

Code of Conduct

RF Group

The scope of this Code of Conduct

This Code of Conduct defines the fundamental principles for ethical, moral, and legally correct decision-making and the behaviour of employees within our company group.

The basic principles, guidelines, and recommendations herein are addressed to all employees of the RF Group, as well as to anyone acting in the name or on behalf of our company group. The RF Group includes Rupert Fertinger GmbH, Metallwarenerzeugung Rupert Fertinger GmbH and Fertinger Armaturen GmbH.

The RF Group will ensure that this Code of Conduct is implemented in its entirety in all companies of the RF Group.

In addition, it is important for us that all relevant stakeholders of our value creation process (e.g. suppliers, cooperation and implementation partners) and our customers operate in the spirit and meaning of our Code of Conduct and – to the fullest extent possible – accept, respect and incorporate this in their activities and actions.

RF Group our Vision and Mission

RF is a globally leading Tier 2 Supplier.

Amidst the challenges of our globalised world, we want to make our own lasting contributions to improving driving comfort, lowering the cost of vehicle operation, increasing the functional reliability of vehicles and reducing the burden on society with regard to the expense and environmental impact of transportation. We remain constantly aware of our responsibility to offer our customers products, engineering work and services that help them successfully meet the challenges of the market and the needs of society.

RF creates added value through the synthesis of Tradition, Innovation and Growth.

RF is a specialist in the development of components for temperature management in vehicles, modules for carrying electricity and operating media as well as assemblies of lightweight metallic materials. Components for bath and sanitary furnishings also make up part of our product portfolio. We strive to exceed the expectations of our customers in supplying these products and services.

The framework for the Code of Conduct

The group companies and their representatives are subject to many corporate, legal and political regulations relating to their international business activities.

Any breach of legal provisions, internal guidelines, general rules and instructions or stipulations of this Code of Conduct may have serious financial consequences for the RF Group or be detrimental to its image.

Accordingly, employees of the RF Group will face disciplinary action if such breaches occur. Contraventions of this Code of Conduct may also have consequences under criminal or civil law, and result in claims for recourse and compensation for damages by the RF Group against the respective non-compliant person.

Our Code of Conduct may be updated from time to time and may be supplemented by additional and/or specific guidelines that apply only to certain countries, regions or stakeholders.

Implementing the Code of Conduct

The management of the RF Group shall set the example for all employees in implementing the intention and content of the Code of Conduct. They should also instruct their employees in applying the Code of Conduct in daily practice and monitor consistent and precise adherence.

RF Group employees should also trust their own judgement in interpreting the rules of the Code of Conduct, and ask themselves whether a specific line of action – one that for example could offend, or injure the interests of, another person – could be a cause for criticism based on generally applicable ethical and moral standards.

This requires country – specific standards and practices to be taken into account. Such discretion, however, is in any event limited by the applicable legal framework.

In case of ambiguities or questions regarding the guidelines for conduct, each RF Group employee is encouraged to seek appropriate advice and/or assistance in a decision with the management of RF Group.

The RF Group human resource department is available to answer any additional questions on the Code of Conduct.

Strictly in line with applicable
Laws and regulations

All business activities and decisions of the RF Group are subject to compliance with all applicable laws and internal and external regulations.

All RF Group employees are encouraged to actively inform themselves of the laws and regulations applicable to their area of responsibility, as well as internal regulations and guidelines, and to fully comply with them.

Privacy policy
in the RF Group

The RF Group acts in a trustworthy manner, in particular when dealing with business information. Every effort is made to ensure that internal and confidential information of the RF Group as well as its customers and partners, is subject to strict confidentiality and is not disclosed to third parties.

RF Group employees are bound by the obligation of confidentiality even after their employment relationship with the company has terminated. If disclosure of sensitive business information is required by legal regulations, the RF Group together with its legal department will cooperate with the competent authorities.

The RF Group stands
for **fair competition**

Transparent, fair and professional behaviour within the market serves to secure the interests of the Group and its employees in the long term, and helps the RF Group as a whole to achieve reliable and sustainable competitiveness. The RF Group's corporate philosophy prohibits any limitation of free competition, as well as any breach of antitrust regulations.

Since the breach of national and international antitrust and other competition regulations may have serious consequences for the RF Group and its employees, the RF Group complies with the following guidelines for conduct in the course of its daily operations:

- No agreements with regard to relevant business issues shall be concluded with competitors, in whatever form, especially in connection with price fixing or fixing of production volumes, market share or discrimination against other player in the market.
- Neither unfair business practices nor inappropriate pressure may be applied to motivate business partners to distribute or obtain products or services at a particularly lucrative price or to bring about some other desired action.
- No agreement on sham offers (“phony offers”) will be made with other market participants.

The employees of the RF Group agree not to make any statements nor divulge any information whatsoever on confidential matters relating to the RF Group at meetings or during other contact with competitors or other market participants. Confidential information includes price information, terms of sale, production costs and similar relevant information which can be attributed to the common competitive market environment.

The representation of the RF Group in professional associations and the participation of representatives of the RF Group in association meetings serve, among others, to create positive economic development and to secure the interests of the RF Group in the relevant group or branch. In general, the principles outlined above apply to the participation of employees of the RF Group in any association. In particular, all applicable laws and regulations are to be complied with.

The RF Group on **accepting benefits**

The RF Group rejects any kind of corruption, bribery or preferential treatment. All employees of the RF Group are encouraged to comply with all applicable legal provisions. This is the case for both the acceptance and the granting of monetary or other (valuable) benefits by employees of the RF Group. The RF Group is aware of its moral responsibility for avoiding corruption and will therefore carefully evaluate any benefits from or to third parties in accordance with this code of Conduct. Hospitality within the scope of the usual business practice and in compliance with all relevant legal regulations is considered acceptable according to this Code of Conduct.

The RF Group
on **sexual harassment**

No form of sexual harassment will be tolerated under any circumstances at RF Group. Sexual harassment includes obvious sexual advances, inappropriate remarks, suggestive gestures, or displaying such images or video material within the company and in the corporate environment. Certain types of behaviour may still be classified as sexual harassment even if this was not the original intention of the person and even if this behaviour is not deemed a deliberate act.

The RF Group
on **discrimination**

The contents of the UN Charter and the European Convention on Human Rights are considered by the RF Group to be universally applicable basic principles regarding interaction between people. Employees of the RF Group must accept and respect them in their jobs and implement them in their actions. The RF Group's corporate culture includes and expressly advocates each person unique and valuable. The individual skills and abilities of RF Group employees are appreciated and supported. Therefore, no form of discrimination within the RF Group will be tolerated and such behaviour is prohibited by appropriate measures and directives.

The RF Group
promotes **social diversity**

The RF Group encourages and benefits from the diversity of social systems. Our self – image and our Code of Conduct dictate that we respect the dignity and personality of every employee, treat each other respectfully and appreciate and promote diversity. Through conscious application of the principle of diversity, the RF Group can make employees feel that their diversities are appreciated, as well as create a productive atmosphere across the Group, prevent social discrimination, and guarantee equal opportunities within the Group.

The RF Group has app. 200 employees, men and women from different age groups, with various opinions and convictions, different cultural and religious backgrounds, varied sexual orientations, and an array of physical and mental abilities. The Promotion of diversity is a strategically relevant topic for the RF Group and affects all areas of the company.

The RF Group **conflicts of interest**

RF Group employees are expected to work exclusively in the interests of the company, while continuing to be socio-politically active. We want to avoid situations in which, for personal or economic reasons, conflicts with the interests of our company group may arise. Because this is not always possible, RF Group employees commit themselves to ensuring the highest possible level of transparency when dealing with potential conflicts of interest.

The following situations could for example, result in conflicts of interest between the RF Group as a company and its employees:

- Spare-time work of employees may lead to conflicts of interest, with the exception of volunteer or charitable activities as long as they are done without remuneration. Part-time work which is financially compensated requires prior written approval. This also applies to participation in management, supervisory or advisory boards of companies which do not belong to the RF Group.
- RF Group employees must always report their business interests with business partners or competitors, especially with customers or suppliers, to their direct superiors for approval.
- Transactions or activities by RF Group employees with business partners of the RF Group are also to be reported if a family members or close relative of the RF Group employee works for or is acting on behalf of the business partner.

The RF Group on **confidentiality**

We make sure that confidential information obtained in the course of normal business activities is accessible neither for the promotion of personal interest nor of the interests of third parties. As part of their business activities, employees of the RF Group often have access to sensitive data. Sensitive data in this context refers to sensitive data relevant to the company and sensitive personal data, which may originate from the RF Group employee or from customers, suppliers, partners, etc.

It is important to handle all such information in compliance with applicable law (such as applicable data protection regulations) and in accordance with the degree of sensitivity.

Each employee of the RF Group must ensure that all corporate information is always stored away securely – saved on data storage media in any form. In the event that such information is taken off company premises for business reasons, the employee is responsible and obliged to protect such information at all times from loss or access by third parties.

Absolute confidentiality must be maintained with regard to operational and business secrets of companies of the RF Group. This applies in particular to information dealing with company-relevant issues in research and development, acquisition strategies, or high-level investments, etc. Information regarding the corporate strategy of the RF Group, irrespective of the source of the information, is subject to strict confidentiality.

Information regarding operational and business secrets must also be treated as strictly confidential and should only be disclosed to other RF Group employees if required in the course of their work activity within the RF Group. RF Group employees must ensure that such information is stored safely at all times. Information from contractual partners of the RF Group shall also be treated as strictly confidential, in particular, when a confidentiality agreement has been concluded.

The general confidentiality obligation remains in effect after termination of employment or contractual relationship. In addition, the relevant stipulations about confidentiality of employment contracts and their contents are also valid.

The company-wide guidelines and security regulations on IT usage of the RF Group serve to protect data relevant to the company. Devices such as laptops, mobile phones, etc. must always be stored in an appropriate manner. Password protection is generally installed on all RF Group IT devices. The employees of the RF Group should only take data with them on business travel if absolutely necessary. Disclosure of personal passwords to third parties is to be strictly avoided. If one person is substituting for another, clear and verifiable rules for use shall be applied. Loss of company-related data (e.g. theft) must be reported immediately to the direct supervisor.

The RF Group on **corporate communication**

Press releases, as well as other official announcements, whether in oral or written form, which relate to the interests of the RF Group, will be communicated or published exclusively through the relevant board members, managing directors or the designated spokesperson responsible for communication.

What the RF Group expects from its **business partners**

We expect a high standard of performance and integrity from our business partners. The RF Group aims for high standards of performance and corporate responsibility in all of its business activities; this also applies to relationships with business partners and their respective requirements. Our business partners play a vital role in this process because they enable our sustainable growth.

All relationships between the RF Group and its business partners are based on the high quality of the products and services supplied to us, competitive prices, the best possible level of suitability, and integrity.

The RF Group expects its business partners to observe applicable laws, industry regulations and Contractual terms and also to comply with the generally recognized standards of social responsibility, such as protection of human rights, security, environmental protection, as well as the prohibition of child or forced labour and corruption.

Before entering into a business relationship, the RF Group performs a suitability assessment of the potential business partners in order to ascertain the integrity, quality level, suitability and credibility of the partner. If a business partner fails to comply with applicable laws, industry regulations and contractual conditions and the generally recognized standards of social responsibility, the RF Group will request that the required practice be put into place without delay and, if necessary, will terminate the cooperation if the business partner does not comply with this request.

The RF Group and its **information culture**

In the event that an employee of the RF Group detects any deviations from the stipulations of the Code of Conduct or from the internal regulations and guidelines of the RF Group, they are invited to report them to their direct supervisor, the respective management or to the responsible authority within the RF Group (personnel development).

If such a report is received, the RF Group will, upon request, ensure that the confidentiality of the person making the report is protected and evaluate the report for relevance. As the RF Group's system of corporate communication is based on trust, particular emphasis is placed on ensuring there will be no negative consequences whatsoever for anyone reporting deviations from this Code of Conduct or other RF Group guidelines. This also applies to individuals who participate in the investigation of misconduct by providing information.

The RF Group
on **human rights**

The RF Group safeguards and protects human rights as an integral element of its corporate culture and respects the dignity, privacy, and the personal rights of its employees, customers, suppliers and other people, with whom it comes into contact. The RF Group rejects any form of forced labour or child labour. Compliance with laws and regulations to guarantee human rights, fair working conditions, legal minimum wages and other labour regulations is standard practice for the RF Group. Any form of exploitation, discrimination against people on account of their age, gender, ethnic background, religion, sexual orientation or health, as well as non-compliance with regulations regarding safety in the workplace or the rights of employees is considered illegal and will therefore not be tolerated. The RF Group considers environmental protection, health and safety in the workplace a significant part of its corporate responsibility.