

VOSS Compliance Politics

Compliance

VOSS' values define the basic principles and rules for our conduct within the companies of our group and in relation to our external partners and the public. The worldwide implementation of and compliance with rules of conduct is of increasing importance, particularly due to the growing global orientation.

With the implementation of compliance-specific frameworks, rules are defined clearly and transparently. In this way, we make it clear how we exercise our ethical and legal responsibility. The compliance guidelines of the VOSS Group are contained in the Compliance Manual for the VOSS Group. The central compliance guidelines of the VOSS Group include in particular

- the Code of Ethics,
- the Supplier Code of Conduct for suppliers.

The compliance guidelines include requirements in the area of human rights (no forced and child labor, freedom of association and anti-discrimination). Our compliance management system aims to ensure that our values and rules are lived throughout the Group. Concrete steps are laid down, implemented and tracked annually in a "Compliance Report".

Group-wide Compliance Management

The CEO of the VOSS Group is responsible for an effective compliance management system. The Chief Compliance Officer manages the group-wide compliance activities and reports directly to the Executive Board. In addition to the central compliance department existing at group level, compliance officers have been appointed in all operative individual companies of the VOSS Group. The compliance officers of the individual group companies are in regular contact with the other departments on site and report regularly to the Chief Compliance Officer.

Each member of the VOSS Group's compliance organization can be contacted at any time regarding all questions and topics relating to compliance. The Compliance department is in close contact with the legal department of the VOSS Group in order to continuously consider new or changed legal requirements in the compliance risk analyses and the compliance program.

The effectiveness of the compliance organization set up by the Executive Board is monitored by the Advisory Board of VOSS Automotive GmbH, which is regularly informed about compliance-relevant issues and receives the company's annual "Compliance Report".

Risk Monitoring and Control

Each individual company of the VOSS Group is evaluated centrally by VOSS Group Compliance using an evaluation system with regard to possible compliance-relevant risks.

Together with the companies that have a high-risk value according to the evaluation system, specific compliance risk assessments are carried out on site, in which a detailed analysis of the specific compliance risks of the company is conducted. In addition to the local compliance officer, representatives of all relevant departments are involved, for example Finance, Purchasing, Human Resources, production, Research and Development.

The risks to which the VOSS Group is exposed form the basis for determining the compliance program and the corresponding measures. The implementation of these measures and adherence to the compliance rules are also part of the regular auditing activities of the Internal Audit Department.

Systematic, Needs-Based Training of Employees

In order to ensure the effectiveness of the VOSS Group's compliance management system, all employees must be familiar with the relevant legal requirements and the internal compliance guidelines. It is our goal that all employees of the VOSS Group are familiar with our compliance rules as well as the contact persons and reporting channels.

The VOSS Group's compliance training courses form the basis for this. They take place in the form of classroom and online training. The training courses to be completed are assigned according to the employee's job and responsibility profile and resulting needs. Training courses of fundamental relevance are to be completed as basic training courses by every employee of the VOSS Group; these include the online training courses "Code of Conduct/Compliance Basics", Anti-Corruption, "Data Protection" and "Money Laundering", which are repeated regularly. Depending on their job profile, employees also have to participate in specific training courses.

The need for training is reviewed regularly.

Various Ways of Reporting Infringements

We encourage our employees to report violations of regulations and internal guidelines, also across hierarchical levels. In addition to addressing superiors, the Human Resources department or the compliance officers personally, for example, this includes our whistleblower system via the VOSS Compliance Box. It enables the anonymous reporting of information by internal or external whistleblowers. Employees of the compliance organization always follow up on any indications of compliance infringements. Compliance cases are decided on by the compliance juries specially set up at each operational company location.

Date of release: Feb 17, 2020