

COMPANY POLICY OF THE ENCORY GMBH



Please note:

If you print this policy, you will not be entitled to be up to date due to online versioning. If you have any questions, please contact the management or the QM department of Encory GmbH.

Version history

Version	Changes	Created	Checked	Approved	Date of approval
1.0	Publication	Nolte	Zintl	Eggl, Großeschmidt	04/29/2019
1.1	Detailing occupational safety	Zintl	Nolte	Eggl, Großeschmidt	05/02/2019
1.2	Development of the Human Rights and Employees Chapter	Nolte	Zintl	Eggl, Großeschmidt	05/22/2019
1.3	Adaption of environmental policy after revision	Nolte	Eggl	Großeschmidt	09/30/2019

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1. Company policy

The analysis of existing approaches to the recycling of used automotive parts as well as the development of services against the background of the continuous improvement of all relevant processes forms the basis of our company policy. In doing so, we always comprehensively include all issues relating to our environmental, energy and information security policy and those relating to occupational safety. Encory GmbH pursues the following principles with the company policy:

- Clear formulation of the requirements and goals of the management system, especially which results are to be achieved and how these can be secured sustainably.
- During the development of our processes from the outset, assess their effects and risks on consistent quality, optimized use of resources, safe production, handling and impact on the surroundings and the environment.
- To constantly make clear to our employees their responsibility for the various aspects of the safety of our processes with regard to application as well as sustainability (environment).
- These principles are to be exemplified by our managers and to encourage our employees to implement them.
- Ensure the implementation and fulfillment of applicable laws and other requirements for us and our products and services.
- To influence our partners, suppliers and customers to support our goals.
- Work cooperatively with our partners, customers, suppliers, government and other stakeholders to address these issues.
- In a continuous improvement process, check our integrated management system for its implementation, consistency and effectiveness and, if necessary, initiate corrective measures.

2. Quality policy

Customer focus

The quality policy of Encory GmbH is based on the quality management principles of ISO 9000:2015 and on the values defined in the company itself. We regard the fulfilment of customer requirements in the sense of a strong customer orientation as our highest goal. We orient ourselves to the needs and requirements of our customers and focus on a flexible and agile approach. These characteristics help us to control the changes that occur in order to offer the greatest possible benefit to our customers. With our forward-looking and future-oriented concepts, we identify potential needs and opportunities for our customers. It is always our claim to be recognized as a reliable and strong partner in the market.

Innovation - Sustainability

A solution is only good enough if it fulfils the high demands of our customers and provides benefits. This is the reason why we are looking for innovative solutions, which requires a wide diversity of skills from teams in different areas. A basic condition for innovative solutions is to combine entrepreneurial success with social and economic aspects. Therefore, we want to act in an environmentally conscious, future-oriented and resource-conserving manner. We see ourselves in the driving role of extending the life cycle of vehicle parts through remanufacturing and used parts.

Employees

Our employees are the most important resource for the company. For this reason, they also play a central role in the company's quality policy. Every employee is required to assume entrepreneurial responsibility and actively participate in the development of the company. Agility and flexibility give freedom to find creative solutions and make it possible to advance a wide range of tasks in a dynamic environment. The focus is on personal responsibility and personal development. Furthermore, it is very important for us to work together across all departments. Trust and team spirit are just as important as motivation and fun at work.

Economic success

The actions of each individual employee should not only be aligned with the values of the company or the principles of the norm, it should also follow cost-efficient and economic principles. In this way it should be ensured that the economic success of the company also plays a significant role in the achievement of objectives. Furthermore, we want to manage processes as controlled and valueadded as possible to improve both profitability and our processes on the market. This includes process orientation as an important element in the quality management system.

Management

The management of Encory GmbH ensures that the quality management system can achieve its agreed results. The top management provides the necessary resources and monitors their use against the background of continuous improvement. Furthermore, the management undertakes to fulfil all legal and other requirements to which the company has committed itself. It also provides employees with a development framework in which they are encouraged and challenged. The open feedback culture is just as much as a part of the management tasks as the fulfilment of quality objectives.

Our quality policy forms the basis of our thoughts and actions, because the quality orientation is a fundamental component of our business plan. Future-oriented decisions should be the basis for the long-term success of Encory GmbH and the continuous improvement of the quality management system.

3. Environmental policy

Encory GmbH is aware of its social responsibility as a future-oriented solution provider in aftersales. This explicitly includes the responsible treatment of the environment. Our philosophy is based on the continuous improvement of processes with the aim of continuously optimising the environmental impact (environmental performance) as well as the use of energy and resources. Regarding to our environmental policy, we pursue certain goals and principles.

- We develop innovative, customer-oriented aftersales solutions and evaluate their impact on the environment, energy and resources right from the start.
- The company takes special importance on recognizing waste in advance and avoiding it sustainably.
- We influence our contractual partners about our environmental goals by paying attention to ethical, social and ecological aspects when procuring services.
- For Encory, the open dialogue between customers, employees and the company is a key factor in our success.
- We work together with the stakeholders of our company in a spirit of trust in order to continuously optimize our activities economically, ecologically and socially.
- We have set the goal of complying and exceeding all legal and official regulations and other environmentally related interests as well as our own environmental protection requirements.
- From our point of view, economic action and the possibility of energy saving and energy efficiency do not represent a conflict, but offer us the opportunity to further optimize our structures.
- All employees of Encory GmbH are committed to the principles of environmental policy. They are motivated by the company and its management to maintain an energy-saving environment by use of the environmental goals.

4. Energy policy

In our energy policy, we commit ourselves to complying with the relevant legal energy requirements and to continuously improving the reliable, resource-conserving and economical use of energy. The Encory GmbH pursues the following principles regarding to the energy policy:

- Continuous increase of the efficiency of the energetic power.
- Consideration of energy efficiency in the procurement process of products and services.
- Systematic evaluation of the energy aspects of our processes.
- Motivation and training of our employees regarding to the energy-saving behaviour.
- Decisions with energetic relevance are also made under sustainability aspects.
- Energy consumption is constantly measured and monitored. Essential energy aspects are checked and communicated.
- All relevant legal and official requirements are fulfilled both during manufacture of our products (Encory Parts Recovery Center in Straubing) and at all other locations.
- By committing to continuous improvement, we contribute to the improvement of environmental performance.

5. Health and safety policy

This health and safety policy aims to minimize the risk of accidents and the risks associated with the handling of hazardous substances and technical equipment in order to maintain the health of our employees, customers and service providers. Encory GmbH pursues the following principles regarding to the health and safety policy:

- To offer our employees a safe and healthy working environment, including secure access and escape routes.
- Our health and safety policy possess the same status as our quality and environmental policy.
- We strictly adhere to the global observance of child labor protection regulations.
- Our employees and applicants are not discriminated because of their gender, language or skin color in our company
- Our duty is to comply with all relevant health and safety regulations and, where possible, applicable standards.
- We identify and monitor all physical, ergonomic and psychological risks. It is our declared goal that our employees and people who get into touch with the risks of our activities are exposed to them as little as possible. That is why we use safe technology and processes.
- Take precautions for the safe use, storage, handling and transportation of goods.
- No accidents or occupational diseases are our top priority!
- Appropriate and educate with instructions or trainings so that all employees ca implement our safety and health policy by their own.
- Company health management makes an important contribution to supporting the health and performance of our employees. For this reason, we offer targeted health programmes and preventive medical check-ups through our company doctor in order to prevent workplacerelated risks that can lead to illnesses.

6. Information security policy

The development, standardization and implementation of electronic data exchange as well as the operation of associated processes are an essential part of the processes. These and other tasks are supported and fulfilled by information and communication technology. Due to the high level of confidentiality of the information, importance of the security is high for Encory. The Encory GmbH pursues the following principles regarding to the information security policy:

- When processing data and information, we comply with the relevant legal, contractual and internal regulations at all time. This applies to personal and sensitive data and information.
- The protection of all information that we receive, generate, process, distribute, store and destroy as part of our business activities.
- Supporting managers in promoting the necessary structures and processes to comply with regulations and procedures in all areas.
- Creation of a data protection guideline which sets out the framework conditions for organizational and technical measures for data security. In addition, the appointment of a data protection officer.
- Retention of data, information and documents in accordance with legal requirements; in case of doubt at least 10 years.
- Creation of regulations when data and information are passed on to third parties so that the requirements of corporate policy are complied with comprehensively at all time.
- Further training of our employees regarding to data protection and information security.
- Creation and maintenance of a role-based authorization concept to ensure that employees only have access to data that they require in course of their work.

7. Human rights and employees

Encory GmbH explicitly supports and respects the fundamental human rights mentioned in the Universal Declaration of Human Rights of the United Nations. The company is aware of its responsibility and supports and respect these rights within the scope of its global business activities.

From Encory GmbH's point of view, there is a great connection between the competence of the employees and the results achieved by the company. Therefore, only qualified personnel should be deployed. To make sure that Encory is perceived as an attractive employer, the company undertakes to offer good working conditions and fair wages and to give its employees opportunities for personal development.

The company is aware of the importance of these factors and therefore wages and benefits are designed to meet or exceed national legislation or industry minimum standards. Employees receive all necessary information on the additional services offered by the company and on terms and conditions of employment in a transparent manner. General collective bargaining has no influence on the wages of our employees, as each contract is individually tailored to the needs of each one.

Furthermore, the company respects the right of all employees to form or join a labor union of their choice. This includes freedom of assembly and association. No employee may be subjected to reprisals for exercising these rights.

As an employer, Encory attaches great importance to equal rights, i.e. all employees should be treated fairly and equally. In concrete terms, this means not accepting any circumstances discrimination in recruitment, termination, training, promotion, dismissal or retirement on the grounds of ethnic or national origin, religion, gender, sexual orientation, marital status, disability or other legally protected distinguishing features. For this reason, decisions relating to employment are made solely based on facts relating to competence, experience, conduct or performance.