



ABLE  
GROUP

Act on Corporate  
Due Diligence Obligations  
in Supply Chains:

ABLE GROUP  
Declaration of Principles

As at 01.01.2023

---

## MANAGEMENT INTRODUCTION

The terms "sustainability", "social responsibility" and "compliance" and the associated guiding principles are of crucial importance to us as an owner-managed company - and have accompanied us since our foundation. Therefore, the declaration of principles is just further evidence of the efforts we have been making for several years. In an environment in which the reality of life and regulatory framework conditions are increasingly characterised by the effects of climatic, demographic and socio-cultural change processes, we as a company must view this as an opportunity to define the interaction of our own corporate activities and to derive responsibility from them.

Our Code of Conduct emphasises the corporate principles clearly for everyone - and has done so for many years. It is also important for us to make a clear commitment to respecting and protecting human rights. Because it clearly applies throughout the entire ABLE GROUP with more than 9,800 employees: sustainability is our moral imperative; we can only bring about positive change by acting responsibly and making forward-looking decisions.

True to this attitude, we take our corporate responsibility seriously. As a service provider in the fields of Engineering and IT, we therefore promote compliance with human rights. We take appropriate measures to ensure compliance both within our own business field and our supply chain. Moreover, resource conservation is important to us in order to minimise our environmental impact as far as possible. This declaration serves to ensure the transparency of our endeavours regarding the [German] Act on Corporate Due Diligence Obligations in Supply Chains.



Frank Ferchau



Alexander Schulz



Ralf Helas



Heiko Rostek

## **ABLE GROUP COMPANIES**

The ABLE GROUP companies specialise in the provision of various services in the fields of engineering and IT. In our daily business, we work with customers from a wide range of industries and regions and support them with their tasks and challenges in various ways:

### **ABLE Management Services GmbH**

As the operational holding company and central in-house services provider, ABLE Management Services GmbH not only provides relief for all tasks without a direct customer interface, but also offers sound advice and proactive solutions in response to changing market conditions. In short, it is both a driver of innovation and an accelerator of growth for all ABLE GROUP companies.

### **FERCHAU GmbH**

With 8,700 employees in over 100 branch offices, FERCHAU is one of the leading platforms for first-class technology services in Europe. The full-service provider for Engineering and IT supports hidden champions and global players with top experts in flexible cooperation models.

### **FERCHAU Automotive GmbH**

Since the merger of FERCHAU Automotive and M Plan GmbH on 01.01.2022, M Plan GmbH no longer exists as a separate entity. FERCHAU Automotive GmbH now supports vehicle manufacturers and suppliers along the entire product lifecycle process - from the individual component to the validated system. Our services as a development partner and technology service provider range from conceptualisation via software development to vehicle integration at our own workshop and testing facilities.

### **planting GmbH**

planting is an industry specialist and full-service Engineering provider. The company optimises effectively, plans holistically and implements all processes cost-consciously along the entire value chain in modern plant Engineering.

### **prime-ing GmbH**

As a managed services provider, prime-ing takes on the commissioning, controlling and administration of personnel service providers for industrial companies throughout Germany within the scope of larger projects. Its services include assisting customers to ensure the legally compliant modelling and controlling of contracts for work and services as well as with outsourcing solutions for all aspects of labour leasing.

## **RST Rostock System-Technik GmbH**

RST Rostock System-Technik has been an established partner of the international aerospace industry for system and product development for several decades. In addition to Engineering services, the company also develops and supplies products for various applications in Aviation, Aerospace, Defence and Industry.

## **top itservices AG**

top itservices AG, the personnel services provider for IT and Engineering, combines expertise in the Automotive, Engineering, Industry 4.0, Finance, Pharma & Life Sciences, Public Sector and SAP fields and the placement of permanent employees in specialised competence centres.

## **GENERAL SECTION**

We focus on our responsibility towards our employees, society and the environment. That is why we are explicitly committed to respecting human and environmental rights, also within our supply chains. We expect our suppliers to ensure compliance with these as well as our own principles.

In order to make our principles visible, we already introduced our Code of Conduct several years ago, in which our expectations are clearly expressed for everyone. This has now been supplemented with a developed human rights strategy which is based on the following recognised standards and guidelines (to be found in the LkSG [German Act on Corporate Due Diligence Obligations in Supply Chains]: annex to section 2 (1), section 7 (3) sentence 2), to which we are expressly committed:

- Universal Declaration of Human Rights (UN)
- Core Labour Standards of the International Labour Organisation (ILO)
- Paris Climate Agreement.

Trust, reliability, quality and the implementation of legal requirements and social standards are essential for long-term growth, success and corporate action. Compliance with these values are of great personal concern to us and we therefore actively promote them. As a company, this also includes respecting and protecting human rights and the environment for us. After all, long-term economic success is only possible if these important rights are protected and respected. As an innovation-driving company, we learn and improve constantly in order to fulfil legal requirements and social expectations, among other aspects. The best example of this is our Corporate Social Responsibility strategy, via which we strive to contribute to supporting the United Nations Sustainable Development Goals.

All measures and our Risk Management Policy apply to all ABLE GROUP companies.

## **Code of Conduct:**

Our Code of Conduct is binding for all company employees and for our suppliers. Adherence to the principles set out in it is mandatory, as they are the fundamental values according to which the company acts.

The ABLE GROUP Code of Conduct is based on the following generally recognised guidelines:

- Universal Declaration of Human Rights of the United Nations (UN)
- Global Compact of the United Nations (UN)
- ILO Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development
- United Nations Convention against Corruption

## **HOW DO WE PUT OUR RESPONSIBILITY INTO PRACTICE SPECIFICALLY?**

### **Chapter 1: Risk management**

We have integrated an effective procedure for risk management in the company by embedding it in our business processes. The responsibilities for monitoring and controlling the process within the company are clearly defined and the responsible unit reports to Management annually.

Risk analysis is carried out within the scope of risk management.

### **Chapter 2: Risk analysis**

Risk analysis is carried out once per year and on an ad-hoc basis. Both the company's own business area and its direct suppliers are taken into account. The type, scope, context and severity of the potential or actual impact on human rights and the environment are assessed in order to evaluate the risks. The identified human and environmental risks are appropriately weighted and prioritised. We then communicate the results of the analysis internally to the relevant decision-makers.

The core of the analysis is the risk that violations of the Code of Conduct could occur at direct suppliers' and in the supply chain. The supplier structure and the possibility of influencing suppliers and the findings from the internal notification system must also be taken into account.

Risk analysis only identified increased risks in selected aspects, which are already being counteracted with suitable measures. Based on the risk analysis results, a greater focus is being placed on non-EU suppliers, who are subject to more extensive authorisation and monitoring procedures. No increased risks were identified in the area of indirect procurement of consumer goods.

### **Chapter 3: Preventive and corrective measures**

As a preventive measure, we have declared our Code of Conduct to be binding for all suppliers and have therefore integrated it in the supplier contract. All suppliers must therefore contractually agree to comply with our Code of Conduct and the associated values. We also require our suppliers to pass on the values and principles of our Code of Conduct to any subcontractors in an appropriate manner to ensure that they comply with the principles contained therein.

As a company, we declare our willingness to instruct our suppliers regarding our human rights and environmental expectations. The training serves as a supportive offer. Suppliers are obliged to comply with our principles even if they do not participate in this training. If any abuse occurs and is not remedied within a reasonable period of time and to a reasonable extent, we will terminate our business relationship with this supplier as a last resort.

We regularly review the effectiveness of the measures taken and make adjustments where necessary.

### **Chapter 4: "Speak up" complaints procedure**

Our complaints procedure is open to all stakeholders. Employees also have access to the system via the Intranet. It can be used to report possible human rights violations or environmental damage, as well as eventual violations of our Code of Conduct and this declaration of principles. Both our employees and third parties have the option of reporting via the system. Reports can be submitted by E-mail, by telephone, by appointment or by post. The CSR Officer has access to the communication media. The reporting process is clearly presented on the website. We attach great importance to the protection of the person making the report. The anonymity of the person and confidentiality are guaranteed irrespective of the circumstances. Also, the person is protected against retaliation and reprisals. All complaints are investigated.

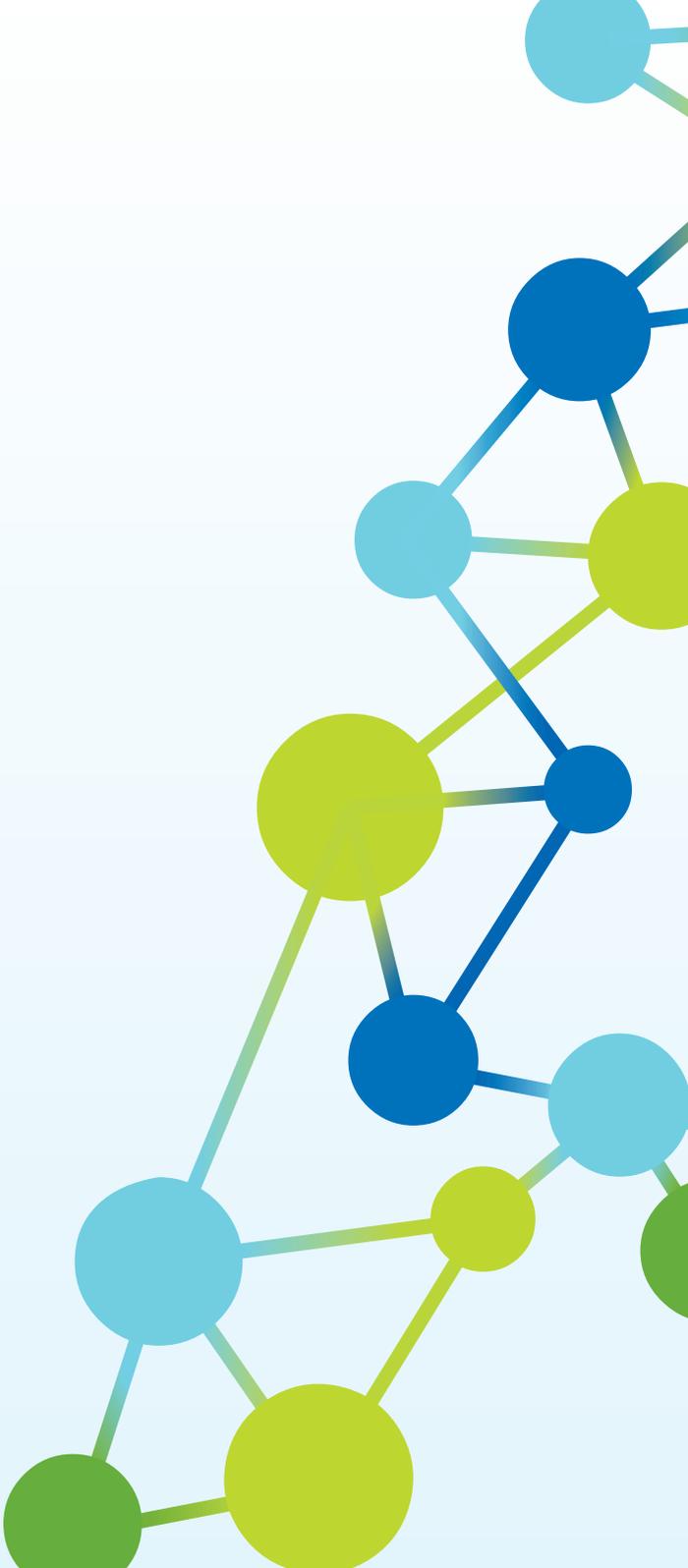
Thus, we ensure that the process is accessible, transparent, independent, fair, effective and confidential. As the person responsible, the CSR Officer has the organisational independence and freedom from instructions which enable him/her to process the submitted reports objectively thanks to the powers defined by his/her appointment.

The effectiveness of the procedure is reviewed annually and on an ad-hoc basis.

### **Chapter 5: Documentation and reporting**

Documentation is made systematically and comprehensibly.

The annual report is prepared in accordance with the requirements of BAFA [the German Federal Office for Economic Affairs and Export Control] and published on the corporate websites after Management approval, but no later than four months after the end of the fiscal year. The reports are available there as a download for at least 7 years.



**ABLE Management  
Services GmbH**  
Steinmüllerallee 2  
51643 Gummersbach Germany  
Phone +49 2261 5011-0  
Fax +49 2261 5011-199  
info@able-group.de  
www.able-group.de