



# Code of Conduct for FLEXA staff members

Principles for social responsibility

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**INTELLIGENT PROFESSIONAL SOLUTIONS FOR PROFESSIONALS.**

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Wir entwickeln und produzieren  
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We develop and produce cable protection devices including the corresponding connectors in Germany.

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ERFÜLLEN HOHE STANDARDS UND  
HABEN WELTWEITE ZULASSUNGEN**

**OUR QUALITY PRODUCTS MEET  
HIGHEST STANDARDS AND HAVE  
RECEIVED WORLDWIDE APPROVALS**

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## Principles for FLEXA's social responsibility.

This Code of Conduct is to serve as a guideline and as a behavioural standard for our acting as a FLEXA manager or employee.

The FLEXA Code of Conduct constitutes a binding internal standard based on applicable law relevant for all our business activities.

### 1. PRINCIPLES FOR FLEXA'S SOCIAL RESPONSIBILITY

We as the FLEXA staff are convinced that social responsibility is an important cornerstone for our long-term success. Social responsibility for us is the condition for and the result of value-oriented and sustainably profitable management.

Our principles regarding social responsibility shall apply without limitations worldwide to any region and to any culture. Every member of our staff receives the same opportunities for his/her individual, personal further development. Our support originates from the social moral concepts of fairness and equal opportunities.

This means that every member of staff will be deployed, supported, and further developed without any discrimination according to his/her competences, skills, and performance irrespective of his/her gender, origin, and religion.

We commit ourselves to respectful and correct relations with our customers, with our suppliers, and with all our other business partners. This explicitly includes the relations to political parties and to the authorities.

We consider active and responsible environmental protection as well as careful utilization of limited resources obligatory.

#### **HUMAN RIGHTS**

FLEXA respects and supports compliance with internationally accepted human rights. Forced labour FLEXA strongly depreciates and outlaws any kind of forced labour.

#### **CHILD LABOUR**

FLEXA stands up for a sustainable abolition of exploitive child labour, i.e. FLEXA ensures that its suppliers also distance themselves from child labour. The development of children must not be restricted, their safety and health must not be curbed, and their dignity must be respected.

#### **RELATIONS TO OUR STAFF**

It is a corporate objective to integrate, to inform, and to involve as directly as possible every single staff member. The behaviour and the tone towards the employees is shaped by respect and fairness.

#### **EQUAL OPPORTUNITIES**

FLEXA commits itself to equal employment opportunities and to refraining from any kind of discrimination unless national laws demand a selection according to certain criteria. Treating employees differently due to their gender, their race, any handicap, their origin, their religion, their age, or their sexual preferences is not permissible.

#### **HEALTH PROTECTION**

FLEXA makes sure that on-the-job safety and health protection at the workplace meet at least national standards and supports a continuous further development to improve the world of work.

#### **REMUNERATION**

FLEXA respects the right of appropriate remuneration typical for the particular labour market.

#### **WORKING HOURS**

FLEXA ensures compliance with the legal regulations and with the agreements on working hours and on regular and paid holidays.

#### **QUALIFICATIONS**

FLEXA supports endeavours to qualify the staff in order to achieve a high performance level.

#### **SUPPLIERS**

FLEXA supports and encourages its suppliers to introduce and to implement similar guidelines in their companies. FLEXA expects its suppliers to apply these guidelines as the basis for the business relations with FLEXA as FLEXA regards such behaviour a reliable basis for long-term and sustainable business ties.

## Responsibilities of managers and employees

### 2. GENERAL CODE OF CONDUCT FOR FLEXA STAFF MEMBERS

Every single FLEXA employee contributes to a corporate culture which features fair and cooperative collaboration. Tolerance and trustful daily teamwork are basic elements of the management's and the employees' convictions. Furthermore, every member of staff stands up for responsible and loyal behaviour. We respect the other person's dignity and, of course, respect everybody's personality. Mutual esteem is based on an inner conviction and on the readiness to act. This also implies that any problems occurring at the workplace are brought up and that matching solutions are searched jointly. As only then an environment characterized through frankness, tolerance, and fairness can develop.

- Trustfully dealing with each other is the most important brick element for fair and cooperative teamwork.
- FLEXA attaches great importance to responsible and loyal behaviour.
- Frankness and fairness avoid problems at the workplace.
- We are all empathically striving to support a frank and balanced work climate.
- Frank and unbiased teamwork with our colleagues from various cultures and origins both enriches and motivates our mindset and thus sustainably promotes the success of our company.

Especially our managers account with their behaviour for compliance concerning respecting the personality and dignity of every single staff member. Their open-minded attitude towards their subordinates creates a climate of frank and natural interchange of ideas.

They are striving to cultivate a team spirit featuring politeness, friendliness, tolerance, and mutual respect. They prevent in the frame of their responsibilities non-acceptable behaviour and shall act as mediators in case of conflicts.

We all, especially the managers, are fully aware of the fact that we as the FLEXA staff represent the company and its reputation to the outside world with our behaviour and also coin our internal culture with the same behaviour.

All FLEXANIANS shall treat other people in the same way they expect to be treated by them. This will lead to a fair and respectful behaviour towards customers, suppliers, and other external entities.

Fairness and esteem account for our self-marketing and our self-representation alike both internally and externally.

### 3. RESPONSIBILITIES OF MANAGERS AND EMPLOYEES

We all are part of the same team and are therefore always aware of our affiliation to this team. We commit ourselves to responsibly fulfilling our tasks in this team. This is the basis for our joint success.

The corporate regulations stated in our contracts of employment are binding and have to be adhered to by all of us. Every member of staff has to know about the legal regulations affecting his/her job, to obey these regulations, and to inform his/her colleagues about such regulations, if required.

Every staff member strives to support his/her colleagues in meeting the guidelines and to cooperate with our company in applying these regulations. The reputation and the success of the company may be at stake.

We are striving to settle the tasks given in a responsible and committed way and to the best of our abilities in the interest of our joint success, and we commit ourselves to doing so.

We commit ourselves to support the excellent FLEXA reputation both internally and externally through impeccable and correct behaviour.

Every staff member makes himself/herself realize that we all are representatives of the company. We therefore commit ourselves to obeying this Code of Conduct not only during the working hours but also during non-corporate activities affecting the interests of the company or when a staff member is perceived as a FLEXA representative by a third party.

We are all responsible for our doing, but we are also responsible for what we are not doing.

## Responsibilities of business partners.

### 4. RELATIONS WITH SUPPLIERS, DEALERS, CUSTOMERS, AND OTHER BUSINESS PARTNERS (CONFLICTS OF INTEREST)

Private deals and financial transactions conflicting with FLEXA interests or affecting any decision taken by a staff member or his | her business activities are not permissible. The following regulations concerning gifts, invitations to meals or events, etc. have to be obeyed.

- It is not permitted for a FLEXA staff member to request any invitation to a meal and | or to an event, any gift, any other benefits, personal services or favours from a business partner.
- An invitation to a business lunch/dinner or to an event as a guest of a business partner may be accepted only if such invitation has been issued on a voluntary basis, if the invitation serves a justified business objective, and if the meal takes place in the frame of ordinary collaboration (e.g. lunch during a seminar or a meeting, a reception following an event, or a dinner during an event lasting several days). The staff member has to inform his/her particular superior in a timely manner about the frequency of and the reason for such meals and events which are paid by the business partner.
- Participating in a sporting event, visiting such events or shows and other events as a guest of a business partner is permissible twice a year. However, a representative of the particular inviting business partner has to be present at such event.
- If a member of staff receives any goods or any service from a supplier, a dealer, or customer for private purposes, the customary price has to be paid, and the payment has to be documented.
- It is not permissible to ask a supplier, a dealer, or a customer for a payment, a loan, or any other financial benefit for the purpose of the staff member's private advantage or to accept such payment, loan, or financial benefit.
- A supplier, dealer, or customer must not act as sponsors for any FLEXA event, for a farewell celebration for a member of staff, for birthday parties or for any other event. In principle, a member of staff must not request or accept, neither in his own name nor on the company's name, the support of a supplier for a charity or a comparable performance as otherwise it cannot be ruled out that also criteria other than the price, the quality, or the supplier's performance may play a certain role when selecting the particular supplier.
- A member of staff may accept any offered discount or any other benefit from a supplier, dealer, or customer only if such discount or benefit is granted to all FLEXA staff members. A discount or benefit for the advantage of a single person or a group of staff members must not be requested or accepted on purchasing or selling goods or services on behalf of FLEXA.

It is not permitted for a staff member and his/her relatives to request or accept any gifts or any other benefits from a supplier, dealer, or customer for the purpose of his/her private advantage. Advertising material and other articles worth up to €50 may be accepted if be excluded that the particular staff member's decision-making process is affected by such material or article.

Any gift whose value exceeds the above €50 must not be accepted, and the business partner has to be informed about this FLEXA Code of Conduct. In special cases (e.g. in an international context where rejecting a gift would offend the gift-giving party), the envisaged procedure has to be agreed upon with the particular superior.



## Behaviour towards competitors and business partners.

### 5. BEHAVIOUR TOWARDS COMPETITORS AND BUSINESS PARTNERS (AGREEMENTS)

FLEXA keeps to the applicable antitrust laws and commercial laws and to the corresponding pricing laws on competition. These laws rule the company's business activities with its competitors, suppliers, dealers and customers. They exclude agreements and any other activities affecting prices or any other conditions, allocating sales regions or customers, or limiting free trade in a non-permissible way. These laws limit the company's possibilities to pass on any information which is legally protected and relevant for competition as well as the company's possibilities to exclude suppliers and other business partners from the market. They also determine the consumer information requirements and requirements for complaint handling procedures. The antitrust laws and commercial laws are complex and apply to all FLEXA business activities both on the domestic and on the international stage. There may be considerable penal consequences in case of any infringement of such laws. If a staff member has any question as to which extent such laws concern his/her sphere of responsibility, he/she may contact his/her superior or the FLEXA Human Resources department.

FLEXA shall make use of any permissible means to acquire information on its competitors but shall avoid any illegal procedure and any procedure which may result in liability claims.

### 6. BEHAVIOUR TOWARDS AUTHORITIES AND PUBLIC OFFICERS

Any payment, loan, or any other monetary benefit granted by FLEXA or by a member of staff to a public servant or to a public sector employee with the aim to receive orders or any advantages for FLEXA, its subsidiaries, affiliated companies or other entities is not permissible.

### 7. BEHAVIOUR TOWARDS FOREIGN GOVERNMENTS AND CUSTOMERS

FLEXA strictly adheres to the anti-corruption and customs acts as well as to the laws on external trade.

Anti-corruption laws forbid to provide foreign administration officials, public servants, political or military institutions or representatives of international organisations (e.g. the UN or World Bank) with benefits in order to win orders or to obtain other advantages for FLEXA. These regulations also contain instructions for documentation, internal accounting and internal control. Besides the FLEXA internal control systems, they are to guarantee reliability and accuracy of the records and reports on all business activities.

Laws on external trade and customs acts determine where and how FLEXA may sell its products and technology and pass on information. In some cases, it is forbidden by law to do business with certain countries; in other cases, exporting goods or passing on services and technologies requires prior approval by the authorities.

Customs acts require a detailed description, a comprehensive list, and an appropriate indication of the value of the goods/services concerned.

Anti-boycott laws may ban participation in boycott activities against other countries and limit the transfer of information on business activities and on a third party. They can also determine that certain requests to pass on information or to participate in boycotts have to be reported. These international trade laws are very complex, and any infringement may result in considerable penalties for the company concerned and in massive fines and imprisonment for the people involved. If you require any further information on how to apply such laws within your sphere of responsibility, please contact your superior or the FLEXA Human Resources department.

## Behaviour towards foreign governments and customers.

### 8. OUTLAWING AND CORRUPTION

FLEXA is determined to reach highest ethical standards for its business activities.

Therefore, FLEXA does not tolerate any immoral or corrupt practices applied by a staff member or by a business partner.

FLEXA strictly prohibits any participation in or toleration of bribery or any other kind of corruption.

Appropriate resources are deployed within the FLEXA business units in order to reveal and to remedy potential weak spots by means of internal controls.

### 9. SECOND JOBS TAKEN ON BY A FLEXA STAFF MEMBER

It is not permitted for a FLEXA staff member to take on second job as a director or as a member of a supervisory board or advisory council in another company without any prior explicit approval by FLEXA.

It is not permitted for a staff member to take on any regular secondary job conflicting with the justified interests of the company or limiting the particular staff member's performance. Furthermore, a staff member requires explicit prior approval before he/she starts working for a business partner or for a competitor. It is approved and even desired by the company that a staff member is engaged in non-profit organisations such as clubs or citizens' groups. This engagement, however, must not conflict with the justified interests of the company.

There are limitations if the staff member concerned acts or is perceived as a FLEXA representative. Executives are subject to stricter limitations due to their position and their corporate sphere of responsibility than other members of staff.

### 10. PUBLIC BEHAVIOUR

FLEXA generally supports the commitment of a staff member to act on a local or national level or in clubs and in a citizens' group. If, however, such commitment is associated with his/her activities at FLEXA, prior approval by HR is mandatory.

Every staff member has the right of freedom of expression. Nevertheless, it has to be made sure that the point of time, the scope, and the contents of each statement made publicly comply with corporate interests and targets and have been agreed on with the particular superior(s).

In addition, legal limits have to be obeyed. Therefore, justified corporate interests have to be considered appropriately.

### 11. SHAREHOLDING

FLEXA staff members and their close relatives must not without prior approval have a direct or indirect share in a company which are currently doing business or are striving for business relations with FLEXA. Exceptions are shares which cannot have any impact on the professional activities at FLEXA.

### 12. ENVIRONMENTAL PROTECTION

It is one of FLEXA's basic concerns to protect the environment for today's and future generations and to obey all relevant laws and regulations for the protection of the environment. The company expects and supports environmentally-friendly acting on the staff side. This especially applies to the utilization and development of new products and manufacturing technologies which save on natural resources and focus on the recycling of such resources, reduce pollution to the greatest possible extent, and safeguard nature.



## Public behaviour - Environmental protection.

### 13. QUALITY

Highest quality and permanent quality improvements are essential for growth and success of the company. We, the staff, want to meet the expectations of both the internal and the external customers and strive to constantly improve the quality of FLEXA products and services.

### 14. PROTECTION OF CORPORATE PROPERTY / DUTY OF SECRECY

All staff members are committed to protecting corporate property against loss, theft, and misuse. Moreover, they have to observe secrecy concerning all and any company and business secrets both during the term of their employment and also after the employment has terminated.

### 15. INTERNAL CONTROL SYSTEMS | REPORTS | DOCUMENTS

FLEXA uses internal control systems to guarantee compliance with legal regulations and internal rules, to protect corporate property (also against misuse), and to guarantee that instructions given and actions triggered on behalf of the company can only be implemented if corresponding approvals and authorizations are available. Any report issued and published by the company has to comply with all relevant national and international standards and legal regulations; especially accounting has to describe the financial standing appropriately.



