

# CODE OF CONDUCT

## FOR CORPORATE SOCIAL RESPONSIBILITY



*Dichtungen. Technische Teile.*

## TABLE OF CONTENTS

Preamble

1	Understanding of Social Responsibility in Corporate Management	2
2	Where the CoC applies	2
2.1	Supply Chain	2
3	Core Values for Social Responsibility in Corporate Management	2
3.1	Adherence to Laws	3
3.2	Integrity and Organizational Governance	3
3.3	Data protection	3
3.4	Export control	3
3.5	Consumer Interests	3
3.6	Communication	4
3.7	Human Rights	4
3.7.1	Privacy	4
3.7.2	Health and Safety	4
3.7.3	Harassment	4
3.7.4	Freedom of Conscience	4
3.8	Working Conditions	4
3.8.1	Child Labor	4
3.8.2	Forced Labor	4
3.8.3	Wage Compensation	4
3.8.4	Employee Rights	4
3.8.5	Prohibition of Discrimination	4
3.9	Hours of Work	5
3.10	Environmental Protection	5
3.11	Dealing with conflict materials	5
3.12	Civic Commitment	5
4.	Implementation and Application	5

# CODE OF CONDUCT

## FOR CORPORATE SOCIAL RESPONSIBILITY



*Dichtungen. Technische Teile.*

### PREAMBLE

Schlösser GmbH & Co. KG affirm their Corporate Social Responsibility as a part of their global business activities (internationally known as 'CSR<sup>1</sup>'). This Code of Conduct for Corporate Social Responsibility' (hereinafter called 'CoC') acts as a guideline in the industry, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust.

### 1. UNDERSTANDING OF SOCIAL RESPONSIBILITY IN CORPORATE MANAGEMENT

A mutual, basic understanding of social responsibility in corporate management forms is the basis of this CoC. This means to us we assume responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests.

We voluntarily contribute to the wellbeing and long-term development of a global society at every point it can at the locations where it is in business. We are geared towards universally held ethical values and principals, especially integrity, honesty and respect of human dignity.

### 2. WHERE THE COC APPLIES

This CoC applies to the entire Schlösser GmbH & Co. KG.

#### 2.1 SUPPLY CHAIN

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains. We reserve the right to check the application of this Code of Conduct at our suppliers systematically and occasion-related. This can take the form of questionnaires, assessments or audits.

### 3. CORE VALUES FOR SOCIAL RESPONSIBILITY IN CORPORATE MANAGEMENT

We will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.

<sup>1</sup> CSR = Corporate Social Responsibility

### **3.1 ADHERENCE TO LAWS**

We comply with the applicable laws and regulations of the countries in which we operate. For countries with weak institutional frameworks, we carefully consider what good corporate practice from our own home country should be applied in support of responsible corporate governance. This includes proper accounting and financial reporting, as well as compliance with legal obligations to combat money laundering and terrorist financing. Ensuring that transactions and activities do not violate export and sanctions laws.

### **3.2 INTEGRITY AND ORGANIZATIONAL GOVERNANCE**

- 3.2.1 We gear our activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.
- 3.2.2 We reject corruption and bribery as stated in the relevant UN Convention<sup>2</sup>. We use suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.
- 3.2.3 We pursue clean and recognized business practices and fair competition, fair competition and protect intellectual property. In competition, we are guided by professional conduct and quality work. We maintain a cooperative and trustful relationship with the regulatory authorities.

### **3.3 DATA PROTECTION**

We process, store and protect personal data in compliance with the legal regulations. Personal data are collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We only process personal data if they are protected against loss, modification and unauthorized use or disclosure by appropriate technical and organizational measures.

### **3.4 EXPORT CONTROL**

We commit to comply with the relevant legal standards for export control - in particular licensing requirements, export- and support prohibitions - in the context of the transfer and export of our goods.

### **3.5 CONSUMER INTERESTS**

To the extent consumer interests are affected, we abide by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

<sup>2</sup> UN Convention against corruption in 2003, in force since 2005

## 3.6 COMMUNICATION

We will communicate in an open way and oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly hanged or destroyed. They will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

## 3.7 HUMAN RIGHTS

We are committed to promote human rights. We respect human rights stated in the Charter of the United Nations<sup>3</sup>, especially those named in the following:

- 3.7.1 *Privacy*  
Protection of privacy.
- 3.7.2 *Health and Safety*  
Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.
- 3.7.3 *Harassment*  
Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.
- 3.7.4 *Freedom of Conscience*  
Protection and guarantee of the right to freedom of conscience and freedom of expression.

## 3.8 WORKING CONDITIONS

We abide by the following core work standards from ILO<sup>4</sup>:

- 3.8.1 *Child Labor*  
The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted<sup>5</sup>.
- 3.8.2 *Forced Labor*  
The prohibition of forced labor of any kind<sup>6</sup>.
- 3.8.3 *Wage Compensation*  
Work standards concerning compensation, especially in regards to the level of compensation as stated in the laws and requirements that are in force<sup>7</sup>.
- 3.8.4 *Employee Rights*  
Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country<sup>8</sup>.
- 3.8.5 *Prohibition of Discrimination*  
Treatment of all employees in a non-discriminatory fashion<sup>9</sup>.

<sup>3</sup> General explanation of human rights, UN Resolution 217 A (III) from 1948

<sup>4</sup> ILO = International Labour Organization

<sup>5</sup> ILO-Konvention No. 138 from 1973 and ILO Convention No. 182 from 1999

<sup>6</sup> ILO-Konvention No. 29 from 1930 and ILO Convention No. 105 from 1957

<sup>7</sup> ILO-Konvention No. 100 from 1951

<sup>8</sup> ILO-Konvention No. 87 from 1948 and ILO Convention No. 98 from 1949

<sup>9</sup> ILO-Konvention No. 111 from 1958

### 3.9 HOURS OF WORK

We abide by work standards concerning the longest permitted time of work.

### 3.10 ENVIRONMENTAL PROTECTION

We fulfill the requirements and the standards for environmental protection that affect our operations and act in an environmentally conscious way at all locations where we are in operation. For additional responsibility with natural resources, we hold to the principles from the Rio Declaration<sup>10</sup>. We work actively to prevent waste and emissions to air, water and soil, as well as sustainable energy management.

### 3.11 DEALING WITH CONFLICT MATERIALS

We take due diligence measures to avoid the use of conflict minerals in our products to prevent human rights violations, corruption and funding of armed groups or similar.

### 3.12 CIVIC COMMITMENT

We contribute to the social and economic development of the countries and regions where we are in business and promotes appropriate, volunteer activities by our employees.

## 4. IMPLEMENTATION AND APPLICATION

We will make every appropriate and reasonable efforts to implement and to apply the principles and values described in this CoC both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No right exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

If, despite of all our precautions, irregularities or risks should nevertheless arise, our employees or other informants can contact our whistleblower office anonymously or not anonymously via various channels. The whistleblowing commissioner initiates appropriate measures in accordance with EU Directive 2019/1937.

Mengen, 24.08.2022



Reinhard Adams  
Geschäftsführung

<sup>10</sup> The 27 principles from the “Rio Declaration on Environment and Development“ from 1992 as the result from the UN Conference on Environment and Development in Rio de Janeiro