

Supplier Code of Conduct for Ethical Business Practices Feintool Group¹

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¹ Feintool International Holding AG and all subsidiaries and affiliates. Feintool International Holding AG is a stock company listed on the SIX Swiss Exchange (ISIN CH0009320091).

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PREAMBLE

The Feintool Group (hereinafter «Feintool») is a global technology company active in the field of fineblanking with proven expertise in forming and electrolamination stamping. As a driver of innovation, the Group's mission is to continuously expand technology horizons. Feintool develops intelligent solutions for the customers and their demanding industrial applications and thus is designed to shape the future of mobility with high-performance sheet metal technology. It is aware of its responsibility as a globally operating company and its related social responsibilities.

Feintool respects the applicable laws and expects the same from its suppliers, service providers, and business partners. This document highlights Feintool's guidelines for suppliers, service providers, and business partners. These guidelines comply with internationally recognized standards and the guidelines set out on page 12 of this document.

Suppliers, service providers, and business partners of Feintool (hereinafter collectively referred to as "business partners") are expected to comply with this Code of Conduct and to act in full compliance with the laws and provisions that apply at all locations where they operate.

A. WORK

Feintool is committed to protecting the human rights of workers or employees (whereby both terms are used with the same meaning in this Code of Conduct), and expects the same of its business partners. In particular, all employees must be treated with dignity and respect in accordance with the recognized standards of the international community. This applies to all workers, including temporary workers, migrant workers, student assistants, contract workers, direct employees, and all other kinds of workers. The recognized standards referred to in the following paragraphs were consulted in the preparation of this Code of Conduct.

These working standards include:

A.1 Free choice of employment

Forced or bonded labor (including debt bondage) or forced servitude, involuntary or exploitative prison labor, all forms of slavery, slave-like practices, servitude, or other forms of the exercise of power or suppression or trade in human trafficking are forbidden. This includes the promotion, accommodation, recruitment, movement, or takeover of persons through the use of threats, violence, duress, kidnapping, or fraud for the purpose of creating work or procuring services. There are no justified restrictions to the freedom of movement of workers within the company and no justified restrictions to accessing or leaving the facilities provided by the company, including, if applicable, the bedrooms and living rooms of the employees.

A.2 Child labor and young employees

Feintool does not tolerate child labor of any kind whatsoever. Feintool expects its suppliers to comply with all locally applicable laws regarding the minimum age for employing people, in particular the ILO international standards. The term "child" refers to a person who has not yet reached the higher of school-leaving age or the minimum age for taking up employment in the country concerned. Employees younger than 18 years (young employees) may not do any work that could jeopardize their health or safety.

A.3 Working hours, wages, and social benefits

Working hours may not exceed the maximum under local law. In line with the labor markets in which the business partner operates, employees must be remunerated fairly and in compliance with all applicable laws, including those concerning minimum wages, overtime, and statutory social benefits. Employees must receive a timely and comprehensible payslip containing all the information needed for reviewing the specific payment for the work done for each wage period. Temporary workers, contract workers, and outsourced workers must be employed in accordance with local legislation.

A.4 Humane treatment, prohibition of discrimination, and harassment

The equal treatment of all human beings is a basic principle of Feintool. As a globally operating group of companies, Feintool applies a zero-tolerance approach to any and all kinds of discrimination against employees or business partners, and expects the same from its suppliers. All violations that have become known and have been proven will result in sanctions, up to and including the termination of the business relationship.

This means that:

Brutal or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, humiliation or insult of employees is prohibited; even the threat of such treatment is prohibited.

Feintool campaigns, and expects the same of its business partners, for a workplace that is free of harassment and illegal discrimination, and does not tolerate any discrimination or harassment on the basis of race, skin color, age, gender, sexual orientation, gender identity and expression, ethnic affiliation or national origin, disability, pregnancy, religion, world view, political affiliation, labor union membership, protected veteran status, protected genetic information, or marital status in its employment and labor practices, such as salaries, promotion, remuneration, and access to training and further education.

On request, the business partner must do everything it can to make provision for the religious practices of the employees.

A.5 Freedom of assembly and association

In compliance with local legislation, the business partner must respect the rights of all employees to establish labor unions and join labor unions of their choice, engage in salary negotiations, and attend peaceful assemblies, as well as the right of employees to refrain from such activities.

B. HEALTH, OCCUPATIONAL SAFETY, AND SECURITY

Feintool attaches the greatest importance to the protection and promotion of health, occupational safety, and the security of employees. For this reason, Feintool expects the same from its business partners. Business partners must comply with all applicable laws on occupational safety. Effective health and safety management systems, e.g. ISO 45001 are in place, are being progressively implemented, or are being used as references.

The health, occupational safety, and security standards include:

B.1 Occupational safety (including fire prevention)

Business partners must identify, assess, and use suitable control measures to reduce potential health and safety risks for employees. This includes the elimination of risks, the replacement of processes or materials, controls by way of suitable concepts and constructs, the implementation of technical and administrative control measures, preventive maintenance and safe work procedures (including locking/cutting power) as well as the provision of ongoing training in the fields of health, occupational safety, and security. If necessary, business partners must provide their employees with suitable, well maintained personal protective equipment. Business partners must implement suitable measures to keep pregnant women and breastfeeding mothers away from working areas prone to higher risks and eliminate or reduce the health and safety risks for pregnant women and breastfeeding mothers at the workplace.

Business partners must reduce the risk of fire by installing and properly maintaining fire alarms, raising the awareness of and training employees with regard to fire protection, appointing fire protection officers, and assessing the risks of fire.

B.2 Preparation for emergencies

Feintool has for a long time been applying a proven quality management system and solid risk management procedures and expects its business partners to do and maintain the same, if they have not already done so. Potential emergency risks relating to occupational and environmental safety, energy management, and the handling of special waste and dangerous substances must be identified, assessed, and documented as part of regular inspections. To keep the impact as low as possible, emergency plans and reaction procedures must be implemented, including the reporting of emergencies, alarm procedures and evacuations of employees, training courses and exercises.

The emergency plans of business partners should include suitable fire alarm and firefighting systems, free and accessible escape routes, suitable exits, contact information of the rescue services, and recovery plans. These plans and procedures should focus on keeping damage to persons, the environment, and property as small as possible.

B.3 Occupational accidents and illnesses

The business partner must implement procedures and systems to prevent, manage, document, and report occupational accidents and illnesses, provide access to the required medical treatment, investigate cases, and implement measures to eliminate the causes, and facilitate employees' return to work. Where such procedures and systems have not yet been implemented, the business partner must facilitate their implementation.

B.4 Occupational hygiene (possible exposure to various substances)

The potential exposure of employees to chemical, biological, and physical substances is identified and assessed on an ongoing basis and controlled in accordance with the hierarchy implemented by the business partner to avoid the effects of such substances. The adopted protection programs are consistently implemented and include instructional materials about the risks associated with these hazards.

B.5 Physically demanding activities

The burden placed on employees by physically demanding activities, including the manual handling of materials and heavy or repeated lifting of loads, long periods spent standing, and very repetitive or demanding installation work, must be recorded, assessed, and controlled.

B.6 Machine Safeguarding

Feintool fulfils the strict security requirements applied to production equipment and other machines and facilities by the applicable national laws, and expects the same from its business partners. Physical safety devices, locks, and barriers are on hand and are properly maintained where machines and equipment present a risk of injury to employees.

B.7 Hygiene and ergonomics at the workplace

The business partner must ensure that all workspaces are totally hygienic and offer the employees a suitable measure of comfort (access to toilets, drinking water, hygienic options for preparing food, suitable temperature, ventilation, and lighting).

B.8 Communication about health, occupational safety, and security

The business partner must provide employees with appropriate information and training on health, occupational safety, and security at the workplace in a language they can understand. Relevant information about health, occupational safety, and security must be displayed prominently at the business premises or put up in a position that is clearly recognizable and accessible by employees.

All employees must receive training when they start working and thereafter attend regular training courses. Employees must be encouraged to discuss any concerns and questions about health, occupational safety, and security with their line managers, without any fear of reprisals. The business partner must ensure that employees are really not threatened by such reprisals or other disadvantages.

C. ENVIRONMENT

Feintool is committed to sustainable development and expects the same from its business partners. The business partner must therefore implement all measures required to protect the environment and to maintain the natural resources within its sphere of influence. The business partner also acknowledges that a sense of responsibility towards the environment is essential in the process of manufacturing world-class products. The business partner must identify the impact on the environment and keep the negative consequences for society, the environment, and natural resources within the production facility as small as possible while still protecting public health and safety. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) are used as references.

The environmental standards are:

C.1 Environmental permits and environmental reporting

Where necessary, all required environmental permits (e.g. discharge monitoring), admissions and registrations must be obtained, maintained and kept up to date; the identified operational and reporting requirements must be observed.

C.2 Avoiding environmental pollution

The business partner must be committed to keeping emissions and harmful substances as well as the production of waste as low as possible.

C.3 Sustainable resources and water management

The business partner must use its resources sparingly in compliance with all applicable statutory and official regulations and environmental standards.

C.4 Harmful substances and responsible management of chemicals

Chemicals, waste, and other materials that pose a danger to people or the environment must be identified, marked, and managed by the business partner in order to guarantee their safe handling, provision, storage, use, recycling or reclamation, and disposal.

C.5 Waste management and avoidance of waste

The business partner has implemented or plans to implement a systematic process of identifying, managing, reducing, responsibly disposing or recycling waste.

C.6 Air Emissions

The business partner must avoid polluting the air with its activities as much as possible. If necessary, emissions of volatile organic chemicals, aerosols, corrosive substances, particles, ozone-depleting substances, and combustion by-products created by the business activities must be described, routinely monitored, controlled, and prepared in accordance with regulations before disposal. Ozone-depleting substances must be effectively controlled and handled in accordance with the Montreal Protocol and the applicable regulations. The performance of air pollution control systems must be routinely monitored.

C.7 Restrictions on materials

The business partner must comply with all applicable laws, regulations, and customer instructions regarding the prohibition or restriction of certain substances in products and manufacturing processes, including labelling for recycling and disposal.

C.8 Greenhouse gas emissions, energy efficiency, and renewable energies

It is key to our ambitions to reduce the environmental footprint of Feintool through the efficient use of energy and our natural resources. We expect our business partners to support us in these efforts. Apart from complying with the applicable regulations, the business partner must monitor its energy consumption and the resulting greenhouse gas emissions. Feintool is constantly looking for methods to improve the energy efficiency of its production processes, including its supply chain, and to reduce its energy consumption and greenhouse gas emissions as much as possible. We expect our business partners to support us in these efforts. Our environmental management system follows the international ISO 14001 standard. Feintool expects its business partners to aim for similar certification if they have not yet done so. The business partner must also promote the environmentally responsible conduct of all employees in order to use resources sparingly and reduce the impact on the environment.

D. ETHICS

To meet our social responsibilities and achieve success on the market, Feintool applies the highest ethical standards and expects its business partners to do the same. These include:

D.1 Business integrity

The highest integrity standards must be maintained for all business activities. All managers and employees of the business partner must refrain from engaging in any activities that could damage the trust placed in Feintool and its selected suppliers by our business partners and the public.

The business partner must pursue a zero-tolerance policy with regard to the following:

- Unsafe and illegal business practices
- Violence and aggression
- Discrimination, bullying, and harassment
- Bribery and corruption
- Revenge measures against persons who express their concern about or report actual or suspected breaches of the law or this Code of Conduct, fraud, harassment, security breaches, or other misconduct

Feintool expects its business partners to execute their business transactions in an ethically sound and responsible manner and to act with integrity. More details about Feintool's relationships with its suppliers are set out in separate documents, in particular in the "Purchasing conditions" document.

D.2 Foreign trade legislation

The business partner must meet its obligations in compliance with the applicable foreign trade laws, including import, export, trade, and customs laws, provisions, and controls.

D.3 Avoiding and combating corruption

Feintool has a zero-tolerance policy regarding corruption and expects the same from its business partners. Corruption distorts competition, harms the free market, and therefore also the Feintool Group and its business partners. The business partner also may not accept any corrupt conduct by its employees, business partners, or customers. The business partner must always act transparently and in compliance with all applicable international regulations to avoid and combat corruption and bribery.

D.4 Disclosure of information

Feintool transparently and correctly documents and accounts for all business transactions. Information regarding employment conditions, health and safety, environmental protection procedures, business activities, structure, financial situation, and performance is disclosed in accordance with the applicable regulations and industry standards. Forgery of documents or the misleading representation of conditions or practices within the supply chain are unacceptable and should be avoided by the business partners involved.

D.5 Intellectual property

The business partner must ensure that intellectual property rights are respected, technology and know-how are transferred in a manner that protects the rights to intellectual property, and information concerning customers and business partners is protected and stored safely.

D.6 Ownership, assets, and property of Feintool

The business partner is responsible for the protection and correct use of any property and other tangible assets of Feintool made available to it. Equipment and other goods that are the property of Feintool may only be used for company purposes. All property of Feintool must be protected from loss, theft, damage, and misuse.

D.7 Fair transactions, fair advertising, and fair competition

The business partner must comply with the applicable standards regarding fair transactions, fair advertising, and fair competition. The business partner must comply with the applicable provisions on competition and the relevant legislation on pricing, competition law, and consumer protection.

D.8 Responsible procurement of raw materials (including minerals)

It is our objective to improve sustainability within our supply chains. Feintool expects its business partners to guarantee best practice in all phases of the supply and production chain with regard to security, occupational safety, health, the environment, and ethics in the procurement of raw materials.

The business partner undertakes to protect human rights throughout the procurement and supply chain for minerals (in particular tantalum, tin, tungsten, and gold) from conflict-affected and high-risk areas.

Feintool's procurement decisions are subject to the Group's risk management policy, including the OECD due diligence guidance for responsible supply chains for minerals from conflict-affected and high-risk areas. The business partner must support Feintool in monitoring these obligations, in particular by providing the required information.

D.9 Data privacy & Information Security

The business partner must ensure that justified expectations are met regarding the protection of the personal data of all business partners, including suppliers, service providers, customers, consumers, and employees. When capturing, storing, processing, transmitting, and forwarding personal data, the business partner must comply with all applicable laws on data privacy and information security as well as all official requirements.

The business partner must also ensure that all information pertaining to Feintool is suitably protected against unauthorized disclosure, amendment, or destruction and unauthorized access, and that unauthorized access to information processing systems is duly prevented. Information processing systems and networks must be protected in accordance with the latest technological standards against manipulation, malware, network attacks, and other malicious activities by third parties.

D.10 Conflicts of interest

Corruption often occurs as a result of conflicts of interest, i.e. in cases where the professional activity is affected by the private interests of a participant. The business partner must ensure and endeavor that managers and employees avoid situations that could lead to a conflict with their personal interests and that they take all decisions free of such conflicts of interest.

D.11 Customs and trade compliance

The business partner must ensure to not engage with persons or companies that have been placed by governments on sanctioned party lists. The business partner must comply with regulations and laws that govern the distribution and use of our products in markets in which we choose to operate.

D.12 Whistleblowing

All business partners along Feintool's value chain can contact an independent ombudsman with questions or concerns regarding the Code of Conduct as well as any (suspected) breaches of the Code of Conduct. As stated below, Feintool provides an ombudsman as a point of contact for Europe, Asia, and America.

The ombudsman

- will take the breaches alleged
- preserve the confidentiality and anonymity of those who report a violation
- forward the information to the Compliance Officer of Feintool in Switzerland
- ensure that they are carefully investigated and support such investigations
- prepare documentation on an annual basis for their area of responsibility

The complaints procedure of Feintool, which warrants the confidentiality, anonymity, and protection of whistleblowers at suppliers and within its own ranks must be observed and respected by the business partner, except where prohibited by law.

See List of Ombudsmen (https://www.feintool.com/fileadmin/user_upload/208-00-01_FIH_Verhaltenscodex_EN.pdf), chapter D.15.

E. IMPLEMENTATION, CONTROL, AND REVIEW

To guarantee the proper implementation, control, and review of this Code of Conduct, Feintool has implemented the following procedures and expects its business partners to introduce similar responsibilities for implementation, control, and review:

E.1 Company commitment and management responsibility

Feintool follows the principle of “good corporate citizenship.” The business partner must implement suitable measures to ensure that all its managers and employees comply with the local laws in all the countries where the supplier is active and observe the provisions of this Code of Conduct.

The business partner must appoint managerial employees and company representatives who are responsible for the implementation, control, and review of this Code of Conduct and the related guidelines.

E.2 Control and review

Feintool will do a self-assessment of the provisions of the Code of Conduct and compliance with its own due diligence obligations every three years to ensure that they meet the statutory and official requirements and specific needs of the Group.

The business partner must also constantly assess and update, if necessary, its own conduct, compliance with its due diligence obligations and the control measures that have been implemented, and institute support measures without delay to rectify identified breaches so as to ensure compliance with all principles along the entire supply chain.

E.3 Communication and instruction

The business partner must ensure that all people involved in a business relationship with Feintool know and apply the Code of Conduct of Feintool. Feintool is available to provide instruction in the event of uncertainty.

E.4 Reporting irregularities and complaints

Employees must be given a safe environment in which to raise complaints and give feedback without fear of reprisals or revenge. Feintool therefore expects its business partners to implement a suitable (internal or external) complaints procedure that allows whistleblowing by the persons affected or by other providers of information.

E.5 Responsibility of business partners

Feintool expects its business partners to execute their business transactions in an ethically sound manner and to act with integrity. More details are provided in separate documents, in particular in the “Purchasing conditions” document.

REFERENCES

This Code of Conduct for Suppliers is based on the following standards:

[Eco Management & Audit System](#)

[Ethical Trading Initiative](#)

[ILO Code of Practice in Safety and Health](#)

[ILO International Labor Standards](#)

[ISO 14001](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas](#)

[OECD Guidelines for Multinational Enterprises](#)

[Universal Declaration of Human Rights](#)

[United Nations Convention Against Corruption](#)

[United Nations Convention on the Rights of the Child](#)

[United Nations Convention on the Elimination of All Forms of Discrimination Against Women](#)

[United Nations Global Compact](#)

[United Nations Guiding principles on business and human rights](#)

[United States Federal Acquisition Regulation](#)

[SA 8000](#)

[SIX Swiss Exchange Corporate Governance Guidelines](#)

[Social Accountability International \(SAI\)](#)

This version of the Code of Conduct for Suppliers, Service Providers, and Business Partners of the Feintool Group comes into effect on 1st of June 2023.



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