



# Code of Conduct of the ECCO-GROUP

Corporate Social Responsibility since 1969



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# The corporate code of conduct of setral® and the other companies of the ECCO-GROUP:

## THE ECCO-GROUP CODE OF CONDUCT

### I Philosophy and Origin: CSR at ECCO & setral®

Our code of conduct originates from the founding philosophy.

**S**icherheit/Safety/Sécurité  
**E**ffizienz/Efficiency/Efficacité  
**T**eamgeist/Team Spirit/Tous ensemble  
**R**espekt/Respect/Respect  
**A**ufmerksamkeit/Attention/Attention  
**L**oyalität/Loyalty/Loyauté

When setral® was founded more than 50 years ago, the awareness of the ethical responsibility of companies was still in its infancy in many places. At setral® (and later at the entire ECCO GROUP), however, responsibility for employees and society already played a major role at that time. This sense of responsibility gave rise to the company philosophy, which brought together the values of safety, efficiency, team spirit, respect, attention, and loyalty (setral®). These values were also reflected in the ECCO GROUP, of which setral® was to become part; they have successfully led our company through the years and should continue to do so today. At that time, the company philosophy laid the foundation for what is now our „Corporate Social Responsibility“ (CSR). Our understanding of CSR becomes binding in our code of conduct: the ECCO GROUP Code of Conduct.

## II The ECCO GROUP Code of Conduct

### Preamble

From our company philosophy and in accordance with the standards on company ethics and social, sustainable behavior, we have developed the following guidelines. Every employee of setral® and the other companies of the ECCO GROUP (hereinafter: „ECCO GROUP“) should orient his actions on these guidelines and help shape the company in accordance with the corporate philosophy. Our code of conduct should be part of our corporate culture. However, its guidelines do not replace the attentive eye in everyday life. The employees of the ECCO GROUP should keep our philosophy and the code of conduct in mind for all critical questions and if the impression of a grey area arises, it is necessary to act as follows:

ACT WHEN YOU SEE A VIOLATION – ASK IF YOU’RE UNSURE.

### Art. 1 Basic rules of the Code of Conduct

#### ART. 1.1 GELTUNGSRAHMEN UND GELTUNGSRAUM

Every employee and the management measure their actions in and for the companies of the ECCO GROUP by this code of conduct. No action may violate any paragraph of the ECCO GROUP Code of Conduct. The code of conduct should be actively lived. The employees of the ECCO GROUP should represent the companies of the ECCO GROUP externally as role models and live this code of conduct internally for each other. Business partners must be selected to the best of our knowledge and belief, considering this code of conduct. Our business partners shall comply with the provisions of this code of conduct and are expected to implement corresponding engagements with their business partners.

#### ART. 1.2 TAKING ACTION

What does taking action mean with regard to the ECCO GROUP Code of Conduct?

First of all, taking action means helping to shape an appropriate working environment in which all points of the code of conduct can be fulfilled. All employees are called upon to live this code of conduct in their daily work. Of course, all actions contrary to the code of conduct must be refrained from.

What do I do if I observe or believe to observe a violation of the ECCO GROUP Code of Conduct?

Here, action consists of various possibilities: Concrete intervention, reporting to the appropriate office in the company (e.B. to the Compliance Task Force, the HR department or to the management), meeting with colleagues of trust, formal reporting, anonymous reporting and, in particularly serious cases or if it persists despite reporting, the involvement of external bodies; these can be the corresponding counselling centers or government agencies. E-Mails can be directed to [compliance@setral.net](mailto:compliance@setral.net) .

Rules of Action: I think I observed a violation of a paragraph of this code of conduct, therefore I should act as described above. If I am not sure whether the code of conduct is violated, I should ask myself: would I stand for the action with my name instead of that of the company? I should act accordingly.

## ART. 1.3 CONSEQUENCES

### **Employees:**

Violations of the ECCO GROUP Code of Conduct may have labor law or disciplinary consequences.

### **Suppliers and business partners:**

Our suppliers and business partners are to follow the rules of this code of conduct.

In general, the main standards and regulations our suppliers and business partners have to comply with include (but are not restricted to) the following:

- The SA 8000
- The Principles of the UN Global Compact
- The ILO Agreement
- The Charter for Sustainable Development of the ICC
- The Dodd-Frank Act

The ECCO GROUP or its subsidiaries will withdraw from business activities within the scope of what is legally possible after becoming aware of a serious violation of the principles of this code of conduct by a supplier or business partner. In minor cases the ECCO GROUP will consider if the violation can be rectified and if steps can be taken in order to avoid the termination of the business relationship. If damages occur as a result of the violation, the ECCO GROUP or its subsidiaries will claim compensation; see also the corresponding contractual provisions.

Our suppliers and business partners are obliged to monitor compliance with the above-mentioned standards and regulations and the standards of the ECCO GROUP Code of Conduct at their own suppliers and business partners and to oblige them to do so.

## Art. 2 Social responsibility

### Principles:

The ECCO GROUP and its subsidiaries are aware of their responsibility and strive for exemplary dealings with stakeholders inside and outside the company. The following paragraphs contain the guidelines concerning social issues. Actions that contradict the following paragraphs must be refrained from and violations are to be reported.

In order to contribute to the improvement of international working conditions, the ECCO GROUP, its subsidiaries and their employees are also committed to the implementation of the guidelines of the International Labour Organization (ILO) and the social standard SA 8000.

All employees, management, as well as suppliers and partners of the ECCO GROUP and its subsidiaries shall strive to comply with the corresponding international standards and regulations and the provisions of this code of conduct, and possible, to exceed them. Infringement may have the consequences listed above.

## ART. 2.1 WAGES AND SOCIAL BENEFITS

All levels of the ECCO GROUP are obliged to comply with local and international standards for wages and benefits. This also applies to suppliers, customers, or business partners. The well-being of employees is a high priority for the companies of the ECCO GROUP. This priority is also in line with the entrepreneurial potential of the ECCO GROUP.

## ART. 2.2 WORKING TIME

All levels of the ECCO GROUP comply with local and international standards for working hours. This also applies to suppliers, customers, and business partners. The ECCO GROUP strives to accommodate its employees as much as possible, e.B. by making working hours more flexible. The well-being of employees is a high priority for the companies of the ECCO GROUP. This priority is also in line with the entrepreneurial potential of the ECCO GROUP.

## ART. 2.3 CHILD LABOUR AND YOUNG WORKERS

All levels of the ECCO GROUP are obliged to comply with local and international standards in relation to child labour and in relation to young workers. This also applies to suppliers, customers, or business partners. The ECCO GROUP pursues a 0-tolerance policy when the best interests of children is in danger. Every employee of the ECCO GROUP is called upon to act immediately if he or she hears a threat to the well-being of a child at any point.

## ART. 2.4 FORCED LABOUR AND TRAFFICKING IN HUMAN BEINGS

All levels of the ECCO GROUP are obliged to comply with local and international standards regarding forced or compulsory labour and human trafficking. At no point is a link to forced labour or human trafficking tolerated. This also applies to suppliers, customers, or business partners. Every employee of the ECCO GROUP is called upon to act immediately if he or she hears a connection to forced labour or human trafficking.

## ART 2.5 OCCUPATIONAL HEALTH AND SAFETY

Occupational safety and the health of employees have the highest priority at all levels of the ECCO GROUP. Close cooperation with experts ensures the appropriate design of working conditions and workplaces. Regular inspections are standard. Together with the management, every employee is called upon to actively participate in the appropriate design of the working environment and to regularly develop suggestions for improvement in the sense of the constant optimization of the ECCO GROUP.

## ART. 2.6 HARASSMENT

The appropriate and collegial interaction of the employees of the companies of the ECCO GROUP is at the core of our philosophy. Harassment of any kind cannot be part of our companies, which is why the ECCO GROUP has a 0-tolerance policy for harassment. All employees are required to report any form of harassment at work, be it sexual, physical or psychological, to our Human Resources Department, provided that this does not violate the personal rights of the harassed person or causes other damage. The management undertakes to deal with this issue appropriately and sensitively and to fully protect the interests of the persons affected by harassment.

## ART. 2.7 NON-DISCRIMINATION

Discrimination both during the application process and at the workplace will not be tolerated. Skin colour, age, gender, sexual orientation, gender identity, ethnic or national origin, disability, pregnancy, religion, political affiliation, trade union membership, marital status or genetic information must not affect the treatment of both applicants and employees. If there is a suspicion that discrimination has nevertheless occurred, every employee of the ECCO GROUP is called upon to act.

## ART. 3 ECONOMIC AND LEGAL RESPONSIBILITY

Principles:

The ECCO GROUP is aware of its responsibility and strives for exemplary dealings with stakeholders inside and outside the company. In the following, the guidelines for dealing with economic and commercial law issues are set out. Action that contradicts the following points must be refrained from and violations are to be reported.

The legal requirements of Germany and the European Union apply. These must also be adhered to when doing business abroad.

All business partners and suppliers of the ECCO GROUP are also required to comply with international standards, the corresponding legal requirements, and the provisions of this code of conduct.

### ART. 3.1 CORRUPTION, EXTORTION, BRIBERY

All levels of the ECCO GROUP are obliged to comply with local and international standards regarding corruption, extortion, and bribery. At no point will corruption, extortion or bribery be tolerated. This also applies to suppliers, customers, or business partners. Every employee of the companies of the ECCO GROUP is called upon to act immediately if he or she hears about corruption, extortion, or bribery.

### ART. 3.2 DATA PROTECTION AND PRIVACY

The ECCO GROUP complies with German and European legislation on data protection and privacy. All employees of the ECCO GROUP are required to perceive the high value of privacy and data and to act accordingly in order to raise awareness of data protection. Data of any kind and from any source may only be passed on in accordance with the statutory provisions. In addition, all employees should adhere to the requirement of data economy. In the event of data breaches or similar negligent or unintentional disclosure of data or violations of privacy, the appropriate office in the company must be informed immediately and emergency measures must be initiated.

### ART. 3.3 FINANCIAL RESPONSIBILITY (EXACT RECORDS)

The ECCO GROUP complies with the applicable legal regulations and is aware of its financial responsibility. All business transactions must be carried out transparently and accurately reflected in financial publications and accounting. Any abnormality must be reported immediately. Proper accounting and financial transparency in accordance with the international standards of the industry are both a fundamental guarantee for business success and for the implementation of the ECCO GROUP Code of Conduct.

#### ART. 3.4 DISCLOSURE OF INFORMATION

Financial and non-financial information to be published must be published in accordance with industry standards and the applicable legal framework. In addition, the ECCO GROUP strives for open communication with all legitimate interest and stakeholder groups. The ECCO GROUP believes in the social value of transparency and openness and tries to convey this to the outside world.

#### ART. 3.5 FAIR COMPETITION AND ANTITRUST LAW

Out of self-interest, the ECCO GROUP upholds free and fair competition. We win through our range of services and the quality of our products and therefore see free competition as an outstanding asset. In addition, all antitrust regulations are also provisions of the ECCO GROUP Code of Conduct, and any violation or attempted violation is prohibited. Here, too, the duty of every employee applies.

#### ART. 3.6 CONFLICTS OF INTEREST

Conflicts of interest of any kind must be disclosed immediately and, if possible, resolved. If this is not possible, the topics concerned must be relocated in order to eliminate the conflict of interest. Conflicts of interest are not always immediately recognizable and special sensitivity must be applied. Even the appearance of a conflict of interest can have a damaging effect. Attention must be drawn to possible conflicts of interest as soon as possible.

#### ART. 3.7 PLAGIARISM AND INTELLECTUAL PROPERTY

Plagiarism harms our brand and our business. Plagiarism, as soon as detected, will be legally prosecuted. The same applies if we notice plagiarism of products from other manufacturers. They must be informed immediately. Plagiarism of all kinds is harmful to free and fair competition. The same applies to the use of intellectual property. All employees of the ECCO GROUP undertake to do everything possible to protect intellectual property in their day-to-day business. This is the only way we can trust that our intellectual property will also be protected.

#### AART. 3.8 EXPORT CONTROLS AND ECONOMIC SANCTIONS

The ECCO GROUP strictly adheres to the legal provisions regarding the export or re-export of goods, software, services, or technology, as well as the provisions that restrict trade with certain countries, regions, companies, persons or other trading partners. To this end, the ECCO GROUP has set up its own task force in order to meet the legal requirements and to establish the highest possible standards of compliance in foreign trade. Business partners and customers are also expected to adhere to these standards and, of course, to comply with the legal requirements..

#### ART. 3.9 PRESERVATION OF IDENTITY AND PROTECTION FROM RETALIATION

Every employee, as well as the management, is called upon to report violations of the ECCO GROUP Code of Conduct. For this purpose, the Compliance Task Force of the ECCO GROUP and the management offer the opportunity for confidential contact. The ECCO GROUP guarantees the anonymity as well as protection from retaliation of anyone who wishes to report breaches.

## Art. 4 RESPONSIBILITY TOWARDS THE ENVIRONMENT

Principles:

Environmental protection and sustainability are particularly important to the ECCO GROUP. ECCO and setral® therefore established an environmental management system in accordance with DIN EN ISO 14001 at an early point in time.

In addition, the ECCO GROUP creates a balance sheet of its CO<sub>2</sub> emissions on the basis of the *Greenhouse Gas Protocol* (GHG Protocol) and compensates twice the amount the emissions through the acquisition and decommissioning of CO<sub>2</sub> certificates.

The ECCO GROUP is aware of its responsibility and strives for exemplary interactions with stakeholders inside and outside the company. The following paragraphs will contain the guidelines for dealing with ecological issues. Actions that contradict the following points must be refrained from and violations are to be reported if necessary.

All business partners and suppliers of the ECCO GROUP are also required to comply with these provisions and to comply with corresponding legal requirements and international standards.

### ART 4.1 ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Energy consumption and greenhouse gas emissions must be reduced wherever possible. Every employee is encouraged to identify potential for improvement that goes beyond the defined processes and to strive for a low ecological footprint. Environmental protection is the task of every single employee and should be practiced this way regularly.

### ART. 4.2 WATER QUALITY AND CONSUMPTION AS WELL AS AIR QUALITY

Water quality and water consumption of industrial plants are regularly monitored. Attention must be paid to air quality. Water consumption must be reduced wherever possible. Every employee is encouraged to identify potential for improvement that goes beyond the defined processes and to strive for a low ecological footprint. Environmental protection is the task of every single employee and should be practiced this way regularly.

### ART. 4.3 MANAGEMENT OF NATURAL RESOURCES AND WASTE PREVENTION

Waste prevention and economy in the consumption of nature as a resource are fundamentally for the self-image of the companies of the ECCO GROUP. Industrial waste is monitored accordingly and disposed of with special care. Every employee is encouraged to identify potential for improvement that goes beyond the defined processes and to strive for a low ecological footprint. Environmental protection is the task of every single employee and should be practiced this way regularly.

### ART. 4.4 RESPONSIBLE PROCUREMENT OF MATERIALS

Material procurement is a central lever to influence the ecological and social impact of industrial production - accordingly, its monitoring is important. Employees and management are expected to procure materials responsibly and to strive for a low ecological footprint as well as a high social and environmental quality of the procured materials. The corresponding international standards must be observed.

# The ECCO GROUP Code of Conduct: Responsibility Worldwide



Amerika  
America  
Amérique

Afrika  
Africa  
Afrique

Europa  
Europe  
Europe

Asien  
Asia  
Asie

Australien  
Australia  
Australie



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