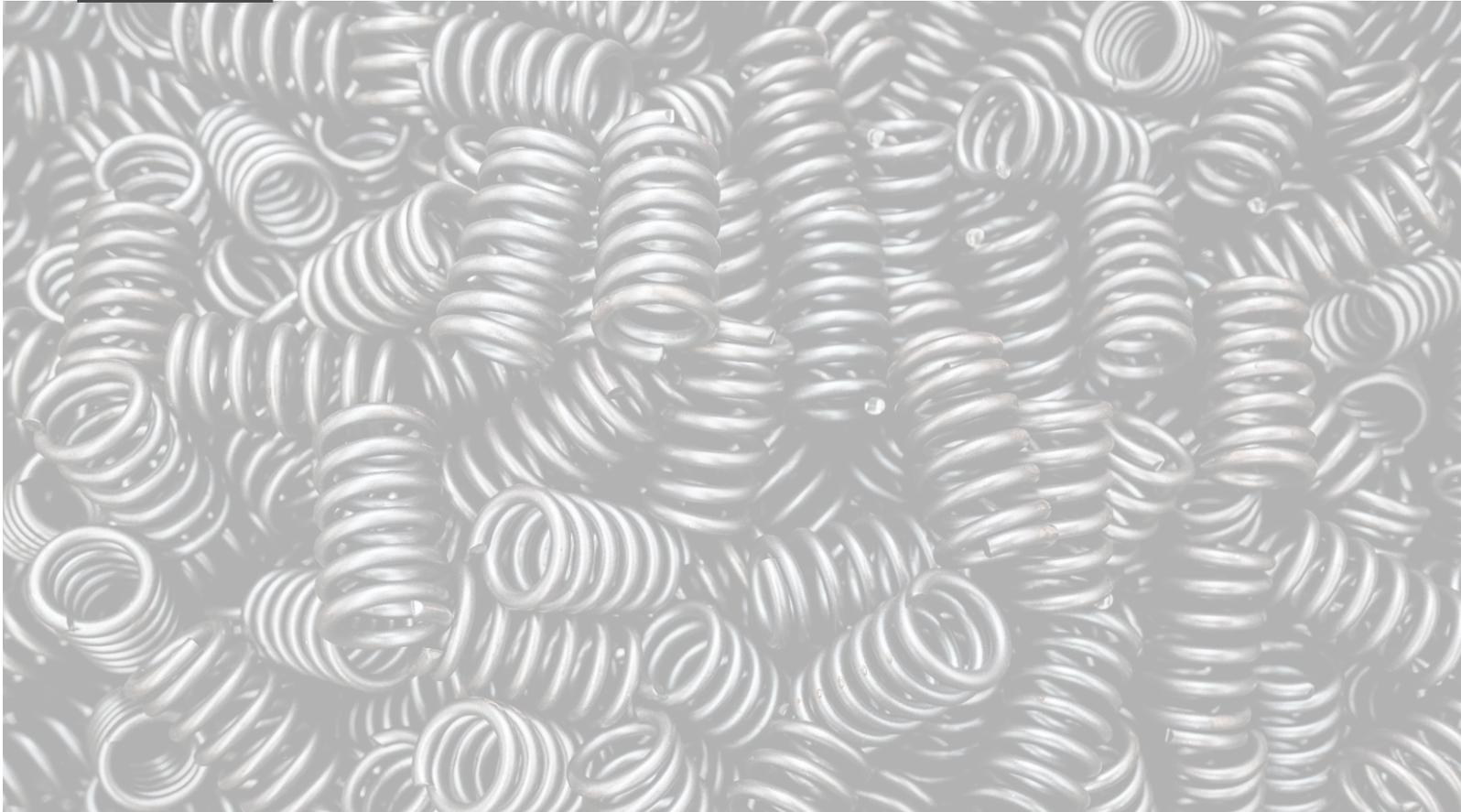


# COMPLIANCE AT ZILLER

Valid for all Stakeholders of Hans Ziller GmbH



Version 1.2



# PREFACE

## Hans Ziller GmbH Compliance

As a regional spring manufacturer, which maintains national and international business relations, the company Hans Ziller GmbH bears responsibility towards customers, employees, investors, and the public.

These corporate responsibilities include, above all, ensuring that Ziller complies with applicable laws, observes ethical principles and acts in a sustainable manner. For this reason, compliance is of integral relevance at Ziller, forming the basis of every business activity and decision and being actively pursued at every level of the organization.

The organization Hans Ziller is trying to take up the possibility of sustainable action and the responsibility that this entails, which is shifting more and more to an individual level, and to achieve sustainability at that level. Therefore, the Hans Ziller GmbH pursues a comprehensive plan of measures to ensure that compliance can be implemented and realized inside and outside the company. Well aware that the company-specific strategic approach of a medium-sized company only corresponds to a sufficient condition for achieving the goal of a global compliance movement, while the necessary condition and the associated decisive responsibility accrue to the larger market and political powers.

This compliance document comprises the Code of Conduct as well as the Environmental Policy and combines requirements that Hans Ziller places on its employees while at the same time addressing the obligations of other interest groups.

Therefore, the following formulation serves on the one hand as a guide to conduct for employees and managers, but should also be an obligatory medium for customers, suppliers, investors and the public.

Ziller strives to continuously optimize its responsibility for the protection of people and the environment and for this reason asks its suppliers to contribute to this in the form of a comprehensive approach, which also takes into account the requirements of the German Supply Chain Duty of Care Act (Lieferkettensorgfaltspflichtengesetz). Consequently, we ask above all suppliers of the company Hans Ziller GmbH to take note of this document, to agree to the contents by signature and to return it to **compliance@ziller-federn**, or to the responsible contact person of the Hans Ziller GmbH.

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# 1 Basic Information

## 1.1 Preamble

This Code of Conduct defines the economic, social and ecological requirements for the company Hans Ziller GmbH for the organization itself as well as the explanation of these requirements serves as disclosure of the expectations that Hans Ziller GmbH places on its business partners. The regulated principles and policies are self-obligatory to comply with for us and our business partners and are therefore part of the contractual conditions. The Code of Conduct represents the basis of all business relations with regard to goods and products purchased by us for all production processes. All business partners guarantee compliance with the principles laid down in this Code of Conduct.

## 1.2 Corporate Values

The company Hans Ziller GmbH with all its organization members commits itself to the regulations in this Code of Conduct. The scope of the fundamental corporate values - quality, precision, reliability - equally encompasses economic, social and ecological responsibility. Compliance with laws and regulations, adherence to established standards, and commitment to international principles such as the UN Guiding Principles on Business and Human Rights form the foundation of our business activities and shape the way we interact with society. Acting with integrity in terms of shared values and norms is considered to be at the heart of our business decisions with the aim of bringing about responsible, fair and morally correct behavior by all stakeholders.

## 2 Economic Responsibility



### Conflicts of Interest

The expectations of Hans Ziller GmbH are directed towards all participants in the organization to engage in loyal behavior. Accordingly, situations in which personal or financial interests conflict with those of the company are to be avoided. Therefore, it is forbidden to acquire shares in companies of competitors, suppliers or customers or to enter into business relationships with them in private, insofar as this may lead to a conflict of interest. The acceptance of benefits resulting from business relationships is not permitted in principle, and invitations are kept within the limits of customary business hospitality.

### Bribery, Corruption and Extortion

All forms of bribery, corruption and extortion must be refrained from. Consequently, within the scope of business activities, all parties involved (employees, business partners, their employees or other third parties) must not procure any inadmissible advantages. This is particularly the case if the nature and extent of such an advantage leads to an inadmissible influence on the actions and decisions of the recipient. In the event of any ambiguity, the management must always be consulted. We promote transparency, integrity and responsible management and control in the company in an appropriate manner.

### Fair Competition, Compliance with Laws and Cartel

The basis of a free market economy is fair competition and compliance with applicable laws. Laws as well as official regulations in Germany and abroad must be complied with in all business activities. Conformity with antitrust law prompts us to focus on honesty, reliability and sustainable relationships with our business partners.

### Protection against Retaliation

We create a culture that is free from fear of negative consequences for the individual in order to raise awareness of misconduct. Reports of violations of our Code of Conduct will be kept strictly confidential. Action or retaliation against individuals who report suspected misconduct or violations is strictly prohibited. Such individuals will not be discriminated against, nor will they be subject to termination or other adverse consequences. If retaliation is proven, disciplinary action will result.

### International Trade Agreements and Sanctions

Embargoes or sanctions imposed by governments and international organizations may result in temporary restrictions affecting certain business transactions and applying to certain countries or individuals. We recognize and comply with these regulations. We do not engage in transactions or business involving goods or technologies that are affected by restrictions.



## **Export Controls and Economic Sanctions**

Export shipments must always comply with national and international regulations for export controls and sanctions. Within the scope of our possibilities, we work together with our suppliers and customers to create the necessary transparency in the supply chains.

## **Management of Assets**

Assets and material goods are to be protected against loss, damage, misuse, theft, misappropriation or destruction. Third-party property is marked accordingly. In the event of improper handling, loss or damage, the appropriate contact person or supervisor must be informed.

## **Financial Responsibility**

All essential business processes are properly documented by us and provide the necessary transparency to create trust with contractual partners and authorities. The recording of relevant financial information in reporting form serves to provide a true and fair view of business operations. Employees who record data relevant to accounting and controlling in the scope of their function are obliged to ensure the reliability and truthfulness of this data and information.

## 3 Social Responsibility



### Human Rights and Treatment of Employees

All participants of the Hans Ziller GmbH are to be treated with respect and dignity without exception. We are committed to the observance and protection of human rights, which promotes morally correct behavior and creates responsible cooperation. Everyone involved in the organization is thereby obliged to ensure that these fundamental rights are maintained.

### Rejection of Child Labor

Child labor and any exploitation of children and young people will not be tolerated. The minimum age for admission to employment must not be below the age at which compulsory schooling ends and in no case below the age of 15.

### Rejection of Forced Labor and Human Trafficking

Forced labor and human trafficking in any form are strictly rejected. Employees may not be forced into employment directly or indirectly through violence and/or intimidation. They are only to be employed if they have voluntarily made themselves available for employment.

### Equality of Opportunity and Non-Discrimination

The company Hans Ziller GmbH promotes the employment of personnel from different origins and with different experience. The aim is to create an atmosphere of respectful cooperation and to resolutely oppose discrimination on the grounds of ethnic origin, gender, religion or ideology, disability, age or sexual identity.

### Safety and Health

All employees are committed to providing a safe and healthy work environment. Compliance with safety regulations serves as a prerequisite for achieving the goal of 0-incidents. In this regard, Hans Ziller GmbH assumes responsibility for health and safety towards its workforce, to act preventively against risks and to ensure the best possible precautionary measures against accidents and occupational illnesses. Compliance with the relevant applicable legal requirements for health and safety at work must be observed by all parties involved. We continuously support and promote the further development and optimization of working conditions. Likewise, employees are required to comply with safety measures and to immediately remedy or report any deficiencies.



## **Remuneration and Working Hours**

Wages and salaries are paid at least according to statutory minimum wages and are based on collective agreements. We also undertake to comply with the statutory working hours. Furthermore, our personnel policy is responsible for the professional and individual development of all active and potential employees in terms of equal hiring and training opportunities.

## **Employee Rights**

The right of employees to freedom of association and assembly under current case law is respected.

## **Data Protection**

Every employee must comply with the applicable guidelines for protecting the data of employees, customers, suppliers, other business partners and any other third parties. In order to protect personal data, the necessary care and the legal regulations must be applied within the scope of the assigned tasks. Any deficiencies identified must be reported immediately to the supervisor or the responsible data protection officer.

## **Confidentiality and Intellectual Property**

We respect and recognize intellectual property of third parties. Intellectual property is used on the part of Hans Ziller GmbH only in cases where the corresponding rights of use of the owner have been obtained or have been decreed by the legislator. Intellectual property will be protected and safeguarded against unauthorized disclosure. Accordingly, detected plagiarisms are not put into circulation, but are reported to the appropriate authorities. Theft of intellectual property is strictly prohibited.



## 4 Ecological Responsibility

### Principles for the Protection of the Environment

Environmental protection and resource conservation are integral parts of our corporate policy. We have set ourselves the goal of striving for continuous improvements in all areas of environmental policy and thus making our contribution to the overall social task of preserving our environment. We are committed to protecting the environment, fulfilling our binding obligations and constantly developing our environmental management system. The environmental policy principles refer to the entire site of Hans Ziller GmbH in Böhmenkirch.

### Environmentally Relevant Requirements

Compliance with all environmentally relevant requirements and laws is of highest priority. We are committed to complying with the relevant laws and regulations and to achieving our own environmental goals. For this reason, we are committed to taking relevant measures in accordance with the 1.5 degree target of the Paris Climate Agreement. In addition, our environmental and energy management system also conforms to the requirements of the ISO 14001 and ISO 50001 standards.

### Resource Management

We strive to create a balanced relationship between ecology and economy in order to leave a sustainable environment for future generations. Therefore, the natural resources energy, raw materials and water are used sparingly and we try either to avoid their waste or to compensate for them by other measures that are in line with the sustainability goals.

### Waste, Sewage, Emissions and Noise Management

The company Hans Ziller GmbH is aware of the ecological impact of its business activities and is committed to protecting soil, water and air. In the course of our activities, we keep environmental pollution such as waste, sewage, emissions and noise as minimal as feasible.

### Air Quality

Through the continuing development of products and services, all those involved pursue the goal of reducing pollutant emissions along the entire supply chain in order to consistently improve air quality. As a contribution to climate protection, we aim to steadily reduce greenhouse gas emissions.



## **Environmentally Conscious Chemical Management**

All those involved undertake to handle chemicals and hazardous substances responsibly, including proper disposal. Environmentally hazardous chemicals are listed, monitored and, where possible, replaced by more environmentally friendly alternatives (see hazardous substances register).

### **Documentation**

We record all of our company's environmental data, assess it, and transfer our goals into measures for improvement. We are committed to constantly working on increasing our resource efficiency. All environmentally relevant business processes are integrated into our management system and examined for improvement potential. For as early as the procurement of goods, we allow environmental aspects to flow into the decision-making process and thus try to ensure that we provide exemplary action within the scope of our efficiency. Furthermore, we promote the environmental awareness of our employees in order to jointly achieve the goals we have set.

## **5 Violations of the Code of Conduct**

This Code of Conduct shall form the basis of the joint business activities and shall therefore be effective for all parties involved and must be complied with.

Violations of the Code of Conduct will lead to consequences, which will be assessed according to the individual case. In the event of violations of applicable law, we are obliged to report the matter to the government authorities.

## 6 Reports and Questions

With its value system, Hans Ziller GmbH stands for authentic and reliable business activity. Maintaining integrity means, in addition to complying with laws, guidelines and legal regulations, also the claim of self-commitment.

In addition, there may nevertheless be comments in which behavior arises in dealings with one another that is not congruent with our shared values.

In cases such as these regarding possible compliance violations, or even just questions about compliance at Ziller, we extend an open invitation to contact us at **compliance@ziller-federn.de** and share your opinion with us or the situation.

The incoming messages are not only treated with care, but also serve to protect the reporter and can therefore also be submitted in anonymized form, if desired, and treated accordingly anonymously.

Furthermore, Hans Ziller GmbH complies with the obligation to refrain from taking appropriate retaliatory measures against complainants.

## 7 Consent

With the following signature, I acknowledge the above-mentioned Compliance Guidelines of the Hans Ziller GmbH and have taken note of my obligations resulting therefrom, as well as my ability to act within my scope of effectiveness by means of appropriate measures already implemented or brought to implementation.

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Date, Place

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Signature and Company Stamp

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Company Name, Address

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Name and Job Title of the Signatory

## 8 Other

Index	Degree of Change	Date	Creation	Authorization	Approval
a	minor	20.09.2023	Carmen Bucher	CEO	CEO