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Code of Conduct and Ethics

In this Code of Conduct and Ethics, the company management of Stelter Zahnradfabrik GmbH defines how day-to-day business should be conducted in an ethical and socially responsible way. It is derived from ethical requirements, applicable legislation and Stelter's own rules.

This code includes:

- How our management perceives its responsibility.
- How we deal with our employees and colleagues.
- The kind of behaviour customers can expect of us.
- How we deal with our suppliers.
- How we conduct ourselves when dealing with other interested parties (authorities, the environment, the wider world, etc.).

Every manager and each individual employee is responsible for conducting themselves according to this code.

The behaviour of our management staff is meant to serve as an example, as they are exponents of the principles of conduct and employ them in every situation.

Human rights, trust, respect

Every individual has the right to be treated justly, with dignity and respectfully. We believe in equality of opportunity and foster a work environment characterised by respect and tolerance, in which the value and the dignity of every individual are recognised and all employees treat each other with politeness, honesty and dignity. Harassment, bullying and intimidation are forbidden.

We reject forced labour and child labour and any form of exploitation or discrimination and ensure strict compliance with corresponding legislation.

Discrimination

We neither practice nor tolerate any kind of discriminatory behaviour in terms of recruitment, remuneration, training opportunities, termination or retirement based on ethnic origin, nationality, gender, age, marital status, religion or ideology, disability, pregnancy, sexual orientation, membership of a trade union or a political party or for any other reasons covered by the ban on discrimination.

Motivation and further training

We consider motivated employees and their identification with the goals of our company as a critical success factor.

We concentrate on further training that is position-related and applicable to the company, as well as the development and promotion of potential future management staff.

Health and safety

The health and safety of our employees is protected to the greatest possible extent by providing a suitable work environment. By complying with the safety regulations that apply in our company, every individual contributes towards a healthy work environment.

Product safety

We produce safe components for our products. We consider ourselves to be a partner to our customers. Long-term client relationships are part of our commercial success. Therefore, providing our components in the best quality is of course important to us.

Our products must not have any damage or defects that could harm the health or damage the property of our customers.

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Compliance with antitrust and competition regulations

With our high-quality products, innovative solutions and our reliability, we compete openly and fairly on the world market. We do not engage in any kind of illegal and/or criminal practices; such as bid rigging, which prevents, distorts or limits competition.

We have an obligation to compete fairly and comply with rules and regulations, on a local, national and international level.

Conflicts of interest, bribery and corruption

All our employees avoid situations in which their personal or financial interests come into conflict with those of the company.

It is therefore prohibited for our employees in particular to involve themselves in competing companies, customers or suppliers or to enter into commercial relationships with them in a private setting if a conflict of interest would arise as a result. Such a conflict always occurs when the nature and extent of such involvement is sufficient to influence behaviour when carrying out ones duties for our company in any way.

Our employees unambiguously distance themselves from the demand, acceptance and receipt of unjustified or unlawful advantages which could influence commercial decisions or transactions.

In turn, none of our employees will offer or provide illicit advantages, to try to engineer them or make agreements to this end in any kind of commercial activities for business partners, their employees or other third parties.

Protection of assets and secrecy

We place importance on the conscientious handling of company property of all kinds; e.g. products, work equipment or intellectual property.

The protection of the company's tangible and intangible assets, the confidential treatment of operational and commercial secrets and customer-related commercial information and compliance with the applicable principles on the protection of data are expected of every individual.

Suppliers

We set high standards for our suppliers and expect them to abide by the same strict principles which are applied to us ourselves when conducting their business, especially in how they treat their staff.

Corporate citizenship

We explicitly stand by our responsibility as a member of the community in which we run our operations and commit ourselves to open communication with all the authorities, as well as commercial and public interest groups.

Compliance

This Code of Conduct and Ethics from Stelter Zahnradfabrik GmbH has been approved by the Managing Director and published for all employees. Our employees will abide by this code when carrying out their duties without exception.

Questions regarding application or interpretation and reports of potential violations are directed to the respective superior.

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