

Code of Conduct

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Springfix Befestigungstechnik GmbH

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Code of Conduct

Preamble

Springfix has been an innovative technology partner to industry for over 50 years. Through innovation and the highest quality standards, we work with our clients to give them the critical advantage.

We espouse ecological and socially responsible corporate governance. We require our employees to comply with the principles of ecological, social and ethical conduct and incorporate these principles in corporate culture. The following Code of Conduct is a commitment by Springfix in dealing with all our company's employees, customers and suppliers and, at the same time, provides guidance internally and externally in dealing with our organisation.

The Code of Conduct is binding for all employees, including the executive management, of Springfix Befestigungstechnik GmbH and the companies affiliated with it.

Requirements

1. Social responsibility

1.1. No forced labour or child labour

Forced labour, slave labour or comparable labour is forbidden. Work must be voluntary, and employees must be able to terminate the employment relationship at any time. Workers may not be treated in an unacceptable manner. No physical hardship, sexual or personal harassment may take place. Child labour may not be used in any phase of production. The ILO Convention on the minimum age for the employment of children shall apply mutatis mutandis. Accordingly, they may not be younger than the age at which compulsory education ends and, in any case, not less than 15 years old.

1.2. Fair pay

The remuneration paid to workers must comply with all applicable laws governing pay, which include laws on minimum pay or overtime, in particular. If the statutory minimum wage is not sufficient to cover the cost of living, we undertake to pay remuneration that covers the basic needs. Deductions from wages as punishment are not permitted. The principle of being paid according to one's labour shall be intimated to the employees continually through a wage slip.

1.3. Freedom of association

We shall respect the right to freedom of association, to join trade unions, to appeal to the workers' representative body and to membership of Works Councils in accordance with the laws applicable locally. It must be possible for workers to communicate with the company's management openly and without fear of reprisals or harassment.

1.4. Non-discrimination principle

Any form of discrimination against employees will not be tolerated. This applies, for instance, to discrimination based on gender, race, caste, skin colour, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. Each individual's personal dignity, privacy and personal rights will be respected.

1.5. Health protection and safety at work

By developing and applying appropriate occupational safety systems, the necessary precautionary measures against accidents and damage to health that may occur in connection with work are taken. Employees shall also be informed of and receive training in applicable health protection and safety standards on a regular basis. Employees shall have access at all times to sufficient quantities of drinking water and access to clean sanitary facilities.

1.6. Dealing with conflict minerals

We shall observe the Due Diligence Guidance of the Organisation for Economic Cooperation and Development (OECD) for the conflict materials tin, tungsten, tantalum and gold as well as for other commodities such as cobalt. Smelting and refining will be avoided without appropriate, audited due diligence processes.

2. Ecological responsibility

2.1. Treatment and discharge of industrial waste water

Waste water from operational processes, production processes and sanitary facilities must be typed, monitored, reviewed and, if necessary, treated before being discharged or disposed of. Measures should also be introduced to reduce the generation of waste water.

2.2. Dealing with air emissions

General emissions from operational processes (air and noise emissions) as well as greenhouse gases must be typed, monitored routinely, reviewed and, if necessary, treated before being released. Waste gas purification systems must be monitored, and cost-effective solutions must be found to minimise any emissions.

2.3. Dealing with waste and hazardous materials

Solid waste is to be identified, reduced and disposed of responsibly or recycled. Chemicals or other materials, which pose a risk when released into the environment, must be identified and handled in such a way that when dealing with these materials, transporting them, storing them, using them, recycling or reusing them and when disposing of them, safety is guaranteed.

2.4. Reducing consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, are to be reduced or avoided. Either this will take place at the place where it is generated or through processes and measures, such as through amending production and maintenance processes or operations in the company, through using alternative materials, through savings, through recycling or by means of reusing materials.

2.5. Energy consumption

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimise energy consumption.

3. Ethical business conduct

3.1. Fair competition

The standards of fair business activity, fair advertising and fair competition must be complied with. The applicable antitrust laws, which forbid, in particular, agreements and other activities, which influence prices or terms when dealing with competitors, must also be applied. These regulations also forbid agreements between customers and suppliers by which customers are to be restricted in their freedom to determine their prices and other conditions autonomously when reselling items.

3.2. Confidentiality

We undertake to protect private information. In recording, storing, processing, transmitting and passing on personal information, the laws on data protection and information security and the official regulations must be observed.

3.3. Intellectual property

Intellectual property rights must be respected. Technology and expertise must be transferred in such a way that intellectual property rights and customer information are protected at all times.

3.4. Integrity/bribery, enrichment

All business activities must be based on the highest standards of integrity. No forms of bribery, corruption, extortion and embezzlement are to be tolerated.

4. Whistleblower-System

We shall not tolerate any infringements of this Code. Regardless of the position of the person, infringements shall lead to measures under employment law and disciplinary measures.

All employees are encouraged to promptly report any observed conduct that they believe violates laws, regulations or other legal regulations or this Code of Conduct.

The information can be made

by e-mail to compliance@springfix.de

or

by the anonymous contact form at www.springfix.de

In addition, it is also possible to give notification anonymously or non-anonymously to the company mailbox. Please indicate the term "Compliance" on the envelope.

Please always provide specific information to your note, so that it can be followed by non-specialist persons. The notification are treated confidentially.

Each employee must be responsible for compliance with the principles of conduct. It is only by working together that we can achieve an ethical, integrity-based corporate culture supported by all employees.

Salach, July 2018