

Note:

Dr. Tillwich GmbH Werner Stehr is a globally active company based in Horb-Ahldorf/Germany, specialising in high-performance lubricants, epilamination agents and tribological testing. Our values, combined with innovative excellence, environmental responsibility and a focus on people, make us one of the world's leading manufacturers of precision lubricants, epilamination agents, tribological laboratory tests and testing equipment. Our actions are based on fair, open, reliable and honest conduct towards our business partners and employees. The Compliance Policy is designed to serve as an ethical and legal compass and to ensure we continue to meet these standards in the future.

misation agents, tribological laboratory tests and testing equipment. Our actions are based on fair, open, reliable and honest conduct towards our business partners and employees. The Compliance Policy is designed to serve as an ethical and legal compass and to ensure we continue to meet these standards in the future.

1. Conduct requirements

The rules of conduct shall be implemented by each individual employee, including executives and senior management, within the framework of their personal tasks. Compliance means that all members of the company need to act in accordance with all applicable laws, guidelines, leadership principles, ethical values and social standards as well as internal instructions without exception, and to promote and maintain the brand and reputation of the company. Violations of applicable rules of conduct not only harm the company, but can also have criminal, liability, labour and disciplinary consequences for employees at all levels of the hierarchy.

2. Competition

The products and services of Dr. Tillwich GmbH Werner Stehr are subject to the high standards and guidelines of the quality management system. All employees are instructed to comply with competition law and antitrust law. Collusion and agreements restricting competition with competitors, communication regarding price components, conditions, discounts, price increases, product launches, services and sales to regulate the market are explicitly prohibited. Every individual member of the company must expressly maintain silence about current, confidential, market-relevant and company-specific information, including when attending meetings of trade associations or representative organisations. Through our commitment to quality standards, we expressly distance ourselves from unfair competition.

3. Data privacy | confidentiality

Dr. Tillwich GmbH Werner Stehr uses modern electronic devices for business transactions and the exchange of information. Electronic data transfer always involves risks with regard to both personal data and sensitive company data. Our company guarantees extremely high standards in terms of the technical protection of data. With regard to personal data (GDPR), it is ensured that data is only collected and used to the extent that this is necessary and legally permissible. The use of data must be transparent and comprehensible for the data subjects. Business and company secrets, as well as confidential information, are assured by Dr. Tillwich GmbH Werner Stehr by means of an obligation of confidentiality agreed by each employee. Access by external or third parties is also excluded.

4. Prohibition of discrimination

The customers, business partners and employees of Dr. Tillwich GmbH Werner Stehr are to be treated fairly and respectfully. The cooperation among employees is characterised by fairness and mutual respect. The personal dignity, privacy and personal rights of each individual are to be respected by everyone. Any form of discrimination, insult or harassment of any kind will not be tolerated. The same applies to any form of coercion and violence or threat thereof.

5. Communication

Official statements in the name of Dr. Tillwich GmbH Werner Stehr as well as communication with the public/press shall be made solely by management or by company employees authorised due to their position.

6. Notification of infringements

If employees observe violations of the provisions of the Compliance Policy, illegal or unethical conduct, or are unsure of proper conduct in certain business situations, they are required to promptly report this to management. Any verifiable – or even suspected – violations reported will be examined and treated with absolute confidentiality by Dr. Tillwich GmbH Werner Stehr. There will be no negative consequences for the reporting itself unless the violation is caused by the notifying person. However, any reports or allegations with regard to the Compliance Policy that are knowingly incorrect will be subject to disciplinary measures.

7. Conflicts of interest

In order to maintain a proper business relationship, conflicts of interest must not be permitted. Dr. Tillwich GmbH Werner Stehr ensures that the private interests of employees are strictly separated from the business interests of the company. Particular attention must be paid to the following: orders to related parties, orders to companies in which related parties are employed in decision-making positions, orders to companies in which related parties are involved. All employees must disclose any conflicts of interest that arise.

8. Corruption

Any form of bribery, the promise or granting of money or other benefits to decision makers, employees, officers or agents of a company in connection with business transactions or initiating business is strictly prohibited.

9. Gifts and personal benefits

It is not permitted to offer, promise or grant benefits in return for preferential treatment. Company employees may not demand, receive or accept personal benefits for themselves or for persons close to them from whom an obligation can be gained.

10. Business assets, company property

All company employees are obliged to treat business assets and company property properly and to protect them from loss and misuse. The use of company assets for private purposes is prohibited.

11. Health, safety and environmental protection

Dr. Tillwich GmbH Werner Stehr ensures that all applicable labour law regulations are complied with. In addition, the company guarantees respect for human rights, labour standards and equal opportunities. Any form of child employment is strictly excluded. There are disciplinary and labour law sanctions for commencing work under the influence of alcohol or drugs. The environment is a key area of concern for Dr. Tillwich GmbH Werner Stehr. Operating processes shall be executed in harmony with the environment and making use of available resources.

The management of Dr. Tillwich GmbH Werner Stehr identifies itself without exception with these corporate regulations.

Horb-Ahldorf, 19.10.2018
Susanne Beyer-Faiß, CEO