

FKN | GROUP

**Behavioural
guideline**

"Code of Conduct"

Foreword

The FKN Group aims to be a reliable and fair partner for all its business partners and employees, and naturally complies with the law and contracts.

We measure ourselves by this standard and are happy to be measured by others.

The FKN Group Code of Conduct sets out this standard for the individual areas of our business activities and defines certain irrefutable minimum requirements.

It is not the purpose of this Code of Conduct to cover every conceivable situation. Rather, it describes the standard by which all activities are to be measured.

It is the direct responsibility of each individual to be a reliable, fair and law-abiding partner in their behaviour. This responsibility cannot be delegated.

The management expects every employee, and in particular the managers of the FKN Group, to strictly adhere to the Code of Conduct.

The management

Table of contents

1.	Introduction	3
2.	Principles	4
2.1.	Law-abiding behaviour	4
2.2.	Role model function of managers	4
3.	Behaviour towards business partners and third parties	4
3.1.	Antitrust and competition law	4
3.2.	Corruption	5
3.3.	Gifts and invitations	5
3.4.	Supplier and customer relationships	5
4.	Human rights, labour and social standards	6
4.1.	Human rights	6
4.2.	Discrimination	6
4.3.	Equal opportunities	6
4.4.	Forced labour	6
4.5.	Remuneration and compensation	7
4.6.	Working conditions	7
4.7.	Qualification	7
5.	Environmental protection, health and safety	7
5.1.	Environment	7
5.2.	Occupational health and safety	8
6.	Conflicts of interest	9
7.	Confidentiality	9
8.	Data protection and data security	10
9.	Company property	10
10.	Money laundering	11
11.	Reporting irregularities	11

1. Introduction

The FKN Group has many years of experience in the development and realisation of individual façade solutions. Our international teams of designers, technicians and skilled workers in production and assembly realise unique building envelopes for internationally renowned architects and customers. Extensive technical know-how in the processing of all relevant materials in façade construction, such as steel, aluminium and glass, form the basis for visually high-quality project results.

The principle of compliance with the law is of particular concern to us both internally and externally. Compliance with the law in our actions and solidarity with our employees are key characteristics of our business activities.

This Code of Conduct is binding for all employees of the FKN Group worldwide and formulates our position with regard to compliance with legal regulations, voluntary commitments, internal guidelines and ethical standards.

Our unshakeable principle is that we want to win over our competitors solely through our understanding of the brand, being pioneering, excellent and reliable. In this way, we can achieve optimum customer benefit and long-term business success.

The managing directors of all companies are personally responsible for communicating the Code of Conduct to all employees, ensuring compliance with the Code and creating appropriate organisational regulations.

In addition, we expect each and every employee to comply with this Code of Conduct and to actively promote the values and principles set out in it.

The FKN Group expressly supports and encourages its business partners to apply and take into account the agreed principles in their own corporate policies. It sees this as an advantageous basis for further business relationships in the future.

2. Principles

We comply with the applicable law.

2.1. Law-abiding behaviour

The FKN Group upholds the principle of strict legality for all actions and measures of the FKN Group. Every employee therefore has a duty to comply with applicable law, and every manager must ensure that his or her employees fulfil this duty. It is strictly forbidden to induce third parties to commit unlawful acts or to knowingly participate in such acts.

2.2. Role model function of managers

Managers have a special role model function in the implementation of this Code of Conduct. They must credibly embody and exemplify the values and consistently take action against any behaviour that is not in line with this policy.

3. Behaviour towards business partners and third parties

We promote fair competition and strictly adhere to legal competition rules. We condemn all forms of bribery and corruption.

3.1. Antitrust and competition law

It is our company's business policy to promote fair competition. We therefore expect all employees to adhere strictly to the applicable antitrust and competition laws.

The FKN Group does not speak ill of competitors, customers, suppliers and business partners and their products and services.

Suppliers and business partners are to be selected exclusively on the basis of objective criteria.

3.2. Corruption

Any form of bribery, granting of advantages or corruptibility is prohibited, whether by public officials or in business dealings.

No employee may accept, offer or grant bribes or other monetary benefits in connection with their business activities. Public officials may not be offered, promised or granted any unauthorised advantages of any kind for themselves or for third parties for the performance of their duties or actions.

3.3. Gifts and invitations

Benefits, for example in the context of invitations or in connection with advertising measures that serve the purpose of promoting business relationships or presenting products or services, are permitted - insofar as this is customary in business.

Such gifts in kind, invitations and personal favours to business partners and competitors or other third parties may only be offered if they are within the bounds of generally accepted business practices. They must therefore be customary in business, must not have an unreasonably high value, must not exceed the personal standard of living of the parties involved and must not be intended to influence business decisions in a dishonest manner or in circumvention of legal regulations.

Corresponding benefits from business partners, competitors or other third parties may only be accepted if such benefits are appropriate in the context of generally accepted business practices and with regard to the occasion and scope and insofar as invitations, gifts in kind or personal favours are not capable of influencing the business decision.

3.4. Supplier and customer relationships

Agreements with customers and suppliers must be complete and unambiguous and must be documented, including subsequent amendments and additions. The internal regulations on the application of dual control ("four-eyes principle") and on the separation of action and audit functions must be strictly adhered to by all employees. Suppliers are to be selected solely on a competitive basis after comparing price, quality, performance and suitability of the products or services offered.

4. Human rights, labour and social standards

We respect internationally recognised human rights as well as labour and social standards.

Through the following regulations, we want to ensure that all employees act in accordance with internationally recognised human rights and the essential labour and social standards.

4.1. Human rights

The internationally recognised human rights are expressly endorsed and supported.

4.2. Discrimination

The FKN Group undertakes to ensure equal opportunities in employment and to refrain from any form of discrimination. Employees must not be treated differently on the basis of gender, race, skin colour, disability, origin, religion, age or gender orientation.

4.3. Equal opportunities

The principle of equal opportunities applies. The FKN Group is clearly against discrimination and exclusion and in favour of integration and tolerance not only among employees, but also between and with managers. The interaction between employees and management is characterised by mutual respect, understanding and mutual trust in the interest of achieving the common corporate goals.

4.4. Forced labour

The FKN Group rejects all forms of forced labour. Child labour is prohibited. The minimum age of employees is based on the respective national laws or collective labour agreement regulations, unless these do not exceed the minimum age specified in the respective national law.

ILO Convention No. 138.

4.5. Remuneration and compensation

The right to appropriate remuneration is recognised for all employees. Remuneration, compensation and other benefits (social benefits, holidays and others) take into account the principle of fairness and correspond at least to the respective national legal requirements or the level of the national economic sectors and industries.

4.6. Working conditions

The FKN Group complies with the respective national regulations and agreements on working hours and regular paid holidays. Working hours, including overtime, may not permanently exceed the existing statutory and collectively agreed standards in the respective countries.

4.7. Qualification

The existing skills and knowledge of employees at all FKN Group sites across Europe are of paramount importance for securing the future. The FKN Group therefore supports and promotes measures for the qualification of employees that are suitable for expanding and deepening the professional and technical knowledge essential for their work. Training and further education are of particular importance in the further development of the company.

5. Environmental protection, health and safety

We protect the environment and operate sustainably. We set high standards in occupational health and safety.

5.1. Environment

The FKN Group's products and services should also be environmentally compatible in the future. The protection of the environment and the improvement of living and environmental conditions are key corporate objectives of the FKN Group. In order to achieve and comply with the relevant international, European and national environmental standards, we work together with the responsible local institutions.

Environmental impact should be avoided or minimised as far as possible when planning new products and manufacturing processes. Sustainability is a major concern. The effective use of resources is a key environmental protection issue.

In order to identify potential for improvement, material and energy flows must be analysed and measures developed to reduce energy consumption and emissions. These should be incorporated into the planning of new product machines as early as the plant design stage. When planning manufacturing processes, considerations for avoiding waste and increasing the recycling rate must be integrated. This includes the use of the latest technologies, the treatment and recycling of waste water, the utilisation of internal recycling potential as well as the avoidance of waste and differentiated waste management. The environmental awareness of employees is to be raised through information and training.

5.2. Occupational health and safety

Occupational health and safety is a top priority. The FKN Group guarantees occupational health and safety in the workplace within the framework of national regulations and supports continuous development for improvement in this regard.

The FKN Group's business activities are geared towards designing workplaces in such a way that employees can work safely and accident-free.

Accident prevention measures should already be taken when planning production lines and ergonomically designed workplaces. Work processes must be constantly monitored for potential hazards for employees.

The respective safety officers must work together with managers and employees to develop strategies to prevent potential accidents at work.

The aim is to continuously review how changes to machines and systems, the reorganisation of transport routes, etc. can be implemented, the number of accidents can be successfully reduced by optimising lighting conditions, improving signage and training employees accordingly.

6. Conflicts of interest

We are committed to promoting the business of the FKN Group.

Every employee is obliged to make business decisions in the best interests of the company. Accordingly, they must ensure that their private interests do not conflict with the interests of the company. Personal interests or relationships must never influence business activities. Any kind of conflict of interest must be avoided and, in case of doubt, reported to superiors immediately.

Accordingly, employees may only represent the company in transactions in which they or their family members have a financial interest with the prior consent of their superiors.

Significant financial interests (more than three per cent) in companies of competitors, suppliers or customers require the approval of superiors.

Secondary employment with suppliers or customers is only permitted with the prior consent of superiors in individual cases.

7. Confidentiality

We protect our company's confidential information and respect the confidential information of others.

Confidential information of the company must be kept secret. Confidential information must be protected from unauthorised access by third parties. Within the company, care must also be taken to ensure that confidential information is only passed on to those employees who need it to fulfil their duties.

This obligation also applies after termination of the employment relationship.

8. Data protection and data security

We respect data protection and protect our company data.

Personal data is only collected, processed or used by the FKN Group insofar as this is done in strict compliance with the applicable regulations and is necessary for specified, clear and legitimate purposes.

Internal company information must be protected against unauthorised access, manipulation or destruction, against espionage and sabotage, and against unintentional alteration or loss.

All employees are obliged to maintain and actively promote the security of information and information systems, communication networks and network services to which they have access in the course of their work.

9. Company property

We insist on honesty and respect the company's assets and property.

Every employee is obliged to handle company property responsibly. Company equipment or objects may not be used for private purposes or removed from the company's premises unless the responsible superior has authorised this in individual cases.

Company property must be protected against loss, damage, theft, misuse and unauthorised use. Employees must handle work equipment provided to them for the fulfilment of their tasks with care.

Intangible assets such as proprietary knowledge, intellectual property rights, copyrighted works and the ideas and knowledge of our employees are also company property to be protected.

10. Money laundering

We only work with reputable business partners.

Money laundering is the smuggling of illegally obtained money or illegally acquired assets into the legal financial and economic cycle. Money laundering is a criminal offence in the member states of the EU and many other countries (e.g. USA, China).

No employee may, either alone or in collaboration with third parties, undertake or tolerate actions that violate the applicable anti-money laundering regulations.

11. Reports of irregularities

Questions regarding the Code of Conduct can be addressed to the management of the FKN Group.

We encourage our employees to report circumstances to us, that indicate a violation of laws, internal guidelines or this Code of Conduct. Reports to internal contacts are generally the most efficient means of ensuring a quick and effective solution.

If you suspect or are aware of irregularities, you can contact the management of the FKN Group or your manager. Information can also be provided anonymously if permitted by law.

All information is analysed, evaluated and, if necessary, the required measures are taken. All necessary and possible steps are taken to protect the confidentiality of the report and its content. If reports are made in good faith, the person making the report has no reason to fear any disadvantage.