



# Code of Conduct

apra-group

Issue 2019

# Preamble

## Extract from the Code of Conduct (CoC) of VDB

*The proceeding globalisation of entrepreneurial activities and the global competition increasingly dominate economical and political discussions. They imply a proceeding integration of the national markets by an intensified international trade and the transboundary exchange of capital, labour and knowledge.*

*Against this background, the implementation of ethical conducts in the course of business and the assumption of social responsibility become more and more important for companies. Due to this, many organisations dispose themselves to demand the integration of business ethics and the acceptance of social responsibility from their suppliers and business partners, too.*

*Thus, the suppliers and business partners are faced with a multitude of different requirements for the realisation of social responsibility and ethics in the course of business.<sup>1</sup>*

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<sup>1</sup> Cf. German Railway Industry Association (VDB) (2009).

## Scope of Application

It is our ultimate demand to carry out all our transactions ethically and legally impeccable. This is intrinsically tied to the way we act in daily business. Accepting this as an international challenge, we decided to implement an own Code of Conduct, which is guided by the principles of the United Nation's Global Compact.

The principles mentioned in this Code of Conduct apply to all employees of the individual business organisations representing the apra-group:

- apra-norm Elektromechanik GmbH
- apra-plast Kunststoffgehäuse-Systeme GmbH
- apra-gerätebau GmbH
- apra-norm s.n.c.
- apra-optinet Sp.z.o.o.

In equal measure, the principles apply to the collaboration with customers, suppliers and other business associates. Only mutual acceptance, observance and promotion of those principles can be a solid base for trustful and successful business relations.

# Principles

## 1 Integrity and Governance

We take on responsibility by considering the consequences of our entrepreneurial decisions and actions in terms of economical, technological, social and ecological matters. In doing so, we are geared to general ethical values and principles, especially to integrity and rectitude as well as to the respect of human dignity.

## 2 Corruption and Bribery

We neglect any kind of illegal business like corruption or bribery. We commit ourselves to transparency while giving or receiving gifts and invitations in order to ensure the compliance with corporate policies, industrial standards and current law.

## 3 Human Rights

We preserve and protect human rights as an integral part of our corporate culture and categorically refuse child labour or compulsory labour. We don't maintain business relationships with companies which don't respect these principles.

## 4 Employment Rights and Discrimination

We deal respectfully and trustfully with each other. Applicable regulations concerning the compensation level and working hours are carefully observed. We provide a working environment which excludes discrimination, harassment and bullying. Our employees are entitled to exercise their right to freedom of association, freedom of assembly as well as collective bargaining.

## 5 Social Responsibility and Environmental Protection

We consider environmental protection, healthcare and occupational safety as integral parts of our social responsibility. We only place safe products on the market. Within the scope of our possibilities and our freedom of action, we voluntarily contribute to the common good and the sustainable development of society in the areas where our sites are located.

## **6 Compliance with applicable Law**

We comply with applicable law on a local, national and international level and maintain legally impeccable relationships with all governmental and surveillance authorities. We are bound to the observance of the applicable antitrust law and competition regulations.

## **7 Company Property and Documentation of Business Transactions**

For the fulfilment of our tasks we use operational IT systems which we guard from internal and external abuse. We protect confidential information concerning the company, employees, associate partners, products, services and other sensitive data from unauthorised transmission or abuse.

## **8 Implementation and Monitoring**

We take all convenient and proportionate efforts to continuously implement and exercise the principles and values defined in this Code of Conduct. We communicate openly and conversationally about these policies and their implementation among each other as well as with our customers, suppliers and other stakeholders.

By focusing on the cooperation with suppliers that either subscribe our Code of Conduct or already have established an own Code of Conduct within their company, we promote the idea of the Global Compact.<sup>2</sup>

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<sup>2</sup> Principles 1-8: Cf. UN Global Compact (2019).



# About

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## References

German Railway Industry Association (VDB)  
[https://bahnindustrie.info/fileadmin/VDB-CoC/VDB-CoC\\_Broschuere.pdf](https://bahnindustrie.info/fileadmin/VDB-CoC/VDB-CoC_Broschuere.pdf)

UN Global Compact  
<https://www.unglobalcompact.org/what-is-gc/mission/principles>