

FORM:

DO14001\_Code\_of\_Conduct

REVISION:

3.0



# Values and Principles of SIKO GmbH

SIKO GmbH  
Weihermattenweg 2  
79256 Buchenbach  
[www.siko-global.com](http://www.siko-global.com)





**Table of Contents**

- 1. General Information ..... 3
- 2. Principle of Strict Legality / Compliance with Laws ..... 3
  - 3.1 Human rights ..... 3
  - 3.2 Prohibition of child labor ..... 3
  - 3.3. Prohibition of forced labor..... 3
  - 3.4. Freedom of association ..... 3
  - 3.5. Equal opportunities / non-discrimination and respect for employees ..... 4
  - 3.6 Fair working conditions/ working hours, remuneration and additional benefits for employees ..... 4
  - 3.7. Occupational health and safety ..... 4
- 4. Sustainability ..... 4
  - 4.1 Conflict Minerals (DODD-Frank Declaration) ..... 4
  - 4.2 Substance Restrictions - REACH / ROHS / TSCA / POP / California Proposition 65..... 4
- 5. Business Relations..... 5
  - 5.1. Avoidance of conflicts of interest ..... 5
  - 5.2. Free competition ..... 5
  - 5.3. Corruption/bribery ..... 5
  - 5.4. Trade secrets ..... 5
  - 5.5 Money laundering/terrorist financing ..... 5
  - 5.6. Data protection ..... 5
  - 5.7 Export control and customs ..... 5
- 6. Application scope of SIKO products ..... 5
- 7. Supply chain/subcontracted business partners ..... 5
- 8. Compliance with and monitoring of the Code of Conduct..... 6

## 1. General Information

Today, SIKO stands for almost six decades of experience in position, angle and speed detection. The highest demands of our customers from industry and mechanical engineering ensure the quality, precision and functionality of our products and services.

Important values for SIKO are quality, integrity, sustainability and compliance with legal regulations.

We also require the same from our business partners. We expect them to comply with the following principles and to make every effort to implement these standards with their partners.

The following principles are based on international conventions such as the United Nations Global Compact, the Universal Declaration of Human Rights and the conventions of the International Labor Organization (ILO).

All requirements that we place on our business partners also apply to SIKO GmbH. This code therefore also serves as proof for our customers.

## 2. Principle of Strict Legality / Compliance with Laws

Economic success and social responsibility are two goals of our company that cannot be separated from each other. Compliance with the laws and regulations of all the countries in which we operate is our top priority. We do nothing or refrain from doing anything that result in violation of the law. Exceptions to this are not permitted, not even due to customary or regional practices.

Therefore, SIKO also requires all its business partners to comply with the provisions of their respective applicable legal systems and to ensure that this Code of Conduct is complied with by third parties used to fulfill the contract with SIKO. The requirements of SIKO in this Code of Conduct can also go beyond the applicable legal provisions of the respective country.

If a requirement of SIKO violates the legal provisions of the respective country, the business partner must inform SIKO accordingly. If one of our principles is lower than the national law of a country or territory, the national laws and thus the higher standard always apply.

In such a case, the business partners must inform SIKO immediately.

## 3. Dealing with Employees

### 3.1 Human rights

SIKO is committed to upholding internationally recognized human rights. Every business partner therefore ensures that internationally recognized human rights are respected by avoiding the cause of and participation in human rights violations.

### 3.2 Prohibition of child labor

SIKO as well as its business partners only employ person who have reached the minimum age required to perform work in accordance with the applicable national legislation. Business partners will respect and observe the rights of the children.

### 3.3. Prohibition of forced labor

SIKO as well as its business partners shall neither use nor contribute to slavery, servitude, forced or compulsory labor or human trafficking.

### 3.4. Freedom of association

Both SIKO and its business partners respect the freedom of association and the right to form interest groups. They grant their employees the right to defend their interests on the basis of national legislation. It shall neither favor nor disadvantage members of workers' organizations or trade unions.

### 3.5. Equal opportunities / non-discrimination and respect for employees

Based on our basic understanding of equal opportunities and the General Equal Treatment Act (AGG), no one may be objectively treated, discriminated against, favored or excluded, in particular because of his race or social or ethnic origin, his skin color, nationality, belief, worldview, gender, age, physical constitution, political affiliation, appearance or sexual identity and orientation.

Everyone has the right to be protected against discrimination and harassment of any kind at SIKO as well as at its business partners.

### 3.6 Fair working conditions/ working hours, remuneration and additional benefits for employees

SIKO as well as its business partner shall pay remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements. The applicable regulations on working hours and vacations are observed. In the case of cross-border deployment of staff, they must comply with all applicable legal provisions, in particular with regard to minimum wages.

### 3.7. Occupational health and safety

Within the framework of national regulations, SIKO as well as its business partners must ensure occupational safety and health protection at its workplaces as well as continuous development to improve the working environment. All employees of business partners are required to comply with the safety regulations and to report accidents immediately to the competent authorities after first aid measures have been carried out. They ask their employees to identify weaknesses in terms of occupational safety and health protection and to make suggestions for improvement.

## 4. Sustainability

SIKO promotes a holistic approach to sustainability that includes the aspects of social commitment, economy and ecology to keep our environmental impact as low as possible. Business partners avoid hazards to people and the environment, keep environmental impacts low and use resources sparingly. Business partners' processes, facilities and resources comply with the applicable legal requirements and standards for fire and environmental protection. Business partners shall establish and implement appropriate environmental management systems.

### 4.1 Conflict Minerals (DODD-Frank Declaration)

As a manufacturer of sensors and positioning systems, we do not directly import minerals and thus also not so-called "conflict minerals" such as cassiterite (tin ore), columbite-tantalite (coltan, tantalum ore), gold, wolframite (tungsten ore), as well as cobalt and mica. These substances can only be used in processed form as aggregates in metals, in surface coatings or in electronic components. We require our business partners who supply us with products with the above-mentioned metals to monitor the conflict materials so that consistent traceability is guaranteed. On request, a CMRT (Conflict Minerals Reporting Template) or EMRT (Extended Minerals Reporting Template) must be sent to us, in which the conflict minerals traceability is documented.

### 4.2 Substance Restrictions - REACH / ROHS / TSCA / POP / California Proposition 65

As a manufacturer of sensors and positioning systems, we are a downstream user (producer of articles) according to the above-mentioned regulations. We use product compliance management to constantly monitor changes in the corresponding substance lists and adapt our products accordingly. We also require our business partners to monitor these above-mentioned guidelines and their prohibited substances. We request a report if there are changes to the articles and pre-assemblies supplied to us because of these specifications, if necessary, we will also request this proof from you by means of a confirmation of conformity.

## 5. Business Relations

### 5.1. Avoidance of conflicts of interest

Both SIKO and its business partners must strictly separate the interests of the company and the private interests of the employees when dealing with their suppliers. Actions and decisions are made free of considerations and interests that are not relevant. Business partners make decisions based on objective considerations and do not allow themselves to be unduly influenced by personal interests.

### 5.2. Free competition

SIKO as well as its business partners do not make any arrangements with competitors that are contrary to antitrust law, such as price, region or quantity agreements. No unfair commercial practices are used to sell products on the market. This is based on the Unfair Competition Act (UWG). In addition, no bogus tenders or manipulated tenders are submitted.

### 5.3. Corruption/bribery

SIKO as well as its business partners shall not tolerate any form of corruption or bribery and shall not participate directly or indirectly in it, nor offer, grant or promise any benefits to government officials or private counterparties to influence official actions or to achieve an unfair advantage. This also includes waiving the granting and accepting impermissible accelerated payments.

### 5.4. Trade secrets

Both SIKO and its business partners ensure that confidential information is kept secret. This also applies after termination of business relations.

### 5.5 Money laundering/terrorist financing

Both SIKO and its business partners must comply with the relevant statutory provisions on the prevention of money laundering and must not promote money laundering or terrorist financing either directly or indirectly.

### 5.6. Data protection

SIKO as well as its business partners must process personal data confidentially and responsibly, respect the privacy of everyone and ensure that personal data is effectively protected and used only for legitimate purposes.

### 5.7 Export control and customs

SIKO as well as its business partners must comply with the applicable export control and customs regulations.

## 6. Application scope of SIKO products

The products manufactured by SIKO are designed purely for civil applications. No products are manufactured or developed for the defense industry. We categorically reject any requests for this.

We also expect our business partners and customers to comply with this requirement.

## 7. Supply chain/subcontracted business partners

Business partners shall take reasonable efforts to ensure that its subcontracted business partners comply with the principles of this Code of Conduct. Business partners must comply with the principles of non-discrimination in the selection of business partners and in dealing with them. Business partners shall communicate this Code of Conduct to third parties who are used to fulfill the contractual relationship with SIKO, shall consider the Code of Conduct in their selection and shall work toward its compliance.

## 8. Compliance with and monitoring of the Code of Conduct

Business partners as well as SIKO GmbH undertake to comply with the values, principles and rules described in this Code of Conduct.

Compliance with this Code of Conduct can be verified with business partners by means of an audit. For this purpose, SIKO will coordinate with business partners concerning the scope, time period and location.

A violation of this Code of Conduct constitutes an impairment of the business relationship between SIKO and a business partner.

Without prejudice to any other rights, SIKO reserves the right in this case to demand clarification of the facts from a business partner and initiation of countermeasures by the business partner.