

BORBET

CODE OF CONDUCT
SUPPLIER
2021



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For reasons of readability, simultaneous use of the linguistic forms male, female and diverse (m/f/d) is dispensed with. All personal designations apply equally to all genders.



SCOPE OF APPLICATIONS

This "[Code of Conduct](#)" defines the principles and requirements that BORBET Group companies set for themselves and for their suppliers of goods as well as works and services with regard to their responsibility for people and the environment. The BORBET Group reserves the right to change or adapt the contents and requirements of the "[Code of Conduct](#)" if necessary.

In this case, the BORBET Group expects its suppliers and business partners to take such changes into account and confirm their acknowledgement.

Document see last page „[Consent supplier](#)“





HUMAN AND LABOUR RIGHTS



prohibition of child labor and forced labor

It is forbidden to recruit employees who are not at least 15 years of age. In countries that come under the exception for developing countries in the ILO Convention no. 138, the minimum age may be reduced to 14 years.

In accordance with the provisions of principle 4 of the United Nations Global Compact, it is prohibited to promote or tolerate any kind of forced labour.



no discrimination

Equal opportunities and equal treatment shall be guaranteed, irrespective of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social background, age, disability or political views, insofar as this is based on democratic principles and tolerance towards other people. Employees are generally selected, recruited and promoted on the basis of their qualifications and skills. Suppliers' employees are also expected to respect the rights, national, cultural and ethnic characteristics of each individual with whom they come into contact during their business activities.



freedom of association

The suppliers and business partners of the BORBET Group recognise the fundamental right of all employees to form and join trade unions and employee representatives. Where this right is limited by local laws, alternative, legally compliant options for employee representation should be promoted.



fair pay and benefits

Remuneration and benefits correspond to the legally valid and guaranteed minimum. If statutory or collective agreements are not in place, BORBET's suppliers and business partners shall align themselves with the sector-specific tariff remuneration and benefits customary for the location.



safaty at work and working hours

BORBET's suppliers and business partners comply with the applicable statutory provisions for occupational health and safety at work. They support the further development and improvement of working conditions. Working hours shall, at a minimum, comply with the respective national legal requirements or the minimum standards of the respective national economic sectors.





ENVIRONMENTAL PROTECTION



creation and application of environmental management systems

All BORBET suppliers and business partners continuously improve their environmental performance. Suppliers implement suitable environmental management systems for this purpose, for example in accordance with the international standard ISO 14001 or the EU EMAS Regulation. In the case of new suppliers, BORBET first obtains a self-assessment and creates a risk profile. If required certificates cannot be viewed, we also carry out production inspections or audits via third parties. With regards to the environment, our existing management system is subject to careful review.

This means suppliers may need to prove REACH registration. We also rely on the self-assessment tool for existing suppliers and request appropriate supporting documents that meet our sustainability requirements. Certificates, documentation, and sustainability reports are evaluated for this purpose.



active handling of ecological challenges

When developing new products and services as well as operating production facilities, BORBET ensures that all the resulting effects on the environment and climate are minimised and that our products make as positive as possible a contribution to environmental and climate protection for our customers. We also demand the same from our suppliers. In order to improve the environmental performance indicators of products and services, the supplier should proactively manage the main environmental indicators, including the reduction of greenhouse gas emissions along the entire supply chain. The BORBET Group monitors the developments of its suppliers and requests information regarding total energy consumption in MWh and CO₂ emissions in tons, Scope 1 and 2 emissions (in accordance with GHG protocol and/or ISO 14064). Furthermore, water consumption must be minimised and the quality of the water must be checked regularly.





ENVIRONMENTAL PROTECTION



waste and recycling

The prevention of waste, reuse, recycling, the economical use of resources and the safe and environmentally friendly disposal of waste are taken into account in development, extraction of raw materials, production, use of products and other activities.



quality and safety

All products and services must meet the contractually defined criteria for quality and safety upon delivery and must be able to be safely used for their intended purpose.



TRANSPARENT BUSINESS RELATIONS



avoidance of conflicts of interest

BORBET's suppliers and business partners make their decisions solely on the basis of objective criteria and will not be influenced by personal and financial interests or relationships.



prohibition of corruption

BORBET's suppliers and business partners do not tolerate corrupt practices and take action against them. BORBET requires its suppliers and business partners to reject and prevent any form of corruption. This also includes so-called „facilitation payments“ (illegal payments to speed up routine administrative matters). Suppliers shall ensure that their employees, subcontractors or agents do not give or offer bribes, kickbacks, improper donations or other improper payments or benefits to customers, public officials or other third parties. Neither shall they accept such payments or benefits from them.





FAIR MARKET BEHAVIOR



fair competition

In all countries, relationships and arrangements with competitors, suppliers, distributors and dealers that affect fair competition are prohibited by law. This includes, for example, price agreements, the division of customers or sales territories between competitors, anti-competitive boycotts and other unfair methods of competition. BORBET and its suppliers are committed to fair competition and to compliance with these laws and regulations.



money laundering prevention

BORBET's suppliers maintain business relationships exclusively with reputable business partners whose business activities are in accordance with statutory provisions and whose financial resources are of legitimate origin.



import and export control

BORBET's suppliers and business partners shall ensure compliance with all applicable laws for the import and export of goods, services and information.



confidential information and data protection

All information that has not been made publicly available is subject to confidentiality and may not be disclosed to unauthorised third parties either during or after termination of the business relationship.

Personal data can only be processed in accordance with the applicable statutory provisions on data protection.



regular inspection

We reserve the right to inspect our suppliers by means of inquiries, internal audits or other procedures.





REPORTING OPTIONS FOR VIOLATIONS OF THE CODE OF CONDUCT

In order to protect the BORBET Group, its employees, suppliers and business partners, misconduct must be detected at an early stage, reviewed and remedied immediately. This requires the awareness of everyone and their willingness to point out possible violations of the rules when there are concrete indications. In the event of concrete indications of misconduct on the part of our employees in Europe or the employees of our suppliers, please report this to the mailbox Compliance@borbet.de, via the homepage under: „**Code of Conduct & Compliance**“ or by phone: **+49 2984 301 343**. Reported information is processed confidentially and anonymously by the responsible parties in a transparent and fair procedure. Information regarding our location in South Africa can be made via the following KPMG hotline: **0800 777117**
KPMG is tasked with receiving and processing the information.



LEGAL CONSEQUENCES OF VIOLATIONS OF THE CODE OF CONDUCT

If a supplier or business partner of BORBET does not comply with the basic principles set out in this document, BORBET is entitled to end the business relationship with this supplier by termination for cause. It is at BORBET's discretion to refrain from such consequences and instead to take alternative measures if the supplier or business partner can provide credible assurances and can demonstrate that he has taken immediate action to prevent future violations.



SUPPLIER COMMITMENT

As one of the leading manufacturers of light alloy wheels, the BORBET Group is aware of its corporate responsibility towards customers, employees, suppliers and the public. Not only our own production is to be made more sustainable, but also the entire value chain. As an internationally active company, it is part of our responsibility to comply with applicable laws at all times and everywhere and to respect ethical values. We expect the same from our suppliers and business partners.

This Code of Conduct is intended to serve our suppliers and business partners as a guideline for compliance with international standards, environmental rights, human rights and business ethics. These values are regarded as fundamental at the BORBET Group, in order to establish long-lasting and mutually satisfying business relationships.

For this reason we ask all our suppliers and business partners to sign this Code of Conduct by a legal representative.

By signing, the supplier confirms that he has read the Code of Conduct and accepts all of the terms and conditions. In addition, BORBET expects its suppliers to have introduced their own internal guidelines and procedures with the same or similar topics of the BORBET Group Code of Conduct. If this is not the case, the supplier confirms with his signature that he adheres to the BORBET Code of Conduct and passes on the conditions mentioned there to his employees and suppliers.

If one or more points, currently or in the future, cannot be fulfilled by the supplier, this must be communicated immediately in writing.

Supplier Commitment	
Company name	
Address	
Signatory's name	
Signatory's function	
Already adopted internal guidelines and procedures? (Company's Code of Conduct)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Date	
Company Stamp & Signature	

Please return the signed form to the following address within two weeks after its receipt:

E-Mail: csr@borbet.de

By post: Sustainability, BORBET GmbH, Hauptstraße 5, 59969 Hallenberg