

Code of Conduct



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1. Foreword

Both as a company and an employer **CONTA-CLIP** is fully aware of its responsibility towards our environment, customers, partners and employees:

With this Code of Conduct we wish to communicate the standards and values that guide our business practices and exemplary company conduct. This code provides us with a framework to operate within and helps us to accept and fulfil our responsibility. The Code of Conduct is a guide and adviser for our daily work.

The standards and values are not new; however, for companies operating on an international scale it is becoming increasingly important to make these practices and principles accessible to everyone at all times by documenting in black and white how we conduct ourselves all over the world.

We have kept the rules of conduct general in nature; however, it is not possible to draw up rules of conduct to cover every conceivable situation. It is envisaged that the core elements of individual and company responsibility will provide all employees with a clear understanding of the valid principles and ethical values that apply at **CONTA-CLIP**.

As well as the Code of Conduct **CONTA-CLIP** is committed to upholding recognized and valid moral concepts anchored in free democracies. In carrying out our business activities we are particularly committed to uphold the following international standards and guidelines:

- The Universal Declaration of Human Rights of the United Nations (UN)
- The Convention of the United Nations (UN) on the Rights of the Child
- The guidelines of the Organisation for Economic Cooperation and Development
- The eight fundamental principles of the „Declaration on Fundamental Principles and Rights at Work“ of the International Labour Organization (ILO)

2. Our Rules of Conduct

2.1. Fair working conditions

The business success of **CONTA-CLIP** depends to a high degree on its employees. For that reason the company is committed to upholding the principles of social responsibility.

CONTA-CLIP sees it as its duty to treat its employees all over the world with respect and honour the principles of social justice. This includes observing human rights, fundamental social standards and maintaining applicable working standards and labour laws with regard to remuneration, working time and employee rights in general.

2.2 Fair behaviour towards business partners

Our business partners (customers, sales partners and suppliers) are at the centre of our activities. The relationship with our business partners should be characterized by lasting and mutual respect. Our business partners expect sincerity in our behaviour, courtesy in our manner, respect and fairness. That includes taking and communicating decisions in a transparent and understandable manner.

2.3 Anti-Discrimination

All employees are entitled to be treated by their superiors and colleagues fairly, politely and with respect. No person at **CONTA-CLIP** shall be discriminated against, favoured, victimized or excluded on the grounds of race, ethnical background, gender, religion or creed, disability, age, looks, sexual orientation or any other personal characteristics. We are committed to protecting the personal dignity and privacy of our employees. All employees are entitled to be protected against discrimination and victimization. Superiors or staff in the human resources department must be informed immediately if a conflict arises.

2.4 Child labour ban

CONTA-CLIP abides by the provisions of the conventions of the ILO and the United Nations (UN) and/or the national laws that forbid child labour. Of the different standards the one seeking to impose the strictest requirements must be applied. It is forbidden to exploit children under all circumstances. It is forbidden to maintain working conditions similar to those of slavery or can damage the health and safety of children. The rights of young working persons must be protected.

2.5 Fair competition

We wish to build and maintain long-term business relationships with our customers and partners based on trust and mutual respect. The regulations anchored in a free market economy designed to protect fair competition represent an indispensable element of this objective. In the laws passed by almost all countries the primary objective is to seek to enforce a ban on collusion between competitors to fix prices, agree sales regions, customer groups and production amounts, prevent forbidden resale price maintenance agreements between sales partners, prevent any abuse of a dominant market position, exercise control over company mergers and prevent the creation of market dominating positions. Prohibited agreements between market participants with the aim of restricting competition are particularly relevant in practically all legal circles.

Forbidden are informal discussions, off the record gentlemen agreements or agreed behaviour if their purpose is to arrange or implement measures restricting competition. Even giving the slightest appearance of any such agreement must be avoided. Also forbidden are vertical agreements between non competitors, for example between supplier and customer that aim to restrict competition with third parties by setting prices and business terms and conditions.

2.6 Corruption ban

CONTA-CLIP will not tolerate any form of corruption or granting of an undue advantage. No employee is entitled in conjunction with his business activities to receive, demand, offer or grant a personal advantage that could even give rise to the impression of exerting undue influence. That applies in particular during the preparation, awarding or fulfilment of a contract. Gifts and invitations must not be given, spoken or accepted without prior authorization by a superior. Exceptions apply only to generally acceptable occasional or promotional gifts as well as gifts that conform to the customs and traditions of a country. The same applies to invitations. If any doubts arise the matter must be discussed with a superior. If an employee is confronted with such an offer or demand he must report the matter immediately to his superior.

2.7 Protection and backup of documentation / corporate property and business secrets

Employees are obliged to safeguard their working equipment as much as possible and document the results of their work as comprehensibly as possible. This includes protecting documentation and data against unauthorized access. Desks, cupboards and offices must be kept locked as far as this is possible. IT installations must be protected with passwords, which must be changed on a regular basis. Documentation may be copied for official business purposes only. Notes and files must be kept complete, unambiguous and understandable to ensure the author can be properly represented.

Furthermore, it must be ensured that: Any transactions concerning accounting and financial statements are completely and correctly documented and posted, accounting records and associated documents accurately reflect all business transactions and show the company assets. Property belonging to **CONTA-CLIP** must be used purely for business purposes only and protected by all employees against loss, theft and damage. Business secrets and other sensitive information must be treated in confidence and safeguarded to prevent access by unauthorized third parties. They must be used for business purposes only.

2.8 Environmental protection

An environmentally conscious behaviour is a corporate obligation; however, it is above all an important precondition for protecting natural resources and guaranteeing our long term survival. Not only our products but also our activities across the entire value creation chain are ecologically sustainable; this is evident from the selection of our materials and the use of energy within our company. We endeavour to minimize the use of natural resources and the resulting negative impact on our environment. We achieve this by continuously re-examining everything we do and all processes, and by putting into practice recognized potentials for improvement. The environmental awareness of our employees is challenged and supported; we take up this challenge every day. We ensure that the respective, applicable legal environmental protection guidelines, laws and agreements are adhered to under all circumstances.

2.9 Health and safety

Responsible behaviour means avoiding dangers as well as being in control of dangerous processes and activities. All employees share an equal responsibility for occupational health and safety in their working environment. All employees are obliged to strictly adhere to all regulations covering occupational health and safety. This includes using available safety equipment. All employees receive thorough training and instruction in occupational health and safety. Each employee is charged with keeping his workplace clean and tidy to make his contribution towards a high standard of cleanliness throughout the entire company. Each employee is charged with ensuring that care and attention is not allowed to diminish with increasing routine.

2.10 Data protection

CONTA-CLIP receives a considerable amount of personal data and secret information when carrying out its corporate activities. **CONTA-CLIP** is committed to treating this data and information in accordance with all applicable data protection laws of the respective legal systems and places the highest possible demands on data protection.

3. Validity of the Code of Conduct

The Code of Conduct is binding for all employees of the **CONTA-CLIP** group. All employees of the company are obliged to act in accordance with these binding guidelines. Third-party companies working on behalf of **CONTA-CLIP** are also encouraged to adhere to these guidelines. Senior management fulfil an exemplary function. They are charged with ensuring and monitoring adherence to these guidelines. It is the responsibility of all members of senior management to ensure that all employees working within their sphere of responsibility understand and adhere to the guiding principles and guidelines. Regular discussions should be held to maintain and raise awareness. As a great deal of importance is attached to the adherence to these guidelines each and every employee is entitled and required to report all violations against these guidelines to his superior or the human resources department immediately. Nobody must fear any disadvantages as a consequence.





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