

Foreword

ATTEC International GmbH considers itself bound by the following Code of Conduct as part of the voluntary commitment. The Code of Conduct is binding for all employees of ATTEC International GmbH. It defines our values, principles and actions that determine our entrepreneurial actions.

With the Code of Conduct, the company management pursues the goal of ensuring compliance with ethical standards, the creation of a respectful working environment and fair treatment with each other. Our company policy is based on compliance with the applicable laws, regulations, ethical principles and voluntary commitment. For our sustainable success, it is necessary to identify risks and opportunities at an early stage and to involve our business partners. By sustainability we mean the assumption of responsibility for the economical, ecological and social effects of our actions.

We therefore also expect our business partners who work with or for us to recognize this Code of Conduct and thus at the same time ensure the protection of every employee of their company and their subcontractors.

Scope of application and scope

1. Environmental protection
2. Human rights and labor rights of employees
3. Transparent business relationships
4. Fair market behaviour
5. Due diligence to promote responsible supply chains
6. Integration of sustainability requirements in the company

1. Environmental protection

ATTEC International GmbH is committed to the sustainable protection of the environment, for which the local environmental laws and regulations are complied with or exceeded. We train our employees to use natural resources carefully, as this is an integral part of our corporate culture.

We aim to keep the environmental impact as low as possible in all phases of our business activities.

We try to reduce greenhouse gas emissions by relying on environmentally friendly and energy-efficient equipment and work equipment. We increasingly use sustainable or recyclable materials for the operation of our company and also include environmental compatibility in the selection of our suppliers. Suppliers with a certification or corresponding orientation according to ISO 14001 are given preference by us when awarding contracts.

The products we sell are largely recyclable, we try to avoid the use of e.g. Chromium VI and lead as much as possible, especially in production for the automotive industry.

We strive to handle the natural resources of our planet with care, so we rely on the economical use of energy, water and renewable raw materials to keep the environmental and health damage we cause as low as possible.

We actively avoid waste by demanding that our partners provide packaging that is as environmentally friendly and recyclable as possible. When it comes to procurement, we rely on reusable packaging where possible. If this is not the case, we recycle as much waste and chemicals as possible through waste separation.

We expect our partners to also feel committed to environmental protection and to comply with our guidelines.

2. Human rights and labor rights of employees

We do not tolerate child labor and we strictly insist to the minimum age for the employment of minors. We feel bound by Convention 138 of the International Labor Organization (ILO). This stipulates that children under the age of 15 are not allowed to work, except that the exceptions of Articles 6 and 7 of the ILO apply. We do not allow overtime and nightwork for workers under the age of 18 and everything will be done to ensure that the health, safety, morals and development of minors is not harmed.

We reject any kind of discrimination and harassment. No one may discriminate or harass employees or their business partners because of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social origin, age, physical or mental limitations, civil status, or pregnancy. We respect the right to join a trade union and the right to a political attitude, as long as this respects our state principles and includes the tolerance of dissenters. We train our employees frequently accordingly.

The remuneration and benefits we pay significantly exceed the national minimum standards for fair remuneration and additional benefits. We base our payment on the local remuneration in order to offer our employees a secure base for their lives. We comply with local working time laws and observe the ILO minimum standard of a maximum of 48 hours per week with a minimum break of 24 hours per week. With regard to the weekly permissible overtime, we are also guided by the requirements of the ILO.

We comply with the local Occupational Health and Safety and Fire Protection Act and train our employees free of charge in accordance with ILO Convention 155. We are continuously working to improve occupational health and safety laws and provide emergency plans, fire protection equipment and first aid materials.

We have appointed first responders in accordance with the legal requirements, so that first aid can be provided on site in the event of an accident at work.

We provide a hygienic environment that is aligned with national laws, and our business premises meet the required standards.

Our employees are free to form trade unions or employee representatives and to join them. We expect our partners to also provide their employees with alternative opportunities for association that at least comply with local legislation.

We expect our business partners to take precautions and create a workplace that complies to our principles and protects the physical and psychological integrity of employees.

3. Transparent business relationships

All employees of ATTEC International GmbH take responsibility for their own actions. The business partners must work towards a corresponding action. We expect our employees to act as ambassadors of the company in order to protect and promote the company's reputation.

We do not allow ourselves to be influenced by financial, personal interests or relationships and decide exclusively on the basis of objectively comprehensible criteria.

Any form of corruption and bribery is prohibited and we take action against such practices. Bribes, inadmissible payments or benefits may not be made and will be punished. Acceptance of corresponding payments or services is strictly prohibited.

We expect our business partners to behave in accordance with the law with regard to our principles and will take measures to remedy them as quickly as possible in the event of deviations.

4. Fair market behavior

We respect and respect fair and free competition. We also expect this from our business partners as the basis of our cooperation. For this purpose, the applicable competition and antitrust requirements are complied with. There are no agreements or agreements with competitors, suppliers or customers. All parties shall ensure that there is no exchange of information relevant to competition law that may unduly influence or restrict competition. We comply with the applicable laws when importing and exporting the products we distribute.

We comply with applicable anti-money laundering laws and all information is protected in accordance with applicable requirements. Our employees are obliged to maintain secrecy and may not pass on, publish or make available trade secrets to third parties. We respect and comply with the data protection requirements of the European Union.

We expect our business partners to behave in an equivalent manner and actively demand this.

5. Due diligence to promote responsible supply chains

We want to be able to ensure the highest possible sustainability in our supply chain. We actively demand compliance with REACH requirements and local standards from our affected suppliers and take this into account in our supplier selection. We do not cooperate with companies that finance armed conflicts or commit or tolerate serious human rights violations such as child, forced labor or slavery.

6. Integration of sustainability in the company

We are committed to continuously sensitizing and training our employees in order to improve our sustainability. For this purpose, the content of this Code of Conduct is also part of the ongoing training courses in the company.

In order to be able to prove the corresponding training courses, we keep a corresponding written proof and regularly renew the knowledge of compliant behavior of our employees. A representative for the conduct agreed in the Code of Conduct is appointed in the company. Employees can contact this representative with their concerns.

Düsseldorf, 09.12.2020

