

CODE OF CONDUCT

PREAMBLE

We as KLINGEL medical metal GmbH acknowledge our social, environmental and economical responsibility. This Code of Conduct does justice to the outstanding role and to the special responsibility we have as a German producer and manufacturer of valuable key elements in a globalized world.

AREA OF APPLICATION

This Code of Conduct applies to all subsidiaries worldwide. As a company group we commit ourselves to promote this Code of Conduct among our suppliers as well as our customers – if possible.

A. BASIC PRINCIPLES OF BUSINESS ETHICS

KLINGEL medical metal GmbH economical and social activities are therefore conducted in accordance with generally recognized ethical and humanitarian principles.

Our activities and our products contribute to prosperity, while at the same time adverse impacts on future generations have to be avoided or at least to be kept to an absolute minimum. Fundamental human rights, cultures and customs must be respected and strictly observed – regarding the employees and those who are affected by the activities of the KLINGEL medical metal GmbH.

1. HARD LABOR, CHILD LABOR AND EXPLOITATION

We as KLINGEL medical metal GmbH support the protection and preservation of human rights. The use of forced labor, child labor and all forms of exploitation and inhumanity will be outlawed.

2. DISCRIMINATION

The KLINGEL medical metal GmbH does not tolerate discrimination based on race, gender, ethnic or social origins, religion, age, disabilities or sexual orientation. We commit to protect our employees from physical, psychological, sexual or verbal harassment and to punish such occurrences.

3. FREEDOM OF SPEECH

The right to freedom of opinion and expression is granted and protected.

B. COMPLIANCE WITH EXISTING LEGISLATION

The KLINGEL medical metal GmbH commits to obey general laws and regulations as well as specific laws that protect fair competition and to support their further development.

1. PREVENTION AGAINST MONEY LAUNDERING

The KLINGEL medical metal GmbH takes appropriate measures to prevent money laundering activities in connection with the precious metals business in advance. The authorities will be supported in their fight against money laundering.

2. CORRUPTION

The KLINGEL medical metal GmbH takes appropriate measures to stop corruption.

3. CONFLICT MINERALS

On the part of KLINGEL medical metal GmbH appropriate measures are taken to prevent financing of terrorist activities in connection with the conflict mineral business (gold, titanium, tin, tungsten). These measures include the support of international activities to find out the facts about the origin of conflict minerals from the Democratic Republic of Congo (DRC) and adjoining countries. The goal is to prevent that conflict minerals from DRC and adjoining countries and their export may contribute to financing terrorism and armed conflicts.

4. DANGEROUS SUBSTANCES

The KLINGEL medical metal GmbH supports that chemicals are fabricated and applied in a way that avoids or minimizes adverse impacts on human health and environment. We therefore check whether parts manufactured by our suppliers contain particularly dangerous substances in a concentration of more than 0.1 percent weight by weight according to REACH regulation (EG) N° 1907/2006. We ensure that chemicals in our production processes are handled properly and used safely and disposed in an environmentally friendly manner. We support the substitution of particularly dangerous substances.

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C. SUSTAINABILITY

The KLINGEL medical metal GmbH produces unique high-valued products which are of vital importance for modern life. These products are key-elements for innovation and technical progress, for environmental protection and for energy-saving. The KLINGEL medical metal GmbH bases all its entrepreneurial actions on the principles of sustainability.

1. RESOURCES

The KLINGEL medical metal GmbH ensures through continuous innovation, that the production processes always correspond to the current technical standards and therefore environmental impact is kept as low as possible. At the same time we look for continuous improvements which make it possible to keep the specific amount of resources in products as low as possible while maintaining the performance.

2. ENVIRONMENTAL PROTECTION AND HEALTH CARE

The KLINGEL medical metal GmbH obeys the rules in the environmental and health care sector. We pay special attention to the environment and health care of our employees.

3. ENERGY SAVING

The KLINGEL medical metal GmbH is in compliance with all the energy policy regulations. Energy consumption as well as energy efficiency constitute considerable criteria in the procurement of energy services, products, facilities and energy.

4. SOCIAL RESPONSIBILITY

The KLINGEL medical metal GmbH contributes to economic growth and prosperity. We provide employment in the supply industry. In some regions the precision metal industry is the main source of income. We are fully aware of our responsibility and we particularly declare our support to secure these jobs. The KLINGEL medical metal GmbH also contributes to social progress, for example by supporting non-profit projects.

D. IMPLEMENTATION AND ENFORCEMENT

The KLINGEL medical metal GmbH shall take appropriate and proportionate efforts to continually implement and apply the principles and values set out in this CoC.

Pforzheim, January 2020



Ralf Petrawitz
Managing Director