



# **CODE OF CONDUCT**

## **for Business Partners of the Firian Group**

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## 1. Preamble

The Firian Group (hereinafter referred to as „Firian“) is committed to the principles of corporate responsibility toward its customers, employees, the environment, and society. Firian expects the same commitment from its business partners.

This Code of Conduct applies to all business partners of Firian and establishes binding minimum requirements regarding business ethics, human rights, social standards, sustainability, and environmental protection, which must be adhered to in all business relationships.

The defined principles of conduct are based on the Universal Declaration of Human Rights, the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the conventions of the International Labour Organization (ILO). They are aligned with applicable laws and international standards.

Firian implements these principles of conduct consistently in its corporate practices and expects its business partners to fully comply with the principles defined in this Code of Conduct, integrate them into their corporate policies, and communicate them to their business partners throughout the supply chain.

Firian enforces a zero-tolerance policy against violations such as corruption, child labor, forced labor, and other severe human rights abuses. Such actions are never tolerated and will result in strict consequences, including the termination of the business relationship.

## 2. Business Ethics and Compliance

Firian expects its business partners to act responsibly and in compliance with applicable laws. Business activities must be conducted with the utmost integrity, honesty, and fairness while adhering to all relevant legal requirements.

### 2.1. Fair Competition and Market Conduct

Business partners commit to fair conduct in competition and to compliance with applicable competition and antitrust laws. This includes, in particular, refraining from participating in anticompetitive agreements with competitors or abusing their market position. Additionally, in international trade, fair pricing practices must be ensured, and unfair competitive practices such as dumping or forcing unlawful price advantages must be avoided.

### 2.2. Prohibition of Corruption

Business partners reject all forms of corruption and commit to ensuring that their employees and company representatives neither offer nor accept bribes or other improper advantages to or from customers, public officials, or other third parties.

### 2.3. Avoidance of Conflicts of Interest

Business partners are expected to make their business decisions solely based on objective criteria and not to be influenced by personal, unrelated interests or relationships. This aligns with the principles of the Business Judgment Rule, which emphasize objectivity and integrity in decision-making.

### 2.4. Anti-Money Laundering and Counter-Terrorism Financing

Business partners ensure full compliance with applicable legal provisions for combating money laundering and terrorism financing. Transactions that could facilitate money laundering or the financing of terrorism must be strictly avoided.

### 2.5. Import and Export Regulations

Business partners ensure compliance with all applicable laws governing the import and export of goods, services, and data. This includes, in particular, export restrictions, embargo and export regulations, and applicable sanctions lists.

### 2.6. Financial Integrity and Transparency

Business partners are obligated to maintain and disclose books, records, and business information in accordance with applicable legal requirements and generally accepted accounting principles.

## **2.7. Data Protection, Information Security, and Intellectual Property Protection**

Business partners are obligated to protect personal data, trade secrets, and confidential information of employees, customers, suppliers, and third parties in accordance with applicable laws. They ensure that their employees are also bound to maintain confidentiality. This includes safeguarding the intellectual property of Firian and third parties.

## **2.8. Handling of Conflict Materials**

Business partners are obligated to establish processes in accordance with the OECD Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This applies to conflict minerals such as tin, tungsten, tantalum, and gold, as well as other raw materials like cobalt. They ensure that smelters and refineries without adequate, audited due diligence processes are consistently avoided.

## **2.9. Product Safety**

Business partners must comply with all applicable product safety regulations. All products and services must meet the contractually specified criteria for quality, safety, and labeling upon delivery.

# **3. Human Rights and Social Standards**

Firian is committed to its social and societal responsibility and also requires its business partners to respect social standards and human rights and to ensure their compliance.

## **3.1. Compliance with and Respect for Human Rights**

Business partners are obligated to comply with and actively promote globally applicable regulations for the protection of human rights. They share the responsibility for preventing human rights violations throughout their supply chain and within their sphere of influence.

## **3.2. Protection Against Discrimination**

Business partners are obligated to refrain from any form of discrimination, harassment, intimidation, or unjust disadvantage. Prohibited practices include unequal treatment based on ethnicity, national or social origin, skin color, gender, pregnancy, religion, belief, illness, age, disability, sexual orientation, or political or union activity.

## **3.3. Prohibition of Child Labor**

Business partners must under no circumstances employ child labor or collaborate with business partners who do. They are also required to comply with the minimum standards of ILO Conventions 138 and 182 regarding the minimum age for employment and the prohibition of child labor.

## **3.4. Prohibition of Forced Labor and Modern Slavery**

Business partners are required to take appropriate and adequate measures to prevent debt bondage, forced and compulsory labor, as well as all forms of modern slavery and human trafficking within their own operations and throughout their supply chain.

## **3.5. Freedom of Association and Collective Bargaining**

Business partners must respect freedom of association and the right to collective bargaining. They are obligated to ensure that their employees can organize, join a union, or form a representation in accordance with applicable laws.

## **3.6. Fair Working Conditions**

Business partners are encouraged to ensure appropriate remuneration for their employees, in compliance with legal requirements for minimum wages, collective bargaining laws, and statutory social benefits. In the absence of legal or collective agreements, remuneration should align with industry-specific and locally customary wages and benefits. Furthermore, they must ensure that working hours and paid leave comply with applicable legal regulations.

### **3.7. Health Protection and Workplace Safety**

Business partners comply with applicable national regulations regarding workplace safety, health protection, and fire safety. They also support the continuous improvement of working conditions.

### **3.8. Use of Security Forces and Prohibition of Forced Evictions**

Business partners ensure that the commissioning and use of security forces does not result in human rights violations.. They also adhere to the prohibition of unlawful forced evictions and the illegal expropriation of land, forests, and water resources during acquisition, development, or other forms of use.

### **3.9. Protection of Minorities and Vulnerable Groups**

Business partners respect the right to dignified living conditions for minorities, vulnerable individuals, and local communities within their business environment. This explicitly includes respecting and protecting the rights and livelihoods of indigenous peoples.

## **4. Sustainability and Environmental Protection**

Firian regards sustainability and environmental protection as core values essential for preserving the livelihoods of future generations. Firian shares this responsibility with its business partners and encourages them to actively consider and promote environmental and sustainability aspects in their business activities.

### **4.1. Ecological Responsibility**

Business partners are obligated to conduct their operations responsibly and sustainably with regard to environmental protection. They commit to making all reasonable efforts to protect the environment, minimize negative environmental impacts, and conserve resources. This includes compliance with all applicable environmental protection and sustainability laws and maintaining all necessary environmental permits and licenses required for their operations.

Chemicals and other substances that may pose a hazard if released into the environment must be identified and managed, stored, transported, and disposed of safely through an appropriate hazardous substance management system.

### **4.2. Resource and Climate Protection**

Business partners commit to implementing measures to reduce greenhouse gas emissions and other air pollutants to minimize environmental and health risks. Additionally, they are encouraged to use resources such as energy, water, and raw materials efficiently and to promote the use of renewable energy and sustainable materials.

Strategies for reducing environmental impact, including the development of climate protection measures and adaptation to climate risks, must be developed. Business partners are required to take appropriate actions to minimize negative impacts on people, the environment, and the economy.

### **4.3. Promotion of Circular Economy**

Business partners strive to implement appropriate and effective measures to prevent waste, reuse resources, recycle materials, and ensure the safe and environmentally friendly disposal of residual waste, chemicals, and wastewater.

### **4.4. No Adverse Impact on Land, Water, and Air**

Business partners ensure that they do not cause harmful soil degradation, water pollution, air contamination, excessive noise emissions, or overuse of water resources that could significantly impair the natural basis for food, drinking water, or human health.

### **4.5. Biodiversity and Animal Welfare**

Business partners ensure compliance with applicable laws and international regulations concerning biodiversity and the protection of natural ecosystems. Additionally, they are encouraged to support and promote ethical and species-appropriate treatment of animals.

### 4.6. Responsible Raw Material Supply Chain

Firian expects its business partners to ensure responsible sourcing of resources and to avoid using raw materials obtained under illegal, ethically questionable, or unacceptable conditions.

## 5. Due Diligence and Monitoring

For Firian, the declaration by its business partners that they meet their social and environmental responsibilities is a prerequisite for any business relationship. Business partners must align their business and procurement activities with this Code of Conduct.

### 5.1. Monitoring Compliance with Principles of Conduct

Firian reserves the right to verify its business partners' compliance with the Code of Conduct through appropriate measures. These checks may include questionnaires (e.g., via the Integrity Next platform) or on-site audits, with the latter conducted only after prior notice and in the presence of representatives of the business partners. Business partners are responsible for implementing this Code of Conduct in a manner that does not incur additional costs for Firian.

### 5.2. Risk Management

Business partners must implement processes to identify, assess, and mitigate risks throughout their supply chain. This is to proactively detect and prevent potential violations of legal requirements, ethical standards, and the provisions of this Code of Conduct.

### 5.3. Violation of Principles of Conduct

In the event of violations of this Code of Conduct by business partners, Firian reserves the right to take appropriate measures, ranging from requesting the implementation of improvement or corrective actions to terminating the business relationship.

### 5.4. Reporting Misconduct / Violations

Business partners, their employees, and other affected parties are encouraged to report suspected cases or violations of this Code of Conduct. The aim is to mitigate the consequences of such violations and prevent future misconduct.

Reports can be submitted via Firian's publicly accessible whistleblowing system or by email to [compliance@firian.com](mailto:compliance@firian.com).