

STANGL COMPONENTS CODE OF CONDUCT

1. PREAMBLE

The prosperity and development of a company is largely based on the confidence between shareholders, customers and commercial partners. This confidence must also exist in the relation between the company and the employees and between the employees themselves

2. GENERAL ISSUES

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means the Stangl Components company assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests. The company voluntarily contributes to the well being and long-term development of a global society at every point it can at the locations where it is in business. It is geared towards universally held ethical values and principals, especially integrity, honesty and respect of human dignity.

This code consists in 5 sections and was prepared in using the international recognized texts and standards such as the Universal Declaration of Human Rights (UDHR), the International Labor Organization (ILO), the UN convention against the corruption and the Rio Declaration on Environment and Development.

This CoC is in effect for all company's branches and business units worldwide.

The Stangl Components company commits to promoting adherence to the content of this CoC at every point it can in all parts of the value chain including its suppliers.

The Stangl Components company will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.

The Stangl Components company will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

3. LABOR AND HUMAN RIGHTS

The Stangl Components company is committed to promote human rights. It respects human rights stated in the Charter of the United Nations (UN Resolution 217 A from 1948)

3.1 Working conditions

The Stangl Components company abides by the following core work standards from ILO (International Labor Organization)

3.2 Forced Labor

The prohibition of forced labor of any kind. (ILO Convention N°29 from 1930 and ILO Convention n°105 from 1949)

3.3 Child Labor

The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted. (ILO Convention N°138 from 1973 and ILO Convention n°182 from 1999)

3.4 Prohibition of Discrimination

Treatment of all employees in a non-discriminatory fashion. (ILO Convention N°111 from 1958)

3.5 Harassment

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.6 Wage Compensation

Work standards concerning compensation, especially in regards to the level of compensation as stated in the laws and requirements that are in force. (ILO Convention N°100 from 1951)

3.7 Working Hours

Works weeks, including overtime, are not to exceed the legally allow number of working hours. Workers should be allowed at least one day off per seven day week

3.8 Privacy

Protection of privacy

3.9 Freedom of Conscience

Protection and guarantee of the right to freedom of conscience and freedom of expression

3.10 Employee Rights

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country. (ILO Convention N°87 from 1948 and ILO Convention n°98 from 1949).

4. HEALTH AND SAFETY

Ensuring health and work safety, especially the guarantee of a safe and health promoting work environment, avoiding accidents and injuries.

4.1 Machine Safeguarding

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers.

4.2 Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled.

4.3 Emergency Plans

Emergency events are to be identified and assessed, and their impact minimized by implementing emergency plans

4.4 Dormitory and Canteen

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation. Worker dormitories provided by the company are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

5. ENVIRONMENTAL IMPACT

The Stangl Components company fulfills the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio Declaration. (The 27 principles from the "Rio Declaration on Environment and Development" from 1992 as result from the UN Conference on Environment and Development in Rio de Janerio)

The Stangl Components ,ISO 14001 certification may be a useful source of information

5.1 Product Restrictions

The Stangl Components company adheres to all applicable laws and regulations regarding prohibition or restriction of specific substances

5.2 Chemical and Hazardous Materials

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

5.3 Waste

Wastewater and waste in general, generated from operations, are to be monitored, controlled and treated

5.4 Air Emissions

Air emissions are to be monitored, controlled and eventually treated

6. BUSINESS ETHICS

6.1 Corruption and bribery

The Stangl Components company rejects corruption and bribery as stated in the dedicated UN Convention. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

6.2 Business practices

The Stangl Components company pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behavior and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities.

6.3 Civic Commitment

The Stangl Components company contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities by its employees

6.4 Communication

The Stangl Components company will communicate in an open way and is oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

6.5 Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights

7. MANAGEMENT COMMITMENT

The Stangl Components company will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CoC both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No right exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

7.1 Responsibility

Clearly identified company representatives responsible for ensuring implementation and periodic review of the status of the management systems

7.2 Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility

7.3 Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews

7.4 Documentation and Records

Creation of documents and records to ensure compliance and conformity to this code with appropriate confidentiality to protect privacy.

8. REFERENCES

ILO International Labor Standards and more specifically:
 ILO Convention N° 29
 ILO Convention N° 87
 ILO Convention N° 98
 ILO Convention N° 105
 ILO Convention N° 111
 ILO Convention N° 138
 ILO Convention N° 182
 ETI Base Code. June 2009 (Ethical Trading Initiative)
 OHSAS 18001 2007 (Occupational health and safety management systems)
 UN Convention against corruption 2003
 Human Rights. UN Resolution 217A 1948
 Rio Declaration on Environment and Development 1992
 ZVEI's Code of Conduct for Corporate Social Responsibility 2010

Stangl Components Europe GmbH
 Im Petersfeld 5
 D - 65624 Altendiez

