commitments and internal guidelines.

3. Integrity and Compliance

3.1 Corruption

We will not tolerate corruption, bribery, fraud, acceptance or granting of advantages or blackmail; they prevent fair competitive conditions. In our business relationships, we neither promise, offer, grant, demand or accept any benefits that are connected with the intention or could give the impression of influencing business decisions or gaining any other unauthorised advantage, nor do we allow ourselves the promise of such benefits. We apply a particularly strict standard when dealing with persons to whom special penal and liability regulations apply (e.g. public officials).

3.2 Fair competition

We act in accordance with national and international competition and antitrust law and will not participate in price fixing, market sharing or customer, market or supply agreements.

3.3 Prevention of money laundering

Money laundering refers to the process of channelling illegally generated funds or illegally acquired assets into the legal financial and economic cycle. We honour our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

3.4 Protection of information and intellectual property

We safeguard confidential information and respect intellectual property. The transfer of technology and expertise must be conducted in such a way that intellectual property rights and customer information, business secrets and non-public information are protected. We observe the prevailing laws on the protection of business secrets and treat the confidential information of our business partners accordingly.

3.5 Data protection / information security

We process, store and protect personal data in compliance with the statutory regulations. This means that personal data is collected confidentially, only for legitimate, predetermined purposes and in a transparent manner. We process personal data only if it is protected against loss, alteration and unauthorised use or disclosure by appropriate technical and organisational measures.

3.6 Export control

We commit ourselves to comply with the relevant legal standards for export control - in particular authorisation requirements, export and assistance bans - regarding the shipment and export of our goods.

3.7 Avoiding conflicts of interest

We will avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this is not successful, we disclose such conflicts.

4. Health and safety

To protect the health of our employees, we take appropriate health and safety measures (such as the implementation of our occupational health and safety management system) that address the following topics appropriately:

- Compliance with applicable laws and adherence to international health and safety standards;
- suitable workplace layout, safety regulations and provision of suitable personal protective equipment as well as extraction systems to prevent emissions;
- implementation of preventive controls, emergency measures, an accident reporting system and other suitable measures for ongoing improvement;
- providing access to drinking water in sufficient quantities and to clean sanitary facilities and social rooms for employees.

We ensure that all our employees receive appropriate training.

5. Remuneration and working hours / personal development

Remuneration is in line with the applicable laws and is subject to the relevant national minimum wage laws. Employees will be informed clearly and in detail about the composition of their remuneration.

We comply with the prevailing laws and (international) labour standards concerning the maximum permitted working hours and ensure that

- the working hours, including overtime, do not exceed the statutory maximum limits;
- the weekly working hours, including overtime, do not exceed 60 hours, even in exceptional cases where there are no such provisions;
- employees have at least one full day off per working week.

5.1 Personnel development

We are particularly keen to consider an employee's personal development along with the company-specific needs and requirements of cost-effectiveness and, as far as possible, to define and pursue development stages in line with the wishes of our employees.

6. Compliance with human rights

We honour and promote internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of every individual;
- protect and grant the right to freedom of speech and expression;
- will not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination;
- respect diversity, honour the equality of people and promote inclusion.

6.1 Prohibition of child labour

We will not tolerate child labour. We do not recruit any employees who are not at least 15 years old and ask for proof of age. We will not employ anyone for hazardous work who is not at least 18 years old.

6.2 Prohibition of forced labour

Forced labour, modern slave labour or similar deprivations of liberty are prohibited. All work must be voluntary and there must be an option to terminate the employment relationship.

6.3 Freedom of association

We respect the right of employees to freedom of assembly and association.

6.4 Promotion of diversity and equal opportunities

We promote equal opportunities and will not tolerate discrimination. We treat all humans equally, regardless of gender, age, colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, beliefs or other personal characteristics.

7. Environment, energy and climate protection

We act in accordance with the applicable laws and are guided by international standards in order to minimise negative effects on the environment and continuously improve our activities for environmental and climate protection. We base our strategic planning and implementation on the Science Based Targets initiative (SBTi) and the Greenhouse Gas Protocol (GHG Protocol).

All employees will be sensitised to environmental protection and will be offered the necessary training measures and courses.

We have taken adequate environmental protection measures (such as the integration of operational environmental/energy management into our ISO management system) that address the following topics effectively:

- targets for environmental issues, definition and implementation of activities and their continuous improvement
- reduction of CO₂ emissions (GHG)

- increasing the energy efficiency and use of renewable energies
- protecting water quality and reducing water consumption
- protection of air quality, prevention of pollution
- encouraging resource efficiency
- reducing and avoiding emissions and immissions
- reducing chemicals and waste with appropriate disposal
- responsible handling of substances that are hazardous to humans and the environment
- preserving biodiversity
- sustainable design of the product life cycle, where this is possible.

Sustainability, efficiency and reusability are the principles of our product development. User protection and repairability are the cornerstones of our product design.

7.1 REACH / RoHS conformity

FISCHER Elektromotoren GmbH is a "downstream user" as defined by the REACH Regulation 1907/2006. Obligations arising from the manufacture and import of substances/chemicals for pre-registration and registration (ECHA) do not apply to FISCHER. Our products are articles in the sense of the REACH regulation. Under normal and predictable conditions of use, these articles will not release any substances. This means that FISCHER is neither obliged to register nor to prepare safety data sheets.

We ensure that our suppliers fulfil all requirements concerning chemical substances and materials and that no substances from the Candidate List of substances of very high concern are used in the manufacture of our products. Here we comply with the obligations of the "ECHA Guidance for Downstream Users".

Our products comply with the RoHS Directive 2011/65/EU and 2015/863/EU on the restriction of the use of hazardous substances in electrical and electronic equipment.

FISCHER Elektromotoren GmbH hereby declares that all our products are manufactured in compliance with REACH and RoHS.

If you have an enquiry about REACH or RoHS, please contact us on +49 (0) 62 65 / 92 22 - 0 and ask to speak to our sustainability officer.

8. Handling conflict minerals (Dodd-Frank Act)

We undertake due diligence to avoid the use of conflict minerals (tantalum, tin, tungsten, gold) in our products so as to prevent human rights violations, corruption and the financing of armed groups or the like.

9. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to implement the contents of this Code of Conduct in their supply chains.

We reserve the right to audit the application of this Code of Conduct at our suppliers systematically and whenever necessary. This could be done through questionnaires, evaluations or visits.

If there are still doubts about the compliance with this Code of Conduct, the supplier is requested to take appropriate countermeasures and to report the matter to his responsible contact in our company. If necessary, the co-operation will be terminated.

10. Consumer interests

Where consumer interests are concerned, we shall comply with consumer-protection regulations as well as with appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. young people or pregnant women) enjoy special attention.

We will undertake appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are sensitised about the content of the Code of Conduct and trained on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labour law.

11. Implementation and application

11.1 Communication

We communicate in an open and dialogue-oriented manner about the requirements of this Code of Conduct and its implementation with employees, customers, suppliers and other interest and stakeholder groups.

11.2 Information on violations

We offer our employees and business partners (stakeholders) access to a protected mechanism to report possible violations of the principles of this Code of Conduct confidentially.

If you have any information, please contact the following independent point of contact, anonymously if you wish:

<https://app.whistleblower-service.com/report/PW5ROBE4IZ>

The FISCHER entrepreneur family

November 2023


Peter Fischer
Maximilian Fischer