

2019

# Code of Conduct



COMPLIANCE GUIDELINES

WEBER & SCHAER\*

## **I. General principles, laws and regulations**

Weber & Schaer (Weber & Schaer GmbH & Co. KG, Polymer-Service PSG GmbH and Braun Battenberg Mahlwerke GmbH), hereinafter called W&S, is committed to fulfilling its corporate social responsibility in all its business operations. It undertakes in all its business practices and decisions to abide by the applicable laws in any given case and to comply with any other relevant provisions in place in the countries in which it operates. Business partners are to be treated fairly. Contracts shall be adhered to, duly taking account of any changes in the general conditions.

## **II. W&S compliance policy**

### **Corruption/antitrust law/forced labour/child labour**

#### **Corruption**

The interests of the company shall be kept strictly separate from the private interests of employees in dealings with business partners (customers, suppliers) and government institutions. Actions and decisions shall be taken without any regard for irrelevant considerations and personal interests. The applicable criminal law on corruption must be observed. There are various points to note, including the following:

- The granting of personal benefits (especially of monetary value, such as payments and loans, and including the granting of smaller gifts over a relatively long period of time) by W&S and its employees to public officials (such as civil servants or employees in the public sector) with the aim of obtaining advantages for W&S or for themselves or third parties is not permitted.
- Non-cash benefits of personal advantage to employees of other companies in return for preferential treatment in the competitive environment and in business transactions may not be offered, promised, granted, or approved. Nor may personal benefits of value be demanded or accepted in dealings with business partners. W&S must enjoin its employees not to accept promises of any such advantages. W&S managers and employees may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in the course of business which are granted with the intention of unduly influencing a business relationship or which could jeopardise the professional independence of the business partner. This is generally not the case with gifts and invitations which are within the bounds of customary business hospitality, convention and courtesy.

Any W&S employees who find themselves in a conflict of interests, or who are uncertain as to whether a conflict of interests exists or could arise, must contact the management.

#### **Antitrust law (conduct towards competitors)**

W&S shall abide by the rules of fair competition, duly complying with the applicable laws which defend and promote competition, especially the relevant antitrust laws and other laws regulating competition.

These regulations specifically prohibit agreements and other arrangements in dealings with competitors whereby prices or conditions are manipulated, sales territories or customers are

allocated, or free and open competition is unduly impeded. These regulations also prohibit agreements between customers and suppliers which seek to impose restrictions on customers and curtail their freedom and autonomy to determine their resale prices and other conditions (control over prices and conditions).

In cases of doubt, the management must be contacted.

### **Forced labour**

W&S shall reject any form of forced labour.

### **Child labour**

W&S shall adhere to the United Nations policy on human rights and the rights of the child. W&S is particularly insistent on compliance with the Convention on the Minimum Age for Admission to Employment (International Labour Organization's Convention 138) and the Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (International Labour Organization's Convention 182). Where stricter standards on child labour are imposed under national regulations, these must take precedence.

## **Principles of social responsibility**

### **Human rights**

W&S shall respect and support the observance of internationally recognised human rights.

### **Discrimination**

W&S shall oppose any form of discrimination in the context of applicable rights and within the relevant legislative framework. This shall apply most notably to discrimination against employees on the basis of gender, race, disability, ethnic origin, cultural background, religion, ideology, age or sexual orientation.

### **Health and safety**

W&S shall put systems in place to guarantee health and safety in the workplace as required within the national regulatory framework. W&S shall promote continuous further development in the interests of improving the working environment.

### **Fair working conditions**

W&S shall respect the right of its employees to freedom of association within the scope of the applicable rights and laws.

### **Environmental protection**

W&S is committed to sustainable targets for the protection of the environment for present and future generations and shall insist on compliance with laws which have been passed in the interests of protecting the environment. W&S is in favour of environmental awareness in its employees and encourages actions which are conducive to this mindset.

### **Trade secrets**

W&S expects its employees to respect company and trade secrets and to abide by a code of confidentiality. Confidential information and classified documents may not be passed on to third parties without authorisation or made accessible in any other way, unless authorisation has been granted for this purpose or unless the information is publicly accessible. Due regard shall be had to the legal principles governing the protection of personal data of employees, customers and all other interested parties.

### **III. Business partners**

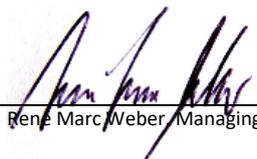
W&S shall communicate the principles of this W&S compliance policy to its direct business partners and expect compliance with the contents which form the basis for contractual agreements. W&S shall also seek compliance among its business partners and monitor this at various times, including during visits.

W&S also expects its business partners to apply the procedure outlined in the previous paragraph to their business partners as well.

### **IV. Compliance**

W&S shall make its employees aware of the content of the compliance policy and the obligations arising therefrom.

W&S shall be guided by the principles of the compliance policy when formulating and, where necessary, amending directives and processes.



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René Marc Weber, Managing Partner

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\* Taken from the wdk code of conduct compliance guidelines

# Appendix

## United Nations Global Compact

### The Ten Principles

The Ten Principles of the United Nations Global Compact are derived from:

- the Universal Declaration of Human Rights
- the International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- the Rio Declaration on Environment and Development and
- the United Nations Convention Against Corruption.

The Global Compact requires from companies, within their sphere of influence, to respect, support and to put into practice a catalogue of core values in the fields of human rights, labour, environment and anti-corruption:

### Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.