

– CODE OF CONDUCT – FOR CORPORATE SOCIAL RESPONSIBILITY SPINNER GROUP

The SPINNER Group as a member of the ZVEI accept the guidelines compiled by the ZVEI and affirm their Corporate Social Responsibility as a part of their global business activities (internationally known as “CSR”). This Code of Conduct for Corporate Social Responsibility” acts as a guideline, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog marked by trust.

This self imposed obligation of the Code of Conduct enables the SPINNER Group to respond to different general conditions in a global market and to face challenges and social demands that are a consequence of the increasingly linked cooperation within the value chain.

1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the basis of this Code of Conduct. This means that the SPINNER Group assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests. The undersigned company voluntarily contributes to the well being and sustainable development of a global society in whichever location it is doing business. It is geared towards universally held ethical values and principles, especially integrity, honesty and respect of human dignity.

2. Where the Code of Conduct applies

- 2.1 This Code of Conduct is in effect for all of the SPINNER Group branches and business units worldwide.
- 2.2 The SPINNER Group commits to promoting adherence to the content of this Code of Conduct at every point it can for its suppliers and in other parts of the value chain.

3. Core Values for Social Responsibility in Corporate Management

The SPINNER Group will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.

3.1 Adherence to Laws

The SPINNER Group will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

3.2 Integrity and Organizational Governance

3.2.1 The SPINNER Group gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

3.2.2 The SPINNER Group rejects corruption and bribery as stated in the relevant UN Convention . It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

3.2.3 The SPINNER Group pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behavior and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities. Additionally, it will hold to the parameters of the “Guide for our Association Activity – Instructions for Compliance with Competition Law in the ZVEI”.

3.3 Consumer Interests

To the extent consumer interests are affected, the SPINNER Group abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

3.4 Communication

The SPINNER Group will communicate in an open way and is oriented towards dialogue about the requirements of this Code of Conduct and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

3.5 Human Rights

The SPINNER Group is committed to promote human rights. It respects human rights stated in the Charter of the United Nations, especially those named in the following:

3.5.1 Privacy

Protection of privacy.

3.5.2 Health and Safety

Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.

3.5.3 Harassment

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4 Freedom of Conscience

Protection and guarantee of the right to freedom of conscience and freedom of expression.

3.6 Working Conditions

The SPINNER Group abides by the following core work standards from ILO :

3.6.1 Child Labor

The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted.

3.6.2 Forced Labor

The prohibition of forced labor of any kind.

3.6.3 Wage Compensation

Work standards concerning compensation, especially in regards to the level of compensation as stated in the laws and requirements that are in force.

3.6.4 Employee Rights

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country.

3.6.5 Prohibition of Discrimination

Treatment of all employees in a non-discriminatory fashion.

3.7 Hours of Work

The SPINNER Group abides by work standards concerning the longest permitted time of work.

3.8 Environmental Protection

The SPINNER Group fulfills the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio Declaration.

3.9 Civic Commitment

The SPINNER Group contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities by its employees.

4. Implementation and Application

The SPINNER Group will make every appropriate and reasonable effort to implement and to apply the principles and values described in this Code of Conduct both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No right exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

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