

## VULKAN Code of Conduct

This Code of Conduct sets out the main principles and values to which we feel committed in our daily interaction with employees, customers, suppliers, society and the environment within the context of our global entrepreneurial activities. We act according to an integrated company concept which includes all social, ecological and economical contributions by a company to the voluntary assumption of social responsibility in the long term and beyond the standards required by legislation.

In this respect we are responsible for creating and maintaining a company culture in which consideration of the principles listed below as well as ethical principles are guaranteed as far as possible.

**VULKAN Kupplungs- und Getriebebau Bernhard Hackforth GmbH & Co. KG is committed to complying with the following principles:**

### Human rights and laws

- We support and respect the UN Charter of Human Rights and guarantee that we are not involved in any human rights violation through our entrepreneurial actions.
- We keep the laws of the respectively applicable legal system; this applies in particular to the respectively applicable laws concerning fair competition, data protection, safeguarding intellectual property of third parties, fighting money laundering and insider trading.

### Employees' basic rights

- We promote the equal opportunities and fair treatment of our employees – independently of their race or ethnical origin, their sex, religion or belief, any disability, age or sexual orientation.
- We respect the personal dignity, privacy and personal rights of every individual.
- We never employ anyone against their will and do not force anyone to work.
- We do not tolerate any unacceptable treatment of employees, such as discrimination, the use of force, misuse, exploitation or sexual harassment.
- We ensure our employees receive fair pay and guarantee to pay the mandatory national minimum wage.
- We observe the legislation governing working hours applicable in the respective state.
- We recognise the employees' freedom of association. We neither favour nor discriminate against members of workers' organisations or trade unions.

### Employees' health and safety

- We assume responsibility for the health and safety of our employees in the working environment;
- We take the best possible preventative measures to minimise risks and avoid or prevent accidents and occupational diseases;
- We maintain and promote an appropriate health & safety management system which includes regular health & safety training.

### Suppliers and partners

- We advocate the appropriate support of observation of the principles and basic values of this Code of Conduct by our suppliers and partners;
- We keep the basic principles of non-discrimination during when selecting and dealing with our suppliers and partners in the same way as with our employees.

## **Corruption and bribery**

- We do not tolerate any kind of corruption or bribery and do not engage in it in any way; this also and particularly concerns any kind of illegal payment offers or similar contributions to government officials and other decision-makers in an attempt to influence their decision-making processes.

## **Child labour**

- We do not employ anyone who cannot prove they have reached the minimum legal age for employees.

## **Environmental protection**

- We make use of an appropriate environmental management system.
- We reduce environmental pollution within the context of technical and economically appropriate possibilities
- Beyond the extent required by legal norms and standards.
- We regular monitor our environmental protection measures and implement appropriate improvement possibilities.

## **Export guidelines**

- We operate an export management system in accordance with the regulations of the European Union and the Federal Republic of Germany and adhere strictly to export embargos.
- We do not tolerate any form of circumvention within our area of responsibility and do not engage in this.
- We do not carry out any business where respective information is available.

We reserve the right to make appropriate changes to this Code of Conduct in the event of changes being made to the compliance principles listed.

Herne, March 2012