

Code of Conduct



Code of Conduct

Preamble

We, the undersigning company ELMAT-Schlagheck Elektrohandelsgesellschaft mbH & Co. KG combine successful management with responsible actions, to create a sustainable future for our company.

We take human rights, environmental protection, and sustainability very seriously. This Code of Conduct forms the basis of the cooperation with all our business partners worldwide.

We expect the same basic understanding from our business partners. Rights in favour of third parties are not to be granted.

I. Legal Compliance

Our behaviour complies with the laws and standards of the respective countries in which we operate. We are guided by the generally accepted ethical values and principles, in particular integrity, honesty, and human dignity. This includes, for example, the payments of duties and tax owed, obtaining necessary official authorisations, safeguarding the material and intellectual property rights of third parties as well as observing all criminal law restrictions, namely in money laundering and fraud.

We expect from our business partners that they adhere to all applicable laws and regulations within the scope of the business relationship.

II. Fair Competition and Antitrust Law

Our company operates according to generally accepted business practices of fairness and honesty. Consumer-protecting standards and anticompetitive laws, in particular antitrust law as well as other laws that regulate competition, are observed.

Unauthorised agreements on prices or other conditions, sales territories or customers as well as the abuse of market power contradict the company's ethical principles.

III. Bribery, Corruption, and Extortion

We do not tolerate corruption, bribery, or extortion; they prevent fair competitive conditions. A particularly strict standard must be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

To build good business relationships and recognise appreciation in business relationships, courtesies such as gifts and hospitality are often exchanged with customers, suppliers, and other partners. However, such gifts and hospitality must reflect normal business conduct and must not influence business decisions or create the appearance of doing so. The principles of proportionality and common sense should guide us in these situations.

Business courtesies are legally prohibited under certain circumstances and in certain countries. We comply with all applicable guidelines.

Our business partners commit to respecting fair competition and complying with antitrust and competition laws. Agreements with competitors and other actions that impede the free market are prohibited. We expect our business partners to adhere to all anti-corruption laws and to not tolerate any corrupt practices in business transactions.

IV. Safety, Data Protection, and Handling Confidential Information

The company and its employees respect the trade secrets of partners and customers. The disclosure of confidential information to third parties or making it publicly accessible is prohibited. This applies to all employees even after the termination of the employment relationship. Additionally, the processing of personal data is subject to strict legal regulations (e.g., the EU General Data Protection Regulation). Confidential and personal data are protected so that no unauthorised third party can access them and are processed only for their intended purpose.

Our business partners also comply with national and international regulations for ensuring health and safety in the workplace. Systems must be established to avoid health and safety risks.

V. Occupational Safety and Health Protection

We safeguard the health of our employees by implementing appropriate health and safety measures that adequately cover the following areas:

- Compliance with applicable laws and orientation to international standards regarding health and safety at work;
- Suitable workplace design, safety regulations, and provision of appropriate personal protective equipment;
- Implementation of preventive controls, emergency measures, and other appropriate measures for continuous improvement;
- Access to adequate drinking water and clean sanitary facilities.

We ensure that our employees are instructed accordingly.

Our business partners are required to implement occupational health and safety according to internationally recognised standards, such as ISO 45001.

VI. Sustainability and Environmental Protection

Responsible handling of our natural resources is becoming increasingly important. We are aware of the current ecological challenges and continuously review our internal processes and workflows to minimise our ecological footprint.

All employees are sensitised to handle our resources sparingly and actively participate in environmental protection. Primary goals are the conservation and protection of natural resources, responsible handling of raw materials, avoidance, reduction, recycling, and proper disposal of pollutants and waste, expansion of energy supply through renewable energies, and the best possible avoidance of environmentally hazardous incidents.

We furthermore recognise our responsibility for sustainability and environmental protection towards suppliers, business partners, and contractors.

VII. Conflict Materials - Due Diligence

Copper is a key material in many of our electrical cables. The trade and extraction of this raw material are increasingly associated with human rights violations and environmental damage.

We expect our suppliers to comply with all applicable laws and the resulting due diligence obligations regarding the procurement of minerals and materials from conflict regions and high-risk areas, which contribute to human rights violations, corruption, financing of armed groups, or similar negative impacts.

Our business partners commit to meeting their due diligence obligations regarding relevant raw materials and complying with all regulations concerning conflict minerals, such as §1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act or Regulation EU 2017/821.

VIII. Social and Ethical Responsibility

Commitment to social and ethical responsibility is an integral part of our corporate philosophy.

We reject discrimination in hiring or employment, particularly any discrimination based on race, ethnic or national origin, skin colour, gender, mental or physical disability, age, religion, political opinion, union membership, or other personal characteristics. We do not tolerate unacceptable treatment of employees, such as physical and psychological harshness, sexual and personal harassment.

ELMAT expects its business partners to reject any form of discrimination and harassment.

a. Human Rights

We respect and support the observance of internationally recognised human rights and respect the personal dignity, privacy, and personality rights of every individual and promote diversity.

Our business partners commit to complying with national and international regulations for the protection of human rights.

b. Child Labour

We reject child labour and any form of exploitation of children and adolescents. Stricter national regulations will be observed.

Business partners are urged not to allow the employment of children at any stage of their own operations or those of their suppliers and business partners. Special protective regulations, such as ILO Conventions 79, 138, 142, and 182; § 2 Abs. 1, 2 LkSG, must be observed.

c. Forced labour

Forced labour and any form of modern slavery and human trafficking are unacceptable. All work must be voluntary, and there must be the possibility of ending the employment relationship.

Persons in need must not be directly or indirectly coerced into employment through violence or intimidation.

d. Working Hours and Remuneration

The remuneration of our employees is based on applicable laws. A statutory or industry-standard minimum wage will not be undercut. Unlawful wage deductions equating to disciplinary measures are prohibited. We ensure compliance with applicable laws concerning working hours, especially the maximum number of daily/weekly hours, and ensure that employees have sufficient rest days.

Our business partners are required to comply with adequate remuneration and working hours according to the respective applicable national laws and regulations, such as ILO Conventions 26 and 131 and ILO Conventions 1 and 14.

e. Freedom of Association and Collective Bargaining

We respect the right of all employees to freedom of association, freedom of assembly, and collective and bargaining rights, as far as legally permissible and possible in the respective country in which we operate. If this is not permitted, appropriate compromises will be sought.

We expect our business partners to respect the rights of their employees and the freedom of association and the right to form interest groups to represent common purposes and goals, such as ILO Conventions 87, 98, 135, 154; the third principle of the Global Compact, § 2 Abs.2 Nr.6 LkSG).

f. Preservation of Natural Livelihoods

Our suppliers commit not to take land, forests, or water in violation of legitimate rights, whose use secures the livelihoods of individuals. Harmful soil changes, water and air pollution, noise emissions, and excessive water consumption must be avoided if this harms people's health, significantly impairs the natural bases of food production, or prevents access to clean drinking water or sanitary facilities.

g. Security Forces

Our business partners commit not to use private or public security forces for the protection of business projects if interference can occur due to a lack of instruction or control.

IX. Compliance

The company ensures that this Code of Conduct is observed by all employees. In case of non-compliance, appropriate remedial measures will be taken immediately, including labour and criminal law actions.

ELMAT expects its business partners to comply with the principles of this Code of Conduct and to pass them on to the suppliers and business partners in their supply chain, to obligate them accordingly, to ensure compliance with these principles, and to agree to a possible review of compliance with these principles. The supply chain generally refers to all products and services of a company and thus to all steps required to produce products and the provision of services at home and abroad.

X. Reporting and Notices

ELMAT strives to prevent any form of unlawful or even criminal conduct within its sphere of influence and encourages anyone who wishes to report possible misconduct or violations of the provisions of this Code of Conduct to send an email to: compliance@elmat.de.

XI. Contact

ELMAT-Schlagheck Elektrohandels-gesellschaft mbH & Co. KG
Alte Ziegelei 27, 51491 Overath / Deutschland
phone: +49 2204 94 81 0
Internet: www.elmat.de; E-Mail: info@elmat.de OR compliance@elmat.de