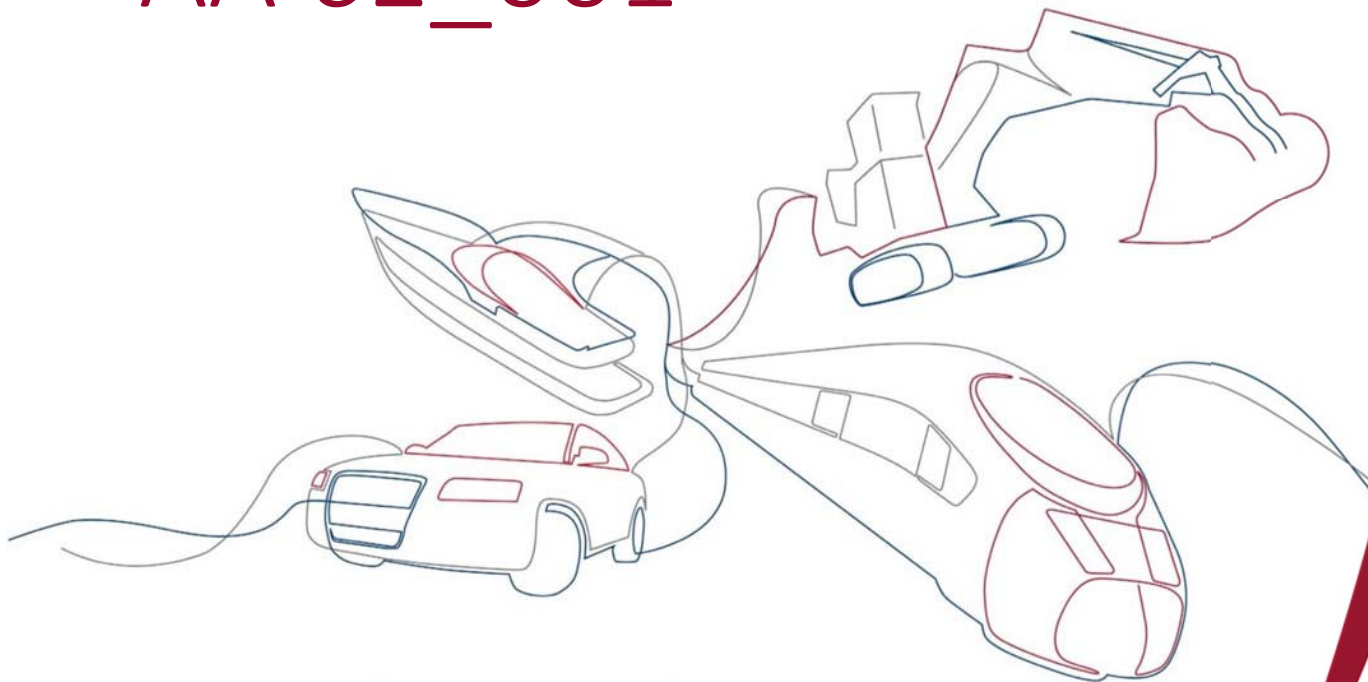


Code of Conduct for employees



AA 62_001



AT SEA • ON SHORE • ON RAILS



Disclaimer



Throughout this code of conduct, gender-specific terms may be used in order to ease the text flow. Whenever a gender-specific term is used, it should be understood as referring to both genders, unless explicitly stated.

This is done solely for the purpose of making the text easier to read, and no offense or sexism is intended.

Introduction



As a family-owned company operating all over the world and having a long-lasting tradition, the aichele GROUP has obtained an excellent reputation in public, at business partners and employees. Upholding this reputation is our top priority.

We therefore require to behave in an ethical, proper and law-abiding manner and we follow a 0-tolerance policy towards any unethical business actions.

The present code of conduct shall be applied as a binding and compulsory guideline for any daily business operations. In addition to our core values, this code of conduct shall define minimum standards for which principles of behavior are relevant and binding for us in order to meet the aichele GROUP's high-demanding request for an ethically correct behavior in compliances with rules and regulations as well as with our core values.

In addition to this code of conduct every employee participates in safety and data protection trainings as well as in instructions of specific procedures such as sustainability management or conflict minerals if needed.

Scope of application

This code of conduct applies to all sites and companies belonging to the aichele GROUP and it shall apply worldwide, even if the way to behave defined by this code of conducts is contrary to the behavior patterns or business practices which are requested, expected or tolerated by the authorities or by the public in the countries where the aichele GROUP is active.

In case one of these countries request stricter rules or behavior patterns the stronger rules shall apply.

With signing the code of conduct, this code of conduct is considered as being accepted by the employee.

With acceptance, the employee engages to ensure it within his activities for the aichele GROUP..

In case the requirements of this code of conduct are not fulfilled, the aichele GROUP can terminate the labor contract with the employee.

Occupational Health and Safety

Health and safety of all employees and visitors is top priority for the aichele GROUP.

For this reason, the aichele GROUP engages to provide safe products and workstations and to control and operate all processes, machines, production resources according to the applicable legal and requirements regarding health and safety as well as fire and environment protection and to install any necessary protective devices.

The availability of an appropriate number of emergency exits, evacuation ways and collective places with respective identification is ensured.

The aichele GROUP engages to shall take proactive measures to prevent accidents and minimize health risks and has nominated a contact person for internal health and work safety for all of its sites.

There is evidence that all employees have access to sufficient information and qualification about potential risks, the corresponding measures and to the necessary personal protective equipment.

The medical first aid is ensured by appropriate measures of prevention (such as provision of first aider training, first aid material, medical boxes, or other).

Further, the aichele GROUP ensures appropriate fire protective installations such as fire alarms and fire extinguishers and ensure their surveillance.

Any chemicals that are used are labelled according to the globally harmonized system (GHS) or CLP in European countries and they are stored according to the national regulations. Employees who are in charge with the handling or storage of chemicals have necessary qualification and information.

The aichele GROUP has containment plans with instructions how to react in case of potential risks and employees are trained on these containment plans.

Human Rights

fair and safe working conditions

The aichele GROUP refuses but not limited to any form of

- Forced labor
(any compelled work or service provided under the threat of punishment)
- Child labor
Prohibition of employing workers at compulsory school age according to the national law, however in no case an employment of minors younger than 15 years (exception: work on a voluntary basis in the frame of future career days or orientations days in the frame of school projects)
- Exploitation of children or minors
- Slavery or similar practice
(bondage, easement, debt bondage, human trafficking, ...)
- Prostitution, notably involvement, arrangement or offer of child prostitution
- Involving, arranging or offering children for illegal activities
(such as dealing, theft, ...)
- Commissioning or using private or public security forces that operate by using torture, inhuman or degrading treatment, violation of life and limb or breaching the right of freedom of association and the right to organize.

With acceptance of this code of conduct the employee is obliged to respect human rights according to the “UN Convention of International Bill of Human Rights”.

Human Rights

fair and safe working conditions

The aichele GROUP ensures the principles and rights at work in compliance with the International Labor Organization (ILO) and thus provide safe and fair work conditions to the employees. The aichele GROUP grants appropriate and regular salaries and social benefits that must ensure the employees' existence.

The aichele GROUP engages to not exceed the legally imposed maximum work hours with respecting break and rest times as well as national holidays in order to offer optimal work hours to the employees. Any excessive physical or mental fatigue is excluded.

Unless there are no legal regulations or minimum standard, the international ILO standard requesting a maximum of 48 hours per week and a minimum rest period of 24 hours every seven days shall be applied.

Every employee has the right to join or to form a trade union and to engage in collective bargaining, express his or her opinion in public or to apply the right of strike without fear of discrimination, retaliation or any other negative repercussion by the aichele GROUP.

Environment & Conflict minerals

The aichele GROUP engages to comply with all applicable environment-related laws and international standards (such as regarding soil conservation, emissions, wastewater, hazardous substances, packaging or waste disposal).

The aichele GROUP further engages to follow all laws and regulations that prohibit or limit the use of certain substances (e.g., EU RoHS, EU REACH, California Proposition 65, U.S. TSCA, Minamata Convention, UNIFE substance list) and to provide to the interested parties of the aichele GROUP every necessary information, authorization or license for restricted substances when delivering products or when providing services.

Further the aichele GROUP immediately and without any request informs the concerned customer in case one employee has notice that one or several prohibited substances are part of the products subject to delivery contracts or if the admissible quantity of restricted substances is exceeded.

The employees of the aichele GROUP must handle, collect, store and dispose all kinds of waste according to the European directive on waste and the national regulations.

The employees of the aichele GROUP are not allowed to export waste if the receiving country is not able to handle, collect, store or eliminate this kind of waste with protecting the environment or if the receiving state forbids the import of such kind of waste.

Environment & Conflict minerals

The aichele GROUP shall determine the impact of its activities on the environment and implement a continuous improvement process in order to minimize the carbon footprint of the supplier's company.

In no case, the aichele GROUP's environmental impact shall lead to

- Detrimental alterations caused to soils
- Pollution of water bodies, air or water
- Harmful noise disturbance
- Excessive waste of water
- Loss of biodiversity

which considerably impairs the conservation and production of food, hinders or destructs the access to safe drinking water and to sanitary installation and / or which harms to health.

The aichele GROUP further refrains from any unlawful evictions or deprivation of land, forests and waters that serve as basis of existence for a person.

The aichele GROUP promotes the awareness of the employees' responsibility by instructing them regarding the use of natural resources, measures for recycling, preventing and elimination waste and the environmental-related risks at their workstations.

Within the bounds of possibility, the aichele GROUPS establishes an energy concept in order to minimize the use of energy notably energy from fossil fuels and to promote the use of renewable energy sources.

Each employee of the aichele GROUP commits to follow the following ethical rules:

- No authorization of corruption, extortion, money laundering or bribery
- Respect of all customs and export control regulations foreign trade, embargos, customs and terrorism control in the countries of the supplier's business activities. Further concerned employees who are in charge with import or export of goods, services or technologies or payment transactions must be engaged to respect the applicable laws and regulations about economic sanctions, export and import controls related to the business activities.
- No acceptance, offering or provision of improper payments, gifts or other advantages that may lead the receiver into a binding situation querying the receiver's economical independency due to their value or for another reason.
- No granting of side-agreements that lead to a direct or indirect benefit for single persons or organizations in relation to the arrangement, placing, authorization, shipment, realization or payment of orders (e.g. Kick-backs)
- Avoidance of any situation that may lead to a conflict of interest or to a potential conflict of interest between the supplier's personal interests and the aichele GROUP's interests
- Prohibition of each kind of discrimination, harassment, disadvantage, vilification or other contemptibility but also each kind of preferential treatment of employees or business partners due to their ethnic, sex, religion, ideology, political views, physical or mental disability, age, sexual orientation or other ethic, social or legally protected characteristics. The supplier must ensure a discrimination-free environment..
- Prohibition of each kind of harassment at work, notably sexual harassment and immediate announcement to competent authority in case of breaches.
- Promotion of women rights, inclusion of disabled persons and integration of foreign employees.
- Following all applicable laws, rules and regulations as well as respect of the rights for minority groups and indigenous peoples.
- Prompt and precise response to all questions from the aichele GROUP regarding origin countries or free-trade agreements.

The aichele GROUP engages to comply with the privacy policy as well as to nominate a data privacy officer in order to keep confidential any information regarding the employees – including personal data or literary property – with appropriate controls, protective measures and measures to ensure data privacy.

The employees shall keep secret any information about the companies from the aichele GROUP confidential and shall not disclose them to a Third or to the public unless this kind of information has not been published or provided before in admissible manner. Any communication of information in the frame of request for information by official authorities, needed for the supplier's operating activities are exempted from this obligation. The obligation of confidentiality shall remain also after contractual relations are terminated.

Any direct or indirect use of confidential information for personal purposes is forbidden. The directors, management teams, and all employees are obliged to internal directives for active protection of confidential information against unauthorized accessibility.

The aichele GROUP notably refuses any kind of industrial espionage nevertheless if this is active or passive.

For this reason, the employees are not allowed to use or to publish without authorization intellectual property such as inventions, patents, artistic values, patterns or other plagiarism.

By purchasing our raw materials from official and certified sources / suppliers, the aichele GROUP minimizes the probability of integrating falsified materials or plagiarism into their products.

Whistleblowing Policy



For any question about the content or interpretation of this code of conducts, the employees can directly contact the board of directors or sending an email to compliance@aichele-group.com .

This also applies in case of real or potential conflicts of interest, violations or suspected cases.

The employee notifying about such violations or suspected cases without fear of any resulting disadvantage by the aichele GROUP. The notification is strictly confidential.

As far as necessary, the aichele GROUP will undertake appropriate measures to protect the concerned employee (or informant) against disadvantages. Where possible and legally allowed the aichele GROUP will keep the identity of the employee who notified about a violation or a suspected case or who actively contributed to clarify such violation confidential.

compliance@aichele-group.com

Any
questions?

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