

# FASTBOLT CODE OF CONDUCT

## 1. Introduction

### 1.1 Company

The company Fastbolt Schraubengroßhandels GmbH is part of the Fastbolt Group headquartered in Gronau, Germany. The group has additional branches in the United Kingdom, Portugal, and the People's Republic of China. Fastbolt specializes in sourcing fastening elements from global manufacturing markets and distributing these products to dealers in Europe. Across three European warehouse locations, the company group provides its customers with numerous logistical and technical services. The two locations in the People's Republic of China also support procurement processes in Asia and are integral components in ensuring product quality.

This Code of Conduct applies to all companies within the group, referred to hereafter as FASTBOLT.

### 1.2 Fundamental principles

FASTBOLT commits to ecologically and socially responsible corporate leadership. We have defined principles of ecological, social, and ethical conduct for our employees, which we expect to be integrated into the daily lived corporate culture. Furthermore, we strive continuously to optimize our business practices and products and services in line with sustainability principles.

### 1.3 Scope

FASTBOLT places identical requirements on its own business conduct as it does on its suppliers. Therefore, FASTBOLT has formulated the following provisions for a common code of conduct to both FASTBOLT and its suppliers. FASTBOLT and its suppliers commit to meeting the principles and requirements of the code of conduct and undertake to ensure that their subcontractors are contractually obligated to comply with the standards and regulations outlined in this document. Suppliers also agree to allow FASTBOLT audits to verify compliance with the code of conduct.

## 2. Responsibilities

### 2.1 Social responsibility

#### 2.1.1 Prohibition of Forced Labor

No forced labor, slave labor, or similarly comparable forms of labor shall be used. All work must be voluntary and free from the threat of punishment.

#### 2.1.2 Prohibition of Child Labor

In no phase of production shall child labor be employed. FASTBOLT and its suppliers are urged to adhere to the recommendation from the ILO conventions on the minimum age for employment of children. Accordingly, the age shall not be less than the age at which, by the law of the country of operation, the general compulsory education ends, and in any case, not under 15 years.



## **FASTBOLT CODE OF CONDUCT**

### **2. Responsibilites**

#### **2.1.3 Fair Remuneration**

The remuneration for work performed must be at least the applicable national statutory minimum wage. Additionally, employees are entitled to all legally mandated benefits. Fastbolt and its suppliers must ensure that workers receive clear, detailed, and regular written information about the composition of their remuneration.

#### **2.1.4 Compliance with Maximum Working Hours**

The maximum working hours as stipulated by the respective country's regulations must not be exceeded.

#### **2.1.5 Prohibition of Discrimination**

Any form of discrimination against employees is prohibited, unless justified by the requirements of the job. This includes, for example, discrimination based on gender, national, ethnic or social origin, skin color, disability, health status, political beliefs, worldview, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and individual rights of each person must be respected.

#### **2.1.6 Health and Safety Protection**

FASTBOLT and its suppliers are responsible for providing a safe and healthy working environment for their employees. Necessary preventive measures against accidents and health damage during professional activities are to be implemented through occupational safety systems. Excessive physical or mental fatigue is to be prevented through appropriate measures. Additionally, employees are regularly informed and trained on applicable health and safety standards.

#### **2.1.7 Freedom of Association**

To the extent legally permissible in the respective country, the freedom of association of employees is to be acknowledged, and members of worker organizations or unions should neither be favored nor disadvantaged or discriminated against.

### **2.2 Environmental Responsibility**

#### **2.2.1 Compliance with Legal Environmental Requirements**

All applicable legal environmental standards in the respective countries, as well as international standards, must be adhered to.

#### **2.2.2 Minimization of Environmental Impact**

FASTBOLT and its suppliers are responsible for monitoring and continuously minimizing the environmental impact resulting from their business activities.



## FASTBOLT CODE OF CONDUCT

### 2. Resposibilites

#### 2.2.3 Handling of Waste and Hazardous Substances

FASTBOLT and its suppliers follow a systematic approach in waste management with the goal of identifying, handling, reducing, and responsibly disposing of or recycling waste.

#### 2.2.4 Reduction of Energy Consumption

Energy consumption is to be monitored and documented. Economical solutions should be identified to enhance the energy efficiency of production and minimize energy consumption.

### 2.3 Ethical Business Conduct

#### 2.3.1 Integrity/Bribery, Extortion

The highest standards of integrity must be applied to all business activities. FASTBOLT and its supplier must adopt a zero-tolerance policy regarding the prohibition of all forms of bribery, corruption, extortion, and embezzlement.

### 2.4 Data safety and data protection requirements

FASTBOLT and its suppliers are responsible to comply with national and international data protection regulations in order to protect all personal data of all customers, suppliers, business partners and employees. Personal data must be protected from access or inappropriate use by unauthorised third parties.

Furthermore, FASTBOLT and its suppliers must treat in the strictest confidence any corporate data, information and business secret resulting from the cooperation with FASTBOLT. Confidential data must be protected from unauthorized access and disclosure to colleagues not involved or any other third party.

  
Ekkehard Beermann

Managing Director  
Fastbolt Schraubengroßhandels GmbH

