

CODE OF CONDUCT

STADLER SENSORIK CNC-TECHNIK GMBH

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2 INTRODUCTION

This Code of Conduct of Stadler Sensorik CNC-Technik GmbH sets standards to create working conditions in our company and in the supply chain that ensure that employees are treated with respect and dignity and that business activities are conducted in an ecologically and ethically responsible manner.

We see our employees as an important component of our entrepreneurial success and as the personified reflection of the trust placed in us. In order to support our employees in taking personal responsibility for their specific business activities, this Code of Conduct was developed as an internal company basis for the Ethical Principles.

Deutschfeistritz, July 2017



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2.1 SCOPE

This Code of Conduct applies to all employees of Stadler Sensorik CNC-Technik GmbH and all organisations acting on behalf of Stadler Sensorik CNC-Technik.

We expect from all our suppliers and subcontractors that the content of this Code of Conduct is consciously acknowledged and that their actions comply with the standards contained therein. Stadler employees are responsible for informing all suppliers, subcontractors and organisations that have a business relationship with Stadler about the contents of this Code of Conduct. Every Stadler employee should be aware of the contents of this Code of Conduct and act in accordance with these principles.

The Code of Conduct of Stadler Sensorik CNC-Technik GmbH is based on international standards for fair business.

2.2 DECLARATION ON OUR ETHICAL PRINCIPLES

Many of our internationally active customers see themselves as having a strong ethical responsibility, especially with regard to the impact on the environment, the prudent use of natural resources and the observance of human rights and dignified working conditions.

This sustainability commitment goes far beyond the customer's own production facilities and extends to the entire supply chain. As a supplier/provider/partner, we are required to fully support these intentions and efforts.

As a supplier, we are expected to comply with both local legislation and the principles of our customers' codes of conduct. Furthermore, we are expected to communicate these principles in our supply chain and to demand compliance with them. We are also informed in writing that, in exceptional cases, our customers reserve the right to terminate business relations with a supplier if the latter violates the principles in the rules of conduct communicated. If you have any questions or require further information, please do not hesitate to contact me at any time!

3 WORK

Stadler, together with its suppliers, is committed to respecting the human rights of workers and treating them with dignity and respect in accordance with the understanding of the international community. This applies to all workers, including temporary and migrant workers, student workers, contract workers, permanent employees and all other types of workers. No forced labour, servitude (including debt bondage) or compulsory labour, involuntary prison labour, slave labour or work based on human trafficking shall be used.

The use of child labour is prohibited at any stage of the manufacturing process. Weekly working hours may not exceed the maximum number of hours allowed under local law. In accordance with local law, overtime worked by workers shall be remunerated at a rate higher than the normal hourly rate. The remuneration paid to workers shall comply with all applicable laws on remuneration, including laws on minimum wages, overtime and statutory social benefits. The brutal or inhuman treatment of workers is prohibited, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion and verbal assault. This also applies to the threat of such treatment. Any form of harassment or discrimination based on skin colour, age, gender, sexual orientation, ethnicity, disability, religion, political or trade union affiliation or marital status is prohibited.

Employees and/or their representatives should be able to communicate openly and without fear of discrimination, reprisal, intimidation or harassment with management and express ideas and concerns about working conditions and management practices.

4 HEALTH AND SAFETY

Stadler and its suppliers recognise that a safe and healthy working environment not only helps to minimise work-related injuries and illnesses, but also improves the quality of products and services, the continuity of production, employee retention and employee morale. Where workers are exposed to potential safety risks, these risks must be monitored through appropriate design, technical and administrative control mechanisms, preventive maintenance, safe working practices and regular safety training. If the hazards cannot be adequately monitored by such measures, adequate, well-maintained personal protective equipment shall be provided to workers.

Workers should be encouraged to raise safety concerns. Potential emergency situations and events shall be identified and evaluated. Their impact shall be minimised through the implementation of contingency plans and emergency response procedures. These include, but are not limited to: Emergency reporting, worker alerts and evacuation measures, training and emergency drills for workers, appropriate fire detection and extinguishing facilities, appropriate escape routes and rescue plans. These plans and procedures shall focus on minimising damage to life, the environment and property.

Procedures and systems must be in place to prevent accidents at work and occupational diseases. Clean sanitary facilities and drinking water must be made available to the workforce at all times. Workers shall be provided with appropriate training on health and safety at work.

5 ENVIRONMENT

Stadler and its suppliers acknowledge that the responsible treatment of the environment is an integral part of the manufacture of products. In the manufacturing process, negative effects on the community, the environment and natural resources must be minimised while protecting the health and safety of the public.

The use of resources and the creation of waste of any kind, including water and energy, shall be reduced or avoided, either directly at the point of origin or through procedures and measures such as the modification of production and maintenance processes or the company's operations, the use of alternative materials, savings, recycling and reuse of materials. Chemicals or other materials which pose a risk when released into the environment shall be identified and handled in such a way as to ensure maximum safety in the handling, transport, storage, use, recycling or re-use of these substances and in their disposal.

A systematic approach to identifying, handling, reducing and responsibly disposing of or recycling (non-hazardous) solid waste shall be used. All applicable laws, regulations and customer requirements regarding the prohibition or restriction of specific substances in products or in the manufacturing process must be complied with. Economic solutions to improve energy efficiency and minimise their energy consumption and greenhouse gas emissions should be sought and integrated.

6 ETHICS

Stadler, its suppliers and their representatives must comply with the highest ethical standards in order to fulfil their social obligations and successfully position themselves on the market. The highest standards of integrity must be applied in all business activities.

A zero tolerance policy should be pursued in prohibiting all forms of bribery, corruption, extortion and embezzlement. All business processes should be transparent and accurately reflected in books and records to ensure compliance with applicable anti-corruption laws. No bribe or other means of obtaining an improper or inappropriate advantage shall be promised, offered, approved, paid/applied or accepted. This prohibition also applies to the promise, offer, approval, granting or acceptance, directly or indirectly by third parties, of monetary benefits to maintain or maintain a business, to convey a business to a person or otherwise obtain an improper advantage.

The standards of fair business activity, fair advertising and fair competition must be observed. Appropriate means must be available to protect customer information. A strategy must be in place to ensure that tantalum, tin, tungsten and gold in the products manufactured or supplied are not used, directly or indirectly, to finance or support armed groups guilty of serious human rights violations in the Democratic Republic of Congo or neighbouring countries. Due diligence shall be exercised with respect to the origin and chain of custody of these minerals and such diligence may be disclosed upon request.