



Code of Conduct

Graewe GmbH & Co KG is committed to its social responsibility – as part of our business activities we bear responsibility towards our own Company, towards our customers and suppliers in the value chain and towards the environment and society.

As an industry guide, this Code of Conduct sets out the common value basis with regard to social responsibility and fair competition. We, Graewe GmbH & Co KG (hereinafter referred to as the “Company”), commit ourselves to the following principles by signing this Code of Conduct.

I. General principles

1. Basic understanding

Our Company acknowledges its social responsibility and is committed to fulfilling this responsibility in all its business activities.

2. Compliance with the law

Our Company is committed to comply with all applicable laws and regulations of the countries in which we operate in all business actions and decisions. Business partners are to be treated fairly. Contracts are adhered to, taking into account changes in the framework conditions.

3. Orientation to generally valid values and principles

Our Company’s actions are based on generally accepted ethical values and principles, in particular integrity, honesty, respect for human dignity and non-discrimination.

II. Principles of social responsibility

1. Human rights

Our Company respects and supports the observance of internationally recognised human rights. In particular, we respect human rights in accordance with the UN Charter of Human Rights (Universal Declaration of Human Rights, Resolution 217 A (III) of the General Assembly of 10 December 1948).

2. Non-discrimination rule

Our Company rejects any form of discrimination within the scope of the applicable laws and regulations. This applies in particular to discrimination against employees based on race, ethnic origin, gender, religion or belief, disability, age or sexual orientation.

3. Health protection

Our Company guarantees occupational safety and health protection at the workplace within the framework of national regulations. The Company supports continuous further development to improve the working environment.

4. Working conditions, prohibition of forced labour and child labour

Our Company respects the right of our employees to freedom of association and assembly within the framework of the applicable rights and laws. Our Company complies with labour standards regarding the maximum permitted working hours and remuneration, in particular the level of remuneration, in accordance with applicable laws and regulations.

Employees must be protected from physical punishment and from physical, sexual, psychological and verbal harassment.

The privacy of the employees is respected. The prohibition of forced labour of any kind is observed. In particular, the 1930 Convention on Forced or Compulsory Labour (Convention 29 of the International Labour Organisation) and the 1957 Convention on the Abolition of Forced Labour (Convention 105 of the International Labour Organisation) are respected.

Our Company complies with the regulations prohibiting child labour, in particular the 1973 Convention on the Minimum Age for Admission to Employment (Convention 138 of the International Labour Organisation) and the 1999 Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organisation). If a national regulation on child labour provides for stricter standards, these must be observed as a matter of priority.

5. Environmental protection

Our Company is committed to the goal of protecting the natural foundations of life for the present and future generations. Laws and regulations enacted to protect the environment must be observed.

6. Communication

Our Company communicates openly and dialogue-oriented about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other stakeholders.



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III. Principles of fair competition

1. Prohibition of corruption

Our Company rejects corruption and bribery. When dealing with business partners and government institutions, the interests of the Company and the private interests of employees on both sides are strictly separated. Decisions are made free of irrelevant considerations and personal interests. The applicable law on corruption must be observed.

Among other things, the following must be observed:

The granting of personal benefits by the Company and its employees to domestic and foreign public officials (such as civil servants or public servants) for the purpose of obtaining benefits for the Company or itself or third parties is not permitted.

Personal monetary benefits in return for unfair preferential treatment in commercial transactions between undertakings may not be offered, promised, granted or approved. Similarly, in dealings with business partners, personal benefits of value for unfair preferential treatment in business dealings may neither be demanded nor accepted. The management and employees of our Company may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in the course of business that are granted with the intention of unfairly influencing a business relationship or which could jeopardise the professional independence of the business partner.

This is generally not the case with gifts and invitations in the scope of hospitality, custom and courtesy customary in the business.

2. Conduct towards competitors

Our Company respects fair competition. It therefore complies with applicable laws that protect and promote competition, in particular applicable antitrust laws and other laws regulating competition. In dealings with competitors, these regulations prohibit in particular agreements and other activities that unfairly influence prices or conditions, illegally allocate sales territories or customers or impede free and open competition in an inadmissible manner.

Furthermore, these rules prohibit unfair agreements between customers and suppliers which are intended to restrict the freedom of customers to determine their own prices and other conditions when they buy back (determination of price and conditions).

3. Business secrets

Our Company respects and protects the business and trade secrets of others. Confidential information and documents shall not be divulged or otherwise made available to any third party without authorisation, except when authorised to do so, when such information is publicly available, or when required to do so by an enforceable decision of any governmental or judicial authority.

IV. Scope, implementation, suppliers

1. Scope

This Code of Conduct applies to Graewe GmbH & Co.KG.

2. Implementation and compliance

Our Company will make its employees aware of the content regulated in this Code of Conduct and the obligations arising therefrom. We will take appropriate measures to ensure that the Code of Conduct is complied with.

3. Suppliers and customers

Our Company is required to communicate the principles of this Code of Conduct to its direct suppliers and customers.

Wolfgang Graewe
Executive Director
Graewe GmbH & Co. KG

Kay Olaf Graewe
Executive Director
Graewe GmbH & Co. KG