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# Code of Conduct

EUROTEC Antriebszubehör GmbH consciously acknowledges its increasing social responsibility.

# Code of Conduct for social responsibility

## Preamble

EUROTEC Antriebszubehör GmbH acknowledges its social responsibility within the scope of its corporate activities (referred as „CSR“<sup>1</sup> internationally). This Code of Conduct for social responsibility (hereinafter referred as COC) serves as a guideline for identifying compliance with working conditions, social and environmental sustainability, transparency, trust-based cooperation and dialog. The contents of this COC are an expression of the fundamental values as defined in the vision and mission and, in particular, as set out in the commitment to the social market economy. This COC is implemented on an ongoing basis in our day-to-day business activities and is intended as a voluntary commitment. With the provision of this COC, EUROTEC Antriebszubehör GmbH responds to different framework conditions in a global market and addresses the challenges and social expectations that follow from increased networked interaction in value chains.

## 1. Basic understanding about socially responsible company management.

This Code of Conduct is based on a shared conception of socially responsible company management as defined by the following guiding principles. Hence the undersigning company accept responsibility for the consequences of our business decisions and activities in respect of the economic, technical, social and environmental implications and bring about a reasonable balancing of interest. The undersigning company voluntarily contributes to the well-being and sustainable development of global society at the locations where it operates, within the scope of its respective capabilities and scope for action. In doing so, it is guided by universally applicable ethical values and principles, in particular integrity and honesty and respect for human dignity.

## 2. Scope

2.1 This COC is valid for all the affiliated partner companies of the undersigned company worldwide.

2.2 The undersigned company undertakes to promote compliance with the contents of this COC also among its suppliers and in the further value chain within the scope of its respective capabilities and scope of action.

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<sup>1</sup> CSR = Corporate Social Responsibility

### **3. Key points of socially responsible corporate governance**

The undersigned company actively endeavor to ensure that the values and principles set out below are observed and complied with on a sustainable basis.

#### **3.1 Compliance with legislation**

The undersigned company complies with the current laws and regulations of the countries in which it operates. For countries with weak institutional frameworks, it carefully assesses what best corporate practice from its home country for responsible corporate governance should be applied in a supportive fashion.

#### **3.2 Integrity and Organizational Governance**

3.2.1 The undersigned company orients its actions to universally accepted ethical values and principles, in particular integrity, righteousness, respect for human dignity, open-mindedness and non-discrimination with regard to religion, ideology, gender and ethnicity.

3.2.2 The undersigned company strictly rejects corruption and bribery in accordance with the relevant UN Convention<sup>2</sup>. It promotes transparency, integrity and accountable management and control in the company in an appropriate manner.

3.2.3 The undersigned company observes clean and reputable business practices and fair competition. In competition, it is guided by professional conduct and quality work. It maintains a cooperative and trusting relationship with the supervisory authorities.

#### **3.3 Consumer Interests**

To the extent that consumer interests are affected, the undersigned company complies with consumer protection regulations and observes appropriate sales, marketing and information practices. Especially vulnerable groups (e.g., protection of minors) enjoy special attention.

#### **3.4 Communication**

The undersigned company communicates openly and dialog-oriented about the requirements of this COC and its implementation to employees, customers, suppliers and other stakeholders. All documents and records are dutifully prepared, will not be tampered with or destroyed, and will be properly stored. Company secrets and business information of the partners are handled sensitively and confidentially.

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<sup>2</sup> United Nations Convention against corruption dated 2003, in force since 2005.

### 3.5 Human rights

The undersigned company is committed to promoting human rights. It observes human rights in accordance with the UN Human Rights Charter<sup>3</sup>, in particular those listed below:

#### 3.5.1 Privacy

Protection of privacy

#### 3.5.2 Health and safety.

Compliance with health and occupational safety standards, insuring particularly a safe and healthy promoting working environment in order to prevent accidents and injuries.

#### 3.5.3 Harassment

Protecting employees from corporal punishment and from physical, sexual, psychological or verbal harassment or abuse.

#### 3.5.4 Freedom of expression

Protection and safeguarding of the right to freedom of opinion and expression..

Although EUROTEC Antriebszubehör GmbH is not covered by the EU Supply Chain Act due to the size of our operations, we actively safeguard human rights by selecting our suppliers from Europe only. Furthermore, the majority of our suppliers are from Germany and also directly from our region.

### 3.6 Working conditions

The undersigned company complies with the following ILO<sup>4</sup> core labor standards:

#### 3.6.1 Child labor

The prohibition of child labor, i.e., the employment of persons younger than 15 years of age, unless local law establishes higher age limits and unless exceptions are permitted.<sup>5</sup>

#### 3.6.2 Forced labor

The prohibition of forced labor of any kind.<sup>6</sup>

#### 3.6.3 Compensation

The labor standards regarding compensation, especially regarding the level of compensation in accordance with the applicable laws and regulations.<sup>7</sup>

#### 3.6.4 Employee rights

Respecting the right of employees to freedom of association, freedom of assembly and collective bargaining, to the extent permitted and legally possible in the respective country.<sup>8</sup>

#### 3.6.5 Discrimination ban

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<sup>3</sup> Universal Declaration of Human Rights, UN Resolution 217 A(III) dated 1948

<sup>4</sup> ILO= International Labour Organization = Internationale Arbeitsorganisation

<sup>5</sup> ILO-Convention Nr. 138 dated 1973 and ILO-Convention Nr. 182 dated 1999

<sup>6</sup> ILO-Convention Nr. 29 dated 1930 and ILO-Convention Nr. 105 dated 1957

<sup>7</sup> ILO-Convention Nr. 100 dated 1951

<sup>8</sup> ILO-Convention Nr. 87 dated 1948 and ILO-Convention Nr. 98 dated 1949

Non-discriminatory treatment of all employees.<sup>9</sup>

### **3.7 Working hours**

The undersigned company complies with the labor standards regarding the maximum permitted working hours.

### **3.8 Environmental protection**

The undersigned company complies with the regulations and standards on environmental protection that affect its respective operations and acts in an environmentally conscious manner at its headquarters and at all affiliated partner companies. It also uses natural resources responsibly in accordance with the principles of the Rio Declaration.<sup>10</sup>

### **3.9 Civic Engagement**

The undersigned company contributes to the social and economic development of the country and region in which it operates and promotes corresponding voluntary activities by its employees.

## **4. Implementation and enforcement**

The undersigned company shall make all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this COC. Contractual partners shall be informed about the essential measures upon request and within the framework of reciprocity, so that it becomes transparently clear how their compliance is fundamentally ensured. There is no entitlement to the disclosure of trade and business secrets, information relating to competition or other information worthy of protection.

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<sup>9</sup> ILO-Convention Nr. 111 dated 1958

<sup>10</sup> The 27 principles of the 1992 Rio Declaration on Environment and Development as an outcome of the United Nations Conference on Environment and Development in Rio de Janeiro.