

Supplier Code of Conduct



Foreword

The Aspöck Group (=Aspöck) has been bringing light to the road for 40 years, making it Europe's leading manufacturer of prefabricated lighting systems for towed vehicles of all kinds.

Responsible as we are for our employees, the environment and our society, we obligate ourselves to compliance with ethical and sustainable practises in all our business activities. This primarily applies for our relationships with suppliers and business partners (=Suppliers).

For Aspöck, sustainability within the supply chain is an important component of its entrepreneurial responsibilities. The topic of sustainability extends across the entire procurement process for materials, products and services.

We have laid down our expectations on suppliers with regard to environmental protection, working conditions, the adherence to human rights laws and business ethics in this Code of Conduct. It reflects the non-negotiable minimum standard and the basis for relationships with our suppliers.

In this way, we want to assume our responsibility for people and the environment and ensure that our actions and the actions of our suppliers are ethically correct, ecologically sustainable and socially compatible.

01

Basic social principles, working conditions

Humane treatment

Our suppliers shall treat all their employees with respect. They may not make use of punishments or other forms of physical or psychological coercion, sexual harassment, sexual abuse, verbal abuse or the threat of such treatment.

Non-discrimination

Our suppliers are obligated not to discriminate employees based on their race, ethnic origin, skin colour, nationality, religion, gender, age, marital status, pregnancy, disability, sexual orientation, religious or political convictions or trade union memberships. They shall create a working environment without any harassment whatsoever.

Forced labour

Our suppliers must refrain from any form of forced labour, bonded labour or compulsory work. All work must be voluntary and the employee must be able to terminate the working or the employment relationship at any time. Slavery or human trafficking is prohibited.

Working age, child labour

Our suppliers must adhere to all local legislation on labour law with relation to minimum age limits and the legislation regarding child labour. Child labour is prohibited.

Remuneration and working hours

Our suppliers shall pursue a fair remuneration policy which complies with all national laws on payment and guarantees an appropriate standard of living. Employees shall be paid regularly and on time.

Health and safety at the workplace

Our suppliers shall adhere to the respective applicable legal specifications for health protection and safety at the workplace. They shall comply with the internationally-acknowledged standards and work actively on the identification and removal of safety deficits in order to improve workplace conditions so that health and safety can be guaranteed and protected.

Freedom of association

Our suppliers respect the right of freedom of association and collective negotiations. Employee representatives may not be discriminated against. Their work agreement may not be terminated in revenge for the exercising of employee rights, the assertion of grievances, the participation in trade union activities or the reporting of suspected legal violations.

02

The environment

Environmental protection

Our suppliers proactively undertake measures to ensure a responsible approach when dealing with their environment. The respective valid national environmental laws, regulations and standards must be complied with. They obligate themselves to put into place systems which prevent or at least minimise inadvertent leakages or releases into the environment. Employees shall be instructed on how environmental risks can be actively avoided.

Energy and resource efficiency

Our suppliers are expected to use natural resources sparingly and to reduce environmental pollution in the air, on land and in water. They shall play an active role in the reduction of greenhouse gas emissions and energy consumption.

Waste and recycling

During the development, the manufacture and the usage phase of products as well as during other activities, our suppliers are expected to take into consideration the avoidance of waste, the reuse, the recycling and the harmless, environmentally-friendly disposal of any remaining waste.

Conflict materials

On request, our suppliers shall issue information regarding the country of origin of raw materials. It is expected that no raw materials are used in products which are mined in conflict and high-risk regions, or those which finance armed groups guilty of violating human rights.

Hazardous substances

Our suppliers are expected to determine any chemicals or other materials which represent a hazard on release into the environment, and handle these so that their handling, transportation, storage, use or reuse and disposal take place safely.

Chemical substances

Should they manufacture or import chemical substances into the European Union in quantities of more than one tonne per year, our suppliers are expected to have these substances verifiably registered in the REACH (=Registration, Evaluation, Authorisation and Chemicals) authority central database.

Product safety

Our suppliers are expected to observe all the respective applicable legal product safety regulations and specifications. This also comprises the legal specifications concerning the safety, identification and packaging of products as well as the use of hazardous substances and materials. The suppliers shall inform Aspöck proactively regarding the environmental and safety aspects of their products.

03 Ethical principles

Compliance with legislation

Our suppliers shall comply with the applicable international, national and local legislation during their business activities. The necessary permits are to be obtained and submitted to Aspöck on request.

Corruption

Our suppliers may not take part in any form of corruption, blackmail or embezzlement or permit these. They shall ensure that their employees, sub-suppliers or representatives do not grant, offer or accept any unpermitted payments or advantages towards third parties. It is expected that suppliers do not grant or offer staff at Aspöck with gifts anything other than low in value, or other personal advantages.

Money laundering

Our suppliers comply with the pertinent legal provisions regarding the prevention of money laundering, and do not take part in money laundering activities.

Export and import laws

Our suppliers adhere to the respective applicable legislation regarding the export and import of goods, services and information. Trade restrictions, embargoes and other restrictions shall be respected.

Competition

Our suppliers conduct themselves fairly towards their competition. They practise their business activities by adhering to the applicable antitrust laws and regulations.

Conflicts of interest

Our suppliers make their decisions exclusively based on objective criteria. They shall not allow themselves to be influenced by personal interests and relationships.

Data protection, intellectual property, business secrets

Our suppliers shall observe all the respective application legislation regarding the protection of personal data of employees, customers, suppliers and other persons concerned. Intellectual property, patents, company and business secrets of Aspöck and third parties shall be respected and may not be forwarded without the express written consent of Aspöck.

Expectations; consequences in case of violation

Aspöck expects its suppliers and their employees to act responsibly, to keep to this Code of Conduct and to work in compliance with its guidelines and principles.

Aspöck is authorised to terminate business relationships to suppliers through extraordinary termination in case of violations against this Code of Conduct.