



Code of conduct

(Code of conduct)

for the following companies of the Vollmann Group:

Otto Vollmann GmbH & Co. KG
Vollmann (Sachsen) GmbH & Co. KG
N.I.E.R. Stanz- und Umformtechnik GmbH & Co. KG
SYNTEKS Umformtechnik GmbH
AZ Ausrüstung und Zubehör GmbH & Co. KG
Vollmann Presstechnik GmbH & Co. KG
Vollmann Lege s.r.o.
Vollmann MetalWorx s.r.o.
Vollmann Stamping Kft.

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1. Foreword

As a family-run company, we have very high ethical standards and complete freedom in designing our own future.

With this code of conduct, the Vollmann Group is specifying the requirements for our daily actions as an elementary pre-requisite for our sustainable and economic success. Our requirements are based on the national and international laws, ordinances, conventions and standards, as well as the guidelines of the Drive Sustainability Initiative for improving sustainability.

Specifically, this means having a clear commitment to at least the following points:

- Working conditions and human rights
- Health and safety
- Business ethics
- Environment and climate protection
- Responsible procurement of raw materials
- Information security and data protection

2. Working conditions and human rights

Vollmann Group applies human rights due diligence to identify, prevent, mitigate and address human rights abuses in its own operations as well as in its supply chains.

2.1. On the issue of child labour and under-age workers

The Vollmann Group does not tolerate any child labour, and demands that all of the suppliers in its supply chain prevent all forms of child labour in accordance with conventions 138 and 182 of the International Labour Organisation (ILO).

2.2. Wages and remuneration

We are committed to paying our employees in accordance with the applicable laws and industry standards. The Vollmann Group will inform its employees about their working conditions, including services, in a form and language which is easily understandable, such as a written employment contract and a punctual salary confirmation.

2.3. Working hours

The Vollmann Group is obliged to adhere to the locally applicable maximum weekly working hours. The standards of the International Labour Organisation (ILO) for working hours, holidays and rest periods are adhered to.

2.4. On the issue of modern slavery

We do not tolerate any form of slavery, coercion or compulsory labour, human trafficking or involuntary work. It must be ensured that the employees are not subject to corporal punishment or inhuman treatment.

2.5. Freedom of association and collective bargaining

All employees have the right to freedom of association and the creation of interest-based groups. Employees are given the opportunity to freely express their thoughts regarding working conditions and to have open communication with the management.

2.6. Dealing with discrimination and harassment

The Vollmann Group does not tolerate discrimination in the hiring of employees regarding their gender, age, background or religion, sexual orientation or union affiliation.

3. Health and safety

3.1. Safety in the workplace

As soon as employees are exposed to potential safety risks, the hazards are prevented using suitable countermeasures such as training, preventive measures and safe working procedures. If potential hazards cannot be prevented by taking suitable countermeasures, the employees are provided with appropriate personal protective equipment.

3.2. Prevention of work accidents and occupational illnesses

Work accidents and occupational illnesses are prevented as much as possible using appropriate systems. If a work accident occurs, we undertake to follow up and report these accidents. Measures for preventing further accidents will be initiated immediately.

4. Business ethics

4.1. On the issue of corruption, bribery and extortion

The Vollmann Group does not tolerate any form of corruption, bribery or extortion by its own employees or employees in the supply chain. Employees must not accept any kind of inappropriate benefit for or from third parties, whether private or public.

4.2. Fair competition

We undertake to adhere to all of the relevant competition laws and regulations and prohibit all illegal price fixing, agreements on customer allocation and the exchange of competitively sensitive information.

4.3. Preventing money laundering

We take appropriate measures to prevent money laundering and terrorist financing.

4.4. Avoiding conflicts of interest

The Vollmann Group undertakes to conduct business in such a way that no conflicts arise between financial, private or other external interests and the duties of the employees.

4.5. Protection from retaliatory measures

We have implemented suitable complaint channels and correction mechanisms, which are made available to all employees and third parties, in order to be able to express concerns or complaints, but also recommendations and suggestions for improving our company, without fear of retaliation.

4.6. Financial responsibility and publication of information

The Vollmann Group undertakes to record and, if necessary, disclose business documents, such as financial statements, quality reports, information about the workforce or environmental and occupational safety measures.

4.7. Protection of intellectual property

The Vollmann Group is aware of the value of corporate know-how, and protects the intellectual property of employees and business partners.

4.8. Import and export regulations

We undertake to comply with all of the applicable export and import laws, including economic sanctions, embargoes and other laws, regulations or guidelines.

5. Environment and climate protection

5.1. Conservation of resources

Protecting our environment and continuously improving energy efficiency are essential values of the Vollmann Group. For this purpose, resources such as energy carriers, water or raw materials are documented and monitored.

5.2. Reducing greenhouse gas emissions and waste

In order to ensure that emissions are continuously improved and minimized, we monitor and document the main emissions in the air, water and soil, as well as waste water and waste that arise from our systems.

We regard it as our social responsibility to endeavour to have a sustainable supply chain by minimizing the environmental impact, and therefore contribute to protecting the global climate.

6. Responsible procurement of raw materials

6.1. Dealing with conflict minerals

The Vollmann Group undertakes to adhere to all of the applicable legal regulations, such as those of the U.S. State Department and other recognized national or international institutions such as the OECD Due Diligence Guideline. If a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten or gold), we are obliged to carry out an appropriate review of the supply chain to ensure that the conflict minerals are obtained from mines and smelters outside of conflict regions.

6.2. Hazardous substance management

Safety-related information about the substances used is made available to users, and all legal obligations for training in the handling of hazardous substances are adhered to. The Vollmann Group provides its employees with appropriate personal protective equipment.

7. Information security and data protection

7.1. Information security

The positions of excellence of the Vollmann Group are achieved and reinforced by protecting our information resources, so that the confidentiality of the information is safeguarded in an appropriate way, and all legal, statutory and contractual obligations can be fulfilled. All of our employees and the company management are aware of their responsibility with regard to the handling and use of IT, company and customer information, and support the IT security strategy to the best of their ability.

Reporting of information incidents → informationssicherheit@vollmann-group.com

7.2. Rules for dealing with data protection, privacy and plagiarism

The Vollmann Group observes all of the applicable laws for the protection of personal information. During the use, storage, processing and passing on of personal information, suitable measures are taken to protect it from misuse.

The Vollmann Group does not approve of the use, processing or marketing of plagiarism.

8. Whistleblower system

The Vollmann Group has implemented a whistleblower system via our home page – www.vollmann-group.com/hinweisgebersystem.

A report can be made through the following channels:

- Direct supervisors / management
- HR department
- Works council
- Post → Rosendahler Str. 98, 58285 Gevelsberg
- Email → compliance@vollmann-group.com

All information is treated confidentially. If desired, it can also be submitted anonymously. In order for your tip-off to be processed and investigated appropriately, it is important that the tip is as specific as possible.



Axel Vollmann
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Vollmann Group