

Code of Conduct

Core principles for suppliers

Süddeutsche Gelenkscheibenfabrik (SGF) is a recognized partner of the global automobile industry and caters to industrial applications across all industry sectors. We are mindful of our responsibility towards our business partners, employees, and organizations in which we are active. That is why we have set strict ethical rules for ourselves that guide our business activities.

We expect all suppliers who have a business relationship with us to act according to the same basic ethical principles. This Code of Conduct was compiled for our suppliers in order to set the standards for our business relationships.

1. Interaction with people - Equal opportunities and non-discrimination

The supplier shall undertake to enforce all human rights, equal opportunity and anti-discrimination laws, as well as to adhere to generally recognized customs of the countries in which he is active. The supplier shall guarantee equal opportunity without any form of discrimination (e.g. skin color, race, gender, disability, sexual orientation, and political or religious beliefs) and rejects any form of harassment. This must also apply equally to its employees and business partners around the globe.

The right to fair remuneration is recognized for all employees. Wages and other social benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors and regions. The supplier strictly rejects any form of forced and child labor, modern slavery and the exploitation of young workers.

2. Freedom of association and collective bargaining

The supplier respects the right of its employees to freedom of association and collective bargaining. Employees are free to set up an employee representative body or to become a member of an employee representative body. An employee must not suffer any disadvantages as a result of membership in a trade union. Likewise, the employees or their respective organizations can negotiate and conclude company agreements or collective agreements at a suitable level.

3. Working hours

The supplier undertakes to comply with the applicable national laws, applicable collective agreements and regulations on working hours.

4. Fair competition and antitrust law

Maintaining free and fair competition and complying with the relevant statutory provisions on antitrust law are the top priority for the supplier.

The supplier shall refrain from price fixing or other arrangements for limiting competition, as well as observe the ban on cartels. The supplier shall select its business partners based on defined criteria in comparison to existing competitors.

5. Corruption, extortion and bribery

The supplier rejects any kind of corruption, extortion and bribery.

Business relationships and activities with clients and suppliers shall be comprehensively documented. The acceptance, submission, and requesting of bribes or unfair advantages with regard to business partners are to be avoided at all costs.

When dealing with international relationships, the supplier has to pay attention to the guidelines on foreign economic legislation, tax legislation, and customs laws in the corresponding countries.

6. Conflicts of Interest

A conflict of interest exists when the private interests of an employee collide with the interests of their employer or there is a possibility of this. The supplier's employees are committed to the well-being of their company. The supplier will trust that all employees of its company make their decisions exclusively on the basis of factual criteria and do not allow themselves to be influenced by personal interests and relationships.

7. Occupational health and safety

The supplier has to adhere to prevailing occupational health and safety regulations and to ensure a safe and healthy working environment in order to maintain employees' health and to avoid accidents, injuries, and work-related illnesses.

In order to ensure an optimal working environment, fair working conditions, work safety, and the facilitation of work are crucial.

8. Environmental protection

The supplier has to develop, design, and produce its products and manufacturing processes in a manner that conserves resources and protects the environment. In this regard, the objective is to avoid sustainably endanger people, animals and plants, soil, water, the atmosphere, species diversity and cultural and other material assets. When planning for new business premises and operational equipment, the supplier shall undertake to design them in a manner that is energy-efficient and also conserves the environment.

9. Privacy and data protection

The supplier undertakes to comply with the laws on data protection and data security with regard to all business and personal data of its employees (protection of privacy) as well as its business partners, customers and suppliers.

10. Whistleblowing - protection from retaliation

The supplier is responsible for establishing an effective grievance mechanism at operational level to report potential violations of this Code and supplier's own Code of Conduct. The supplier will protect the confidentiality of whistleblowers and prohibit retaliation.

11. Dialog with business partners

The supplier shall relay the basic principles specified in this Code of Conduct to his sub-contractors and other business partners and shall require them to act according to these standards at all times.

12. Adherence to the Code of Conduct for suppliers

SGF reserves the right to verify that the requirements of the Code of Conduct for Suppliers are being adhered to after appropriate advance warning. SGF encourages its suppliers to introduce their own guidelines for ethical behavior and to uphold them.

The supplier shall encourage its own suppliers — in the context of fulfilling their contractual obligations — to comply with the ethical standards, human rights, work standards, and environmental protection standards on which this agreement is based. The supplier is responsible for his own supply chain.

Every violation of the obligations specified in this Code of Conduct for suppliers shall be seen as a major breach of contract on the part of the supplier, with the consequence that SGF shall reserve the right to require remedial action and, if necessary, terminate the partnership.