

Global Code of Conduct for Suppliers

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1. Introduction

Feinwerktechnik hago GmbH in Germany and Hago Automotive Corp. in the United States (subsequently referred to a “hago”) are both part of the hago group, a globally aligned company. The global procurement strategy of both sites complies with the principles of this Code of Conduct. hago stipulates that their contractors and subcontractors (subsequently referred to as “supplier/s”) not only comply with but also actively implement this Code. Moreover, hago reserves the right to adapt this Code of Conduct to reflect the growing requirements and expects the suppliers to accept and adopt these modifications in their strategy. hago reserves the right to inspect or develop the suppliers by means of audits, to which the suppliers expressly agree. In addition, hago reserves the right to block suppliers from new projects or to withdraw from existing contracts if they fail to meet these requirements. hago is to be indemnified from any resulting compensation claims.

2. Abidance by the Laws

The applicable laws and principles of the United Nation Global Compact must be met on both national and international levels. The supplier must provide suitable processes, which guarantee compliance with the applicable laws.

3. Prohibition of Corruption, Commercial Dealings

hago expects from its suppliers that they do not tolerate or participate in any form of corruption, blackmail, or bribery. Gifts, regardless of their form, may not affect the conclusion of a contract or be construed as a decision-affecting favor. hago employees are advised only to accept gifts, which are considered standard in general business practices and only as long as the gift can be seen as a minor business courtesy (e.g. ballpoint pens, advertising materials, business meals within the usual scope.)

4. Prohibition of Forced Labor and Child Labor (see www.ilo.org)

hago suppliers expressly distance themselves from all forms of force labor (compare ILO Convention 29) and child labor (compare ILO Convention 138 and 182.) In the context of this Code of Conduct, children are defined as individuals who are of school age, or 14 years and younger. If national provisions stipulate a higher age, the higher age applies. Employees, who are younger than 18 years, may not perform tasks, which may harm them. This includes night employment, except where night employment is specified as part of the training and is permitted by local laws.

5. Prohibition of Discrimination, Observing Equal Opportunity, and Freedom of Association

hago suppliers do not accept any kind of discrimination and harassment. Employees may not be discriminated against based on sex, skin color, sexual orientation, religion, country of origin, handicap or age, as the rights of every individual must be observed. An employee performance appraisal must be based solely on performance-oriented approaches, skills, and ethical behavior. In addition, suppliers must ensure open and respectful interactions with each and equal opportunities for all. Suppliers must observe the right of freedom of association and collective bargaining in compliance with the applicable laws and provisions.

6. Abidance of Minimum Wage and Working Hours

hago suppliers comply with the legal provisions pertaining to work and vacation times and the payment of the respective legal minimum wage.

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7. Observance of Health and Safety Measures

Every individual has the right to physical integrity. As a result, our suppliers must meet the national laws for occupational health and safety measures and agree to implement actions to prevent accidents and illnesses and ensure ergonomic workplace conditions.

8. Environmental Protection and Energy Management

As environmental and energy management becomes increasingly important in our life and actions, we strive to select partners, who work according to ecological principles, implement preventative measures to sustain our environment, and respect and implement the legal provisions. A certified environment / energy management system (e.g. ISO 14001/50001) is a positive step towards sustainable protection of ecological resources.

9. Open Competition, Money Laundering, and Terrorism

hago expects that its suppliers behave fairly towards their competitors and observe applicable antitrust codes. Moreover, hago expects that suppliers meet all obligations in term of money laundering prevention and do not participate in any form of money laundering activities. In addition, hago dissociates itself from all terroristic activities or the support of such. We expect the same from our suppliers.

10. Declaration of Consent and Signature

We herewith confirm that we have received and read the Code of Conduct in full. We guarantee compliance with its provisions and confirm that we will enforce compliance with our subcontractors. We acknowledge that a non-observance or violation against this Code of Conduct can lead to the loss of purchase orders or even termination of the existing business relationship.

We consent that hago employees, or third party employees working on behalf of hago, may audit all relevant production sites in a suitable manner concerning the compliance of this Code of Conduct, should hago have reasons to suspect a breach.

Company: _____
Address: _____
Name: _____
Position: _____
Signature: _____

Company Stamp:

Please note: Signatory must have power of representation!

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