



Photo: tkMS, Germany

**SUPPLIER  
CODE OF CONDUCT**

---

## Contents

|   |   |
|---|---|
| Contents .....                                    | 2 |
| 1 Supplier Code of Conduct.....                   | 3 |
| 2 Treatment of employees .....                    | 4 |
| 3 Health protection and occupational safety ..... | 5 |
| 4 Environmental protection .....                  | 5 |
| 5 Conduct in a business environment.....          | 6 |
| 6 Supplier relationships .....                    | 7 |

## **1 Supplier Code of Conduct**

Again and again, reports of appalling working conditions and unfair competition horrify today's world, making it indispensable and of vital significance for companies to observe certain values and norms deemed as standard in international business. Consequently, the long catalogue of selection criteria for suitable suppliers comprises not only price and service, reliability and innovation, but they are also expected to fulfil minimum standards in ecological and social aspects like working conditions, the prevention of corruption and environmental protection.

This Supplier Code of Conduct defines the targets and values Gabler lives and to which we feel obliged.

At certain points in references to the descriptions of tasks and functions solely the male version is chosen to simplify readability. In the sense of equal treatment, such terms always apply to all sexes.

---

## 2 Treatment of employees

### **Forced labour**

Gabler expects all suppliers not only to avoid and forbid forced labour in their own production and administration, but also to select their suppliers and business associates which, in turn, strictly exclude these criteria.

### **Child labour**

Gabler expects its suppliers not to exploit children. Similarly, all suppliers should ensure that their sub-suppliers have no part in the exploitation of children. The employment of minors is not principally excluded, however, the extent of and remuneration for work must correspond to national laws.

### **Discrimination**

Gabler expects its suppliers to not discriminate against or place at a disadvantage anyone in their companies due to his colour, his sex, his ethnic origin, his faith, his sexual orientation, his outer appearance or handicap. This principle should be applied in the policies on employment and promotion.

### **Freedom of association**

Gabler expects every single supplier to ensure that all its employees have the freedom to safeguard their interests through a legal and national labour representation and to negotiate collectively.

### **Remuneration for working hours**

Gabler expects its suppliers pay remuneration for working hours that is in conformity with national legislation and oriented to the moral conviction of fair payment for fair work.

### **3 Health protection and occupational safety**

Gabler expects its suppliers to guarantee the safety of employees in the performance of their duties in the company at all times within the legal framework of the specific nation. Gabler is aware of the hazards involved in operating machines and recognises that it may come to accidents in rare cases. However, Gabler also expects that such experiences will be dealt with professionally and that this hazard will be considered as the reason for improving the work and health safety. Consequently, Gabler expects each supplier to introduce occupational safety management measures and to subsequently revise these in order to reduce work safety risks and to educate and sensitive employees in order to prevent occupational accidents and illness as far as possible.

### **4 Environmental protection**

As a future-oriented enterprise, Gabler expects every supplier to be aware of its responsibility for protecting the environment. Suppliers are consequently expected to observe all standards and prevailing laws governing the environment. Suppliers are expected to maintain environmental management to comply with these in order to minimise pollution during the course of business and in such way to promote environmental protection.

---

## **5 Conduct in a business environment**

### **Corruption**

The United Nations (UN) and die Organisation for Economic Cooperation and Development (OECD) have been combating the spread and practice of corruption on the world market for many years. Gabler expects its suppliers to neither become involved in corruption activity nor to support such due to inactivity. Every company, with which Gabler cooperates, engages to observe international and national anti-corruption conventions and laws. Gabler expects suppliers to ensure that Gabler employees, or persons closely associated with them, will not benefit from any advantages stemming from orders or any benefits.

### **Invitations and gifts**

Invitations and gifts should always remain within reason in relation to generally accepted business practices. Gabler is aware that many gifts are an expression of courtesy towards business associates. However, suppliers should restrict these to low-value gifts to remain beyond any suspicion of corruption or bribery. Similarly, all Gabler employees should always take care to avoid any misinterpretation of these gifts.

### **Conflict of interests**

Gabler expects any decisions on business cooperation or orders are always made according to businesslike criteria. To ensure this, it should be avoided that any persons meeting business agreements could have a private interest in the conclusion of business. In addition, no private interests of third parties should have any influence on the decision.

### **Open competition**

Gabler expects that suppliers are not involved with agreements contravening anti-trust laws. It is similarly expected that any market-dominating positions are not exploited to unreasonably place other players at a disadvantage in their competitive position. Prevailing anti-trust laws must always be observed and asserted by all Gabler suppliers.

## **Money laundering**

As money laundering promotes organised criminal activity, Gabler expects all suppliers to ensure that they are not involuntarily misused for money laundering by their sub-suppliers. Furthermore, no supplier should ever knowingly take part in a money-laundering activity or profit from this. To avoid this at the outset, Gabler expects all suppliers to adhere to the laws governing the prevention of money laundering.

## **6 Supplier relationships**

Gabler expects its suppliers not only to live the contents of the Supplier Code of Conduct, but also to act according to it in the selection of their own sub-suppliers. Moreover, Gabler reserves the right, in the event of reports of any violation of Supplier Code of Conduct, to demand information from the supplier about the facts and to investigate this. By accepting an order, the supplier agrees to these conditions and simultaneously engages to, adhere to and implement the moral principles of the Supplier Code of Conduct.