



## Code of ethics and conduct

This Code of Ethics and Conduct applies to all employees of M&S Armaturen GmbH as well as to our suppliers and subcontractors and must be applied and implemented accordingly.



Respektiere jedes Individuum gleichermaßen  
Respect each individual equally



Vermeldung von Interessenkonflikten  
Avoidance of any conflicts of interest



Transparentes Vorgehen  
Transparency and Control



Unbestechlich und gegen Korruption  
Anti-bribery and anti-corruption



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### Introduction

The company M&S Armaturen GmbH was founded under the same name on 7 January 1983. In addition to our convictions and commitments developed from the very beginning, we also want to establish rules of ethics and behaviour that should apply to all employees, service providers and suppliers of M&S Armaturen GmbH.

This Code is a reminder that all M&S activities involve more than just strict compliance with applicable laws and regulations. It is based on national laws and regulations such as the law on corporate due diligence in supply chains as well as international conventions such as the UN Civil and Social Covenant, the Guidelines on the Rights of the Child and Business Conduct, the UN Guiding Principles on Business and Human Rights, the international labour standards of the ILO and the UN Global Compact. We set out the principles of business ethics that must guide our behaviour in all circumstances in all countries and are based on integrity, fairness and respect for the dignity and individual rights of all stakeholders.

We at M&S rely on every employee - in the offices or work areas - internalising these rules. This ensures that we retain the trust of our customers, partners and employees and remain true to our core values. M&S expects all our business partners to act as described in this Code of Ethics and Conduct in the context of our business relationship and throughout the supply chain.

### **LINES OF ETHICS AND BEHAVIOUR**

The M&S Code of Ethics and Conduct sets out certain obligations and principles for employees and subcontractors in relation to general behaviour. These rules are intended to go beyond compliance with applicable laws and regulations in order to achieve exemplary professional behaviour in the interests of M&S.



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### Respect for individuals

M&S applies a personnel policy that complies with the applicable laws. No racist behaviour towards people will be tolerated, regardless of their nationality, religion, culture or other. Violations of this policy will result in drastic measures being taken by M&S against the accused person(s) and/or company(ies).

*We do not tolerate direct or indirect involvement in modern slavery, forced labour or human trafficking. The use of labour as punishment or as a means of ideological or political discrimination is not acceptable to us. No employee is employed by us against his/her free will. Our employees have the freedom to terminate their employment relationship with reasonable notice. We ensure that our employees are not required to pay a deposit, recruitment fee or equivalent advance payment, either directly or via recruitment agencies. We expect the same from our business partners.*

### Compliance management

All companies and their employees must comply with all applicable national and international laws and regulations.

*M&S and its employees must comply with all applicable national and international laws and regulations. All employees must refrain from any actions that involve employees or the company in illegal practices. Any misconduct*

*must be reported to supervisors or quality management and will be brought to the attention of top management. The misconduct will then be analysed and clarified using all quality management methods.*

### Antitrust law

Competition can only develop freely if it is fair. M&S is committed to integrity and fairness in competition with others in the market. Behaviour that undermines competition will not be tolerated. M&S will compete in the marketplace in an ethical manner within the framework of antitrust and competition laws.

*Antitrust laws prohibit agreements or actions that eliminate or impede competition, create a monopoly, abuse a dominant position, artificially maintain prices or otherwise illegally hinder or distort trade.*

*It is therefore expressly prohibited, for example, to discuss processes in connection with participation in tenders or to exchange information on prices, market shares or other market conditions with competitors, customers and business partners in violation of applicable law.*



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### Combating corruption

The prohibition of corruption applies to M&S and all persons acting on its behalf. Violations can have serious consequences both for the individuals involved and for M&S.

*Corruption undermines economic development and free competition. It ruins reputations and exposes both companies and individuals to risks. M&S is against all forms of corruption that do not occur in any part of the company's business activities. The ban on corruption applies to M&S and all persons acting on our behalf. In the event of violations, there may be serious consequences both for the individuals involved and for M&S. Gifts, hospitality and invitations (regardless of their material or immaterial value and nature) may be offered or accepted if their value is low or reasonable under the circumstances. In case of doubt, the line manager or the management must be consulted before accepting or offering a gift.*

### Conflicts of interest

Every company and every employee of M&S is obliged to act loyally. Therefore, employees must not accept work from suppliers, customers or competitors that could interfere with the fulfilment of their duties within M&S.

*In order to prevent employees from becoming involved in a conflict between personal interests and the interests of M&S, they must inform their*

*line manager or quality management that they must not interfere in business relationships between M&S and the third parties concerned.*

### Transparency and control

In order to continuously improve and develop M&S performance and quality management, every employee must be actively involved in identifying, correcting and preventing problems as they arise.

*Honest and accurate record keeping is essential to ensure complete transparency in operations and services, including applicable regulations and internal procedures. Compliance is reviewed and confirmed on a day-to-day basis in co-operation with all employees. In addition, regular checks and internal audits are carried out. Any obstruction of the proper performance of these audits or the disclosure of records and documents is prohibited and can lead to serious consequences.*

### Data protection and privacy

To protect the personal data and privacy of our employees, customers and other data subjects, every employee is obliged to comply with the applicable laws and regulations on data protection.



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### **Fair wages/social benefits and working hours**

We ensure that employees are regularly paid fair wages for the hours they work. The wages paid meet or exceed the statutory minimum wage. Working hours and public holidays comply with applicable national laws.

### **Child labour and underage workers**

We do not tolerate child labour or any form of exploitation of young employees.

*Only workers who are legally authorised to work in their companies but who are not younger than 15 years old may be employed. Labour relations must comply with national laws. Appropriate documentation must be available.*

### **Social responsibility of the company (CSR)**

Social commitment and responsibility towards society are important parameters for us. We consider our entire company (corporate social responsibility) and include customers, partners and suppliers as part of the supply chain. In our work, we attach great importance to the preservation and protection of nature. At M&S, we promote sustainability, the environmental awareness of our employees and active environmental protection.

*Resources are used carefully and unnecessary environmental pollution is minimised as far as possible. Suggestions and opportunities for improvement from our employees are welcome at any time and will be incorporated accordingly after being checked for effectiveness, success and feasibility.*

### **Consumption of alcohol, cannabis and illegal substances (zero tolerance)**

M&S strictly prohibits the consumption, possession or distribution of alcohol, cannabis and other illegal substances on company premises, during working hours or when representing the company in any capacity.

*We comply with local, national and international laws and regulations on substance use. M&S is committed to the well-being of its employees.*

### **Whistleblower protection**

We have ensured that our employees can raise concerns about misconduct or wrongdoing within our organisation without fear of harassment, subsequent discrimination, disadvantage or dismissal.

*We also want to encourage our employees to raise serious concerns within the organisation rather than ignoring or 'making light of' an issue.*



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### Our commitment

- [Highly qualified personnel](#)

M&S endeavours to maintain long-term employment with professionally trained staff in order to provide our customers with the best possible experience in safe and qualified services.

- [Occupational health and safety](#)

M&S's primary duty is to ensure the health and safety of all employees in the workplace. The target set by the management is to reduce the number of accidents among employees and subcontractors to zero. All managers are closely involved in the implementation, monitoring and correction of the relevant corrective and preventive measures.

- [Equivalence](#)

M&S has established principles that prohibit discrimination against people on the basis of skin colour, gender, religion, culture or age. These principles are based on mutual trust and respect to ensure that everyone is treated with dignity. M&S does not tolerate any form of discrimination and will take appropriate action if discrimination is detected.

- [Environmental protection](#)

In all its activities, M&S endeavours to comply with environmental standards for the conservation and sustainability of natural resources, waste management and pollution prevention. The environmental management system complements quality management in its continuous development and improvement process. We expect our employees and our business partners to implement the services and products they supply in accordance with the most environmentally and climate-friendly standards.



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### **Ethical rules of M&S Armaturen GmbH**

M&S imposes certain obligations and principles on its employees and subcontractors with regard to general behaviour. These rules are intended to go beyond compliance with applicable laws and regulations in order to achieve exemplary professional behaviour in the interests of M&S.

Each individual employee must familiarise themselves sufficiently with the conditions applicable to their respective activities and be aware of all possible consequences.

If this Code of Conduct is deemed incomplete or inaccurate, all parties are encouraged and requested to consult their line manager or the M&S Human Resources Department.

#### **Our objectives are:**

- Encourage our employees to have the confidence to raise serious concerns as early as possible and to challenge and respond to concerns about practices
- Give our employees the opportunity to raise these concerns and receive feedback on the actions taken
- Ensure that our employees receive a response to your concern and that you know what to do if you are not satisfied
- Reassure our employees that you are protected from possible reprisals or harassment if you have made a report in good faith.

Any concerns must be reported to management immediately. All information will be treated confidentially and every effort will be made not to disclose your identity if you so wish. If the investigation is followed by disciplinary or other proceedings, it may not be possible to take action as a result of your disclosure without your assistance. You may therefore be asked to give evidence as a witness. If you agree to this, you will be offered advice and support.



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### **Implementation**

M&S management is responsible for implementing the ethical requirements set out in this Code and must adapt them specifically to the characteristics of the industry in which it operates. Compliance is required of all employees and all individuals are encouraged to be vigilant regarding their own behaviour and the behaviour of their team members.

Any violation of these rules constitutes an offence and may result in sanctions and penalties appropriate to the offence and in accordance with applicable laws.

Employees who have questions about these rules and regulations or difficulties in understanding and implementing them are asked to contact Human Resources or Quality Management.

### **Concluding remarks:**

Our business partners are also obliged to comply with the duties and principles set out in this Code of Ethics and to behave accordingly. Possible violations (internal or external) must be reported immediately to top management. In the event of non-compliance, we reserve the right to take legal action and to immediately terminate the business relationship with this business partner for cause.

These rules and regulations will come into force on 1 July 2024 and will be regularly reviewed and communicated to all parties concerned.