

The image shows a close-up, low-angle shot of a modern building's facade. The building features a grid of white window frames against a clear blue sky. In the foreground, a dark, possibly black, sign is mounted on the building. The sign has the word "FIDLOCK" in large, white, three-dimensional block letters. A registered trademark symbol (®) is visible at the end of the word. The lighting is bright, suggesting daytime, and the overall composition is clean and professional.

FIDLOCK®

CODE OF CONDUCT

FIDLOCK GmbH

1. Introduction

FIDLOCK's vision not only includes innovative and premium-quality solutions, but also an understanding of our social and environmental responsibilities towards our customers as well as suppliers.

Based on our vision we established this Code of Conduct to make our position clear for all our suppliers, and our own employees. The ILO core conventions are considered a baseline, that any business partner must comply with.

In many cases the Code of Conduct requirements are the same as provisions specified in national laws and regulations. Should the provisions of national law and the requirement of our Code of Conduct differ, the highest standard shall apply.

In case of non-compliance, we will work together with our business-partners to define and conduct appropriate corrective actions. If these are not realized, FIDLOCK may terminate the business relationship.

2. FIDLOCK's Vision

Driven by our pioneering spirit, we want the moment of opening and closing a fastener to become a unique and positive experience for adults, children, athletes, and professionals. Therefore, we focus on innovation, ease-of-use, and secure hold by creating a unique combination of magnetic force and a mechanical lock. Moreover, our goal is to produce components which users and customers can trust and rely on. As a result, development and production are centered around very high standards in quality and durability of our products. Additionally, sustainability is of great importance to us. Therefore, we continuously review our work and strive for improvement in all areas, including suppliers, development, production, and delivery of our products within our possibilities regarding underlying economic conditions. This has already resulted in actions such as the relocation of B2C production processes to Europe and continuing production in China for our B2B components, in order to reduce the distance of deliveries in both areas. Of course, we will also continue our research, evaluation, and the realization of improving actions regarding sustainability in the near and distant future.

3. Code of Conduct

a. Social responsibility

i. No forced labour (ILO Conventions Nos. 29 and 105):

There shall be no forced, slaved, or comparable involuntary labour. Every employment shall be voluntary and terminable for the labourer. Moreover, no physical, psychological abuse or sexual and personal harassment is acceptable.

ii. No child labour (ILO Conventions Nos. 138, 182 and 79):

At no point in the value chain child labour shall be used. All suppliers are bound to follow the recommendation of the ILO-convention,

which sets the minimum age at 15 years. In all cases, the employment shall not be detrimental to the child's education.

Children and persons under the age of 18 shall not be engaged in labour that is hazardous to their health or safety, including night work.

iii. Fair wages (ILO Convention No. 131):

Payment of the employee shall meet, at least, national legal standards or industry standards, whichever is higher. Wages should always be enough to meet basic needs.

Working hours, wages and overtime compensation shall be set in accordance with relevant law.

All workers must receive a written and comprehensible contract outlining their salary and method of payments before entering employment.

The employer shall comply to national laws regarding maternity leave, holiday pay or similar social benefits.

A reduction of pay as a punishment is not acceptable.

iv. Fair working hours (ILO Conventions 1 and 14):

Working hours shall comply to national laws and industry standards and workers shall have at least one day off per week. Overtime must be voluntary.

v. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135, 154):

All workers have the right to organize themselves in Unions and bargain collectively.

Employee representatives shall be protected against discrimination and have the right to inspect the working place and conditions of the workers.

If the right to freedom of association and collective bargaining is limited by laws, the employer must provide alternatives to ensure freedom of association and collective bargaining.

vi. Non-discrimination rule (ILO Conventions Nos. 100, 111, 159):

Discrimination of employees is not accepted. This includes but is not limited to disadvantages because of gender, race, colour of skin, caste, disabilities, political opinion, origin, religion, age, pregnancy, or sexual orientation.

All partners shall respect the dignity, privacy, and personal rights of each employee.

vii. Safety at the workplace

All partners are responsible for a safe and healthy work environment.

This shall be ensured by employing a suitable concept for occupational safety to reduce accidents or damages of the employees' health.

b. Environmental responsibility

- i. To eliminate the use of harmful substances, we implemented our own FIDLOCK-RSL, which is comprised of different legal and industry standards as well as our customers' requirements. Further, we ask our production partners to adhere to different programs like Higgs or ZDHC.

- ii. Through high quality standards we strive for longevity of our products.
- c. Ethical business practices
 - i. Fair competition

We demand fair business practices and fair competition.
This includes compliance to antitrust laws, rejection of corruption and bribery, blackmail, and misappropriation.
 - ii. Further, we presuppose compliance to general data protection rules.
 - iii. As innovation is the main component in FIDLOCK's success, we understand the significance of Intellectual Property and confidential information. We treat inventive ideas of our business partners with respect and we expect respect from all business partners for our Intellectual Property.
To ensure confidential treatment, we covenant Non-Disclosure-Agreements with all relevant partners if required.