

Code of Conduct – MÜNZING Group

Following the principles of this code of conduct is obligatory for all MÜNZING Group employees. Its values are based on the Ten Principles of the UN Global Compact for corporate sustainability.

Behaving with integrity in all business activities

The MÜNZING Group operates exclusively within the framework of statutory regulations in all business activities. Each employee is personally responsible for compliance with the legal requirements in their field of work. A knowing participation in any unlawful act is prohibited, including to bring a third party act unlawfully. Similarly, the MÜNZING Group expects its business partners to commit to full regulatory compliance.

Corruption and bribery

The MÜNZING Group will not allocate payments or gifts to employees of authorities nor other companies with the aim of obtaining an undue commercial advantage. This applies regardless of location and cultural environment. Conversely, all employees are prohibited from accepting such payments or gifts. Attempts by outsiders to influence employees of the MÜNZING Group in their decisions must be notified to the responsible supervisor.

Commissions and fees paid to distributors or consultants must be reasonable in relation to their activities.

Privacy and confidentiality

The MÜNZING group will ensure regulatory compliance and requirements for data protection and information security by appropriate measures. All employees of the MÜNZING Group are obliged not to submit any confidential information, over which they have gained access through the business activity, to third parties. This obligation shall also apply after termination of employment.

Competition law

Principle of MÜNZING Group is fair entrepreneurial spirit. The MÜNZING Group does not participate in illegal agreements with other companies, in particular concerning territorial or customer allocations, agreements and exchange of information on prices, suppliers and supply behavior with competitors.

Rights of employees

Within the MÜNZING Group, all employees are treated in a respectful and appreciative way.

Trade union activities

The MÜNZING Group is committed to the right of workers to organize unions in a free and democratic manner as a basic principle. Within the MÜNZING Group, every employee has the right to exercise an activity as an employee representative in the context of legal requirements. The MÜNZING Group will in no way hinder nor discriminate the workers' representatives in the exercise of their trade union activities. In countries where trade union activity is not permitted by law, the MÜNZING Group will enable the employees to freely elect employee representatives.

Discrimination

Within the MÜNZING Group applies the principle of equal opportunities. The selection of new employees is carried out exclusively by qualification and suitability. Employees may not be discriminated, excluded or preferred because of age, gender, religion, disability, sexual orientation, race, color or other factors identified by the legislative authorities.

The percentage of employees with disabilities and the proportion of women in management positions is tracked within the MÜNZING Group.

Working hours and compensation

Within the MÜNZING Group, the statutory maximum working hours, rest periods and regular non-working days are always respected. Regardless of the legal framework, the maximum normal working hours is not more than 45 hours a week, and it shall be granted at least one day off per week.

Overtime work constitutes an exceptional case; the provision is

voluntary for the employee.

Employees of the MÜNZING Group receive an adequate remuneration based on their respective function and qualification, which is sufficient to allow them and their families a decent life, as well as legally granted benefits. The fee is equal to at least the minimum wage prescribed by law. The payment of remuneration is timely, regularly and without any deductions.

At sites with separate collective agreements or employment agreements, which provide more favorable provisions than the legal regulations for the workers, the respective agreements will apply.

Child labor / youth employment

The MÜNZING Group does not employ any children under 16 years of age. As part of the recruitment process, a determination of age with reliable, but not degrading or inhumane measures will be carried out. The employment of young workers, in particular for the purpose of vocational training, is carried out in the framework of appropriate legal provisions. In particular, the MÜNZING Group will ensure that young people do not work at night, are specially protected in their activity particularly regarding health and development, and are enabled to participate in appropriate programs for vocational training during working hours.

Forced Labor / inhumane working conditions

The MÜNZING Group condemns all whatsoever forms of forced or compulsory labor, trafficking or servitude and employment under inhumane conditions, and will under no circumstances employ workers under such or similar conditions.

Health, safety and environmental protection

Health, safety and environmental protection are targets of central importance within the MÜNZING Group and are considered superordinate to the achievement of economic targets.

Protection of employees in the workplace

Occupational health and safety measures within the MÜNZING Group are based on the respective statutory health and safety regulations or, if national regulations are inadequate, international standards. The MÜNZING Group uses appropriate management systems to identify, assess and avoid hazards for the health and safety of employees, and

takes effective measures to create a safe working environment and safe working procedures, as well as to assess the effectiveness and the constant development of measures. Analysis of all occupational and commuting accidents is included as obligatory in the management systems, as well as conclusion of necessary improvements of safety measures and statistical analysis of all accident events.

For adolescents, pregnant and disabled people special precautions are taken to prevent any health hazard.

The MÜNZING Group ensures that all employees are provided with necessary personal protective equipment for safe exercise of their activities free of charge.

Appropriate occupational medical care is available for all employees.

Environmental protection

The MÜNZING Group complies – as a general principle – with all statutory environmental protection regulations or, if national regulations are inadequate, international standards. The same applies for any rules on the determination of potential hazards and the registration of chemical substances at national authorities. The MÜNZING Group uses appropriate management systems to identify, assess and prevent risks and burdens for the environment, and takes effective measures to minimize environmental impact of business and production processes, and assesses effectiveness and constant development of measures. Environmentally relevant events or accidents are recorded in the management systems, analyzed, necessary measures derived, and all data statistically evaluated.

Minimizing the consumption of resources (materials, energy, water), the emission of carbon dioxide and generation of waste is a permanent objective within the MÜNZING Group. The current consumption and the progress of measures will be evaluated in the management systems. The use of certain raw materials that are mined outside of state control, in defiance of human or international rights and international environmental guidelines (so-called "conflict minerals"), is avoided within the MÜNZING Group.

Violations of the Code of Conduct

Reporting violations

Every employee of MÜNZING Group has the right and the duty to point his supervisors or the management to possible violations of the conditions laid down in this code of conduct. This can be done anonymously. Employees who report violations will not expect any handicaps linked to their message. All indications will be investigated and, if appropriate, measures will be taken to remedy the violations. The number of messages and the actions taken are statistically analyzed.

Behavior of business associates

The MÜNZING Group expects a similar attitude to the values listed in this code of conduct from its business partners. If the MÜNZING Group will get to know significant breaches of the code of conduct by one of its business partners, the MÜNZING Group will request the respective business partner to establish appropriate measures to ensure compliance with the code of conduct, and prove the effectiveness of these measures. Should the business partner not be willing to cooperate, the MÜNZING Group will terminate the business relationship.

Publisher

MÜNZING CHEMIE GmbH
Münzingstraße 2
74232 Abstatt
Deutschland

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