



# Code of Conduct of the OKE Group

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## **1. Rules of conduct**

These rules of conduct are a code of ethical principles and recognition of the company's social responsibility, with a commitment to fair, sustainable and responsible action. They apply to all companies of the OKE Group and require a strict separation of company and private interests and require that all decisions in the business area are free of personal interests. The granting or acceptance of personal benefits is not permitted.

The OKE Group, a global automotive supplier, is committed to growth based on socially responsible actions and behavior.

We commit ourselves to recognize the principles on the basis of the Universal Declaration of Human Rights, on fundamental principles and rights at work. (A/RES217, UN-Doc. 217/A(III))

In our business field, we strive for a trustworthy and respectful working environment and orient ourselves to current international working standards.

Through our environmental and energy management system, we ensure that environmental risks are avoided and resources are saved, the energy efficiency of plants is ensured, and the energy saving is taken into account. The employees are encouraged to behave in an environmentally and energy-conscious manner.

Environmental protection and energy efficiency are continuously maintained and improved in the OKE Group.

To this end, the OKE Group has implemented management systems that meet the above requirements. These management systems should ensure:

- Compliance with applicable laws and standards.
- The determination of customer requirements in relation to our activities and products.
- Conduct in accordance with these rules and identify and mitigate operational risks associated with these rules.
- We also strive for continuous improvement in all business areas.

## **2. Compliance with laws and standards**

In all its activities, the OKE Group is fully committed to comply with the laws, rules and regulations of the country in which it operates. We encourage all participants, employees, partners, suppliers and customers alike to go beyond the law and to promote social and ecological responsibility and business ethics by adhering to internationally accepted standards.

## **3. Business practices and the fight against corruption**

We always act in an honest, trustworthy and reliable manner in all our business activities. The copyrighted property as well as intellectual property of our business partners is protected in a responsible manner.

All legal requirements regarding the fight against corruption, fair competition and the prevention of cartels are implemented within the Group and are part of our Code of Conduct.

### **3.1. Prohibited agreements and business relations**

We ensure that information on prices, costs or other aspects relevant to competition are not passed on to third parties. The OKE Group strives for fair business practices and forbids prohibited or benefit-based arrangements.

## **4. Basic rights of workers**

We are aware of, and will be responsible for, the rights of workers and workplace safety standards.

We undertake to treat all employees respectfully and not to impose any threat of physical violence or other forms of physical injury, coercion or harassment.

#### **4.1. Fair recruitment procedures and employment**

The OKE Group provides equal opportunity in employment for all qualified persons and prohibits discrimination in employment on the basis of sex, race, colour, nationality, religious affiliation, age, disability, sexual orientation or other personal characteristics.

We respect the dignity, privacy and personal rights of our employees and treat them equally.

#### **4.2. No forced or child labour**

The OKE Group does not employ forced or unpaid temporary employees and ensures that the recruitment procedures regarding the minimum age comply with the applicable laws.

We support legal training programs to comply with all relevant laws and regulations.

#### **4.3. Freedom of association and assembly**

The OKE Group respects the rights of workers to associate freely, join a workers organisation of their own choice as permitted by and in accordance with applicable laws and regulations. Such persons shall not be subject to discrimination or favouritism.

#### **4.4. Fair working hours with fair pay**

The OKE Group is committed to at least complying with all applicable laws and regulations regarding remuneration and working hours, including those related with minimum wages, overtime, hourly wages, salary and other allowances, and to provide statutory benefits.

We control the operating procedures in such a way that overtime does not exceed the extent of the permissible maximum overtime according to the applicable law unless this is strictly necessary due to exceptional operating circumstances and the employees agree to do so.

#### 4.5. Safe, healthy and fair working conditions

The OKE Group is committed to provide its employees with a safe and non-harmful workplace according to all applicable laws and regulations. We respect the dignity, privacy and personal rights of all persons involved in performing their business within the group. We do not tolerate physical / psychological violence, sexual or other harassment, verbal abuse nor any other forms of intimidation. *Intimidation or retaliation against employees who provide reports of suspected or actual misconduct must not be tolerated.*

#### 5. Environmental compatibility and sustainability

The OKE Group is committed to pay attention to environmental protection and energy consumption in all its work. We will comply with at least all applicable laws, regulations and standards relating to environmental protection / energy (e.g. regulations for the disposal of chemicals and waste, recycling, clarification and discharge of wastewater, CO<sub>2</sub> emission reduction controls, obtaining permits and producing reports).

In addition, we comply with all additional environmental protection requirements for raw materials and individual products and use no forbidden substances in compliance with the REACH regulation. To this end, the OKE Group has implemented management systems that meet the above requirements.

Hörstel 09.03.2017

Place, date



*A. Hagemann*  
Signature with company stamp