



# CODE OF CONDUCT

FOR SUPPLIERS OF THE  
EMCO GROUP





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## EQUALITY NOTICE

For the sake of convenience, where necessary only the masculine form is used for personal names and personal nouns in this document. The corresponding terms apply to all genders in accordance with the principle of gender equality.

# 1. OUR UNDERSTANDING OF SUSTAINABILITY IN THE EMCO GROUP

The emco Group has been a successful, independent and family-run company for over 70 years. Our unique success story is down to our commitment to quality, coupled with our passion for innovation and the international focus of our business. We take a proactive and forward-looking approach to our planning. This allows us to create sustainable values through innovation and quality for both ourselves and our customers. So that we can continue to grow profitably and also operate as a financially independent company in the future, we always take our corporate decisions with foresight, very much in the spirit of sustainable development.

In doing so, we also factor in the social and ecological impact of our actions. We are committed to ensuring responsible corporate governance and in particular to upholding human rights. As an internationally active company, we believe it is our corporate responsibility to make a contribution to the achievement of the global targets on sustainable development, namely the [UN Sustainable Development Goals \(SDGs\)](#), and ensure that our suppliers are also on board when it comes to implementing our sustainability strategy.

**The emco Group requires adherence to these principles and expects responsible business practices in compliance with conducive social framework conditions.**

For this reason, we have developed a Supplier Code of Conduct. This Code of Conduct defines the minimum standards for compliance with corporate due diligence in the supply chain that need to be respected and adhered to by suppliers and third parties in business dealings with the emco Group.

The Code of Conduct is based on the [Universal Declaration of Human Rights](#) and the principles of internationally recognised standards for responsible corporate governance. These include the [UN Global Compact](#), the core labour standards of the [International Labour Organization \(ILO\)](#) and the [Organisation for Economic Co-Operation and Development \(OECD\)](#). We are committed to collaborating only with suppliers that act according to the principles and, in this context, comply with the relevant national legal requirements.

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We would like to thank all the suppliers  
who share our commitment to responsible  
and ethical conduct.

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## 2. LABOUR AND HUMAN RIGHTS

### A. BAN ON CHILD LABOUR

**The emco Group does not tolerate** any form of child labour in its supply chain. We expect all suppliers to comply with the **ILO's core labour standards**, and, in this context, we expect them to prohibit all forms of exploitation of children in their companies and to ensure that such practices never take place.

### B. BAN ON DISCRIMINATION

**The emco Group expects** its suppliers to ensure equal treatment of all employees. Discrimination of any type shall not be tolerated and is prohibited. This includes all forms of disadvantage, denigration and unequal treatment on the basis of a person's skin colour, nationality, ethnic origin, gender, religious or philosophical conviction, political opinion, age, physical characteristics, sexual orientation, appearance or other personal characteristics.

### C. FORCED LABOUR

**The emco Group demands** that its suppliers reject forced labour, modern slavery and human trafficking. The employment of persons under forced labour conditions is prohibited. All employees shall perform their work or provide their services on a voluntary basis. They must be permitted to leave the company of their own free will under observance of the statutory notice periods. All threats of punishment – including isolation, restricting freedom of movement, withholding identification documents or work permits, intimidation, physical violence and withholding wages – are prohibited.

### D. FREEDOM OF ASSOCIATION

**The emco Group demands** that its suppliers respect the right of association and the right to collective bargaining under observance of applicable laws.

### E. WORKING HOURS AND COMPENSATION

**Die emco Group insists** that its suppliers observe the applicable national legislation on working hours. In an absence of national legislation, the international standards laid down in the core labour standards of the ILO (**International Labour Organisation**) shall apply. Compensation must be consistent with the applicable local laws, ensuring the legally valid and guaranteed minimum income.

### 3. HEALTH AND SAFETY IN THE WORKPLACE

Suppliers must take appropriate precautions to ensure the health and safety of their employees and contractors. In order to guarantee the safety and well-being of employees, suppliers should have health and safety programmes in place.

**The emco Group expects** its suppliers to take appropriate safety measures to ensure the effective protection of its employees and contractors and compliance with applicable national legislation on health and safety in the workplace.

The emco Group requires the implementation of necessary technical protection measures in order to reduce risks in the workplace and also prevent accidents and occupational illnesses. Such measures include a safe and appropriate working environment, protective equipment, employee training and instruction in a clear and comprehensible form, and also appropriate measures for emergency planning and documentation.

### 4. ENVIRONMENTAL OBLIGATIONS

**The emco Group expects** its suppliers to comply with all applicable environmental regulations, provisions on health and safety in the workplace as well as international conventions on environmental standards. Suppliers shall have in place suitable management systems to ensure that product quality and safety standards meet the applicable requirements. Furthermore, they shall promote the safe and environmentally compatible development, production, transport, use and supply of their products.

The emco Group places particular emphasis on ensuring that resources are utilised economically, that technologies are used in an energy-efficient and environmentally friendly manner and that emissions in air, water and soil are reduced.

## 5. BUSINESS INTEGRITY

**It is vital for the emco Group** that its suppliers comply with all applicable laws, legal provisions and regulations in the countries in which they operate or are based. The business partner shall ensure that its activities, corporate structure and services are truthfully and accurately documented and disclosed according to the applicable provisions and industry standards.

### A. BAN ON CORRUPTION AND BRIBERY

**The emco Group expects** its suppliers to condemn all forms of corruption, bribery and extortion and ensure compliance with the conventions of the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) in their companies. All forms of bribery, corruption, extortion and embezzlement are prohibited. Suppliers must not grant any benefits or offer, pay or accept any bribes. Furthermore, intermediary third parties must not be used to handle or facilitate such activities and every form of action must be taken to combat such behaviour.

### B. INVITATIONS AND GIFTS

**The emco Group expects** its suppliers to prohibit the sending of gifts to private persons or public officials for the purpose of influencing business decisions or encouraging these individuals to violate their obligations in some other way. Invitations and gifts must only be given on appropriate occasions, to an appropriate extent and if they can be considered as reflecting local, generally recognised and legal business practice.

### C. AVOIDING CONFLICTS OF INTERESTS

**The emco Group expects** its suppliers to make decisions connected to business with the emco Group based exclusively on objective criteria.

### D. FAIR COMPETITION

Suppliers of the emco Group must conduct their business in accordance with fair and intensive competition and under observance of applicable antitrust law. They must adhere to fair business practices, including accurate and truthful advertising.

## E. DATA PRIVACY

**It is important for the emco Group** that its suppliers guarantee the protection of personal data belonging to all customers, suppliers, other business partners and employees, under observance of both national and international data privacy regulations. The supplier shall treat in the strictest confidence all company data and other sensitive information, manage such information appropriately and protect it against unauthorised access through adequate technical protective measures.

## F. EXPORT CONTROL AND CUSTOMS LEGISLATION

**The emco Group expects** its suppliers to ensure strict compliance with applicable export prohibitions, sanctions and embargoes in international trade.

# 6. SUPPLY CHAINS AND DUE DILIGENCE

Suppliers of the emco Group must comply with national requirements on supply chains and due diligence.

### **Conflict minerals**

Suppliers must ensure that they do not supply the emco Group with any products containing conflict minerals that might be financing or supporting armed groups, directly or indirectly, resulting in potential human rights violations. The emco Group expects its suppliers to fulfil their due diligence obligations for responsible supply chains of minerals from conflict-affected and high-risk areas ([OECD DDG](#)) as well as all applicable legal regulations on conflict minerals.

### **Product safety**

The supplier shall meet the relevant product and process quality standards at all times and comply with the applicable legal requirements and all contractual agreements.



## 7. REPORTING AND COMPLAINTS PROCEDURES

### Reporting violations

The supplier is obliged to report any suspected violations of the Code of Conduct for Suppliers. The notification must be made in compliance with the legitimate interests of the suppliers, the rights of employees, data privacy and protecting trade secrets. If there is sound evidence or concerns suggesting unlawful conduct or misconduct, we ask our suppliers to contact the responsible compliance department.

[compliance@emco.de](mailto:compliance@emco.de)

The aim is to counteract violations at an early stage and limit the damage for the emco Group, our employees and our suppliers. We also offer all employees, suppliers and other third parties the option to report incidents anonymously through our whistleblower system.



<http://emcogroup.whistleblownetwork.net>

Where legally possible, the emco Group welcomes any measures taken by its suppliers to establish appropriate mechanisms that would allow employees to highlight breaches of human rights or environmental obligations, while ensuring that no sanctions are imposed upon such employees for raising such concerns.

## 8. COMPLIANCE WITH THE CODE OF CONDUCT

The contents of the Code of Conduct reflect what we expect from our suppliers. We expect them to regularly refer to the contents of this Code of Conduct or apply similar code of conduct standards. We value long-term business relationships based on partnership.

We reserve the right to regularly inspect our suppliers' compliance with relevant principles and requirements as part of a due diligence process in order to identify, reduce and prevent risks in the supply chain. Should serious violations be identified, we reserve the right to take appropriate contractual measures, including termination of the contractual relationship.

Please fill this out and send it by email to [supply-chain@emco.de](mailto:supply-chain@emco.de), by fax to +49 (0) 591 9140 811 or by post to emco Group, Breslauer Straße 34–38, 49808 Lingen, Germany.

## SUPPLIER DECLARATION OF COMMITMENT

We hereby declare that we have received the Code of Conduct for Suppliers of the emco Group and commit to ensuring compliance with these principles and requirements, where applicable beyond our obligations from commercial contracts with the emco Group or emco Group companies.

Furthermore, we understand that any violation of the Code of Conduct shall be considered a serious breach of contract, which may result in the suspension or termination of the supply arrangement.

### Right to audit

We agree that the emco Group or an independent third party commissioned by the emco Group may conduct audits, following prior arrangement, in order to inspect compliance with the Code of Conduct at our plants or at commissioned production facilities or depots.

Place, date

Company address or stamp and legally binding signature

# SOURCES AND LINKS

## Universal Declaration of Human Rights

[https://www.ohchr.org/sites/default/files/UDHR/Documents/UDHR\\_Translations/eng.pdf](https://www.ohchr.org/sites/default/files/UDHR/Documents/UDHR_Translations/eng.pdf)

## UN Sustainable Development Goals (SDGs)

<https://sdgs.un.org/goals>

## ILO's core labour standards (International Labour Organisation)

[https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/normativeinstrument/wcms\\_716594.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf)

## 10 Principles of the UN Global Compact

<https://www.globalcompact.de/en/about-us/united-nations-global-compact>

## OECD (Organisation for Economic Co-Operation and Development)

<http://dx.doi.org/10.1787/9789264252479-en>

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