

NET COLD FORMED COMPONENTS CODE OF CONDUCT

LABOUR CONDITIONS

NET CFC acknowledges that good working conditions, as well as a safe and healthy work environment improves the quality of goods, and services and motivates the workforce.

NET CFC agrees to safeguard the human rights of its employees and to treat them with dignity and respect. This refers to all employees, including part-time and temporary workers, migrant workers, student interns, full-time employees and any other form of manpower.

FREE CHOICE OF EMPLOYMENT, MODERN SLAVERY AND HUMAN TRAFFICKING

There shall be no forced labour, slave labour or any other form of comparable labour. All labour must be voluntary and employees must be free to end their employment at any time.

NET CFC confirms that it has implemented policies, processes and monitoring systems to ensure compliance with this provision.

NO CHILD LABOUR

The employment of children is prohibited. Children of compulsory school age or those that have not yet reached the minimum age for employment in the respective country shall not be employed.

Young workers shall not perform work that could endanger their health or safety (hazardous work).

NET CFC confirms that it has implemented policies, processes and monitoring systems to ensure compliance with this provision.

WORKING HOURS

The weekly hours of work shall not exceed the statutory maximum of relevant jurisdiction.

The weekly hours of work including overtime shall in any event not exceed internationally recognised set maximum. Emergencies and extraordinary circumstances can constitute an exception.

Employees shall be entitled to days off according to internationally recognised set standards.

WAGES AND EMPLOYEE BENEFITS

Alongside economic circumstances, the requirements for business development and productivity, the remuneration paid to employees (employees and their family members) shall comply with all applicable national laws on remuneration, which includes laws on minimum wage, overtime and statutory welfare benefits.

Such remuneration shall as a minimum meet basic needs of the employee (i.e. living wage, not minimum wage if there is a discrepancy).

HUMANE TREATMENT

Employees shall not be subjected to disproportionate stringency or be treated in an inhumane manner.

This includes sexual harassment, sexual abuse, physical reprimand and physical and mental abuse as well as any threat of such treatment.

PROHIBITION OF DISCRIMINATION

NET CFC agrees not to tolerate any unlawful harassment or discrimination within its workforce.

The NET CFC partner's selection and employment practices, such as for promotion and remuneration or access to training opportunities, shall not discriminate against employees on the basis of race, skin colour, age, gender, sexual orientation, ethnic background, disability, pregnancy, religious or political conviction, trades union membership (or the lack of) or family status.

FREEDOM OF ASSOCIATION

In line with relevant national legislation, NET CFC shall grant employees the right to form and join or not to join trade unions and to safeguard their interests. If national legislation prohibits trade unions the employer shall encourage alternate forms of representation such as establishing internal committees or similar.

HEALTH AND SAFETY AT THE WORKPLACE

NET CFC shall ensure that it has organizational systems, processes and/or measures in place in order to comply with national health and safety legislation.

NET CFC shall identify, assess and take measures to eliminate potential safety risks. Employees shall be informed of potential safety risks and be instructed on proper, safe behaviour and corresponding safety measures shall be implemented. As regards hazardous work, employees shall always be provided with suitable personal protective equipment.

Clean drinking water must be easily accessible and free of charge at all times. All facilities must be clean and regularly maintained.

EMERGENCY PREPAREDNESS

Potential emergency situations and events shall be identified and evaluated. Their impact shall be minimized by implementing emergency plans and reporting procedures.

ENVIRONMENT

NET CFC acknowledges that environmental responsibility is an integral part of product manufacture. Production processes shall be designed to prevent negative impacts on the environment and natural resources shall be conserved.

ENVIRONMENTAL PROTECTION

NET CFC confirms that it has implemented systems, processes and/or measures and has obtained the necessary approvals in order to comply with statutory national environmental regulations. Employees shall be instructed on how to mitigate environmental risks.

HAZARDOUS SUBSTANCES

Chemicals and other materials, that are hazardous to the environment if released, shall be identified and managed in such a way that ensures their safe handling, transport, storage, use and recycling or disposal.

SUBSTANCES IN PRODUCTS

NET CFC shall abide by all applicable laws and regulations and customer specifications regarding the prohibition or restriction of specific substances. This includes mandatory labelling for recycling and disposal.

COMPETITION LAW

NET CFC shall respect fair competition and conduct every business activity in compliance with applicable competition and anti-trust laws.

Thus, NET CFC partner may enter into discussions or agreements with competitors concerning pricing, market sharing or similar.

PROPERTY RIGHTS, CONFIDENTIAL INFORMATION AND PERSONAL DATA

DISCLOSURE OF INFORMATION

Information on business activities, structure, financial situation and performance shall be disclosed in accordance with the applicable provisions and usual business practices in the sector.

Falsification of records and misrepresentation of conditions and practices are not acceptable.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

NET CFC's, or their customers', intellectual property rights shall be respected; transfer of technology and knowhow must be done in a manner that protects intellectual property rights and such rights may not be exploited without the relevant owner's consent.

Intellectual property includes, but is not limited to, trademarks, inventions and patents, designs and knowhow.

Trade secrets shall only be disclosed to the extent necessary and permitted and shall be protected appropriately.

PERSONAL DATA

Personal data shall be processed in accordance with applicable laws, regulations and in a correct and careful manner. This includes collecting data for specified, explicit and legitimate purposes only. Personal data shall not be processed in a manner that is inconsistent with such purposes.

EXPORT, IMPORT AND TRADE COMPLIANCE

All NET CFC partners engaged in foreign trade activities must comply with export, import and other trade compliance laws and regulations.

Thus, NET CFC Partners must refrain from transactions that are unlawful or irregular under applicable law or regulations relating to trade embargoes and economic sanctions, export controls, anti-boycott, cargo security, import classification and valuation, product/country of origin marking, and application of free trade agreements.

All requisite export and import licences and approvals under applicable import, export and sanctions regulations must at all times be obtained.

CONFLICT MINERALS

NET CFC shall adopt appropriate and reliable measures which ensure, to the best of the partner's knowledge and belief, that certain materials (tantalum, tin, tungsten, gold and other conflict minerals) used in the manufacture of its products do not directly or indirectly serve as means to finance or support armed groups that commit serious human rights violations.

NET CFC shall exercise due diligence with respect to the origin and chain of custody of such minerals and shall disclose these precautionary measures to NET CFC upon request.

BUSINESS ETHICS

NET CFC shall uphold high ethical standards in order to fulfil their legal and social responsibilities.

INTEGRITY

All business interactions shall be governed by high standards of integrity. NET CFC shall not have any tolerance towards bribery, money laundering, extortion, fraud, embezzlement and other forms of corruption, and shall prohibit such acts or omissions in any form.

All business processes must be transparent and properly reflected on the partners' business records. No documents may be manipulated.

ANTI-BRIBERY

Bribes or other means of obtaining an illegal or improper advantage shall not be offered, accepted, promised or received.

This prohibition applies in relation to both the public and the private sector, and to bribes both given directly or indirectly, e.g. by the means of a third party, such as an agent. NET CFC also prohibits facilitation ("grease") payments, even if such payments are legitimate under national legislation.

In order to ensure compliance with anti-corruption laws, processes and procedures that address anti-corruption issues shall be implemented and monitored.

CONFLICT OF INTERESTS

Decisions shall only be taken on the basis of objective, business-related considerations and not be influenced by any personal interests.

VIOLATIONS OF THIS SUPPLIER CODE OF CONDUCT

NET CFC acknowledges that its partners may be in various stages of maturity in relation to certain standards of this code. However, if an audit, or other sources of information, indicates or verifies that a violation of this code has occurred, NET CFC expect its partners to work together with NET CFC to achieve continuous improvements by implementing corrective measures.