


Stand: 01.01.2023	Code of Conduct	
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1 Policy statement

S&R Eisenmann is a globally active company. Compliance, integrity and sustainability are anchored in our corporate culture. The guiding and business principles of S&R Eisenmann as well as our Code of Conduct reaffirm our ongoing commitment to compliance with laws, to promoting fairness, respecting cultural differences, assuming social responsibility and protecting the environment and the well-being of the people who work with and for us along the supply chain. With this document, the management of S&R Eisenmann GmbH provides clear rules of conduct as well as an effective control system in order to offer protection, to avoid breaches of law and to establish a binding course of action for all suppliers.

As a certified company (ISO 9001), we are committed to conducting our business activities in accordance with the guidelines. The Code of Conduct applies worldwide and is aimed at both manufacturing suppliers and service providers of all kinds, including consultants, intermediaries and other business partners as well as the respective subcontractors.

2 Goal of the Code of Conduct

S&R Eisenmann expects its suppliers to comply with all principles and requirements described below, to pass them on to their subcontractors and subcontractors and to work towards ensuring that their subcontractors and subcontractors also comply with these principles and requirements.

3 Compliance with laws


The suppliers of S&R Eisenmann comply with all applicable laws, regulations and regulations in the countries in which they operate and take appropriate measures to ensure compliance with these laws, regulations and regulations in their companies and at their suppliers.

3.1 Corruption, bribery, extortion, embezzlement and fraud

We have a zero-tolerance policy towards all forms of corruption, bribery, embezzlement, theft or extortion and require our suppliers to do the same.

Suppliers must comply with applicable anti-corruption laws, including those targeting bribery abroad.

In particular, suppliers will not accept bribes, kick-backs or other illegal payments, incentives, gifts, hospitality, favors or other benefits or gratuities of value for the realization of business opportunities or in any way related to doing business with our company.

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3.2 Conflict

Conflicts of interest arise when a person or company (whether private or public) can exploit its own professional or official function in any way for personal or corporate good.

S&R Eisenmann's suppliers make business decisions exclusively on the basis of objective criteria and are not influenced by personal interests and relationships. They will immediately disclose any actual or potential conflict of interest in connection with their work for S&R Eisenmann.

3.3 Fair and free competition

S&R Eisenmann's suppliers respect fair and free competition and comply with the laws that protect and promote it, in particular the applicable antitrust laws. They do not enter into anti-competitive agreements with competitors, suppliers or customers, exchange information relevant to competition and do not abuse a dominant position.

3.4 Money laundering and terrorist financing / financial records

The suppliers of S&R Eisenmann ensure that the applicable provisions for the prevention of money laundering and terrorism financing are complied with. They maintain financial records and prepare reports in accordance with applicable laws.

3.5 Export Control and Customs

S&R Eisenmann's suppliers ensure that they comply with all regulations for the import and export of goods, services and information. They comply with customs and foreign trade obligations in all countries in which they do business and observe the applicable sanctions imposed.


3.6 Privacy

Suppliers of S&R Eisenmann comply with the applicable laws for the protection of personal data of employees, customers, business partners and other personal data.

3.7 Protection of confidential business information, protection of (intellectual) property

Non-personal data resulting from a business relationship will also be adequately protected. Under no circumstances will confidential content be published, passed on to third parties or made available in any other form without authorization.

S&R Eisenmann's suppliers shall adequately protect S&R Eisenmann's know-how, patents, trade and business secrets.

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4 Human rights / fair and safe working conditions

Respect for internationally recognized human rights and the creation of optimal **working conditions** are the basis of all business relationships for S&R Eisenmann. S&R Eisenmann's suppliers undertake to respect the rights of their employees and to treat them in accordance with the guidelines of the international community.

4.1 Prohibition of child labor

Child labor is prohibited. The minimum age for admission to employment in accordance with the applicable legal provisions is respected. If there are no legal regulations, Convention 138 of the International Labor Organization (ILO) applies accordingly. Under this Convention, the direct or indirect employment of children under the age of 15 years is in principle not permitted. Employees under the age of 18 may only work in accordance with the legal requirements of their country of employment.

4.2 Prohibition of slavery and forced labor

S&R Eisenmann does not tolerate slavery (modern slavery, e.g. through forced overtime, withholding of identity documents, etc.), serfdom, forced labor, in whatever form, or human trafficking in the supply chain. S&R Eisenmann also does not accept debts or contractual debt bondage or involuntary prison labor, the work must always be done voluntarily.

4.3 Freedom of association

In accordance with local laws, suppliers must respect the right of their employees to join, not to join or to establish employee representation without fear of reprisals, intimidation or obstruction by employers.

Suppliers must recognise and respect the free activity of trade unions in accordance with the law of the workplace, in particular the right to strike and the right to collective bargaining.

4.4 Equal opportunities and non-discrimination


S&R Eisenmann expects its suppliers not to tolerate discrimination or unequal treatment in its own business area, in particular on grounds of national or ethnic origin, social origin, race, religion or belief, political opinion, sexual orientation, trade union activities or due to age, gender or any form of disability.

4.5 Occupational health and safety

Our suppliers ensure occupational safety and health in accordance with applicable laws and requirements. S&R Eisenmann obliges its suppliers to prevent occupational accidents, health hazards and work-related illnesses of employees.

4.6 Violence and harassment in the workplace

S&R Eisenmann does not tolerate violence in the workplace, neither in its own business premises nor in the supply chain. This includes direct or indirect threats, threatening behavior, intimidation, physical attacks and any form of harassment.

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4.7 Fair pay and working hours

S&R Eisenmann's suppliers ensure that their employees are remunerated appropriately and at least comply with the statutory minimum wage regulations. In the absence of such regulations, remuneration shall be based on remuneration and services customary in the industry and location. The working hours must at least comply with the applicable laws or industry standards of the respective national economic sectors. The International Labor Organization Convention limiting working hours and rest periods must be complied with as a minimum standard at all times.

5 Environmental protection

S&R Eisenmann assumes responsibility for business activities that are as environmentally friendly as possible and expects the same from its suppliers. S&R Eisenmann's suppliers ensure compliance with the environmental and energy laws applicable to them, use natural resources sparingly and minimize environmental impacts in their production processes and products.

They ensure the environmental compatibility of products and manufacturing processes and contribute to the reduction of emissions as well as energy and water consumption. They ensure compliance with legal requirements regarding waste disposal as well as the storage and handling of hazardous substances.

6 Product compliance and safety

For S&R Eisenmann, it is not only a legal obligation, but also its own claim to comply with legal and official regulations regarding product conformity and safety.

This presupposes that S&R Eisenmann's suppliers develop, manufacture and supply products that correspond to the respective state of the art and guarantee the requirements with regard to product integrity, conformity and safety.

The suppliers of S&R Eisenmann comply with the official and technical regulations and specifications applicable in the country of manufacture and assembly, in particular the applicable laws on the safety, labelling and packaging of products and the use of hazardous substances and minerals.


They ensure that all products and services meet the contractually defined criteria for product conformity, safety and quality upon delivery and can be safely used for their intended use.

7 Due diligence on supply chains and minerals from conflict-affected and high-risk areas

S&R Eisenmann expects its suppliers to implement an appropriate and effective risk management system to identify, prevent and mitigate risks of human rights violations and environmental impacts in their supply chains, including appropriate grievance mechanisms and reporting based on the United Nations Guiding Principles on Business and Human Rights and other relevant laws and guidelines.

Suppliers undertake to comply with all applicable laws relating to due diligence along the supply chain. As part of its general supply chain due diligence obligations, S&R Eisenmann expects its suppliers to be aware of and comply with applicable legal requirements regarding minerals from conflict-affected and high-risk areas.

Upon request, suppliers shall provide S&R Eisenmann with information about smelters or refineries used by them or their subcontractors for minerals such as tin, tantalum, tungsten or gold.

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8 Compliance by suppliers with the Code of Conduct

8.1 Obligation of suppliers

The suppliers of S&R Eisenmann undertake to comply with the provisions and principles of this Code of Conduct. They shall ensure, e.g. through appropriate training measures, that their managers and employees are aware of and comply with the principles of conduct laid down therein.

In addition, the suppliers undertake to pass on these principles of conduct to their respective direct and indirect business partners, to oblige them accordingly and to ensure their conformity with this Code of Conduct. This applies in particular to S&R Eisenmann's human rights and environmental expectations, which are expressed in this Code of Conduct.

S&R Eisenmann reserves the right to review compliance with the laws and requirements of this Code of Conduct on a case-by-case basis in consultation and taking into account necessary requirements.

8.2 Complaint mechanism and measures in case of infringement

S&R Eisenmann encourages all those who discover violations of the provisions of this Code of Conduct to report them to an appropriate place (e.g. to employees of S&R Eisenmann).

S&R Eisenmann considers compliance with the principles contained in this Code of Conduct to be essential for the respective contractual relationship. If a supplier violates the principles contained in this Code of Conduct, S&R Eisenmann is entitled, without prejudice to other contractual provisions, to terminate the transaction or business relationship by extraordinary termination.

It is at the discretion of S&R Eisenmann to waive the termination and to instruct the supplier to immediately create and implement a concept that prevents the termination of the business relationship and future violations. For the duration of the implementation of the concept, S&R Eisenmann is free to temporarily suspend the business relationship.

S&R Eisenmann GmbH –
Marcel Brinkwirth -
Hemmingen, 01.01.2023
(valid without signature)