

Code of Conduct

The Institutes Dr. Schrader operate worldwide

Our business relations shall be based on our Code of Conduct. Compliance with statutory provisions and trade practices, also of other nations, and the rules of conduct which we have set ourselves are the basis for our actions. Traditional values and norms of other cultures shall also be respected. It is our claim to conduct all business processes with our customers and suppliers in a legally and ethically correct manner. Our employees are obliged to avoid conflicts of interest and to comply with the Code of Conduct and all the referenced regulations. This self-imposed obligation applies without exception in all countries in which we operate. Every employee is obliged to comply with the principles laid down in the Code of Conduct within the framework of his activities. Violations of laws or the Code of Conduct can have serious consequences – for the employees themselves and for the company.

1. Conduct Among Themselves

As an internationally active company we operate in a multicultural environment. We regard the diversity of people as an enrichment. We reject unequal treatment or degradation on the basis of gender, race or ethnic origin, religion or belief, disability, age or sexual orientation, we reject. Our interaction with each other and our communication is characterized by honesty, respect and fairness. We respect the personal rights and privacy of all stakeholders with whom we come into contact and do not tolerate any expression or behavior that promotes a negative working atmosphere and could have the aim of exclusion of individuals.

2. Conflict of Interests

Our employees should avoid situations that could lead to a conflict between personal interests and the interests of the Institutes Dr. Schrader. Each personal advantage which might result from contact with customers, suppliers or other authorities should be avoided so that business decisions can be made objectively and in the interest of the company. We behave properly at all times and comply with all applicable laws against bribery, corruption and fraud. Part of this Code of Conduct is also our Anti Bribery Policy which is known to every employee and is equally respected and observed by all.

3. Supporting Social Projects and Contributions

The Institutes Dr. Schrader provide financial and material support for social projects on a basis adapted to the size of the company. The following criteria should be considered for the award of donations:

- neediness,

- close proximity to the company (region Holzminden/Höxter),
- sustainable effect,
- no support of profit orientated organisations or such whose aims contradict those of our Code of Conduct.

4. Confidentiality and Data Secrecy

All business and operational matters are subject to confidentiality until they are released by the authorized body of the company. Failure to comply with the duty of confidentiality can have serious consequences. The company-internal guidelines must be followed.

5. Social Standards

We commit ourselves to respect the human rights and all national labor laws and regulations. Furthermore, we support the aims of the ILO Convention, the United Nations Conventions on the rights of children and the general human rights declaration. In particular, we strictly reject child labor and the use of forced labor and disciplinary measures (such as physical punishment, coercing mental or physical enforcement as well as verbally abusive assaults) and condemn this.

6. Environmental Protection, Safety and Quality

We use our integrated quality management system as a tool for continuous improvement of all services and activities. This is affiliated to applicable standards and takes into account the requirements of our customers. All laws concerning safety, health and environmental protection are an integral part of our thoughts and actions. Guidelines and regulations are described in the integrated management system for quality, safety, health and environment as well as in guidelines and instructions.

7. Complaints and Hints

Violations of the Code of Conduct or laws must be reported to the Compliance Officer or the Ombudsman. Here, the applicable laws concerning the allegation of untrue facts have to be observed (in particular §§ 186, 187 of the German Criminal Code, slander and libel). The Institutes Dr. Schrader will not take reprisals against employees who want to communicate or have communicated possible violations. The Institutes protect everyone who wants to communicate incidents in good faith. It does not matter if a suspicion is confirmed in the end or not. As long as the described events or perceptions correspond to the truth, each employee meets his duties and will be protected.

Thomas Meyer (Managing Director)