



24.9.2018

Code of Conduct



Preamble

SYE Europe GmbH and its affiliated companies affirm their Corporate Social Responsibility as a part of their global activities. This Code of Conduct for Corporate Social Responsibility (hereinafter called „CoC“) acts as a guideline for the SYE Europe Group, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust.

The content of this CoC is an expression of the common core values of the SYE Group.

1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means SYE assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interest. SYE voluntarily contributes to the well being and long-term development of a global society at every point it can at the locations where it is in business. SYE is geared towards universally held ethical values and principles, especially integrity honesty and respect of human dignity.

2. Where the CoC applies

2.1 This CoC is valid for all SYE branches and business units worldwide.

2.2. SYE commits to promoting adherence to the content of this CoC at every point it can for its suppliers and in other parts of the value chain.

3. Core Values for Social Responsibility in Corporate Management

SYE will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.

3.1 Adherence to Laws

SYE will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, SYE will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

3.2 Integrity and Organizational Governance

3.2.1 SYE gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.



3.2.2 SYE rejects corruption and bribery. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

3.2.3 SYE pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behaviour and high standards of quality for work. SYE fosters partnership and trusting interaction with the supervisory authorities.

3.3. Consumer Interests

To the extent consumer interests are affected, SYE abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

3.4 Communication

SYE communicates in an open way and is oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They be properly stored. Company secrets and partner's information will be handled sensitively and will be kept in confidence.

3.4 Human Rights

SYE is committed to promote human rights. SYE respect human rights stated in the Charter of the United Nations, especially those named in the following:

3.5.1 Privacy

Protection of privacy

3.5.2 Health and safety

Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.

3.5.3 Harassment

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4 Freedom of Conscience

Protection and guarantee of the right to freedom of conscience and freedom of expression.



3.6 Working conditions

SYE abides by the following core work standards:

3.6.1 Child Labour

The prohibition of child labour, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit.

3.6.2 Forced Labour

The prohibition of forced labour of any kind.

3.6.3 Wage Compensation

Laes and requirements concerning compensation. Especially in regards to the level of compensation.

3.6.4 Employee rights

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country.

3.6.5 Prohibition of Discrimination

Treatment of all employees in a non-discriminatory fashion.

3.7. Hours of Work

SYE abides by work standards concerning the longest permitted time of work.

3.8 Environmental Protection

SYE fulfils the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation.

3.9 Civic Commitment

SYE contributes to the social and economic development of the countries and regions where it is in business and promote appropriate, volunteer activities by its employees.

3.10 Conflict Minerals

SYE endeavours not to procure raw material from regions or countries that give reason for serious ethical and/or ecological concern, or to use such raw material for production. Accordingly, it is SYE´s aim by diligently monitoring and auditing the supply chain to ensure that no so called conflict minerals are procured or used in the production.



4. Implemetation and Application

SYE will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CoC both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No right exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

Hüllhorst, 24. September 2018

SYE EUROPE GmbH

Thomas Sasse

- Geschäftsführung -