



ZOLLERN

Solid metals. Fine solutions.

Supplier Code of Conduct

February 2019



Table of contents

1	Preamble.....	3
2	Laws and Regulations	3
3	Principles for business activities	3
4	Principles in the workplace	4
5	Principles for handling information	5
6	Principles of social responsibility	5
7	Compliance with the supplier code of conduct.....	6

1 Preamble

With a history stretching back over 300 years, ZOLLERN has evolved into an internationally recognised and successful company. The key to top performance, profitable growth and success is ultimately based on our corporate structure. Reputation and integrity – how we are perceived and how we conduct ourselves – those are the key components of our success. This also applies to our dealings with our business partners, whom we also treat fairly and correctly and from whom we also expect to act with integrity.

This supplier code of conduct describes the requirements and principles for cooperation with ZOLLERN suppliers. ZOLLERN expects its suppliers to conduct their activities in accordance with the law and the principles of this supplier code of conduct. The supplier shall work to ensure that its suppliers and subcontractors also comply with the principles of this supplier code of conduct or comparable principles.

ZOLLERN reserves the right to make appropriate or necessary adjustments. In such cases, ZOLLERN expects its suppliers to accept and comply with such changes.

2 Laws and Regulations

Compliance with laws and regulations has top priority at ZOLLERN. The supplier is obliged to observe all applicable laws, rules and regulations in the countries in which he operates.

3 Principles for business activities

3.1 Corruption

Corruption is forbidden by international conventions and national laws. The supplier shall refrain from all forms of corrupt behaviour and also avoid even the slightest hint of such conduct. Contributions that may compromise our ability to make objective and fair business decisions within the business relationship with ZOLLERN shall not be offered, requested or accepted, neither directly nor through third parties.

3.2 Cartel and Competition Law

The supplier is committed to the principles of the market economy and fair competition without restriction. The supplier shall comply with applicable laws that protect and promote competition. These include in particular the cartel and commercial laws and the corresponding laws on price-fixing, competition law and consumer protection.

3.3 Customs and foreign trade legislation

The supplier shall observe all relevant export control and customs regulations. These include national and international trade control legislation as well as country-specific embargoes.

3.4 Intellectual property

The applicable regulations for the protection of intellectual property are respected and complied with. This includes patents, copyrights and trademarks.

3.5 Money laundering

The supplier shall comply with the applicable laws for the prevention of money laundering and shall take all necessary measures to prevent money laundering.

3.6 Conflicts of interest

ZOLLERN expects that the supplier's employees do not base their business decisions on private interests or personal considerations. Decisions should be made transparently and based on relevant considerations.

4 Principles in the workplace

4.1 Fair working conditions

The supplier must observe the applicable wage and working hours regulations. This includes in particular the regulations on minimum wages and overtime. The supplier shall respect the applicable law on the freedom of its employees to form a coalition.

4.2 Discrimination

The supplier shall promote a working environment free from discrimination and harassment. Discrimination based on belonging to a particular group or minority is countered.

4.3 Occupational Safety and Health Protection

The supplier shall protect the health and safety of its employees. Any risks are minimised by appropriate precautionary measures. ZOLLERN expects the supplier to establish and apply an appropriate occupational safety management system.

5 Principles for handling information

5.1 Information Security

ZOLLERN expects the supplier to adequately protect confidential information. All business information of ZOLLERN, its customers or suppliers that is not publicly known is regarded as confidential information.

5.2 Data Protection

The supplier shall observe the applicable laws when it comes to handling personal data.

5.3 Trade secrets

All confidential information transmitted by ZOLLERN to the supplier must be kept secret at all times and not used for purposes other than the original business purpose.

6 Principles of social responsibility

6.1 Environmental protection

The supplier shall promote environmental protection and the responsible use of natural resources. The supplier shall comply with all applicable environmental laws and regulations.

6.2 Human rights

The supplier respects and supports compliance with internationally recognised human rights. It shall ensure that the provision of services is not based on illegal child labour, forced labour or trafficking in human beings.

6.3 Conflict minerals

The supplier is aware of the legal regulations on conflict minerals and ensures that they are complied with. It shall take appropriate precautions to avoid the procurement and use of raw materials obtained illegally or unethically.

7 Compliance with the supplier code of conduct

The supplier undertakes to comply with the principles of this supplier code of conduct. The supplier shall inform its employees about its contents and the resulting obligations.

Stricter provisions than those contained in this supplier code of conduct may apply in individual countries, divisions or markets. In such cases, the stricter provisions shall apply without exception.

In the event of deviations from the supplier code of conduct, ZOLLERN reserves the right to review the business relationship with the supplier and to draw appropriate conclusions. This can lead to an immediate termination of the business relationship and the assertion of claims for damages.

ZOLLERN also reserves the right to carry out an on-site inspection during business hours agreed in advance if there are justified grounds for doing so (e.g. if fines/punishment proceedings are initiated against the supplier). The supplier must provide information on the relevant facts in compliance with the applicable laws.

The supplier is encouraged to report violations of the aforementioned principles and requirements that could have an impact on ZOLLERN. The ZOLLERN Compliance Hotline is available for this purpose: +49 7571 70-733 or compliance@zollern.com.

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