

	Richtlinie		Blatt 1	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

Unternehmensrichtlinie (EN)


	Richtlinie		Blatt 2	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

Inhaltsverzeichnis

1	Aim and Purpose	4
2	Scope.....	4
3	Code of Conduct.....	5
4	Confidentiality, ethics and business conduct	5
4.1	Confidentiality and data protection	5
4.2	Financial responsibility	5
4.3	Disclosure of information.....	5
4.4	Protection against bribery, fraud and corruption.....	6
4.5	Intellectual Property.....	6
4.6	Money laundering.....	6
4.7	Avoidance of conflicts of interest.....	6
4.8	Whistleblowing and protection against retaliation.....	6
4.9	Customs and export regulations.....	6
4.10	Plagiarism.....	6
4.11	Export controls and economic sanctions.....	6
4.12	Dealing with property of the company and its business partners	7
4.13	Standards in the supply chain	7
5	Sustainability issues.....	7
5.1	Non-discrimination and equal opportunities	7
5.2	Working hours	7
5.3	Animal welfare.....	7
5.4	Wages, salaries and social benefits	7
5.5	Career management and training.....	7
5.6	Right to freedom of association	8
5.7	Freedom of expression and social dialog	8
5.8	Child and forced labor	8
5.9	Acquisition of land	8
5.10	Protection of minorities, local communities and indigenous peoples.....	8
5.11	Modern slaver.....	8
5.12	Deployment of security forces	8
5.13	Fair competition and ban on cartels	8
5.14	Diversity.....	9

	Richtlinie		Blatt 3	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

5.15	Equality.....	9
5.16	Inclusion	9
5.17	Information and communication	9
5.18	Dealing with conflict minerals	9
5.19	Notes and queries	9
6	Quality management.....	9
7	Health protection, occupational safety, environmental protection and energy management.....	10
7.1	Handling waste and hazardous substances	10
7.2	Health and safety	10
7.3	Risk assessment and ergonomics.....	10
7.4	Emergency management	10
7.5	Fire protection	11
7.6	Handling fresh and waste water	11
7.7	Dealing with air and noise emissions	11
7.8	Quality of air and soil	11
7.9	Climate protection	11
7.10	Biodiversity and deforestation-free supply chain.....	11
7.11	Environment and energy	12
8	Responsible procurement.....	12
8.1	Responsible procurement of raw materials	12
8.2	Avoiding hazardous substances.....	12
8.3	Environmentally friendly products.....	12
8.4	Sub-suppliers	13
8.5	Management systems	13
8.6	Inclusion as a key principle.....	13
8.7	Equal opportunities.....	13
8.8	Sustainability	13
9	Compliance with company policy.....	13
9.1	Controls	14
9.2	Remedial action.....	14
9.3	Consequences and violations.....	14

	Richtlinie		Blatt 4	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

1 Aim and Purpose

The fischer group operates as one of the leading manufacturers of stainless steel tubing and components worldwide. In Germany, the group is represented at Achern headquarters by the parent company fischer group SE & Co. KG and its subsidiaries F.E.R. fischer Edelstahlrohre GmbH, fischer Maschinentechnik GmbH, fischer Edelstahlrohre GmbH, fischer Rohrtechnik GmbH and fischer Power Solutions GmbH, as well as by fischer Hydroforming GmbH in Menden. Around the world, the group of companies also includes the national companies in Austria, Canada, USA, Mexico, Uruguay, South Africa and China (hereinafter referred to collectively as "fischer").

The corporate activities of fischer are based on globally applicable standards, in particular the ten principles of the Global Compact Initiative (www.globalcompact.org) of the United Nations, the core labour standards of the International Labour Organisation (ILO), the Science Based Targets Initiative (SBTi), the Voluntary Principles on Security and Human Rights (Vps), as well as the German Supply Chain Act (Lieferkettengesetz). We encourage our employees to uphold the principles and business conduct guidelines listed below.


fischer expects its business partners to comply with these guidelines and to ensure compliance with fundamental human rights in their business activities in accordance with the applicable domestic laws.

In this company policy, for the sake of easier reading, we use the generic masculine form. All personal designations shall apply equally to all genders.

2 Scope

This corporate policy applies to all employees and business partners of the fischer group companies listed below:

- ▶ fischer group SE & Co. KG
- ▶ F.E.R. fischer Edelstahlrohre GmbH
- ▶ fischer Maschinentechnik GmbH
- ▶ fischer Edelstahlrohre GmbH
- ▶ fischer Rohrtechnik GmbH
- ▶ fischer Power Solutions GmbH
- ▶ fischer Hydroforming GmbH

	Richtlinie		Blatt 5	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

3 Code of Conduct

All employees of the fischer Group are obligated to comply with laws, standards, and guidelines. This includes the applicable laws, regulations, internal policies, and principles. As a customer-oriented company, these requirements also encompass customer-specific demands.

The following unified guiding principles apply:

- ▶ We treat each other with respect, fairness and loyalty.
- ▶ We act responsibly.
- ▶ We assume social responsibility.
- ▶ We maintain a close relationship with our customers and suppliers.
- ▶ We respect each other's values.
- ▶ We work together.
- ▶ We act in a resource-conscious manner and treat resources with care.

4 Confidentiality, ethics and business conduct

The principles of confidentiality, ethics, and business conduct established in this section form the foundation for the following detailed regulations, which ensure compliance with all relevant legal, ethical, and operational standards across various areas of our company.

4.1 Confidentiality and data protection


We practice an open and transparent communication within the limits of business confidentiality. When doing so, the internal regulations on company and business secrets must be observed. The Data Protection Act and the internal regulations on information security and the protection of prototypes must be observed and complied with. Information from our business partners is subject to special protection. It is only communicated in a restricted manner between previously defined and discussed partners. The rules regarding the protection of data and information are regulated by the information management system.

4.2 Financial responsibility

We document all essential business transactions transparently and early. Financial records are prepared under current law and generally accepted principles of proper accounting.

4.3 Disclosure of information

fischer discloses information in line with the applicable provisions and standard practices in our field.

	Richtlinie		Blatt 6	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

4.4 Protection against bribery, fraud and corruption

Any form of bribery, fraud and corruption must be avoided and combated, i.e. any criminal or unethical influence on decisions by unlawfully offering, granting, demanding or accepting advantages to or from business partners.

4.5 Intellectual Property

Intellectual property rights shall be respected. The transfer of technology and know-how shall be made in a way that protects intellectual property rights and customer information.

4.6 Money laundering

Relevant legal provisions for preventing money laundering shall be observed and the reporting duties duly fulfilled.

4.7 Avoidance of conflicts of interest

All fischer employees shall make their decisions based on factual considerations and shall not be guided by personal interests in an inadmissible way.

4.8 Whistleblowing and protection against retaliation

All employees are encouraged to immediately report any information about known or suspected violations of laws and regulations to their managers or to the relevant specialist department. Employees need not be afraid of retaliation for passing on information.

The reporting office for violations can be reached via the following link:

<https://fischergroup.compliance.one>

4.9 Customs and export regulations


International customs and export control regulations shall be monitored and a proactive exchange of foreign trade information is ensured with the aim of safeguarding a secure supply chain.

4.10 Plagiarism

Plagiarised products must not be brought into circulation or acquired and must be reported immediately to the management. Theft of other people's intellectual property is strictly prohibited.

4.11 Export controls and economic sanctions

In the spirit of corporate ethics, we ensure that fischer always checks and complies with any export controls and existing economic sanctions.

	Richtlinie		Blatt 7	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

4.12 Dealing with property of the company and its business partners

All fischer staff treat the property of the company as well as the property of business partners with care. Theft or willful destruction will be reported and will have consequences under criminal law.

4.13 Standards in the supply chain

Our suppliers are aware of fischer's corporate guidelines and are obliged to observe them equally and to pass them on in the supply chain accordingly.

5 Sustainability issues

The sustainability aspects and related regulations described below are an essential part of our commitment to responsible and future-oriented corporate governance. They address the social, ecological, and ethical dimensions of our business activities and serve to protect the rights and interests of all parties involved.

5.1 Non-discrimination and equal opportunities

fischer cultivates respectful, fair and loyal dealings with each other. The personality of each individual employee shall be respected and any discrimination of employees in hiring and employment must be opposed. Any discrimination based in particular on gender, ethnic origin, affiliation to specific population groups, skin color, disability, membership in a trade union, political conviction, origin, religion, age, pregnancy or sexual orientation is unlawful. These requirements will support diversity and inclusion in the workplace.

5.2 Working hours

The respective statutory provisions and company regulations on working hours must be complied with.

5.3 Animal welfare


Any form of animal experiments for product testing is strongly criticised by fischer and is not supported, but combated wherever possible.

5.4 Wages, salaries and social benefits

At fischer, remuneration is generally based on the latest industry standards. fischer concludes or offers every employee additional social benefits such as a company pension scheme, group accident insurance, occupational disability pension, cost coverage for personalised hearing protection or orthopedic insoles, etc.

5.5 Career management and training

fischer encourages its staff to take qualification measures which enable them to acquire skills and knowledge and to expand and deepen both their professional and technical knowhow.

	Richtlinie		Blatt 8	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

5.6 Right to freedom of association

Employees' rights to freedom of association shall be upheld in accordance with the applicable domestic legislation.

5.7 Freedom of expression and social dialog

fischer makes every effort to develop and promote a relationship of trust at all levels of the company by inviting its employees to express themselves freely, in particular for improving their working environment.

The quality of discussion and communication between each employee and his superior is an integral part of the social dialog in the company.

5.8 Child and forced labor

Any form of illegal employment and forced labour as well as child labour is strongly criticised by fischer and is not supported, but is opposed wherever possible.

5.9 Acquisition of land

When acquiring land, fischer does not participate in unlawful evictions or other forms of unlawful deprivation of land, forests and waters, the use of which secures the livelihood of others or ensures local biodiversity. The local land, forest and water rights shall be observed.

5.10 Protection of minorities, local communities and indigenous peoples

fischer adheres to the rights of minorities, local communities and indigenous peoples who may be affected by operations at any sites of the partner. We take appropriate measures to avoid any potentially harmful effects on the health, safety and livelihoods of local communities and indigenous peoples. We shall neither illegally relocate any minorities, local communities and indigenous peoples nor contribute to their involuntary resettlement.

5.11 Modern slaver


We are committed to acting ethically and correctly in all our business activities and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery does not occur in our company.

5.12 Deployment of security forces

fischer is committed to discouraging the use of extensive force when using private or public security forces for company purposes.

5.13 Fair competition and ban on cartels

The applicable rules of competition and cartel law as well as the imperative of fair competition shall be complied with.

	Richtlinie		Blatt 9	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

5.14 Diversity

fischer strives to achieve a diverse workforce and recognizes the value of different backgrounds, experiences and perspectives. Any discrimination based on gender, race, ethnic origin, religion, sexual orientation or disability will not be tolerated.

5.15 Equality

fischer is committed to ensure that all employees enjoy the same level of rights regardless of their gender, race or other protected characteristics. fischer seeks to achieve equal opportunities in matters of placements, promotions and training measures.

5.16 Inclusion

We promote an inclusive work environment which allows all employees to exploit their full potential. We shall identify and eliminate any barriers for persons with disabilities in order to achieve an accessible working environment.

5.17 Information and communication

All fischer employees have direct access to this Company Policy. For partners and suppliers we shall provide this Company Policy on our website.

5.18 Dealing with conflict minerals

When dealing with conflict minerals such as tin, tungsten, tantalum, cobalt and gold, fischer is guided by the Organisation for Economic Co-operation and Development (OECD) Guidelines on Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas and expects the same from its suppliers. Any smelters and refineries which do not provide adequate, audited due diligence processes shall be avoided.

5.19 Notes and queries


Suspected cases of violations of these Guidelines may be reported to the fischer group at any time.

6 Quality management

Our goal is to manufacture products that meet the requirements and expectations of our customers. We carefully plan and carry out all phases of product development in compliance with the relevant standards, regulations, legal provisions and customer requirements.

We shall provide the necessary resources to achieve the quality objectives. Trained and qualified personnel carry out the necessary work in all areas of the company.

We achieve the quality of our products by planning all necessary measures prior to and during order processing and by systematically monitoring all product development processes. All activities focus on the zero-defect strategy including preventive measures to prevent the occurrence of defects.

	Richtlinie		Blatt 10	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

We apply an objective and systematic procedure to determine and evaluate customer satisfaction as part of market monitoring. Trends in customer development and satisfaction are documented, evaluated and, if possible, compared with the competition.

Every employee is obliged to observe and implement the rules and specifications set up by the quality management system.

7 Health protection, occupational safety, environmental protection and energy management

The following regulations on health, labor, environmental, and energy management highlight our commitment to protecting people and the environment. They ensure that we act responsibly in all relevant areas while adhering to the highest standards in resource management, safety, and sustainability.

7.1 Handling waste and hazardous substances

fischer follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment are identified and managed in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing and disposing of them.

7.2 Health and safety

The health and safety of our employees is one of our top priorities at fischer. As occupational health and safety are of fundamental importance to our company, we strive to minimise the risks for our employees, contractors and third parties and to achieve the goal of zero accidents.


7.3 Risk assessment and ergonomics

We rely on external and internal experts on occupational safety and health protection. Topics such as work equipment, ergonomics, health hazards, order and cleanliness, activities and working practices as well as PPE are continuously monitored and improved. Regular workplace risk assessments ensure safe and healthy workplaces.

Each manager is responsible for the protection of his employees and must instruct, train and supervise them. We also take reasonable protective measures to ensure the safety of guests and visitors.

7.4 Emergency management

The emergency plan regulates emergency planning in case of occupational accidents, fire, explosion, natural disaster, environmental accidents, pandemics as well as information security incidents and first aid. Especially trained first aiders and fire protection assistants can coordinate immediate measures.

	Richtlinie		Blatt 11	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

7.5 Fire protection

All fischer buildings are monitored via a state-of-the-art fire protection system which is directly linked with the local fire brigade control centre. In addition, fire alarms can be triggered via house alarms or emergency systems. Areas requiring special protection, such as server rooms, are additionally equipped with automatic gas extinguishing systems. There is special machinery equipped with flushing and extinguishing devices to prevent a rapid spread of fire sources. Hand-held fire extinguishers and water hydrants to allow direct fire-fighting intervention are installed all over the company premises.

Specially trained staff monitor the fire safety precautions and maintain regular contact with the local fire brigade. There are regular fire safety trainings and evacuation drills taking place or these are simulated.

Fire brigade plans and rescue plans are clearly visible throughout the company premises.

7.6 Handling fresh and waste water

Waste water from operations, manufacturing processes and sanitary facilities is typified, monitored, inspected and, if necessary, treated in a waste water treatment plant before they are discharged or disposed of. In addition, we introduce measures to reduce the consumption of fresh water as well as the generation of waste water.

7.7 Dealing with air and noise emissions

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions are typified, routinely monitored, verified and, if necessary, treated before they are released.

7.8 Quality of air and soil

The relevant regulatory requirements relating to the quality of air and soil as well as the provisions by local authorities will be controlled and complied with.


7.9 Climate protection

We participate in sustainable and active climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources. This involves creating transparency about our CO2 emissions and setting ambitious CO2 reduction targets.

7.10 Biodiversity and deforestation-free supply chain

We shall ensure that our business activities do not contribute to nor benefit from the illegal conversion of natural ecosystems.

This also applies to illegal deforestation, where this refers to the conversion of natural forests, primarily into agricultural land.

	Richtlinie		Blatt 12	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

7.11 Environment and energy

By using natural resources and energy carefully, we contribute to minimising the environmental impacts associated with the manufacture of products and services. A environmental and energy management system fully integrated into the organisation serves to implement our environmental and energy policy, monitors compliance with the environmental and energy targets and controls the relevant operational processes. Every fischer employee undertakes to comply with the environmental and energy management specifications in force.

We actively involve our suppliers in our environmental and energy management and encourage them to comply with the same standards. When planning, introducing and operating new procedures and processes, we are oriented on the state of the art in order to reduce the environmental impact and energy consumption as far as possible.

By informing and training our employees in environmental protection and energy efficiency, we promote awareness for environmentally oriented and energy-saving action.

8 Responsible procurement

The following regulations on responsible sourcing emphasize our commitment to sustainable and ethical procurement practices. They ensure that all aspects of raw material sourcing, product development, and collaboration with suppliers align with our high standards for environmental and social responsibility.

8.1 Responsible procurement of raw materials

fischer supports activities that ensure a responsible procurement of raw materials. Any procurement and use of raw materials obtained illegally or through ethically reprehensible or unreasonable measures shall be avoided. We exclude the use of raw materials which are affected by embargoes or other import restrictions, for example conflict minerals. We are committed to identifying the raw materials in the supply chain and to communicating the origin of the raw materials we use from disclosed sources of supply.


8.2 Avoiding hazardous substances

We avoid the use of any substances the release of which poses a risk to human beings and the environment. We maintain and actively perform a hazardous substances management system that ensures their safe use and transport as well as their safe storage, reprocessing, reuse and disposal.

8.3 Environmentally friendly products

When developing products, we ensure that their use is economical in terms of energy consumption and natural resources. The products are suitable for reuse, recycling or safe disposal.

Our products do not contain any substances of high concern covered by the REACH regulation. If necessary, any affected ingredients must be reported to fischer in advance. Materials or purchased parts that do not comply with the RoHS specifications shall be substituted.

	Richtlinie		Blatt 13	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

8.4 Sub-suppliers

By making the appropriate contractual arrangements with subcontractors fischer shall ensure to comply with the regulations set forth in this item.

8.5 Management systems

fischer maintains adequate management systems to ensure compliance with the principles set out in this sustainability policy.

fischer prefers to work with suppliers who actively implement a quality management system according to DIN standard EN 9001, an environmental management system according to ISO 14001, an information security management system according to ISO 27001 or VDA TISAX, as well as ISO 45001 for occupational safety or equivalent systems.

8.6 Inclusion as a key principle

fischer shall ensure to set up a supply chain representing the breadth and depth of the global business environment. We actively welcome suppliers which are of different size, geographical origins, industries and backgrounds. By selecting diverse suppliers we contribute to promoting diversity while creating a dynamic and inspiring environment for mutual success.

8.7 Equal opportunities


Our commitment to equal opportunities shall cover all aspects of our supply chain. Regardless of gender, ethnicity, sexual orientation, disability or any individual characteristics we strive to ensure equal opportunities and opportunities fairly valued for all suppliers. An open and inclusive procurement practice shall create an environment which allows all employees to exploit their full potential.

8.8 Sustainability

fischer regards sustainability as an integral part of our supplier program. We support practices which are environmentally responsible and socially sustainable. These efforts shall apply from the supply chain to the end use of our products. Together with our suppliers, we strive to minimise our impact on the environment while taking social responsibility.

9 Compliance with company policy

The following provisions for compliance with corporate policy underscore our commitment to the continuous monitoring and enforcement of established standards. They ensure that violations are promptly identified and corrected, and business relationships are adjusted as necessary to uphold the integrity and accountability of our company.

	Richtlinie		Blatt 14	von 14
	Unternehmensrichtlinie (EN)	Erstellt 12/12/2024 10:29 AM	Akt. Stand 12/19/2024 8:14 AM	Version 1

9.1 Controls

fischer reviews at regular intervals if this company policy is observed. External inquiries and requests for information will be answered within a reasonable period of time and in compliance with the specified formalities within the framework of the applicable data protection laws.

9.2 Remedial action

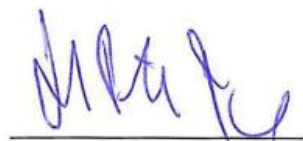
We shall take remedial measures without delay in order to put an end to any violations, in particular in connection with human rights or environmental obligations. The measures taken will be documented and examined as to their effectiveness. Furthermore, where there is a suspicion, any suspected violations will be clarified immediately and the management will be informed about the clarification measures taken.

9.3 Consequences and violations

These corporate guidelines shall be binding for fischer and we commit ourselves and our employees to comply with them. We expect the same from our business partners. If, in the course of the business relationship, fischer determines that business partners do not behave according to analogous principles or violate some of the items from these guidelines, fischer shall consider this to be a significant impairment of the business relationship and reserve the right to reconsider, if not terminate, the business relationship.

In case our business partners discover that employees of fischer group violate such guidelines, this may be reported at any time to <https://fischergroup.compliance.one>.

These binding corporate guidelines shall come into force on 01.01.2025.



Hans-Peter Fischer



Roland Fischer