



# CODE OF CONDUCT

## KONZELMANN GMBH

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# I. PHILOSOPHY

The Konzelmann GmbH Quality Policy is enshrined in the following binding principles. The Policy applies to the whole company and thus to all employees.

## **Guiding Principle No. 1**

Our aim is to have highly satisfied customers. The high quality of our products and service is therefore a top-priority company goal. The customer sets the standard for our quality. Our customers' opinion about our products and services is what matters the most.

## **Guiding Principle No. 2**

Our quality objective is "zero errors" and "100% correct". This not only improves quality, but also lowers the costs. Quality increases the safety of our customers' products. It is a crucial to profitability and safeguards our competitiveness and thus our jobs.

## **Guiding Principle No. 3**

Every employee of the company helps us to realize our quality objectives. It is therefore the duty of every employee, from apprentice to managing director, to deliver the best work he or she can. Anyone who recognizes a quality risk and cannot eliminate it within their scope of responsibility is obliged to inform their superior immediately.

## **Guiding Principle No. 4**

Only by constant measurement of our process results are we able to monitor and continuously improve our process quality. To achieve this, the management regularly gathers and evaluates information. The results help to continuously improve the efficacy of our QM system.

## **Guiding Principle No. 5**

Both the defects and their causes must be eliminated. Defect prevention has priority over correction of defects.

## **Guiding Principle No. 6**

Realizing our quality objectives is an important management duty. The opinion and satisfaction of our employees is therefore essential. Only satisfied employees are able to achieve the required level of quality.



### **Guiding Principle No. 7**

The quality of our products also depends on the quality of our purchased parts. Therefore, you should always demand the highest quality from our suppliers and support them in pursuing our shared quality objectives.

### **Guiding Principle No. 8**

The Konzelmann Quality Policy – as well as that of the entire QM system – is constantly checked for efficacy and suitability and improved in line with regular internal audits. In order to ensure that quality and process objectives are met, employees are trained with regard to customer-specific product requirements and safety aspects. This must be documented.

### **Guiding Principle No. 9**

To help conserve the environment, Konzelmann strives to reduce energy consumption and increase energy efficiency, as well as utilize renewable energy supplies. Our employees are important partners to achieve these goals. They are trained and instructed about the impact of their activities on the environment. We provide our employees with comprehensive information about the environment to encourage them to act in an ecologically responsible way.

We thank you for your compliance and continuous development.



## II. GENERAL RULES

### Scope

This Code of Conduct brings together in one document the basic rules and principles that are important to us. It applies to the entire company, and equally to management, executives and each individual employee.

### Compliance with the law and ethical conduct

We comply with the applicable laws and regulations of the respective countries in which we operate. Safety and legality of our actions, our products and our processes are always a prerequisite and non-negotiable. In our daily actions, we are guided by universally accepted ethical values and principles, in particular integrity, righteousness and human dignity.

### Trade secrets and confidential information

We treat business secrets as confidential and take the necessary steps to protect confidential information of our employees and business partners from access and insight by non-involved colleagues and other third parties in an appropriate manner.

## III. GLOBAL GUIDELINES

Our company is guided by the United Nations Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO). Therefore, the following principles apply in particular:

### Basic rule

At all times, all company employees and business partners are to be treated with dignity and respect. Our daily activities as a globally operating business enterprise are always carried out in accordance with the applicable national and international standards and in compliance with internationally recognized human rights<sup>1</sup>.



## **Child labor**

We reject child labor and any kind of exploitation of children and young people and in this respect strictly comply with the relevant laws.

## **Forced labor**

We reject any form of forced labor and conditions similar to it. Company employees may not be forced into employment, directly or indirectly, by force or intimidation <sup>2</sup>.

## **Appropriate compensation**

All employees should receive a fair wage for full-time employment that is at least sufficient to meet basic needs. Pay shall be disbursed in a practical manner as well as a pay stub shall be made available to a reasonable extent <sup>3</sup>.

## **Working time**

Working hours comply with applicable national law, industry standard or relevant ILO conventions <sup>4</sup>.

## **Employment of disabled people**

Konzelmann complies with all national legal regulations concerning the employment of disabled people and is committed to participating in measures to promote their employment.

## **Health and occupational safety**

The national and international regulations for ensuring health and safety at work are complied with. Appropriate systems are in place to avoid risks to health and safety <sup>5</sup>.

<sup>1</sup> Universal Declaration of Human Rights – UN Doc. 217, so-called UN Human Rights Charter

<sup>2</sup> See ILO Conventions 29 and 105

<sup>3</sup> See ILO Conventions 26 and 131

<sup>4</sup> See ILO Conventions 1 and 14

<sup>5</sup> See ILO Conventions 155



## VI. ETHICAL AND SOCIAL PRINCIPLES

A culture of equal opportunity, mutual trust and mutual respect is of great importance to us. Therefore, we pay particular attention to compliance with the following principles:

### **Non-discrimination**

We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or world view. We promote equal opportunities and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and development measures.

### **Harassment and bullying**

No employee will be subjected to corporal punishment or other physical, sexual, psychological or verbal harassment or abuse in the company. Every employee has the right, if he or she feels disadvantaged, treated unfairly or otherwise adversely affected by actions of the company or other employees, to appeal verbally or in writing to his or her supervisor, Human Resources, management or another trusted person. A corresponding complaint can also be submitted anonymously, via the complaint mailbox in the company (placed at the personnel entrance 1 / information board) or on the Internet via the company's homepage [www.konzelmann.com](http://www.konzelmann.com) under the Contact section.

### **Freedom of expression**

Mutual trust and cooperative interaction are based on an open and constructive dialog characterized by mutual respect. Therefore, the right to freedom of opinion and expression is guaranteed.

### **Privacy**

The right to privacy shall be respected.



## **V. SUSTAINABLE ENVIRONMENTAL AND CLIMATE PROTECTION**

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. Both in the development of new products and in the operation of production facilities, we take care to ensure that any resulting impact on the environment and climate is kept to a minimum and that our products make a positive contribution to environmental and climate protection. Each employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through his or her individual behavior.

## **VI. ANTITRUST AND COMPETITION LAW**

We are committed to fair competition. In doing so, we comply with the applicable antitrust and competition laws. Improper agreements on prices or other conditions, sales territories or customers as well as an abuse of market power are contrary to our principles. Every employee is called upon to actively participate in the observance and implementation of fair and lawful competition in his or her area of responsibility. Cases of bribery and corruption will not be tolerated. Managing directors, managers and all employees must ensure that no personal dependencies or obligations to customers or suppliers arise. For example, company employees may not accept or make gifts that could reasonably be expected to influence business decisions. Where gifts are customary and courteous in a country, care must be taken to ensure that they do not give rise to any relationships of dependency and obligation and that they comply with national law. Violations of these requirements will not be tolerated and, if necessary, will be punished with measures under labor law.



## VII. COMPLIANCE WITH THE CODE OF CONDUCT

Management and executives have a special role model function and are particularly measured against the Code of Conduct in their actions. They are the first point of contact for questions on understanding the regulations and ensure that all employees know and understand the Code of Conduct. As part of their management duties, they prevent unacceptable behavior or take appropriate measures to prevent violations of rules in their area of responsibility. Violations will be punished consistently and uniformly. Every employee working at Konzelmann as well as every customer, supplier, service provider or external stakeholder has the right to draw attention to possible violations of this Code of Conduct and can use the following channels for this purpose: a) by email to [beschwerde@konzelmann.com](mailto:beschwerde@konzelmann.com) b) via the company's homepage [www.konzelmann.com](http://www.konzelmann.com) under the Contact - Complaints Management section c) in writing (also anonymously) by mail or via the internal complaint mailbox. This Code of Conduct is reviewed for currency on a regular basis and updated if necessary.

