

CODE OF CONDUCT

Seeberger Code of Conduct and
Sustainable Development Goals



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Revision date: 2023-06-01

Replacing rev. dd. 00.00.00

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1. INTRODUCTION

In 1983 Seeberger has commenced with the supply of high-quality products “Made in Germany”. We have specialised on the production of tubes and profiles from stainless steel, steel, aluminium, brass and copper – predominantly for the automotive industry. As a family run business, we have put our stake on mutual trust and reliability. This has been a solid base for cooperation in good partnership. We intend to expand our position as a solid independent business undertaking by way of permanent improvements in our performance and responsible cost-efficiency actions.

As a committed employer and place of training we are fully aware of our ethical and social responsibility. This Code of Conduct has been formulated to define the principal values that provide us with orientation. From our employees we expect an utmost respect for these values adhering to the principles defined herein implementing the same in their day-to-day work. Hereinafter you will find both, the tasks we have imposed on ourselves, and the standards our suppliers expect us to comply with.

2. BASIS OF COOPERATION

We cooperate in a friendly, polite and team-oriented way demonstrating a positive attitude. We support each other. Our specialised knowledge and motivation is subject to a never-ending improvement. Constructive criticism has the purpose of improving matters. We have no intention of hurting humans.

Our cooperative, democratic management style is based on the assumption that our entire staff will cooperate in a reliable way and, within their sphere of activities, act with self-responsibility. This includes that they may and should express criticism whenever they consider inappropriate any process in the business undertaking or the conduct of colleagues and/or superiors. This is a condition that cannot be done without to guarantee a positive working atmosphere. The basis of our success has been a content and qualified staff. They are committed to our customers by way of professionalism and performance.

The compliance with all applicable laws is a matter of course to both management and staff.

3. OBSERVATION OF HUMAN RIGHTS

Seeberger is committed to observe Human Rights within their sphere of influence. We undertake to participate in no violation of Human Rights, be it in a direct or indirect way.

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4. CHILD LABOUR, FORCED LABOUR AND TRADE IN HUMAN BEINGS

Seeberger declares adherence to all bans on forced labour. This shall include all kinds of work or services, which have been provided by a person under the threat of punishment or force. We also declare our compliance with the prohibition on any and all ways of trade in human beings. In strong terms we condemn both child labour and the working of minors. We expect from our suppliers a compliance with all laws and regulations concerning the minimum age for employment. We have zero tolerance for child labour, forced labour and/or trade in human beings.

5. FAIR WORKING CONDITIONS

Seeberger has a high regard for fair working conditions. The same are applicable to the entire workforce. This includes the compliance with statutory provisions on working hours, vacation days and overtime as well as the right to fair pay with due consideration for statutory minimum wages. As a growing business we have a clear interest in never-ending improvements on part of our workforce. Consequently, we take great interest in their professional development supporting them whenever they wish to upgrade their qualification.

6. FAIR COMPETITION AND FIGHTING OF CORRUPTION

Our understanding of fairness and good business relations prohibits both the payment and the acceptance of bribes, slush money or similar gifts of money. Seeberger disapproves of all kinds of corruption including extortion. There may be no influencing of decision-making processes by way of improper payments.

We consider competitive injury like price-fixing agreements with competitors, allocation of sales territories are just as inadmissible as the misuse of one's position in a market.

7. FREEDOM OF ASSOCIATION AND FREEDOM OF ASSEMBLY

Seeberger respects the right of their employees to freedom of association and freedom of assembly. We offer our workforce open communication with the management. They have to fear no disadvantage.

8. DISCRIMINATION

Seeberger undertakes to deal with all staff members on a non-discriminatory basis irrespective of their race, colour of skin, religion, national origin, sex, age, sexual preference, family status, physical disability or invalidity. We will hire, train and pay our workforce solely on the base of their performance, work-related qualification and ability. We take diversity among our workforce as an advantage wishing to leave no room to unequal treatment.

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9. PREVENTIVE HEALTH CARE AND INDUSTRIAL SAFETY REGULATIONS

Seeberger complies with the applicable legislation to preventive health care and safety standards at work. We use all our strength to keep the risk for our workforce at a very low level by taking appropriate action to prevent any impairment of their health or accidents. We will make sure to observe and control on a regular basis prevailing conditions, which are applicable to preventive health care, ergonomics at the workplace and/or safety standards at work informing and training our workforce accordingly.

10. DATA PROTECTION AND PROTECTION OF INFORMATION SOURCES

Seeberger makes sure to comply with the applicable guidelines and rules for the protection of data when processing personal data. We are in compliance with the standard rules on the protection of information sources when processing information about customers, suppliers and/or employees. This has been ensured by our documented IT-guidelines.

11. CONSERVATION OF THE ENVIRONMENT

Seeberger has given special importance to the conservation of the environment. No later than 2006, with the introduction of our environmental management system under the DIN ISO 14001 standard, we have made it clear that we take the conservation of resources seriously wishing to protect our environment. We set great store on the reduction and efficient use of our energy consumption, the management of natural resources, the avoidance of waste as well as the utilization of recycling options applying a great sense of responsibility in the management of chemicals. Since 2018 Seeberger has been certified as a business that compensates emissions.

12. BASIC PRINCIPLES FOR THE GUIDELINES

The Seeberger Code of Conduct has been based on the following generally recognised guidelines:

- Universal Declaration of Human Rights, UN resolution 217A (III) – 1948
- ILO (International Labour Organization) declaration on fundamental principals and rights at work
- United Nations Convention Against Corruption – 2003
- Principals of the “Rio Declaration On Environment And Development” – 1992
- United Nations 10 Global Compact Principles –1999

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13. OBSERVATION OF THE GUIDELINES

This Seeberger Code of Conduct has listed the minimum standards we recognise. All our suppliers may expect that we will comply with them. The definition and implementation of these guidelines we consider an essential part of our responsible management system.

With all activities we assume compliance with the national laws, rules and regulations as well as with the statutory customs and export provisions. The same shall be applicable for all Seeberger staff as well our suppliers. In case of any infringement on laws and/or the standards defined hereinabove we reserve the right to take action under the labour legislation or to terminate the business relation itself.

14. CONTACT

In case you have any question concerning this Code of Conduct or the concept of sustainability or wish to comment and/or complain on grounds of possible infringements on laws or this Code of Conduct feel free to contact codeofconduct@seeberger.net. We guarantee the anonymity of the informing person as well as the confidentiality, whatever happens.

Seeberger GmbH & Co.KG



Frank Seeberger
Managing Director