

***Act on Corporate Due Diligence
Obligations in Supply Chains:***

***Declaration of Principles
FERCHAU Holding GmbH & Co. KG
and FERCHAU GmbH
(together: "FERCHAU")***

MANAGEMENT INTRODUCTION

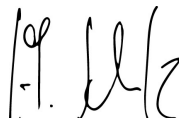
The terms "sustainability", "social responsibility" and "compliance" and the associated guiding principles are of crucial importance to us as an owner-managed company – and have accompanied us since our foundation. Therefore, the declaration of principles is just further evidence of the efforts we have been making for several years. In an environment in which the reality of life and regulatory framework conditions are increasingly characterised by the effects of climatic, demographic and socio-cultural change processes, we as a company must view this as an opportunity to define the interaction of our own corporate activities and to derive responsibility from them.

Our Code of Conduct emphasises the corporate principles clearly for everyone – and has done so for many years. It is also important for us to make a clear commitment to respecting and protecting human rights. Because it clearly applies throughout the entire FERCHAU Holding and for its affiliated companies with more than 10,100 employees: sustainability is our moral imperative; we can only bring about positive change by acting responsibly and making forward-looking decisions.

True to this attitude, we take our corporate responsibility seriously. As a service provider in the fields of Engineering and IT, we therefore promote compliance with human rights. We take appropriate measures to ensure compliance both within our own business field and our supply chain. Moreover, resource conservation is important to us in order to minimise our environmental impact as far as possible. This declaration serves to ensure the transparency of our endeavours regarding the [German] Act on Corporate Due Diligence Obligations in Supply Chains.



Frank Ferchau



Alexander Schulz



Ralf Helas



Thomas Hucht

FERCHAU Holding GmbH & Co. KG and associated companies

The FERCHAU Holding affiliated companies specialise in the provision of various services in the fields of engineering and IT while FERCHAU Holding unites all of its companies in one Group. In our daily business, we work with customers from a wide range of industries and regions and support them with their tasks and challenges in various ways:

ABLE Management Services GmbH

As the operational Group holding company and central in-house services provider, ABLE Management Services GmbH not only provides relief for all tasks without a direct customer interface, but also offers sound advice and proactive solution approaches as a response to changing market conditions. In-brief, it is both an innovation driver and a growth accelerator for all companies in the Group.

FERCHAU GmbH

With 9,000 employees in more than 120 branch offices, FERCHAU is one of the leading platforms for first-class technology services in Europe. The full-service Engineering and IT provider supports hidden champions and global players with top experts in flexible cooperation models.

FERCHAU Automotive GmbH

FERCHAU Automotive GmbH accompanies vehicle manufacturers and suppliers along the entire product lifecycle process – from the individual component to the validated system. As a development partner and technology service provider, it provides services ranging from conceptual design and software development to vehicle integration in its own workshop and testing facilities.

planting GmbH

Premium engineering and project controlling for process engineering plants in all sectors of the processing industry – planting stands for this. With 6 sites as well as 13 regional Project Execution Centres in Germany, the company is the top address for customers from the Oil & Gas, Chemicals, Petrochemicals, Energy, Pharmaceuticals and Life Science sectors.

prime-ing GmbH

As a managed services provider, prime-ing takes on the nationwide commissioning, control and administration of personnel service providers within the scope of larger projects in Germany. The company also relieves the burden on customers for the legally compliant modelling and control of works and service contracts and also with outsourcing solutions concerning the topic of temporary employment.

RST Rostock System-Technik GmbH

RST Rostock System-Technik has been an established partner of the international aerospace industry for system and product developments for several decades. The company not only provides Engineering services, but also develops and delivers products for various applications in Aviation, Aerospace, Defence and Industry.

top itservices AG

top itservices AG can look back on a success story of more than 40 years. As a partner for digital transformation, the company combines expertise within the sector whilst focusing on the Finance, Public, Industry, Energy, Healthcare, Consumer Goods and Telecommunications & Media fields with high technological and methodical competence.

GENERAL SECTION

We focus on our responsibility towards our employees, society and the environment. That is why we are explicitly committed to respecting human and environmental rights, also within our supply chains. We expect our suppliers to ensure compliance with these as well as our own principles.

In order to make our principles visible, we already introduced our Code of Conduct several years ago, in which our expectations are clearly expressed for everyone. This has now been supplemented with a developed human rights strategy which is based on the following recognised standards and guidelines (to be found in the LkSG [German Act on Corporate Due Diligence Obligations in Supply Chains]: annex to section 2 (1), section 7 (3) sentence 2), to which we are expressly committed:

- Universal Declaration of Human Rights (UN)
- Core Labour Standards of the International Labour Organisation (ILO)
- Paris Climate Agreement.

Trust, reliability, quality and the implementation of legal requirements and social standards are essential for long-term growth, success and corporate action. Compliance with these values is of great personal concern to us and we therefore actively promote it. As a company, this also includes respecting and protecting human rights and the environment for ourselves. After all, long-term economic success is only possible if these important rights are protected and respected. As an innovation-driving company, we learn and improve constantly in order to fulfil legal requirements and social expectations, among other aspects. The best example of this is our Corporate Social Responsibility strategy, via which we strive to contribute to supporting the United Nations Sustainable Development Goals.

All measures and our Risk Management Policy apply to all FERCHAU Holding affiliated companies as well as to FERCHAU Holding itself.

Code of Conduct

Our Code of Conduct is binding for all company employees and for our suppliers. Adherence to the principles set out in it is mandatory, as they are the fundamental values according to which the company acts.

The Group Code of Conduct is based on the following generally recognised guidelines:

- Universal Declaration of Human Rights of the United Nations (UN)
- Global Compact of the United Nations (UN)
- ILO Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development
- United Nations Convention against Corruption

The Code of Conduct consists of eleven principles which are highly relevant for the company:

- Principle 1: Adherence to human rights
- Principle 2: Adherence to the freedom of association and right to collective bargaining
- Principle 3: Adherence to fair working conditions
- Principle 4: Elimination of all forms of forced labour, child labour and human trafficking and respect for the rights of minorities and indigenous peoples
- Principle 5: Elimination of all forms of discrimination in recruitment/employment and conflicts of interest

- Principle 6: Compliance with occupational Health and Safety
- Principle 7: Observation of environmental protection
- Principle 8: Financial responsibility and combating all forms of corruption, as well as money laundering
- Principle 9: Protection of intellectual property and prevention of the placement of counterfeit parts on the market
- Principle 10: Observation of the data protection and information security requirements
- Principle 11: Conflict minerals and the Supply Chain Due Diligence Act

HOW DO WE PUT OUR RESPONSIBILITY INTO PRACTICE SPECIFICALLY?

Chapter 1: Risk management

We have integrated an effective procedure for risk management in the company by embedding it in our business processes. The responsibilities for monitoring and controlling the process within the company are clearly defined and the responsible unit reports to Management annually.

Risk analysis is carried out within the scope of risk management.

Chapter 2: Risk analysis

Risk analysis is carried out once per year and on an ad-hoc basis. Both the company's own business area and its direct suppliers are taken into account. The type, scope, context and severity of the potential or actual impact on human rights and the environment are assessed in order to evaluate the risks. The identified human and environmental risks are appropriately weighted and prioritised. We then communicate the results of the analysis internally to the relevant decision-makers.

The core of the analysis is the risk that violations of the Code of Conduct could occur at direct suppliers' and in the supply chain. The supplier structure and the possibility of influencing suppliers and the findings from the internal notification system must also be taken into account.

The risk analysis did not identify any increased risks. Regardless of this result, the existing preventive measures will stay in place (for more detailed information, see Chapter 3). The company's expectations of employees and suppliers are clearly described in the Code of Conduct. Nevertheless, an increased focus remains on non-EU suppliers, who are subject to more extensive authorisation and monitoring procedures.

Chapter 3: Preventive and corrective measures

As a preventive measure, we have declared our Code of Conduct to be binding for all suppliers and have therefore integrated it in the supplier contract. All suppliers must therefore contractually agree to comply with our Code of Conduct and the associated values. We also require our suppliers to pass on the values and principles of our Code of Conduct to any subcontractors in an appropriate manner to ensure that they comply with the principles contained therein.

As a company, we declare our willingness to instruct our suppliers regarding our human rights and environmental expectations. The training serves as a supportive offer. Suppliers are obliged to comply with our principles even if they do not participate in this training. If any abuse occurs and is not remedied within a reasonable period of time and to a reasonable extent, we will terminate our business relationship with this supplier as a last resort.

We regularly review the effectiveness of the measures taken and make adjustments where necessary. Furthermore, our certified management systems ensure, for example, that adequate occupational safety is continuously guaranteed.

Chapter 4: "Speak up" complaints procedure

Our complaints procedure is open to all stakeholders. Employees also have access to the system via the Intranet. It can be used to report possible human rights violations or environmental damage, as well as eventual violations of our Code of Conduct and this declaration of principles. Both our employees and third parties have the option of reporting via the system. Reports can be submitted by E-mail, by telephone, by appointment or by post. The CSR Officer has access to the communication media. The reporting process is clearly presented on the website. We attach great importance to the protection of the person making the report. The anonymity of the person and confidentiality are guaranteed, irrespective of the circumstances. Also, the person is protected against retaliation and reprisals. All complaints are investigated.

Thus, we ensure that the process is accessible, transparent, independent, fair, effective and confidential. As the person responsible, the CSR Officer has the organisational independence and freedom from instructions which enable him/her to process the submitted reports objectively thanks to the powers defined by his/her appointment.

The effectiveness of the procedure is reviewed annually and on an ad-hoc basis.

Chapter 5: Documentation and reporting

Documentation is made systematically and comprehensibly.

The annual report is prepared in accordance with the requirements of BAFA [the German Federal Office for Economic Affairs and Export Control] and published on the corporate websites after Management approval, but no later than four months after the end of the fiscal year. The reports are available there as a download for at least seven years.

Der Code of Conduct is available on our corporate website:
<https://www.ferchau.com/de/en/downloads>



FERCHAU Holding GmbH & Co. KG

Steinmüllerallee 2
51643 Gummersbach
Fon +49 2261 3006-0
info@ferchau-holding.com
ferchau-holding.com

FERCHAU GmbH

Steinmüllerallee 2
51643 Gummersbach
Fon +49 2261 3006-0
Fax +49 2261 3006-99
info@ferchau.com

ferchau.com

