

Code of Conduct

Putting responsibility into practice has always been the basis of ALBROMET's corporate culture. Practiced responsibility creates trust. A trustworthy, respectful relationship with all stakeholders is the basis for our success – and has been for almost 30 years.

Compliance management represents an important aspect of our company alongside quality management and occupational health and safety management as well as environmental protection.

This Code of Conduct aims to establish rules to ensure that our actions are impeccable, correct and exemplary at all times. In addition to the Code of Conduct, our ALBROMET self-image and our understanding of leadership should determine our actions and shape our corporate culture – for the benefit of our employees, our company and all business partners.

Geretsried, 01.10.2024

Andrea Bäring
(Managing Director)
ALBROMET GmbH

Scope (as of June 1, 2024)

This Code of Conduct applies to ALBROMET GmbH. ALBROMET is technological leader in the distribution/trade and CNC machining of non-standard aluminum bronzes and copper alloys as well as for tube bending tools in Germany and Europe.

Compliance with the law in our business activities goes without saying for us. Violations are not compatible with our values, which is why we consider adherence to the following principles to be essential.

Compliance with the law

Laws and other regulations of the applicable legal systems must be strictly complied with. These include in particular:

- the United Nations Global Compact,
- the UN Universal Declaration of Human Rights,
- the UN Principles of Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises
- and the 1989 International Labor Organization Declaration on Fundamental Principles and Rights at Work.

Forced labor

ALBROMET does not use forced labor, serfdom, debt bondage, compulsory labor or other forms of slavery. All work performed by employees must always be voluntary. Trafficking in human beings must neither be used nor contributed to.

Child labor

ALBROMET does not employ children who are younger than the legal minimum employment age in the respective country or under the applicable jurisdiction. Irrespective of local regulations, ALBROMET only employs children and young people from the age of 15. Employees under the age of 18 require special protection and may only be employed in accordance with the respective legal requirements in the country of employment. This means that no work may be performed that is classified as hazardous in accordance with ILO Convention 182.

Under no conditions, employees may not have their ID cards or other work documents taken away from them with the aim of keeping them in employment. Furthermore, no psychological or physical coercion may be exercised.

Freedom of assembly and association

ALBROMET allows its employees to freely decide to join or not to join a trade union or employees' representative body of their choice, free from threats, intimidation or other forms of influence.

Employees being members in employees' organizations or trade unions are neither favored nor disadvantaged by ALBROMET.

Anti-discrimination

ALBROMET ensures that its employees are not discriminated against neither in hiring, job promotion, remuneration, performance evaluation nor other working conditions due to their skin color, race, nationality, ethnic or political affiliation, social origin, disability, sexual orientation and identity, religious beliefs, gender or age. Any incidents in this regard are neither tolerated nor encouraged. Particular attention must also be paid to psychological hardship, sexual harassment or discrimination, coercion, threats, abuse or exploitation of a predicament.

Occupational health and safety

ALBROMET undertakes to comply with the applicable health and safety regulations and to ensure a safe and healthy working environment. This is intended to ensure the health and safety of employees. Accidents that could lead to injuries or breakdowns should be prevented as far as possible and third parties should be protected. ALBROMET also offers training courses to ensure that its employees are trained and informed about these topics. ALBROMET maintains an appropriate health and safety management system (including appropriate emergency preparedness, accident management and fire protection), which is subject to regular reviews.

Remuneration and working hours

ALBROMET ensures compliance with the working time regulations of the respective country. Furthermore, ALBROMET pays appropriate remuneration and complies with all applicable remuneration and compensation regulations. ALBROMET employees are paid on time and informed clearly and comprehensibly about the basis on which they are paid. Furthermore, ALBROMET strictly complies with the applicable minimum wage regulations.

Environmental protection

ALBROMET aims to continuously improve the environmental compatibility of its business activities and to use raw materials and the environment in a careful and responsible manner. In particular, this includes the use of renewable energies, the sustainable use of resources and, where possible, avoiding waste. The company is obliged to comply with all applicable environmental laws, regulations and standards and to install a system that identifies and avoids potential hazards. Environmental pollution must be minimized to the extent necessary. Appropriate environmental protection must be continuously improved. In order to be able to fulfill these tasks efficiently, ALBROMET is committed to supporting the use of climate-friendly products and incorporating this into the manufacturing processes. This should help and enable environmental and climate protection goals to be achieved.

Integrity in business activities

Anti-corruption and bribery

ALBROMET complies with the respectively applicable national and international anti-corruption laws and other regulations. In particular, it does not tolerate any form of corruption or bribery, either directly or indirectly towards business partners and administrative officials. ALBROMET does not grant, offer or promise benefits in order to influence actions or gain an unfair advantage. This also includes the waiver, acceptance and/or granting of facilitation payments or other benefits granted to public officials for decisions that do not allow for discretionary powers.

Free competition

ALBROMET complies with the applicable competition and antitrust laws and acts in accordance with national and international competition laws. ALBROMET does not participate in price fixing, market or customer allocation, market collusion or bid rigging.

Foreign trade law requirements

ALBROMET complies with all applicable export control and customs regulations, including export controls and sanctions defined by contractual regulations.

Money laundering

ALBROMET is committed to complying with all applicable anti-money laundering laws and regulations and thus will not directly or indirectly facilitate money laundering or terrorist financing.

Conflicts of interest

ALBROMET avoids conflicts of interest that involve a personal or financial interest, business or personal actions or relationships, a previous or current employment relationship, as a result of which the possibility of an objective decision is or may be impaired. If there is a risk of a conflict of interest at ALBROMET, ALBROMET will submit this to the Customer without being asked in order to avoid even the appearance of a conflict of interest. These conflicts of interest include relationships with relatives or in-laws, life partners or spouses and investors.

Trade secrets

The information obtained in the course of the business relationship shall be treated confidentially and kept strictly secret. It is to be protected against unauthorized access by third parties in the same way as our own business secrets are protected. The intellectual property rights and know-how of others are to be respected.

Procurement of minerals

ALBROMET complies with all applicable laws and the resulting obligations regarding the procurement of minerals and materials from conflict regions and high-risk regions that may contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

Supply chain

All suppliers of ALBROMET that fall under the legislation of the German Supply Chain Duty of Care Act in its latest version are obliged to fulfill the provisions of the Supply Chain Duty of Care Act.

In particular,

- a risk management system with clear responsibilities shall have been introduced,
- a risk analysis shall have been carried out and documented,
- a declaration of principles on human rights has to be issued,
- prevention and remedial measures have to be anchored in the company's own business area and with direct suppliers,
- measures must be taken with indirect suppliers if there are indications of violations of human rights or the environment,
- a complaints procedure must be set up
- and reports on relevant measures must be submitted to the Federal Office of Economics and Export Control (BAFA) at intervals to be defined.

If ALBROMET has indications from its suppliers that a violation of a human rights or environmental obligation within the meaning of the Supply Chain Due Diligence Act appears possible, ALBROMET requests its suppliers to take measures to eliminate the risk or the violation.