





Schaltbau GmbH Group

Supplier Code of Conduct

# Schaltbau GmbH Group

### Components and customer specific solutions

The Schaltbau GmbH Group develops and produces connectors, snap-action switches and contactors as well as electrical components such as toggle switches, master controllers and driver desk equipment for a broad range of applications in the rail sector and industry. The Italian subsidiary SPII specialises in fully integrated driver's cabs for railway vehicles.

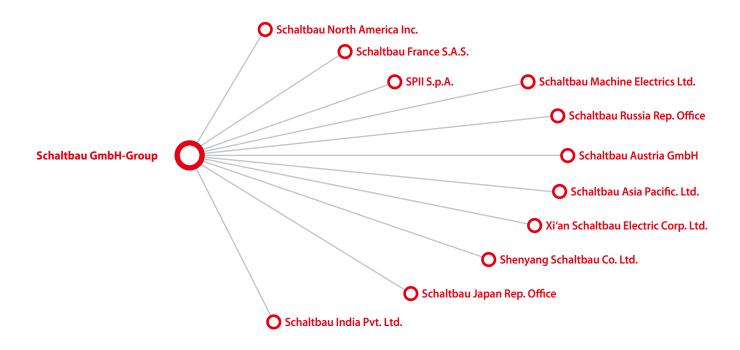






In order to guarantee maximum safety, Schaltbau products are subject to a strict quality and failure management. This enables us to standardise and optimise our processes and keep the failure rate low. Thus Schaltbau fulfils all the requirements for continuous product improvements – with a view to safety.





## Based in Europe, globally present

The various companies in the Schaltbau Group operate more than 30 sales and production sites worldwide. They also work together with external sales partners.

With their specialised knowledge and a high degree of product innovation, the companies in our Group have worked hard to win the confidence of their customers and strive continually to strengthen their current market position through well-targeted research and development activities. Organic growth is the result of innovative products and solutions, the concentration on new target groups and greater market penetration.

# Schaltbau GmbH Group

## Components and customer specific solutions

Schaltbau GmbH and its subsidiary companies adhere strictly to the principles set out in the general Code of Conduct of its parent company, Schaltbau Holding AG.

The Supplier Code of Conduct is the key document in which we describe the minimum expectations we place on our suppliers to source materials responsibly and in keeping with sound corporate principles. For this reason it is essential that our suppliers are familiar with the Supplier Code of Conduct and act accordingly. All suppliers to the Schaltbau GmbH Group are required to comply with the Supplier Code of Conduct. Failure to do so may result in the termination of the business relationship. Suppliers are requested to ensure that their contractual partners also comply with the provisions set out in this document.

#### **Partners**

Schaltbau GmbH as customer and all its subsidiaries (hereafter jointly "Schaltbau") are committed to integrity and the upholding of ethical practices in all aspects of their business conduct with customers, suppliers, employees, competitors and other stakeholders. "Suppliers" are individuals or legal entities that supply or render services to Schaltbau.





# Supplier Code of Conduct

### Compliance with laws, rules, regulations, interests, human rights, working conditions



Compliance with laws, rules and regulations

Suppliers are required to comply with all laws, rules and regulations applicable in the countries in which they conduct their business.



Conflicts of interest

Suppliers are required to avoid all conflicts of interest that may adversely influence business relationships.





#### Respect of human rights

Schaltbau expects its Suppliers to respect the personal dignity, privacy and rights of each individual. No individual may be forced to work against his or her will. Furthermore, any behaviour, including gestures, language and physical contact, that is considered sexual, coercive, threatening, abusive or exploitative is prohibited.



### Fair working conditions

Schaltbau ensures fair working conditions. For this reason, Schaltbau expects its suppliers to do the same by refraining from discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation.

Suppliers are required to respect the rights of employees to freely associate and bargain collectively.

Child labour is banned in accordance with the provisions of the International Labour Organisation (ILO).

Furthermore, Suppliers are required to refrain from the use of forced labour, including involuntary prison labour and work conducted by victims of slavery and human trafficking, and allow all employees the choice to discontinue their employment freely upon reasonable notice.

Suppliers are required to compensate employees fairly and comply with local wage regulations and/or collective agreements. If these do not exist, suppliers are required to pay employees at least the minimum compensation that enables them to meet their basic needs.

# Supplier Code of Conduct

### Competition, antitrust, anti-corruption, data protection, money laundering, import and export



#### Competition and antitrust

Suppliers are required to adhere to the principle of fairness in competition and comply with antitrust regulations. Unfair price or bid rigging, market-sharing agreements or the abuse of a dominant market position are not permitted.



#### Anti-corruption

Schaltbau expects its Suppliers to ensure that no benefits are promised or granted to employees of Schaltbau.

Suppliers may not offer or give bribes, kickbacks, illegal payments, incentives, gifts and other benefits of value in return for business opportunities. Furthermore, Schaltbau does not tolerate grants, offers or promises of anything of value to government officials with the aim of influencing official action or obtaining an improper advantage.



#### Data protection

Suppliers are required to comply with all applicable data protection regulations. Confidential business data relating to Schaltbau must be kept securely and may not be used by or disclosed to third parties without prior permission.



#### Money laundering

Suppliers are required to prevent money laundering and may not participate in any form of money laundering. Suppliers are prohibited from receiving, converting or selling property or assets, or concealing or disguising the nature of the proceeds, or possess or use property or assets, knowing that these are derived from criminal activity.



#### Import and export regulations

Suppliers are required to comply with all import and/or export control regulations, sanctions, embargos and laws relating to import and export.





# Supplier Code of Conduct

### Confidential information, health, safety, environmental management, product safety



# Confidential information and intellectual property

Confidential information and secrets obtained by Suppliers in the course of their business activities with Schaltbau may not be used or disclosed to third parties without prior permission. Suppliers are required to protect all intellectual property rights belonging to Schaltbau. Intellectual property belonging to Schaltbau may only be used in the course of business activities in collaboration with Schaltbau.



#### Health, safety and environmental management

Suppliers are required to provide a safe and healthy workplace for all their employees and conduct their business in an environmentally sustainable way. In particular, Suppliers are required to formally appoint a competent person to manage health, safety and environmental programmes and improvements and establish appropriate organisational structures and procedures for the effective management of health, safety and environmental risks. Furthermore, Suppliers are required to ensure that all their employees are sufficiently aware of these risks and appropriately trained to implement control measures.



#### Material compliance and conflict minerals

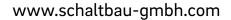
Suppliers are required to ensure that any goods they provide to Schaltbau comply with legal requirements. Suppliers are required to declare any substances listed in the "List of Prohibited and Restricted Substances" that are contained in the goods supplied. If suppliers manufacture products by using conflict minerals, they are required to implement a policy, exercise due diligence to investigate the source of these materials and respond in a timely manner to Schaltbau's requests for evidence of compliance with these requirements.



### **Product safety**

Schaltbau expects its Suppliers to provide products and services that comply with the latest safety standards observed by Schaltbau and also to comply with all legal requirements and industry specifications.







## Schaltbau – the smart and creative DC specialist

For detailed information on our products and services visi www.schaltbau-gmbh.com – or give us a call!



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