

# **Code of Conduct**

## **Gubesch-Group**

Gubesch GmbH  
Wilhelmsdorf  
Bergstraße 31

Gubesch Engineering and Production GmbH  
Emskirchen  
Bahnhofswald 2

Gubesch Prototypes and Tools GmbH  
Wilhelmsdorf  
Bergstraße 34

Gubesch Thermoforming GmbH  
Wilhelmsdorf  
Industriestraße 1

Gubesch ROM s.r.l.  
Strada Industriei 10  
420160 Bistrita  
Rumänien

## Preamble

The member companies are committed to their social responsibility within the framework of their entrepreneurial activity (Corporate Social Responsibility). The present Gubesch code of conduct is a voluntary agreement, through which member companies wish to guarantee particularly the observance of global demands on ethical and moral actions as well as the standards of proper conduct in the areas of competition and antitrust law (compliance). This also means promoting fair and sustainable standards dealing with suppliers and customers as well as own company personnel.

The companies recognizing the code of conduct regularly inform company members on the ethical goals and behavior principles of this code of conduct. Moreover, they aim for suppliers to also accept the guidelines.

## I. General regulations

### 1. Validity

This code of conduct is valid for all branches and production sites of the company.

### 2. Laws, standards and ethical behavior

The company adheres to the valid laws and standards of the respective countries it is active in. It takes guidance from the general ethic values and principles, especially integrity, righteousness as well as human dignity.

### 3. Business partners, authorities and consumers

The company practices according to the generally recognized business practices of fairness and honesty. It deals truthfully with authorities. Standards protecting consumers are adhered to.

### 4. Trade secrets

Trade secrets of business partners will be treated strictly confidentially by companies and their members. Passing on confidential information to third parties or making this information publicly available is forbidden. This continues to be the case for company members even after the employment has been terminated.

### **5. Data privacy**

The company protects the personal data of employees, former employees, customers, suppliers and other affected parties. The company collects, records, processes, uses and stores personal data strictly in accordance with legal provisions.

### **6. Export and Import Regulations**

The company will comply with all applicable import and export control laws.

### **7. Conflict of Interest**

Employees are expected to act in the best interest of the company. The company and its employees will avoid any activity or situation which may lead to a conflict of private interest of an employee and the business interest of the company.

### **8. Financial responsibility / Accounting and Disclosure of Information**

Information on the company's business activities, structure, financial situation and performance are reported and disclosed in accordance with the applicable provisions.

### **9. Intellectual Property**

Intellectual property rights are respected; transfer of technology and know-how will be done in a manner that protects intellectual property rights. The company is engaged to prevent counterfeited parts entering the supply chain

## **II. Antitrust and competition law guidelines**

### **1. Antitrust law**

The company is committed to a fair competition. Laws protecting fair competition, particularly antitrust law and other competition regulating laws, are adhered to. Collusion on prices or other conditions, sales areas or customers as well a misuse of market power contradict the principles of the company.

### **2. Bribery, bribability and corruption**

The company opposes bribery, corruption and extortion and does not tolerate such behavior. The employees are to take care not to create personal dependencies or obligations towards customers or suppliers. In particular, employees are not allowed to accept or make gifts which, under reasonable

contemplation, could influence business decisions. In case gifts are part of a country's custom, it is important to note that no binding dependencies are created and local legal standards are adhered to. Contravention will routinely have legal consequences.

### **III. Global guidelines**

#### **1. Human Rights**

Internationally recognized human rights<sup>1</sup> are supported explicitly and consistently. Equally, in the case of disciplinary measures, all company personnel are to be treated with dignity and respect. Such measures must only take place in accordance with the current national and international standards and internationally recognized human rights.<sup>1</sup>

#### **2. Child Labor**

Child labor and any kind of exploitation of children and adolescents is rejected. The corresponding laws are adhered to.

#### **3. Forced labor**

Any kind of forced labor, debt bondage, slave work or slavery or similar situations are rejected. Company members must not be forced to work through means of violence or intimidation, neither directly nor indirectly.<sup>2</sup>

#### **4. Wages**

All employees in full time employment shall receive a fair salary covering at least their basic needs. The wages are to be paid in a practical way (cash, cheque, bank transfer) and payroll accounting has to be made available to a reasonable extent.<sup>3</sup> The right of employees to freedom of association, freedom of assembly and collective bargaining in as far as this is legally admissible and possible in the respective country, shall be respected.<sup>4</sup>

#### **5. Working hours**

Working hours correspond to valid national laws, industry standards or relevant ILO conventions. Extra work has to be done on a voluntarily basis.<sup>5</sup>

## 6. Health and employment protection

The national and international regulations for securing health and safety at work are adhered to. Relevant systems to avoid risks for health and safety are to be set up.<sup>6</sup>

## 7. Environmental protection

The company adheres to the goals of sustainable environmental protection. Environmentally friendly production methods are aimed for in this context. In accordance with the principles of the Rio Declaration on Environment and Development of the United Nations<sup>7</sup>, the company deals responsibly with natural resources.

# IV. Ethical and social principles

## 1. Non-discrimination

The company opposes discrimination on employment or occupation, in particular a discrimination because of race, ethnic or national origins, colour of skin, gender, or mental and physical disability, age, creed, membership of a trade union or any other personal traits.<sup>8</sup>

## 2. Molestation

The company disapproves of physical, psychological or sexual violence.

## 3. Freedom of opinion

The right to freedom of opinion and free expression of opinion is warranted.

## 4. Privacy

Privacy is respected.

# V. Report of breaches

Members of company are obliged to inform the legal department of any breaches. Contact: e-mail [compliance@gubesch.de](mailto:compliance@gubesch.de). External partners of Gubesch companies (especially customers and suppliers) may also report alleged breaches to this contact. The company will not permit retaliation of any kind in regard to a Person reporting any breaches against this Code of Conduct in good faith.

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- 1 General Declaration of Human Rights – UN-Doc. 217, UN Human Rights Charter.
  - 2 See. ILO Conventions 29 and 105
  - 3 See. ILO Conventions 26 and 131
  - 4 See ILO Convention 87 of 1948 and 98 of 1949
  - 5 See ILO Conventions 1 and 14
  - 6 See ILO Convention 155
  - 7 27 principles of the Rio Declaration on Environment and Development, decided upon by the United Nations Conference on Environment and Development (UNCED), Rio de Janeiro, 1992
  - 8 See ILO Conventions 100, 111, 158 and 159