



**ESG–Manual  
(Environmental-, Social- and Governance-Standards)**

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Ihre Zeichen

Ihre Nachricht vom

Unsere Zeichen

Datum

CB

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Dear Ladies and Gentlemen,  
dear employees,

we want to be a reliable partner for our shareholders, customers, suppliers and of course our employees. The three essential success factors are transparency, confidence and cooperation. Transparency creates confidence and confidence is the basis for a good cooperation.

As a family company, we have earned an excellent reputation among our customers, suppliers and the general public through decades of dedicated work, innovative solutions, first-class quality and flexible service. This is a very valuable asset that we want to secure and expand.

We want to continue to grow profitably. But not at any cost. No business is so important that we can violate the applicable rules and laws. Acting irresponsibly can lead to considerable damage. For this reason, we have to comply with the rules and laws and see this as an integral part of our corporate culture. Our Code of Conduct should provide orientation. It applies to everyone equally - the management, the managers, every single employee - and at the same time it represents an important promise to the outside world.

Dear employees, we all want to contribute to leading the company into a sustainably successful future. We expect that every employee feels personally responsible for the compliance with this Code of Conduct and supports the colleagues in adhering to it as well.

Thanks for your support.

Best regards,

Christian Böhm and Norbert Jehl  
Managing partners

This manual was created using the EDP technology and is also valid without a signature.



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### 1. Compliance

Code of Conduct for employees (Compliance guidelines)

Preamble (preliminary remark)

This Code of Conduct has been defined with the aim of establishing principles according to which we cultivate the relationships with employees and business partners. They apply equally to all personnel, both to all members of the management and to all employees.

We always strive that these principles are also lived by our suppliers, consultants and other business partners.

#### 1.1 Corporate principles

##### 1.1.1 Compliance with the law

We comply with the applicable laws in every country in which we operate. In situations where there are no legal regulations, each of us orientates in his/her behavior to our corporate values and corporate culture.

In all cases where there is a conflict between any applicable laws and the principles of this Code of Conduct, the applicable law takes precedence.

##### 1.1.2 Dealing with business partners

The business relationships between us and our business partners should always be characterized by fairness. We may not offer any rewards or benefits that are contrary to applicable law or good morals to potential customers, authorities, government agencies or other representatives of such institutions.

Our employees must not accept any payments, gifts or other remuneration from third parties that could lead to decisions being influenced by them and not being made with the necessary objectivity.



### 1.1.3 Accounting and bookkeeping

All financial transactions must be documented in accordance with the generally accepted accounting principles. All accountancy must be given a clear, unambiguous and not misleading description of the content of the transaction. It must always be possible to represent all business transactions in a comprehensible manner.

### 1.1.4 Dutiful behavior

The employees and members of the management are obliged to structure their private and other activities as well as financial interests in such a way that they do not conflict with the interests of the company or give rise to conflicts.

If such a conflict arise, then the person concerned must immediately report this to his/her supervisor.

### 1.1.5 Money laundering

Money laundering is understood to be the smuggling of illegally obtained income into a legitimate economic and business process with the aim of concealing the illegal origin of the funds. Money laundering is punishable. Actions of all employees must therefore be oriented towards uncovering every suspicious process that could consciously or unconsciously constitute a violation of the Money Laundering Act.

### 1.1.6 Confidential information

No employee may disclose or otherwise use any confidential information obtained in the course of his/her work without express permission, during or after his/her work for the company. This guideline also refers to nondisclosure or confidentiality agreements that regulate the handling of confidential information by our business partners.

### 1.1.7 Data protection and IT

All devices and resources made available to the employees, such as computers, mobile phones and access to e-mail and the Internet, are intended for the conduct of business activities. Basically, the use of Internet should be limited to job-related activities. However, personal use, for example for private e-mails, SMS messages and appropriate Internet use, can be allowed. Private use is only permitted provided it does not endanger the business or reputation of the company or could be viewed as objectionable. Devices and systems of the company may not be used to gain access to illegal or vulgar content or to create such content.

The employees should always take special care when receiving e-mails, which may contain dangers to the IT equipment security or the security of data and information. In addition, it is prohibited to copy or install content or software for which they have no permission or a valid

license. To ensure security and confidentiality, passwords must never be disclosed to unauthorized third parties. Employees should always log out of their computer (or lock access) before leaving their desks. Confidential information may only be stored where appropriate access restrictions have been set. The exchange of confidential



information may only take place via the e-mail system and data network of the company. If in doubt, contact the IT system administrator immediately.

#### 1.1.8 Respectful treatment

The following behaviors are prohibited:

- Any discrimination for reasons of racism, sexism, belief, sexual orientation, age or any physical disability of an employee
- Sexual harassment, moral violations
- Inflicting bodily harm
- Insulting another person (verbally or in writing)
- Intimidation and/or threats
- Sabotage of activities of others

#### 1.1.9 Addressing of grievances and disagreements - whistle blowing

Acting responsibly means addressing grievances and disagreements and to contribute to improvement- Stand up & Speak up. Therefore, the employees who actively address and communicate grievances are acting correctly. The management must be aware of any violations of legal and internal company rules (compliance violations) in order to be able to deal with them quickly and confidently. By addressing the grievances, the employees protect themselves, their colleagues and the interests and rights of our company.

Every employee can approach the contact persons named at the end of this document with suggestions or for advice and information.

## 2. Human rights & working conditions

### Declaration on human rights & working conditions - Preamble

The management is aware of its social responsibility. Via a value-oriented corporate management, it should be ensured that the employees are treated fairly and respectfully at all times, thereby strengthening the purposes of the company. The internationally recognized human rights are respected. Throughout all business activities, national laws and regulations as well as the principles of the International Labor Organization (ILO) are observed.

#### 2.1 Basic human rights & working conditions

##### 2.1.1 Free choice of employment

Employment at our company is freely chosen. Nobody should be forced to take on a particular job or pursue an occupation that he/she refuses. This includes the prohibition of all forced and compulsory labor.

##### 2.1.2 No discrimination

Equal opportunities and equal treatment, regardless of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social origin or political attitude are guaranteed.



The employees are neither favored nor disadvantaged because they are members of a trade union or employee representative body.

#### 2.1.3 No children work

According to the ILO Convention No. 138 and 182 children must not be inhibited in their development. Their dignity must be respected and their safety and health must not be compromised. Requirements regarding the minimum age of employees are always observed.

#### 2.1.4 Forced labor and Human trafficking

All work at the company is done voluntarily. Forced labor, compulsory labor and generally any form of involuntary labor is rejected. This results in a clear distancing from these matters. All employees are free to terminate their employment at any time, taking into account the agreed or statutory notice periods. Furthermore, no actions or measures will be tolerated which, within the framework of applicable legal and social norms, are suitable for restricting the freedom of movement of the employees.

#### 2.1.5 Freedom of association

The right of all employees to form collective employee representatives and to conduct collective bargaining to regulate the working conditions is recognized. The company will cooperate in a trusting manner with the respective employee representatives. The aim at all times is to maintain a fair and collaborative partnership over the long term.

#### 2.1.6 Remuneration

The remuneration observes - without any regard for the gender difference - the minimum wages guaranteed by law and the minimum standards of the respective economic sectors, while orienting to the relevant labor market.

#### 2.1.7 Working hours, recreation and time-off

The company observes and complies with the applicable rules and regulations regarding the working hours and regular, paid relaxing vacation.

#### 2.1.8 Work and health protection

Occupational safety and health protection is guaranteed by the company at the workplace, at least within the framework of the statutory provisions. Attention is always paid to health, safety in the workplace and humane working conditions. To monitor and provide ongoing advice in these areas, a safety officer / safety specialist is employed.

#### 2.1.9 Qualification and career opportunities

The employees are generally selected, hired and promoted on the basis of their function-specific qualifications and skills. A targeted and continuous qualification of all employees is supported, in order to enable a high level of performance and high quality work. All employees have the same opportunities for advancement, taking into account the duration of employment and qualifications.



## 2.2 Principles of implementation

### 2.2.1 Communication

The goals and implementation principles of this declaration are part of the corporate culture of the company. Employees, especially employees with managerial positions, are always required to observe the established principles and to encourage other employees to observe them.

### 2.2.2 Regular exchange of experiences

Compliance with the objectives and the accomplishment of implementation principles of this declaration are discussed on a regular basis.

### 2.2.3 Obligation for the suppliers / partners

Compliance with the objectives and the accomplishment of the implementation principles of this declaration are communicated regularly in meetings with the suppliers and in-house with the contact persons.

The supplier is requested to adhere to the specifications and to implement the requirements in his company.

## 3. Health, occupational safety, security & environmental protection

### 3.1 Economy and ecology

Our actions must be in harmony with the economy, ecology and responsibility for our environment and our fellow human beings and, last but not least, also with regard to future generations. All employees are always careful that their actions are oriented in such a way that hazards or unnecessary burdens for the environment are avoided. Applicable laws and regulations must always be observed. In addition, it should be acted at all times as it is reasonably appropriate.

### 3.2 CO<sub>2</sub> – balance

Protecting our environment is an integral part of corporate responsibility. The company undertakes to comply with all environmental regulations and standards applicable to the company and to use environmentally-conscious practices at all locations. The environmental impact should be

reduced to a minimum and the environmental protection should be continuously improved. Every employee bears responsibility for reducing the energy consumption, water consumption and greenhouse gas emissions in all of their activities.

For this purpose, a CO<sub>2</sub> balance sheet is created and measures are derived from the results, in order to initiate improvements.

### 3.3 Health, safety and occupational safety

Health, safety and occupational safety are important components of the policy of our company. A safe and healthy work environment with appropriate facilities and protective



equipment is provided for all employees. All workplaces are constantly checked for hazards and hazardous substances in order to avoid accidents.

### 3.4 Principles of implementation

#### 3.4.1 Accident prevention and behaviour in the event of an accident

Employees are trained in accident prevention regulations, behaviour in the event of accidents and emergencies and the use of protective clothing and equipment. Our employees are offered the opportunity to participate in first aid courses or first-aid courses at regular intervals, so that, in the event of an accident, we can offer the victims the fastest and best possible first aid.

#### 3.4.2 Environmental sustainability

All operational activities and processes are assessed under the aspect of ecological sustainability (recycling, reduction of CO<sub>2</sub> emissions, management of waste, etc.). From this assessment, measures and environmentally friendly goals are determined in order to meet the legal and other requirements. The use of energy and raw materials is as sparingly as possible in order to avoid unnecessary environmental pollution. The environmental awareness of our employees should always be promoted. This environmental policy is taken into account in the entire value chain and can save for the company costs and effort at the same time.

#### 3.4.3 Hazards and/or security gaps

If possible dangers and/or security gaps are identified, then suitable measures must be taken immediately to avoid the resulting risks and dangers or to reduce them as far as possible.

### 4. Free competition

In the spirit of free competition, we completely refrain from any anti-competitive behavior such as price fixing, the division of market segments, price maintenance, etc. We pursue a ZERO tolerance strategy with regard to competitive collisions.

### 5. Sourcing strategy

In our efforts in the supply chain, we are committed to sourcing raw materials with the same basic support for human rights, labor, health and safety, the environment and ethics. Our corporate mission is to help people and companies realize their full potential. In accordance with this mission, we see the need to address the problems associated with harvesting, extracting and transporting raw materials as a global responsibility for all substances used in our products - unlimited by specific materials or locations.

We have topic-specific programs, e.g. the use of conflict-free minerals in our products that correspond to our focus. We expect our suppliers to support our commitment for a responsible sourcing of raw materials. Our requirements are stipulated in this manual for sustainability, social responsibility and compliance, which are required as part of the contract in our assignments.



## 5.1 Material compliance

Material compliance has the purpose of ensuring the safe handling of substances and products that are used in our own products. The material compliance requirements apply equally to other material or product requirements. As for material compliance standard, it is about the legal requirements (e.g. REACH, RoHS etc.). The supplier is obliged to obtain the current guidelines, laws and standards himself. It is the supplier's duty of care not to use prohibited substances or to pay attention to and point out any corresponding restrictions. Products and raw materials of unknown origin and/or composition, or raw materials for which insufficient material data is available, may generally not be used.

## 5.2 Conflict minerals

The supplier undertakes to do everything in his power to prevent the use of so-called conflict materials. This applies in particular to raw materials such as columbite-tantalite (coltan, niobium, tantalum), cassiterite (tin), gold, wolframite (tungsten) from the DR Congo and its neighboring countries. The basis for this are Section 1502 of the US American <<Dodd-Frank Act>> from 2010, the Regulation (EU) 2017/821 from 17.05.2017 and comparable national and international legal obligations. They further undertake to refrain from obtaining any material from illegal sources.

This declaration takes effect on the day it is signed. Claims by third parties cannot be derived from this Declaration.

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