

BERNING SMART FASTENERS® is a good old name. It stands traditionally for good products at fair prices, but also for decency, reliability and responsibility in our daily work. The consumer gets more and more concerned about fair social conditions and environments in the production of those things he wants to buy. Subsequently our customers are putting ever more emphasis on social accountability choosing their supplier. So additionally to EMAS and ISO 14001: 2004 (Ecological Audit Systems) and OHSAS 18001:2007 (Occupational Health & Safety Audit System) BERNING has undergone the auditing according to SA 8000 (Standard for Social Accountability).

From our suppliers and sub-suppliers we expect products and services of good quality at reasonable prices. Furthermore BERNING expects fair working conditions, a safe and good environment in production and generally a degree of responsibility that deserves our confidence. Therefore we have developed the following Code of Conduct, which also comprises the most important criteria of social responsibility as laid down by the International Labour Organisation (ILO) and the UN Declaration of Universal Human Rights. Those suppliers not up to this Code of Conduct will have a fair chance to improve, those who refuse to cooperate continuously do run the risk that our business relation will end. In turn, suppliers have a right to be treated fair. They can trust that BERNING will not act indecently despite all economic necessities. We stand to what we have agreed.

CODE OF CONDUCT FOR SOCIAL ACCOUNTABILITY

1. Legal requirements
All suppliers and sub-suppliers shall follow their national laws and regulations.
2. No Child Labour
 - a. Children under 15 shall not be employed.
 - b. Children before turning 18 shall not be exploited but rather treated with special consideration, that is having working hours and tasks adapted to their age.
3. No Forced Labour, no Violence
 - a. There shall be no forced labour in every thinkable way. So, for example, the border has been crossed when an employee must deposit a "security" or make a "down payment" for getting the job.
 - b. Neither physical nor psychological violence to employees shall be tolerated.
4. Respecting Employers' Rights
 - a. Employees have the right to organise and to collectively negotiate with the employer without having to fear punishment.
 - b. No employer shall be discriminated on the grounds of race, class, caste, nationality, religion, gender, age, ideological orientation or functional disability.
 - c. Employers have the right to have an employment contract.
 - d. Wages shall at their lowest correspond to the legal minimum, be reasonable in proportion to the amount of work and paid out regularly.
 - e. All employees shall be covered by applicable national or private insurance.
 - f. Working hours must not exceed the legal limit. Overtime shall not be under threat and unpaid.

Code of Conduct



- g. Employees are entitled to regular days free of work and holidays.
 - h. Employees shall be entitled to sick and parental leave without negative repercussions. Pregnancy may not under any circumstances be considered a ground for termination.
5. Safety and Working Conditions
- a. Machinery and equipment, methods and facilities shall not be hazardous. Regular instructions of employees to avoid accidents or other hazards shall be cared for.
 - b. First aid shall be available. In the case of injury medical treatment shall be organised and paid for as far as not covered by insurance.
 - c. The working conditions must not be nocuous.
 - d. The working environment must be befitting human beings. So the employer shall care for drinking water, toilets, lighting, heating, aeration and common rooms.
6. Environment
Applicable environmental laws and regulation shall be followed to protect our habitat.
7. Correctness
Business shall be conducted in a correct and responsible way. So there shall be no such things as "fake", cheating, divulging of secrets or bribe.

Following this code of conduct shall be monitored regularly. If the code is not followed adequate measure shall be taken to improve conditions.

It is equally in the responsibility of the supplier to secure that this Code of Conduct is followed by her suppliers. In the case of serious doubts inspections may take place.

The undersigned hereby confirms that this Code of Conduct is accepted as a base for doing business with BERNING.

Company

Date

Signature (s)

PS All related proposals, information, documentation or certificates are always welcome.