

Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH
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Deutschland

NCFSI Policy-Guideline for Suppliers

(non-conforming, counterfeit, fraudulent and suspect items)



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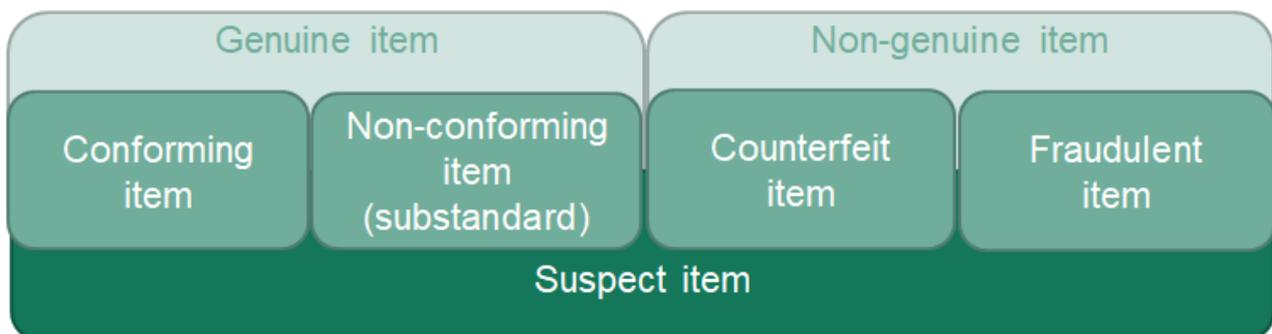
1. INTENDED USE

Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH including all its affiliated companies in relation to §15 AktG ("HOPPECKE") supplies battery systems for nuclear power plants and the systems industry (insurance companies, banks, hospitals, power stations, railway operations and many more). Products from our suppliers are processed in production at HOPPECKE or sold as commercial goods.

Non-conforming, counterfeit, fraudulent and suspect items ("NCFSI") are a product safety risk with a high potential for damage in the above-mentioned industries.

HOPPECKE's aim is to obtain from all suppliers only original products that conform to specifications, with permanently consistent quality, as well as meeting all the requirements over the specified life cycle of the product.

2. NCFSI DEFINITION



Genuine item: Products that are manufactured and certified without intent to deceive.

Non-genuine item: Products that are manufactured and certified with intent to deceive.

Suspect item: Products for which there is an indication or suspicion that they may not be genuine.

Non-conforming item: Products do not meet the requirements and have been manufactured by the supplier out of specification.

Counterfeit item: Products that are intentionally manufactured, refurbished, or altered to imitate genuine products.

Fraudulent item: Products that are falsely labelled or have counterfeit or inaccurate certification.

3. ERROR DETECTION AND DEVIATION MANAGEMENT

Every supplier has to implement processes that ensure early detection of errors and proper management as well as escalation of deviations. Any NCFSI case must be identified at an early stage. HOPPECKE expects from its suppliers that

- a.** the supplier has an internal control system that is used to monitor and detect errors early and quickly. This enables short-term sustainable reconciliation. Errors are visualized and resolved on site at the decentralized monitoring boards or escalated to the next monitoring level.
- b.** the supplier's system continuously measures product quality against established specifications using test plans. Product inspections and audits are conducted to verify the application of the relevant standard systems. The outgoing goods inspection checks the parts to be delivered against the defined specifications. Non-conforming material is immediately blocked to prevent the delivery of these products to the customers.
- c.** the supplier has a comprehensive qualification system that regularly trains the employees regarding working methods that meets the specifications. The supplier has identified a procedure to verify the effectiveness of qualification measures. The employee who has been trained on a sustained basis is able to recognize deviations against the specification.

4. RISK MITIGATION

The supplier will avoid any product safety risk and ensure sensitive working practices of the workforce that will escalate any NCFSI within a short time. HOPPECKE expects its suppliers to take the following measures:

Purchasing

- All contracts concluded with subcontractors shall contain terms and conditions prohibiting the supply of NCFSI, as well as provisions to ensure that subcontractors are aware of their responsibility to provide the correct products and the consequences of supplying NCFSI products.
- Contracts and purchase orders of suppliers with/to their subcontractors are available in the required languages and contain a clear specification to ensure that the subcontractors do not supply incorrect, used, overhauled, or repaired items. Furthermore, the supplier is obliged to deliver all items with the appropriate documentation and certificates.
- Suppliers are assessed to determine whether they meet the conditions for avoiding NCFSI cases from this policy. In addition, a review of suppliers' commercial information with credit rating agencies on their financial health and creditworthiness is conducted.
- Suppliers and subcontractors are sensitized to the importance of avoiding NCFSI.
- Raw materials are only purchased according to defined specifications from directly producing and licensed sub-suppliers or they are produced by the suppliers themselves.
- Suppliers must have the following certificates: DIN EN ISO 9001, DIN EN ISO 14001 and DIN EN ISO 45001.
- Outgoing goods from suppliers are checked by appropriate testing methods for compliance with NCFSI principles (non-compliant, counterfeit, fraudulent, and suspect items) and whether they are delivered in the condition and quantity as ordered.

Manufacturing and warehousing

The production and storage of goods and raw materials takes place in premises in which all materials are protected from access by unauthorized third parties and from environmental influences.

- Access to the manufacturing facility and warehouse is strictly controlled and only registered employees are allowed to enter and work in the premises.
- All materials and raw materials are produced in-house in approved processes and under strictly controlled conditions.
- Before the shipment of the products, which are to be delivered to HOPPECKE, the suppliers check the product quality and the existence of all required documents.

5. STAFF TRAINING AND AWARENESS RAISING

The supplier ensures that the workforce is qualified and competent. The qualification requirements are described in the qualification matrix and the trainings are carried out according to the agreement. The trainings serve to provide the supplier's employees with basic knowledge and to raise awareness of NCFSI as an important topic. See also point 3c.

6. NCFSI COMMUNICATION

In the case of an NCFSI incident, HOPPECKE will be notified immediately by the supplier. Furthermore, the affected supplier will no longer ship goods to HOPPECKE unless they have undergone an audit outlining how NCFSI became part of the supply chain and what steps they are taken to avoid it in future.

As long as it is not fully ensured that this incident will not occur in the future, this supplier will no longer supply HOPPECKE.

The content of the NCFSI guideline is to be anchored in the supplier's standards and trained at regular intervals. The implementation of the NCFSI guideline is the subject of supplier audits.

7. OMBUDSMANN

Critical NCFSI cases or other relevant information on NCFSI can be reported to the HOPPECKE Ombudsman:

Dr. Carsten Thiel von Herff

Telephone: +49 521 557 333 00

E-Mail: ombudsmann@thielvonherff.de

Homepage: www.report-tvh.com

We recommend installing an Ombudsman who can address confidential information at each supplier.

8. MEMBERSHIPS, CERTIFICATES, RATINGS

We recommend memberships or certifications such as:

Supply Chain and Customs: Authorized Economic Operator - AEO

Membership in the UN Global Compact (www.unglobalcompact.org)

Participation in the ecovadis CSR rating (www.ecovadis.com)