

Code of Conduct Speck | Circutec Group

Preamble

The companies in the group are committed to responsible, sustainable and legally compliant corporate management. Integrity, respect, fairness and sustainability form the basis of our actions.

This Code of Conduct applies to all companies in the Group as well as to all managers, employees and other persons acting on behalf of the Group.

Our business activities are guided by the principles of the UN Global Compact, the ILO Core Labour Standards, the OECD Guidelines for Multinational Enterprises and all applicable national and international laws and regulations.

1. Compliance with laws and regulations

We comply with all applicable laws, regulations and internal guidelines. Violations of the law will not be tolerated. All employees are obliged to inform themselves about the regulations relevant to their area of activity and to comply with them.

2. Integrity and responsible action

We act honestly, transparently and responsibly. We make business decisions exclusively on the basis of objective criteria and in the interest of the company.

Corruption, bribery, the granting of advantages or other unfair business practices will not be tolerated.

3. Fair competition

We are committed to free and fair competition. Cartel agreements, market manipulation or other anti-competitive behaviour are prohibited.

All employees are obliged to comply with the applicable antitrust and competition regulations.

4. Human rights and working conditions

The group of companies respects and protects internationally recognised human rights.

In particular, we are committed to:

- the rejection of child labour and forced labour,
- respect for freedom of association and the right to collective bargaining;
- the promotion of equal opportunities and non-discrimination,
- respect for human dignity and personal rights.

Any form of discrimination, harassment or bullying will not be tolerated.

5. Diversity, Equality and Respect

We promote a corporate culture that is characterized by mutual respect, appreciation and openness.

No one may be discriminated against on the basis of gender, age, origin, nationality, ethnicity, religion, ideology, disability, sexual orientation or other characteristics protected by law.

6. Data protection and IT security

Personal data and confidential information must be protected from unauthorized access.

IT systems must not be misused.

7. Environmental and climate protection

Sustainability is an essential part of our corporate strategy.

We are committed to the responsible use of natural resources, to the avoidance of environmental pollution and to the continuous improvement of our environmental performance.

Our goal is to minimize the negative impact of our business activities on the environment and climate.

8. Conflicts of interest

Private interests must not influence business decisions.

Possible conflicts of interest must be disclosed and reported immediately to the responsible manager or compliance office.

9. Handling of information and data protection

Confidential company information and personal data are protected and used exclusively within the framework of the legal requirements.

All employees are obliged to protect trade secrets and comply with applicable data protection regulations.

10. Protection of company assets

The Group's property and resources must be used carefully and responsibly.

Company assets may only be used for permissible business purposes.

11. Supply chain responsibility

We also expect our business partners, suppliers and service providers to comply with comparable ethical, social and environmental standards.

The Group promotes a responsible and sustainable supply chain.

12. Reporting violations

Employees are encouraged to report actual or suspected violations of this Code of Conduct, laws or internal policies.

Whistleblowers must not experience discrimination or reprisals as a result of a report.

Final provisions

This Code of Conduct is a binding part of our corporate culture. All managers and employees are obliged to comply with the principles set out herein and to actively contribute to their implementation.

The Group regularly reviews this Code of Conduct and continuously develops it in order to meet current legal, social and economic requirements.

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