

FiONTEX

FiONTEX AG Code of Conduct for Business Partners and their affiliated companies

Foreword

FiONTEX AG assumes responsibility towards the environment and society as part of its value-added mission. In addition to applicable laws and industry-specific and cross-industry standards, we are guided by rules and principles that are set out in writing in the FiONTEX AG Code of Conduct and that form the basis for our daily work.

However, the scope of our principles and rules of conduct should not be limited to our own organization and activities. We expect our business partners and also their subcontractors to strictly comply with all applicable anti-corruption, money laundering, antitrust, competition, capital market, labor, data protection and environmental protection laws. Furthermore, we expect to ensure fair working conditions, respectful and dignified behavior, and ecologically sustainable processes along all value creation processes of our partners.

FiONTEX AG's Code of Conduct, which is available for public inspection, includes rules of conduct and principles for the following areas:

- 1) Confidentiality, integrity and avoidance of conflicts of interest.
- 2) Legally required minimum wages and working time regulations
- 3) Health and safety standards
- 4) Human rights due diligence and prohibition of child and forced labor
- 5) Freedom of association
- 6) Environmental protection and origin of materials
- 7) Compliance with the code and measures in the event of violations

This document is therefore to be understood as a supplement to our Code of Conduct and should be taken note of by our business partners.

1. Confidentiality, Integrity and Avoidance of Conflicts of Interest

- 1.1. FiONTEX AG cultivates business relationships carefully and always pays attention to mutual respect, trust, as well as integrity, openness and honesty.
- 1.2. Insofar as our business partners receive information from FiONTEX AG in the course of cooperation that has not already been published by the company, such

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information must always be treated confidentially and may never be disclosed or published without the express written consent of FiONTEX AG.

1.2.1. In the event that confidential information is provided inadvertently, business partners shall be obliged to inform their contact persons at FiONTEX AG thereof immediately.

1.3. We expect our business partners to activate effective internal safeguards in the event of a business relationship with competitors of FiONTEX AG, which ensure both the confidential treatment of information and the avoidance of conflicts of interest.

1.4. Furthermore, we require that our business partners never grant FiONTEX AG employees any benefits or financial contributions in the hope of influencing the actions and decisions of employees in their favor.

2. minimum wages and working time regulations prescribed by law

2.1. FiONTEX AG expects its business partners to ensure that the remuneration of their employees complies with and adheres to the statutory minimum wage regulations.

2.2. We also expect a clear regulation for the payment of overtime (hours in excess of those stipulated in the employment contract) of the employees.

2.3. We expect our business partners to comply in principle with the working time regulations laid down by law.

2.3.1. These include, among other things, the prescribed maximum limit for working hours for the protection of employees, specified rest periods and breaks, and statutory holiday regulations.

3. health and safety standards

3.1. Compliance with statutory health and safety regulations is a matter of course for us.

3.2. Our Code of Conduct summarizes the additional health and safety rules that apply in our company.

3.3. Accordingly, all employees are required to contribute to the continuous optimization of health management and occupational safety at FiONTEX AG.

3.4. We also expect from our business partners and their employees the exact, absolute compliance with the legal requirements for occupational safety and health protection, furthermore a behavior that takes into account the health and safety of all people who are directly or indirectly affected by the process of value creation.

3.5. The duty of care for the protection of health and safety at work should also include training and instruction of employees for the active prevention of occupational accidents and/or occupational diseases.

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3.6. In the case of international business relationships of our partners, we require that they perform their due diligence for the protection of persons involved in the value creation process on the basis of the international labor standards of the International Labor Organization (ILO).

4. Human Rights Due Diligence and Prohibition of Child and Forced Labor

- 4.1. Since FiONTEX AG's business activities are primarily focused on the German market, our company primarily acts in accordance with German legislation and observes the local provisions on human rights due diligence.
- 4.2. In the context of possible cross-border business activities, we always take into account the applicable international labor standards as well as the prohibition of child and forced labor.
- 4.3. We also expect our business partners to comply fully with national and, where applicable, international provisions on human rights due diligence. This also includes compliance with prohibitions on child and forced labor in the context of their business relationships as well as the examination of potential business locations and suppliers with regard to the risks of human rights violations and/or child and forced labor.

5. freedom of association

5.1. FiONTEX AG expects its business partners, in accordance with German legislation, to generally grant their employees the right and freedom to establish a works council or to join an employee representation as well as to negotiate tariffs with the business partner.

6. environmental protection and material origin

- 6.1. FiONTEX AG wishes to keep the impact of its business activities on the environment as low as possible and to continuously optimize the ecological footprint within the scope of all value-added processes.
- 6.2. We therefore expect our business partners and suppliers, in addition to complying with all environmental protection laws applicable in Germany, to be committed to the environmental compatibility of joint and own business activities and to take appropriate measures to avoid possible environmental hazards.
- 6.3. 3 As a matter of principle, we expect our partners to make beneficial and careful use of all natural resources and to continuously improve environmental protection through new processes, technologies and materials.
- 6.4. For all processes, technologies and materials required in the value-added process, other solutions that are as environmentally friendly as possible shall be considered and presented or offered to FiONTEX AG.

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- 6.4.1. Furthermore, we presuppose that our business partners are fundamentally willing to enable the reuse and recycling of materials.
- 6.5. The sources of supply and properties of materials and goods with which the business partners supply FiONTEX AG shall be traceable in any case.
- 6.6. Goods and materials shall never be obtained, produced or transported in an illegal, ecologically questionable or dishonest manner.
- 6.7. The employees of FiONTEX AG are requested to point out to the business partners possibilities for optimization with regard to environmental compatibility and, in individual cases, to demand proof of the use and certification of environmental management systems (primarily ISO 14001 and/or EMAS).
- 6.7.1. In this context, we expect the necessary willingness to cooperate and transparency from our business partners.

7. compliance with the code and measures in case of violations

- 7.1. Our business partners shall ensure compliance with the principles and rules of conduct described in the FiONTEX AG Code of Conduct as well as in this document.
- 7.1.1. In addition, we expect our business partners to discuss these principles and rules of conduct with their own subcontractors and service providers and to encourage them to comply with them and also to monitor their compliance.
- 7.1.2. Violations of the principles and rules of the FiONTEX AG Code of Conduct and of the present supplementary Code of Conduct for Business Partners may lead to immediate termination of business relations and to termination of contracts without notice.
- 7.1.3. FiONTEX AG offers its employees as well as its business partners and external persons the use of an electronic whistleblowing system. Through this system, errors within the sphere of influence of the company or its business partners, possible violations of compliance rules or violations of the principles and rules of the FiONTEX AG Code of Conduct and the present supplementary Code of Conduct for Business Partners can be reported to an external ombudsman in an unbureaucratic and anonymous manner.
- 7.1.3.1. The reporting system complies with all applicable requirements for data protection and its security.

Hamburg, February 23, 2023

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