



SCHLEICHER

Fahrzeugteile

Compliance Codex
Schleicher Fahrzeugteile GmbH & Co. KG

Content

1. Introduction
2. Our Company
3. Requirements
4. Principles
- Complaint Procedures and Reporting Offices
5. Responsibility
 - 5.1 Leadership Culture
 - 5.2 We Trust our Employees
 - 5.3 We Respect Human Dignity
 - 5.4 Prohibition of Discrimination
 - 5.5 We Reject All Forms of Forced Labor / Modern Slavery
 - 5.6 Prohibition of Child Labor
 - 5.7 Working Hours
 - 5.8 Social Responsibility
 - 5.9 Occupational Safety
 - 5.10 Health Protection
 - 5.11 Fire Safety
6. Employee Participation
7. Wages and Social Benefits
8. Environment
 - 8.1 Assessment
 - 8.2 Renewable Energies
 - 8.3 Reuse and Recycling
 - 8.4 REACH/CAHRA/3TG
 - 8.5 RoHS-Directive
 - 8.6 PFAS e.g. corrosion protection, packaging materials
9. Data Protection
 - 9.1 Intellectual Property
10. Fair Competition and Antitrust Law
11. Gifts / Invitations
 - 11.1 Acceptance of Gifts
 - 11.2 Monetary Gifts
 - 11.3 Acceptance of Invitations
 - 11.4 Corruption, Blackmail, Bribery & Conflicts of Interest
12. Consequences of Non-Compliance
13. Appendix 1: Conflict Minerals Reporting Template (CMRT) – 3TG-Minerals
Appendix 2: Example Conflict Minerals Reporting Template (CMRT) – 3TG-Minerals-
Steel Grades and Suppliers

Additional applicable documents regarding occupational safety and codes of conduct can be found in directive R2007_01.

1. Introduction / Preamble

Schleicher Fahrzeugteile GmbH & Co. KG is committed to sustainable corporate management by investments in photovoltaic systems and electric charging stations. We also expect our suppliers to adhere to our standards of social responsibility. We likewise assume that our employees follow ecological, social, and ethical principles and integrate them into our corporate culture. Furthermore, we continuously strive to optimize the sustainability of our products and our business operations.

For their future cooperation, the contracting parties agree to the following provisions as a joint code of conduct.

Internal safety principles and rules of conduct applicable at *Schleicher Fahrzeugteile* are set out in Directive R2007_01.

Our Compliance Code covers various areas, beginning with information about our company, followed by our requirements and principles. A major part of the Code addresses responsibility, including leadership culture, trust in our employees, respectful treatment, rejection of forced labor, prohibition of child labor, and compliance with human rights and associated working conditions. Important topics such as working hours, social responsibility, occupational safety, health protection, and fire safety are also detailed. Further sections address employee participation, wages and social benefits. Environmental protection and sustainable, ecological action are important aspects of our time and are also included. In addition, the various aspects of data protection must not be overlooked.

Fair competition and adherence to antitrust laws must be upheld to protect the company's interests. Gifts and invitations may only be offered or accepted when the occasion and scope are appropriate.

Failure to comply with the Code will result in certain disciplinary measures.

Finally, the appendix provides detailed information on the Conflict Minerals Reporting Template (CMRT). If you have any further questions, please contact your customer service representative.

2. Our Company

Schleicher Fahrzeugteile GmbH & Co. KG is a medium-sized family-owned company with its headquarters and production facilities located in Penzberg. *Schleicher Fahrzeugteile* employs fewer than 249 people – we are an SME. We manufacture for OEMs as a “Tier 1 supplier” as well as for other customers. The standards along the supply chain are adhered to as far as possible.

3. Requirements

With our expansion into new markets and countries, we also address the requirements and guidelines for dealing with our business partners. This code of ethics represents our commitment to complying with national and international standards, laws, and regulations in the countries with which we cooperate. Our compliance code is published on our company's website.

4. Principles

All employees of *Schleicher Fahrzeugteile* comply with this policy and bear significant responsibility for doing so. The resulting guidelines and related documents are published in the company's internal Integrated Management System and are therefore accessible to employees at any time. New employees receive them together with their contract documents.

Our Compliance Code is binding for our business partners, customers, suppliers, and consultants. It is available at any time via our website and is therefore binding for our purchasing, sales, and delivery conditions.

Risk identification and risk management are carried out, evaluated, and audited.

Complaint Procedures and Reporting Offices

Internal reporting office:

All employees of *Schleicher Fahrzeugteile* may report complaints to an impartial, independent, and non-directive body. The complainant or a representative is consulted during the remediation/resolution process.

Reporting office in accordance with the German Whistleblower Protection Act:

All types of complaints—such as those related to human rights, environmental issues or unethical business practices—can be submitted by all stakeholders, including external stakeholders (contractors, indirect suppliers, local communities, etc.) as well as employees of *Schleicher Fahrzeugteile*, via the link provided on the company's website.

Scope of Application:

Our principles apply worldwide to *Schleicher Fahrzeugteile* and its business partners.

5. Responsibility

We have a responsibility to ensure that our employees can perform their tasks safely and remain healthy.

Topics such as social sustainability, compliance and corporate ethics, environmental sustainability, as well as risk management in the area of sustainability and much more are embedded at the top management level.

Customers and suppliers are properly screened using sanctions lists. In this way, all requirements related to economic sanctions are met.

Export controls fall under the responsibility of the customs authorities, with whom we cooperate.

5.1 Leadership Culture

Our leaders serve as role models. Through a culture of fair communication and respectful interaction, we demonstrate our appreciation for employees, colleagues, and business partners.

5.2 We Trust our Employees

We rely on the shared responsibility of senior management, supervisors, and all employees to ensure compliance with the guidelines.

5.3 We Respect Human Dignity

We treat one another fairly and respectfully. We do not tolerate any form of discrimination or harassment, including sexual harassment, among employees, temporary workers, and our business partners. A specific policy (Anti-Discrimination Agreement) available to all employees refers to the Anti-Discrimination Act (the German AGG and §61b ArbGG) and outlines the options for filing a complaint with either the Works Council (Anti-Discrimination Office) or, alternatively, the Human Resources Department. These complaint offices have been established at *Schleicher Fahrzeugteile*.

5.4 Prohibition of Discrimination

It is not permissible for employees to be treated unequally in any way, for example, on the basis of health status, disability, skin color, religion, national or social origin, gender, political beliefs, age, pregnancy, or sexual orientation. The privacy and personal rights of every individual are respected. This naturally includes women's rights and the rights of minorities and indigenous peoples.

Ethical recruiting is a **standard practice in our hiring process**. We **evaluate candidates without discrimination or bias**, prioritizing integrity, transparency, trust, and performance.

5.5 We Reject all Forms of Forced Labor /Modern Slavery and Respect the Rights of Individuals

No employee may be forced to work by means of violence.

Schleicher Fahrzeugteile does not tolerate the withholding of identity documents or immigration papers of employees or any other persons, nor the use of recruitment agencies that fail to comply with the local labor laws of the country in which recruitment takes place or that charge recruitment fees to workers.

The violation of land, forest, and water rights as well as forced evictions is rejected by *Schleicher Fahrzeugteile*.

The use of private or public security forces must comply with ethical fundamental rights.

Migrant workers are not employed. *Schleicher Fahrzeugteile* does not provide accommodation for any type of employee.

Employees, including migrant workers, may terminate their employment contracts at any time without financial penalties, subject to a reasonable notice period in accordance with local law and applicable collective agreements.

5.6 Prohibition of Child Labor

We do not tolerate child labor or any other form of exploitation of children and adolescents. The special protections of the German Youth Employment Protection Act (Jugendarbeitsschutzgesetz, JArbSchG) applicable in the Federal Republic of Germany are implemented in our company.

5.7 Working Hours

The Working Hours Act is, of course, strictly adhered to.

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if it is worked on a voluntary basis and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working hours must not regularly exceed 48 hours.

5.8 Social Responsibility

To promote our internal values to the outside world and contribute to community life, *Schleicher Fahrzeugteile* supports the youth programs of nonprofit sports clubs and play/sports events in Penzberg through donations and sponsorship.

5.9 Occupational Safety

The Occupational Safety Specialist (SiFa) works with management and safety officers to advise on and monitor compliance with legal requirements and beyond. Internal and external training sessions on occupational safety, health, and first aid are conducted regularly.

The supplier is responsible for ensuring a safe and healthy work environment within their own operations.

Deliveries must also be made in accordance with applicable laws.

5.10 Health Protection

The health of our employees and proactive preventive action are a matter of course for us. Assessments and inspections of workplaces by the supervisor and the company physician take place on an ongoing basis. Personal protective equipment and preventive workplace equipment are provided to employees free of charge. Optional and mandatory medical examinations, as well as the workplace integration management (BEM) and "return-to-work interviews," are offered and conducted by our occupational safety specialist, company physician and supervisors.

Excessive physical or mental fatigue must be prevented through appropriate measures. Employees must be provided with access to an adequate supply of drinking water.

5.10a Noise Emissions

The health of our employees is our greatest asset.

Noise protection is managed through a “noise inventory,” which identifies sources of noise. These sources are assessed accordingly and reduced where necessary.

This not only affects the health of our employees but also has a positive impact on the environment.

5.10b Air Quality

At *Schleicher Fahrzeugteile*, air quality is ensured by using extraction systems on the production machinery and the exhaust air is treated. The heating systems installed in the facility are also regularly maintained and inspected.

Documentation of these procedures is, of course, provided.

5.11 Fire Safety

Preventive measures regarding the use of work equipment, machinery, and buildings must be taken in advance. Legal and construction-related regulations must be complied with. These must be regularly inspected. In the event of deviations, measures must be implemented to ensure safe working conditions and, consequently, safe delivery. Regular fire protection drills—such as fire detection training, the safe use of fire extinguishers, and evacuation exercises—must be carried out. The findings from these drills must be consistently evaluated and implemented. If automatic fire detection systems are required or derived from applicable regulations, they must be installed before accepting an order and maintained accordingly to ensure safe operations.

6. Employee Participation

As a freely elected employee representative body and a link between management and the workforce, the Works Council serves as the point of contact for all employee concerns and complaints at *Schleicher Fahrzeugteile*. The company is not bound by a collective bargaining agreement; however, employees are free to organize themselves into a union (freedom of association).

Through its co-determination rights established in the German Works Constitution Act, the Works Council participates in company agreements regarding, among other things, the organization of working hours and overtime, payroll records and the structure of bonuses and premiums. All company agreements are published via a notice board and on an internal drive.

We pay special attention to our employees with disabilities and our trainees. They are each supported by their own representatives (the Representative Body for Severely Disabled Employees (SBV) and the Youth and Trainee Representative Body (JAV)) in cooperation with the works council.

7. Wages and Social Benefits

Schleicher Fahrzeugteile provides social benefits commensurate with wages and salaries.

Suppliers and business partners must comply with the national statutory minimum wage or the industry-standard minimum wage for regular working hours and overtime. Employees must be granted all benefits required by law. Wage deductions as disciplinary measures are not permitted.

8. Umwelt / Ökologische Verantwortung

We are committed to leaving an intact environment for future generations; we expect the same from our employees, suppliers, customers, and service providers. This principle also guides our purchasing decisions when sourcing raw materials.

We, along with our suppliers and service providers, use resources such as energy, steel, and operating materials sparingly and efficiently.

Senior management, the entire workforce, and all suppliers and service providers are committed to complying with legal requirements and all applicable internal and external guidelines.

We are well aware of the importance of reducing carbon emissions. We are driving decarbonization through the use of carbon-free and low-carbon energy sources.

Air pollution control (among others the German BImSchG, BImSchV), waste management laws (among others the German GewAbfV, KrWG, NachwV), water and watercourse protection (among others the German WHG, AwSV, WHG, LWG), chemicals (among others the German GefStoffV, TRGS), and emergency preparedness are regularly reviewed. The German StörfallVO does not apply to our company.

Our company has both an environmental management system for implementing environmental policy and environmental objectives (DIN EN ISO 14001:2015) and an energy management system for recording and reducing energy consumption within the company.

8.1 Assessment

As part of our environmental and energy management program, annual goals are set to achieve improvements in these areas.

We are constantly optimizing our environmentally responsible use of resources and our efforts to reduce waste and greenhouse gas emissions.

Energy efficiency is a key factor in the company's decision-making and ongoing development.

8.2 Renewable Energy

When purchasing or procuring our energy (electricity, gas, fuel), we strive to use the highest possible proportion of renewable energy sources.

The current energy mix is illustrated, for example, on the website of the Federal Environment Agency.

A certain portion is covered by our in-house PV system, and we are committed to further expanding our use of renewable energy.

In addition, the *Schleicher Fahrzeugteile* vehicle fleet is being gradually electrified.

8.3 Reuse and Recycling

Wherever possible, the waste hierarchy should be followed. In this process, reuse and repurposing are given priority over recycling and thermal treatment (e.g. waste incineration). Only when all other options have been exhausted, landfilling is the final resort. This must be taken into account and planned for as much as possible in advance, starting with the ordering process and the submission of bids. We use reusable shipping containers whenever possible and assist you, for example, in selecting sustainable packaging.

The concept of sustainability also encompasses improvement and preservation in the areas of animal welfare, biodiversity, soil quality, land use, and deforestation.

The currently valid certificates can be viewed at any time on the company's website. A dedicated environmental and energy management officer, who reports directly to senior management, is responsible for planning and overseeing the functionality and effectiveness of the systems.

8.4 Chemical Testing in Compliance with REACH & the Conflict Minerals Regulation

Our company does not manufacture, modify, mix, or paint any chemical substances.

The steel used to manufacture our products is purchased according to customer specifications and is not modified.

Upon customer request, our products are treated with a REACH-compliant rust inhibitor, taking into account the ban on perfluorinated and polyfluorinated chemicals.

We would like to point out that hazardous substances at *Schleicher Fahrzeugteile* are approved only by our hazardous substances and environmental management officer.

We purchase raw materials only in consultation with and on behalf of our customers from the suppliers they have selected.

Schleicher Fahrzeugteile has no direct influence over the procurement of these materials.

Initiatives related to raw materials are therefore the responsibility of our customers; however, our customers also place the highest priority on compliance with international standards.

We inform our suppliers that we only purchase products that comply with conflict minerals and REACH regulations, and that we adhere to the ban on perfluorinated and polyfluorinated chemicals.

Konflikt- und Hochrisikogebiete - CAHRA & 3TG (Tin, Tantalum, Tungsten, Gold)

Materials are ordered only in consultation with our customers from suppliers they are familiar with. Therefore, we at *Schleicher Fahrzeugteile* have no influence over this. Our customers follow the specifications of CAHRA & 3TG.

8.5 RoHS-Directives

RoHS stands for "Restriction of (the use of certain) Hazardous Substances in Electrical and Electronic Equipment," which refers to restrictions on the use of certain hazardous substances in electrical and electronic equipment.

Since *Schleicher Fahrzeugteile* does not manufacture electrical equipment and uses only materials that comply with the REACH chemical regulation in Europe, we see no need for action.

8.6 PFAS Restriction- Ban on Per- and Polyfluoroalkyl Substances

No chemicals, such as cleaning agents, rust inhibitors, or packaging materials, that contain or are coated with perfluorinated or polyfluorinated chemicals may be delivered to *Schleicher Fahrzeugteile*.

9. Data Protection and Intellectual Property

The protection of the personal data of our employees and business partners is implemented in accordance with the legal framework of the GDPR applicable in the Federal Republic of Germany. The relevant privacy policies are published on our website. The contact information for our data protection officer can also be found there.

To prevent the production and distribution of counterfeit products, data protection must be observed. Photos or drawings should only be used as necessary, when absolutely essential (data minimization). A data protection agreement must be entered into in advance, if required.

We protect **intellectual property** by adhering to data protection regulations and expect the same from our business partners, customers, suppliers, and consultants. Documents, drawings, developments, and other materials provided by customers must be treated as confidential.

Plagiarism is prevented to the greatest extent possible. The handling of customer information is securely regulated and monitored within *Schleicher Fahrzeugteile*.

10. Fair Competition and Antitrust Law

Our employees are required to protect the company's interests and may not use their professional position with business partners for their own benefit or the benefit of third parties. We reject price-fixing or agreements on market allocation with competitors.

11. Gifts/ Invitations

Our employees must not offer or accept gifts or invitations with the intent to influence a business relationship. Even the mere appearance of improper influence must be avoided.

11.1 Acceptance of Gifts

The acceptance of gifts from business partners must generally be declined. Small gifts (tokens of appreciation) valued at no more than the current legal annual limit are exempt from this rule. Gifts exceeding the current legal value may be accepted under certain circumstances if they are customary according to local hospitality practices. In such cases, the gift may be accepted as an exception.

11.2 Monetary Gifts

The acceptance of monetary gifts is strictly prohibited.

11.3 Acceptance of Invitations

Invitations from business partners may be accepted if the occasion and scope of the invitation are appropriate. Such invitations must remain within the bounds of customary business hospitality and must not violate any laws or our ethical principles.

Invitations to business meals may only be accepted if they are related to maintaining external business relationships. In cases of doubt, the supervisor must be consulted.

11.4 Corruption, Blackmail, Bribery & conflicts of Interest

Wir tolerieren weder Korruption, Erpressung, Bestechung noch Interessenkonflikte. Dies ist ein besonderes Anliegen der Firma Schleicher Fahrzeugteile. Bei Verstößen wenden Sie sich bitte an den Betriebsrat und die Geschäftsführung.

We do not tolerate corruption, extortion, bribery, or conflicts of interest. This is a matter of particular importance to Schleicher Fahrzeugteile. In the event of any violations, please contact the works council and management.

12. Consequences of Non-Compliance

Violations of this policy will result in disciplinary measures for employees and appropriate actions concerning the business relationship for business partners.

13. Appendix 1 - Conflict Minerals Reporting Template (CMRT) – 3TG-Mineral

The contact person for the Conflict Minerals Reporting Template (CMRT) – 3TG minerals at Schleicher is the respective account manager.

Tantalum / Tin / Gold or Tungsten → referred to as 3TG minerals in the following text.

- I. We do NOT intentionally use 3TG minerals in the materials we use with the customer and that have been approved by the customer.
- II. We do not know whether any residues of 3TG minerals are present.
- III. We are not aware of the supply chain of our material suppliers and smelting furnaces.
- IV. We are not aware of the supply chains of the smelters that supply us, nor do we know whether these materials are sourced from conflict-affected and high-risk areas.
- V. We do not know whether 3TG minerals were produced from 100% recycled or scrap sources.
- VI. We have required our suppliers, in our purchase orders, to comply 100% with the Compliance Code, including with regard to 3TG minerals.
- VII. We are not aware of whether the smelters listed below use 3TG minerals in other products.
- VIII. Our compliance code also serves as a directive that we procure only conflict-free minerals.
- IX. Our Compliance Codex is available on our website (<https://www.schleicher-fahrzeugteile.de/en/compliance-code>). You are also welcome to request a copy from your account manager.
- X. We do not purchase 3TG minerals, so we are unable to confirm whether the smelters are audited by an independent body.

- XI. Our commitment to conflict-free procurement is a given, simply because of our reliability in delivering on time, our coordination with our customers, and their order approval.
- XII. The suppliers listed in Appendix 2 have fully agreed to our Compliance Codex and, in doing so, have also embraced our values.
- XIII. Our suppliers must review the due diligence information; any discrepancies must be reported to us. Since we are unable to verify this internally, our supplier is responsible.
- XIV. Our quality, environmental, and energy management system uses the management control loop to assess its effectiveness and make adjustments as necessary.
- XV. *Schleicher Fahrzeugteile* is not required to disclose information on conflict minerals on an annual basis.
- XVI.

Appendix 2, Example - Conflict Minerals Reporting Template (CMRT) – 3TG-Mineral – Steel Grades and Suppliers

For privacy reasons, please contact the Purchasing Department. (E-Mail: einkauf@schleicher-fahrzeugteile.de)

Penzberg, January 7th, 2026
Schleicher Fahrzeugteile GmbH & Co. KG

By means of this document, the supplier commits to acting responsibly and adhering to the principles/requirements listed. The supplier undertakes to communicate the contents of this code to its employees, agents, and subcontractors in a manner that is understandable to them, and to take all necessary measures to implement the requirements.