



Industrial Solutions GmbH

CODE OF CONDUCT

for suppliers and contractual partners

of

Heitkamp Industrial Solutions GmbH

Essen, 25.01.2021

Die Geschäftsführung

Christopher Hambleton

Onur Ulu

Atilla Kemal Saglam

		HEITKAMP Industrial Solutions			Document No.: HIS-POL 002		
Pages: 2/7	Doc. Type: POL	Doc. Level: 1	Language: EN	Responsible department: Top Management		Revision: 00	Date: 21.01.2021
Title: Code of Conduct for suppliers and contractual partners							

1. Labour and human rights

Corporate responsibility results in a commitment for HIS to respect human rights and fair working conditions for all people working for us. We demand that all people who work for us are treated with respect and dignity. HIS expects suppliers and contractual partners to comply with the following principles in particular:

Human rights

The suppliers and contractual partners of HIS respect and protect the globally applicable regulations for the protection of human rights as fundamental and universally applicable requirements. This includes in particular that the suppliers and contractual partners of HIS do not use forced labour or child labour. The suppliers and contractual partners observe the regulations on the legal minimum age for the employment of children set out in ILO Conventions 138 and 182.


Employees of suppliers and contractors are free to raise concerns and speak up without fear of disadvantage.

Equal opportunities and non-discrimination

The suppliers and contractual partners of HIS do not discriminate against anyone on the basis of ethnic, national or social origin, skin colour, gender, religion, ideology, age, disability, sexual orientation, political attitude, insofar as this is based on democratic principles and tolerance towards those who think differently, or other legally protected characteristics, insofar as this does not conflict with mandatory law.

Freedom of association

The fundamental right of all employees to form and join trade unions and employee representative bodies is recognised. Where this right is restricted by local law, alternative means of employee representation that comply with the law shall be encouraged.

		HEITKAMP Industrial Solutions			<small>Document No.:</small> HIS-POL 002		
<small>Pages:</small> 3 / 7	<small>Doc. Type:</small> POL	<small>Doc. Level:</small> 1	<small>Language:</small> EN	<small>Responsible department:</small> Top Management		<small>Revision:</small> 00	<small>Date:</small> 21.01.2021
<small>Title:</small> Code of Conduct for suppliers and contractual partners							

Minimum wage

The suppliers and contractual partners of HIS shall ensure that their employees are adequately remunerated, which at least corresponds to the legally valid minimum to be guaranteed. If there are no statutory or collectively agreed regulations, the remuneration is based on the industry-specific, locally customary collectively agreed remuneration and benefits that ensure an adequate standard of living for the employees and their families.

2. Responsible procurement

Product safety

The suppliers and contractual partners of HIS shall observe all applicable product safety regulations and requirements, in particular the legal requirements concerning the safety, labelling and packaging of products as well as the use of hazardous substances and materials and recycling requirements.

3. Occupational safety, health and environmental protection


In accordance with its policy and convictions, HIS wants to make a sustainable contribution to occupational safety, health and environmental protection and therefore expects its suppliers and contractual partners to comply with the following principles:

Safety at work and working hours

The suppliers and contractual partners of HIS shall comply with the respective applicable legal requirements for health and safety at work.

They support the further development and improvement of working conditions. Working hours shall at least comply with the respective national legal requirements or the minimum standards of the respective national economic sectors.

We expect suppliers and contractors to provide all their employees with adequate information and instruction on health and safety matters so that they can fulfil their responsibility to maintain a healthy and safe workplace.

		HEITKAMP Industrial Solutions			<small>Document No.:</small> HIS-POL 002	
<small>Pages:</small> 4/ 7	<small>Doc. Type:</small> POL	<small>Doc. Level:</small> 1	<small>Language:</small> EN	<small>Responsible department:</small> Top Management		<small>Revision:</small> 00
<small>Date:</small> 21.01.2021		<small>Title:</small> Code of Conduct for suppliers and contractual partners				

Compliance with environmental regulations

The suppliers and contractual partners of HIS assume responsibility with regard to environmental protection issues and comply with all legal requirements concerning the environment and sustainability.

Increase energy and resource efficiency

HIS suppliers and contractual partners use natural resources sparingly and minimise environmental impacts in their production processes and products. They contribute to the reduction of energy consumption and CO2 emissions.

4. Transparent business relations

Openness and transparency are the basis for credibility and trust in business dealings. HIS expects suppliers and contractual partners to comply with the following principles in particular:

Avoidance of conflicts of interest


HIS suppliers and contractual partners make their decisions solely on the basis of objective criteria and are not influenced by personal interests and relationships.

Integrity of employees

HIS suppliers and contractors must ensure that adequate and reasonable background checks have been conducted.

Ban on corruption

HIS suppliers and contractors do not tolerate corruption. They shall ensure that their employees, subcontractors or agents do not give, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, public officials or other third parties.

		HEITKAMP Industrial Solutions			Document No.: HIS-POL 002		
Pages: 5/7	Doc. Type: POL	Doc. Level: 1	Language: EN	Responsible department: Top Management		Revision: 00	Date: 21.01.2021
Title: Code of Conduct for suppliers and contractual partners							

Gifts, hospitality and invitations

The suppliers and contractual partners of HIS do not offer HIS employees or third parties, either directly or indirectly, inappropriate advantages in the form of gifts, hospitality or invitations to exert undue influence. Nor do they solicit or accept such improper advantages.

Dealing with authorities

The suppliers and contractual partners of HIS comply with the strict legal requirements in their dealings with authorities and public institutions. When participating in public tenders, they observe the respective legal requirements and the rules of free and fair competition.

5. Fair competition


HIS is a fair and responsible market participant and adheres to contractual obligations. HIS also expects this from suppliers and contractual partners, in particular compliance with the following principles:

Free competition

The suppliers and contractual partners of HIS shall comply with the applicable antitrust laws. In particular, they shall not enter into any anti-competitive agreements with competitors, suppliers or customers.

Export control

HIS suppliers and contractual partners shall ensure compliance with all applicable laws governing the import and export of goods, services and information.

		HEITKAMP Industrial Solutions			Document No.: HIS-POL 002		
Pages: 6/ 7	Doc. Type: POL	Doc. Level: 1	Language: EN	Responsible department: Top Management		Revision: 00	Date: 21.01.2021
Title: Code of Conduct for suppliers and contractual partners							

Money laundering

The suppliers and contractual partners of HIS only maintain business relationships with business partners of whose integrity they are convinced. They shall ensure that the applicable legal provisions against money laundering are not violated.

Business information

HIS suppliers and contractors publish business data and report on their business activities truthfully and in accordance with the applicable laws.

6. Protection of data, trade secrets and company assets

Confidential data, business secrets and company assets must be protected. HIS expects suppliers and contractual partners to comply with the following principles in particular:

Data protection

HIS suppliers and contractual partners shall comply with all applicable laws on the protection of personal data of employees, customers, suppliers and other data subjects.

Protection of know-how, patents, trade and business secrets


The suppliers and contractual partners of HIS respect the know-how, patents, trade and business secrets of HIS and third parties. They shall not disclose such information to third parties without the prior express written consent of HIS or in any other unauthorised manner.

Records

Suppliers and contractors shall maintain adequate internal records to ensure proper compliance with their legal, regulatory, financial and contractual obligations to HIS. Suppliers and contractors shall not destroy any records that may be relevant to any pending or threatened legal or administrative proceedings of which they become aware.

Dealing with company assets

The suppliers and contractual partners of HIS respect the tangible and intangible assets of HIS and do not use them for unfair or non-business purposes. They shall ensure that their employees as well as any third parties (such as subcontractors or representatives) employed

		HEITKAMP Industrial Solutions			Document No.: HIS-POL 002	
Pages: 7 / 7	Doc. Type: POL	Doc. Level: 1	Language: EN	Responsible department: Top Management	Revision: 00	Date: 21.01.2021
Title: Code of Conduct for suppliers and contractual partners						

by them within the framework of the business relationship neither damage nor misuse the assets of HIS.

7. Legal consequences of breaches of the CODE OF CONDUCT for suppliers and business partners

If a supplier or contractual partner of HIS does not comply with the principles laid down in this Code of Conduct, HIS is entitled to terminate the business relationship with this supplier or contractual partner by extraordinary notice.

Information can be passed on to the HIS compliance organisation by e-mail.

compliance@heitkamp-solutions.com