



CODE OF CONDUCT

**For all activities undertaken by
CS Germany Schraubenfedern GmbH
and its business partners.**



Code of Conduct



This Code of Conduct sets out the fundamental requirements for responsibility and integrity in the business relationships of CS-Germany® and all its business partners.

01 Behaviour

Integrity, credibility, transparency

CS-Germany® aligns its actions with ethical values such as integrity, credibility and respect for human dignity. Our actions are based on transparency, responsible governance and monitoring within the company.

Scope of application

Every staff member at CS-Germany® is responsible for actively putting this Code of Conduct into practice, with executives and managers acting as role models in this regard. The Code is a basis and a guide to ethical and legal questions that arise during day-to-day work. Every staff member may contact executive management with questions and suggestions about these matters.

Business partners

CS-Germany® expects its business partners to adhere to, support and implement the guiding values of the Code of Conduct to the best of their abilities, including in their supply chains.

Compliance with legal requirements

CS-Germany® complies with laws and other legal requirements in the countries in which it is active. This also expressly applies to provisions on embargo, toll and export controls.

02 Behaviour towards business partners and competitors

Anti-trust and cartel law

CS-Germany® complies with regulations on fair, open competition and does not enter into agreements that have an impermissible impact on competition.

Tenders

Staff members at CS-Germany® are obliged to comply with regulations relating to fair competition. In particular, agreements of any kind are banned, as is any coordinated behaviour with competitors relating to the following topics:

- Pricing, pricing components and conditions
- Customers, supply areas, quotas and capacity
- Concerted market withdrawals
- Coordination on planned innovations
- Boycotts

If a contract is being awarded on the basis of a formal call for tender, the company will neither discuss nor coordinate bids with other bidders.

Bribery or corruption

'Corruption is the misuse of entrusted power for private gain or benefit.'

CS-Germany® is against every form of corruption, domestically and internationally, and avoids even the appearance of wanting to use dishonest business practices to influence business decisions. No staff member may use the company's professional connections for their own, private or third-party benefit, or to the detriment of the company: e.g. through money, material assets, services. Any staff member of CS-Germany® who suspects corruption or economic crime is obliged to inform executive management, as the responsible body with regard to the Code of Conduct.

Granting and acceptance of benefits, invitations and gifts

If they do not serve the purposes of preferential treatment, invitations and participations (such as work meals or events) may be taken up within the framework of local customs and laws. The same applies to the acceptance or giving of gifts. If there is any doubt, every CS Germany® staff member should seek advice from executive management.

Parties and elected officials

It is also essential to comply with applicable laws concerning donations to parties and political organisations, to elected officials and candidates for political office.

Advisers and brokers

It is impermissible to circumvent the ban on corruption by commissioning advisors or contract brokers.

Donations and sponsorship

Donations and sponsorship undertaken by CS-Germany® do not serve to covertly encourage decisions in the interests of the company. The recipient of the donation and its actual use must be known. Quasi-donations are prohibited.

03 Avoidance of conflicts of interest

Staff loyalty

CS-Germany® ensures its staff do not end up in situations where their personal or financial interests clash with those of the company or its business partners.

04 Handling information

Confidentiality

All CS-Germany® staff members, as well as the company's suppliers, are obliged to protect confidential information (documents, digital data). This is regardless of whether such information is generally known or staff members have explicitly received access to it. It is expected that staff members and suppliers will observe and comply with the company's guidelines, handbooks and contracts on information security and confidentiality.

Data protection

CS-Germany® takes protecting personal data very seriously. In compliance with national data protection legislation, staff members' personal data is only processed to the extent required for the employment relationship.

Documentation

Reports and other written documents must be drawn up correctly and truthfully. Databases and other records must align with the principles of orderly book-keeping, being always correct and complete.

05 Social and environmental responsibility

Social responsibility

Within CS-Germany®'s value-oriented corporate governance, social responsibility is an essential component and a prominent factor for the company's sustainable success.

Human rights

CS-Germany® upholds and supports internationally recognised human rights. We are in ongoing communication with our suppliers to avoid importing products/raw materials from conflict-hit regions.

Child labour

CS-Germany® condemns any form of child labour or forced labour, and upholds the bans on these practices.

Ban on discrimination, equal opportunities

Any discrimination against staff members and minorities is not permitted at the company. This includes in particular sexual or verbal harassment. CS-Germany® promotes equal opportunities for its staff members.

Labour law

CS-Germany® will adhere to applicable national laws and labour norms regarding suitable compensation and maximum working hours. This includes compliance with statutory provisions on generally applicable national minimum wages. The right of employees to gather and associate is recognised, provided this is legally permitted under national law.

Occupational safety and health protection

Within the framework of national law, CS-Germany® will ensure that occupational safety and health protection are upheld in the workplace.

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Environmental and climate protection

Staff members at CS-Germany® and the company's suppliers must comply with country-specific laws and regulations regarding environmental protection and energy management. Staff members must ensure they undertake their tasks in line with the company's guidelines, such as: safeguarding of natural resources, energy consumption and waste management. At the same time, they should ensure that suppliers and other business partners meet environmental protection requirements.

06 Compliance with the Code of Conduct

Communication

The company will implement the principles of the Code of Conduct and communicate them to staff members at CS-Germany® and its business partners. The Code of Conduct is a binding component of the employment contract for staff members at CS-Germany®. Compliance with it is therefore compulsory.

Monitoring

CS-Germany® undertakes to regularly monitor compliance with the Code of Conduct.

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