



TSUBAKI KABELSCHLEPP

CODE OF CONDUCT

TSUBAKI KABELSCHLEPP



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01



IMPORTANCE OF THE CODE OF CONDUCT

The TSUBAKI KABELSCHLEPP Group conducts its business responsibly and in compliance with all applicable laws and other legal regulations of the countries in which it operates. Thus, the company behaves in conformity with the respective laws. The Management of the TSUBAKI KABELSCHLEPP Group is fully committed to all legal and company-specific regulations for a responsible and lawful conduct. The Management also renounces any business that is contrary to the following principles. We do expect the same from our employees and business partners.

Since we are part of the Japanese TSUBAKI Group our code of conduct is based on the values of the TSUBAKI Group Policies:
tsubakimoto.com/company/group_policies

Wenden, November 2020

TSUBAKI KABELSCHLEPP GmbH



Henning Preis
President & CEO

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HUMAN RIGHTS

All our actions are in accordance with the principles of the Universal Declaration of Human Rights of the United Nations and we expect the same from all our business partners.

03



HEALTH & SAFETY OF EMPLOYEES

The health and safety of our employees is our top priority. We live a "safety first" culture throughout the whole TSUBAKI Group since the Group Management gives special attention to this topic. Therefore, we strive for offering our employees safe and healthy working conditions and workplaces.

04



EQUAL OPPORTUNITIES & FAIRNESS

We treat everyone with dignity and respect, regardless of gender, nationality, age, color of skin, social background, or sexual orientation. We deal fairly with one another and are committed to the principles of equal opportunities. We do not tolerate any discrimination and reject mobbing of whatever kind.

We strictly comply with and monitor laws regarding child labor. Furthermore, we respect working hour laws and reject wage dumping.

05



FAIR COMPETITION & ANTITRUST LAW

We are committed to free and fair competition and comply with the respective national and international regulations.

Furthermore, we do not take actions or make agreements that violate antitrust laws. We continuously review any laws and regulations on international restrictions and embargoes and comply with them.



06



BRIBERY, CORRUPTION & MONEY LAUNDERING

The TSUBAKI KABELSCHLEPP Group does neither practice nor tolerate corruption, extortion, embezzlement, or bribery at any time and in any form. We expect a similar behavior from all our business partners.

Gifts and benefits that are beyond appropriate and usual business practice, and which violate legal regulations and/or are offered in expectation of consideration, shall not be accepted by our employees. Vice versa, we also do not make such offers to our business partners.

We engage in sponsoring to a certain extent, but always with a clear and measurable consideration (e.g. advertising possibility).

In addition, we expect compliance with all applicable laws to prevent money laundering. We solely maintain business relationships with customers and business partners, who legitimately do business and use legitimate financial resources.

To avoid any conflicts, the private interests of employees and company interests are strictly separated. Persons or companies that have existing business relations with the TSUBAKI KABELSCHLEPP Group, may only be considered by employees for their private purposes, if the parties have agreed upon customary market conditions for such purposes.

07



INTELLECTUAL
PROPERTY, DATA
PROTECTION &
HANDLING OF
CONFIDENTIAL
INFORMATION

Intellectual property and related creative solutions are the basis for our business success. Therefore, we protect these intangible assets and other business and trade secrets from careless or negligent disclosure throughout the entire TSUBAKI Group and strictly monitor proprietary information.

Internal company data and confidential information of our business partners that we obtain in the course of our activities are subject to strictest confidentiality. Such information may not be disclosed neither internally nor to external third parties. Information and data that we disclose to our business partners shall be dealt with in the same manner.

We treat and protect sensitive, personal data in particular, with the utmost care and in compliance with the legal regulations (DSGVO) for collecting, storing and processing of personal data.

08



SUSTAINABILITY & ENVIRONMENTAL PROTECTION

The protection of our environment and a careful use of natural resources is a key element of our group-wide company policy and environmental philosophy. The TSUBAKI ECO environment program regulates and monitors our environmental activities.

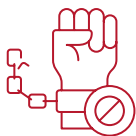
09



PRODUCT SAFETY & QUALITY

The safety and reliability of our products are a key factor of our success. Our ambition is to offer our customers flawless products in high quality. Our quality management is an integral part of all our operational processes. We comply with all legal requirements regarding quality and safety and strive for exceeding them.

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SLAVERY, FORCED LABOR, HUMAN TRAFFICKING, CHILD LABOR

TSUBAKI KABELSCHLEPP does not engage in or tolerate any form of modern slavery, forced labor, human trafficking, child labor or prison labor. We, our suppliers and partners feel obligated to avoid any form of forced labor and to take responsible action against such, regardless if they are permanent, temporary, direct, indirect or homeworkers.

11



WORKING CONDITIONS

TSUBAKI KABELSCHLEPP ensures fair working conditions for all employees and complies with all laws, rules and regulations governing working hours and remuneration. We are committed to an appropriate remuneration based on statutory minimum wages, applicable collective bargain agreements, statutory social benefits and contractual agreements.

KONTAKT

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