



**Böllhoff Group Compliance Policy**

**BÖLLHOFF**

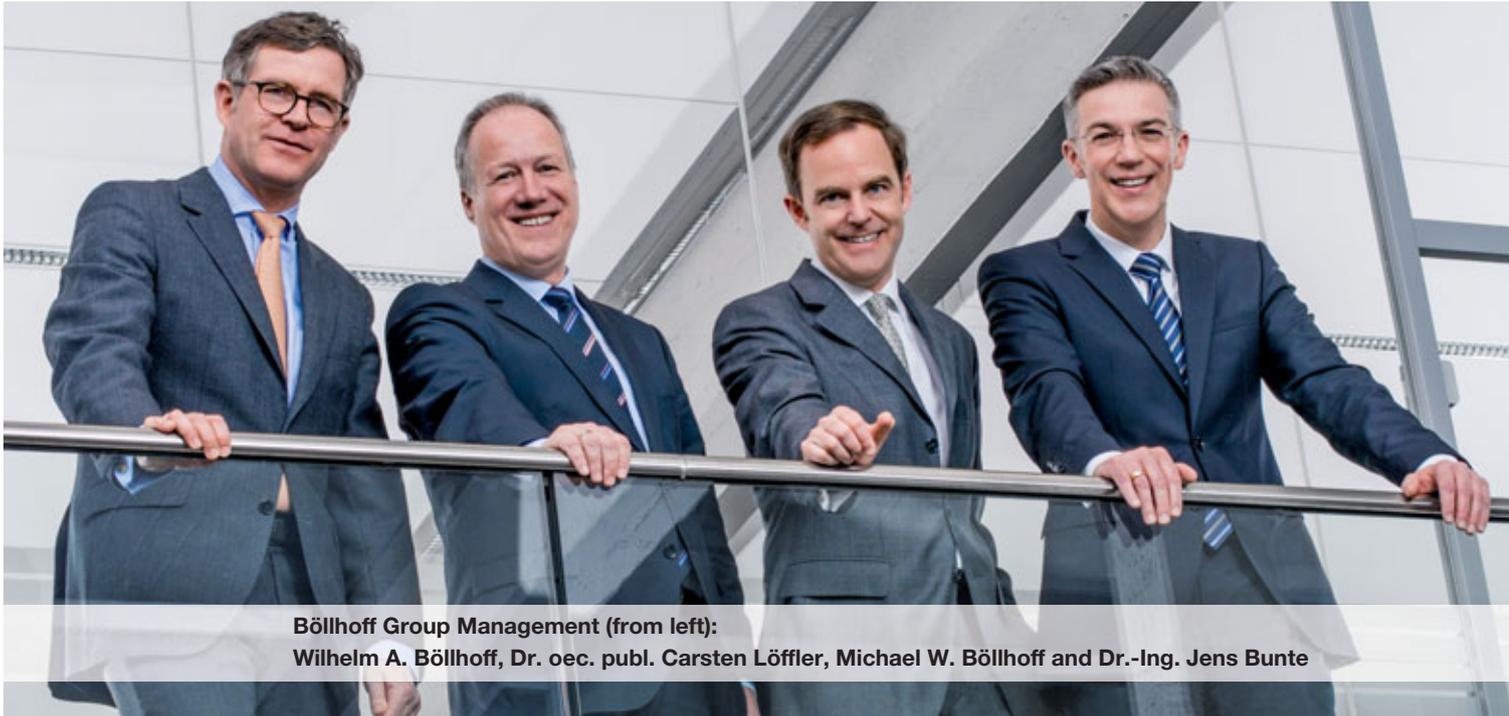
# Contents

---

	Page
<b>Foreword</b>	3
<b>Böllhoff Compliance</b>	4
<b>1. Goal of the Policy</b>	6
<b>2. Scope</b>	7
<b>3. Risk assessment</b>	8
<b>4. Culture and social conduct</b>	9
<b>5. Customer satisfaction, quality and product safety</b>	11
<b>6. Occupational health &amp; safety</b>	12
<b>7. Dealing with resources, the environment and protecting assets</b>	13
<b>8. Data and document security and intellectual property</b>	14
<b>9. Fair competition and observing the ban on cartels</b>	15
<b>10. International transactions</b>	16
<b>11. Conflicts of interest</b>	17
11.1 Gifts and hospitality and their acceptance	
11.2 Accepting or granting financial advantages and observance of anti-corruption regulations	
<b>12. Implementation in the organisation of the Böllhoff Group</b>	18
12.1 Compliance Officers and Compliance Management System in the Böllhoff Group	
12.2 Information and training	
12.3 Reporting of irregularities, sanctions and remedies	
12.4 Control	

For tips, questions and suggestions on this Policy, please contact:  
compliance@boellhoff.com · As of: 03.05.2016

Employees within the meaning of this document are persons of both male and female gender.



**Böllhoff Group Management (from left):  
Wilhelm A. Böllhoff, Dr. oec. publ. Carsten Löffler, Michael W. Böllhoff and Dr.-Ing. Jens Bunte**

Dear colleagues,

as an independent family business, the Böllhoff Group is a leading service provider for fastening and assembly technology with its own production and development. Around 2,500 people work for the Group in more than 40 companies in 24 countries.

The senior management and all employees of the Böllhoff Group have the goal of complying with the applicable regulations – be they provisions of law or Böllhoff rules. We are conscious of the fact that this requires our full commitment each and every day.

To achieve this goal, we are providing all important rules that are relevant for the work of each of us in a comprehensible way. Then we achieve our objective to make Compliance part of our daily work.

The main goal and essence of the Böllhoff Group Compliance System is prevention. So the Compliance System protects the company and every employee.

In addition, our Compliance System defines how the different contents of compliance with the rules are monitored, how we deal with deviations and how the Policy will be constantly updated.

The Compliance System is based on the guiding principles of the Böllhoff Group and the our values, successes and objectives defined therein, which form the basis for how all employees conduct themselves every day.

The Compliance System of the Böllhoff Group ensures that all rules regarded as important are complied with and contributes to the protection of all employees within the meaning of our corporate culture.

We wish you a good read and assume that you will deserve our Compliance Policy at all times.

Wilhelm A. Böllhoff

Michael W. Böllhoff

Dr. Carsten Löffler

Dr.-Ing. Jens Bunte



1. **“Compliance requires full commitment of everybody.”**
2. **“Compliance applies to us all – worldwide.”**
3. **“Compliance also means assessing potential risks in good time and correctly.”**
4. **“We respect the rights of everyone without exception.”**
  - “The cooperation within our company is respectful and appreciative.”**
  - “We conduct ourselves cooperatively vis-à-vis business partners, employee organisations and authorities.”**
  - “How we work is defined by sustainability and conservation of resources.”**
5. **“We set ourselves high quality goals, so that our customers are satisfied.”**
6. **“Only healthy employees enjoy working and with success.”**
7. **“Sustainability is a key factor for us.”**

# Compliance

8. “The protection of data and intellectual property goes without saying for us.”
9. “All competition must be fair, free and unimpeded.”
10. “We respect the principle of free, legal circulation of goods.”
11. “Gifts and hospitality may not affect our objectivity.”  
“No cash-payment without service in return.”
12. “Compliance requires responsible support and further development.”  
“Further development of the Compliance System requires the input of us all.”  
“We want to define the rules and ensure compliance with them.”

## 1. Goal of the Policy

---



### **“Compliance requires full commitment of everybody.”**

The Compliance Policy has the goal of defining the overarching topic areas that the Compliance System should cover and making initial general statements on its direction.

With that, the Policy is the central point of departure for all other rules in those topic areas.

The topic areas will be continually assessed and adjusted in a systematic risk analysis.

Because of the diversity of the rules and standards, this Policy cannot exhaustively cover and comment on all regulatory areas. It goes without saying that those applicable laws and regulations, which are not explicitly mentioned in this Policy, must also be complied with.

This Policy is binding on all employees of the Böllhoff Group. Contraventions of the rules of this Policy will entail appropriate sanctions.

## 2. Scope

---



### **“Compliance applies to us all – worldwide.”**

The Compliance System of the Böllhoff Group and this Compliance Policy apply to all employees worldwide. This also covers any temporary staff who are working for the Böllhoff Group.

We want to implement the values developed and established in the Compliance System not only in our conduct vis-à-vis our customers. We would also like to bring about orientation around these values among our service providers and suppliers.

We are conscious of the fact that the cultural differences between the individual countries of the Böllhoff Group can result in differing interpretations of the rules. We want to deal with that openly, and present and respect the differences transparently.

# RISK MANAGEMENT



**“Compliance also means assessing potential risks in good time and correctly.”**

The careful handling of potential risks for the company and their prevention has priority at Böllhoff. That is why we prepare extensive analyses with the goal of detecting risks at an early stage and taking preventative measures within the meaning of responsible business dealings. Our certified quality management regime ensures that the business processes are continuously optimised. Based on our zero-fault philosophy, we pursue the principle of fault avoidance rather than fault elimination.

Because of the international nature of our company, it is important to address country- and culture-specific standards and the associated risks. Besides voluntary commitments and ethical principles, compliance with the legal rules is top priority at all of our sites.

To take account of these principles, the following sections were consciously selected, with assessment of the risks associated with them, such that they cover the topic areas relevant to the Böllhoff Group.

## 4. Culture and social conduct

---



### **“We respect the rights of everyone without exception.”**

For us, all people are equal regardless of their age, their gender, their skin colour, their race, their nationality, their social origin, any impairments, sexual orientation, their political or religious conviction.

We respect the personal dignity and the personality rights of every individual and will tolerate neither mental intimidation nor personal molestation, physical assaults or discrimination.

We comply with the statutory working times and minimum wages. We do not employ children or people under the statutory minimum age and employ nobody against his will.

### **“The cooperation within our company is respectful and appreciative.”**

We regard the employees of Böllhoff, across departments and firms, as a team and expect all employees to exert a positive influence on their working environment through mutual respect and tolerance. Our employees deal with each other with integrity, loyalty, fairness and trust.

Our leadership style is cooperative and open. We want feedback from our employees and promise that they will not face recriminations as a result.

In their positions, the senior executives of Böllhoff act as role models.

## 4. Culture and social conduct

---

**“We conduct ourselves cooperatively vis-à-vis business partners, employee organisations and authorities.”**

The way we do business is marked by dependability, integrity and unconditional compliance with national and international law. We expect the same of our business partners. We live and expect fair competition without corruption.

We remain true to these principles also when dealing with employee organisations and strive to find solutions for our employees in a spirit of partnership.

We deal with official enquiries of any kind in accordance with applicable law and act honestly and transparently at all times.

**“How we work is defined by sustainability and conservation of resources.”**

We choose each step we take with courage, motivation and respect and place sustainability at the forefront of our company’s development. This means that we handle resources carefully and avoid wastage.

## 5. Customer satisfaction, quality and product safety

---



**“We set ourselves high quality goals, so that our customers are satisfied.”**

Protection of the health of our customers or their customers and third parties is important to us. In the development of innovative fasteners and assembly solutions, in the production, storage and delivery of products and when rendering our services, we observe the applicable product and occupational safety regulations, as well as the generally accepted technical rules. In this way, we want to satisfy the high expectations our customers place on the quality of our products and ensure maximum customer satisfaction at all times. If we source services from subcontractors, we ensure that they comply with comparable standards.

The duty to absolutely comply with these rules also applies even if our customers do not know these rules themselves or where compliance with them in the case in point might result in a financially negative decision.

We provide for appropriate training of all employees.

These principles apply to all Böllhoff companies worldwide, whereby the product safety regulations to be observed locally must also be complied with.



**“Only healthy employees enjoy working and with success.”**

For us, preserving the health and performance of our employees means investing in the future of the company.

For that reason, we offer our employees, besides health days, extensive training and education on the topic of occupational health & safety. Inspections and plant tours accompanied by doctors put us in a position to detect potential risks at the workplace at an early stage and take appropriate measures.

Our management team for occupational safety and health protection regularly checks proper compliance with regulations on occupational safety and accident prevention. In the event of deficiencies, our trained personnel propose measures to improve the situation and then bear the responsibility for their implementation.

Only in a healthy and safe working environment can our employees put in the performance that meets our quality aspirations and secures the business success we strive for.

## 7. Dealing with resources, the environment and protecting assets

---



### **“Sustainability is a key factor for us.”**

As an expression of our sustainable orientation, the protection of our environment and careful handling of resources are principles of our energy and environmental policy. Behind it is our intention to contribute positively to a healthy and diverse future of our planet.

Sustainable and environmentally careful production and corresponding business processes are firmly anchored elements of our integrated quality management system. That includes familiar measures, such as saving water and energy, reduction of waste volumes, improvement of soil and water-body protection and reduction of emissions.

Implementation of these measures makes sense for us in both ecological and economic terms: Because they not only protect our environment, but also contribute to minimising the costs. So measures such as recovering raw materials, bundling transport to minimise emissions and using environmentally friendly materials is everyday practice in the Böllhoff Group.

As part of our quality management, an Environmental and Energy Management Officer ensures that our environmental policy goals and values are achieved and adhered to.

## 8. Data and document security and intellectual property

---



### **“The protection of data and intellectual property goes without saying for us.”**

We always respect the intellectual property of third parties, just as we also defend the intellectual property of Böllhoff against unauthorised use.

We presuppose that all our employees work on business and personal information with appropriate care and do not pass it on to third parties even after termination of the employment relationship.

We are committed to observing and complying with all stipulations of the applicable data protection laws in order to guarantee the greatest possible security within the context of world-wide, electronic exchange of information. Here, the principles of appropriateness for purpose, transparency, proportionality, data avoidance and data frugality, as well as use of suitable encryption technology, are binding on us.

## 9. Fair competition and observing the ban on cartels

---



### **“All competition must be fair, free and unimpeded.”**

Under the principles of the market economy, any competition between companies should be fair, free and unimpeded. In our business activities, we are always mindful of the satisfaction of our customers in that we deliver innovative quality products and offer process-optimised solutions. We want to achieve the satisfaction of our customers by a market presence that strictly observes the standards of competition and cartel law.

For that reason, we will not participate in measures intended or likely to put our business partners at a disadvantage or that we could use unlawfully for business purposes. Nor will we support them.

To the extent this information is not already in the public domain, we will give competitors when in business contact with them – for example at trade fairs or industry association events or on other occasions – no information on our prices, how they are made up or adjusted, on customers, markets or sales territories, as well as on production or delivery capacities or other conditions of our business activities. We will not take part, either directly or indirectly, in collusion with competitors concerning the issuance, or non-issuance, of offers. Nor do we attempt to obtain such information concerning our competitors or their business activities from third parties if obtaining such information is unlawful.

We disclose confidential information only if doing so is permissible in law.



**“We respect the principle of free, legal circulation of goods.”**

We represent the principle of strict legality for all international dealings, measures, contracts and other transactions of the Böllhoff Group and observe the principle of free circulation of goods. That includes customs clearance in accordance with the law and the obtaining of the required official permits for export and import transactions.

Foreign trade export restrictions and orders to act by state authorities are binding. We undertake to strictly observe such laws and stipulations.

Employees who are involved in the export or import of goods, services or technical information must know and comply with the relevant foreign trade and customs regulations. If the export of products and technical data to the country concerned is regulated, the employees must obtain the corresponding licences and other state permits before the export. Furthermore, they must ensure that complete and correct import resp. export documents are prepared and used.

## 11. Conflicts of interest

---



### 11.1 Gifts and hospitality and their acceptance

#### **“Gifts and hospitality may not affect our objectivity.”**

Gifts to business partners or third parties and invitations to or entertaining such persons must be permissible based on the regulations that are normal in the country concerned and appropriate to the occasion and scope of business. If such inducements might be construed as exerting influence or rewarding the recipient, they must, if in doubt, be refrained from. The tax regulations must be observed.

These rules apply in the same way to all employees of Böllhoff upon acceptance of gifts, invitations or hospitality. Inducements in the form of cash may neither be granted nor accepted.

### 11.2 Accepting or granting financial advantages and observance of anti-corruption regulations

#### **“No cash-payment without service in return.”**

Employees of Böllhoff may not, either directly or indirectly, offer or grant financial inducements, which do not form part of the normal exchange of services within the business relationship, or other non-cash benefits which might be considered impermissible in law, to any business partner or third party, or accept same from them. This explicitly excludes agreements on rebates, discounts, bonuses or commission as normal in the business.

The statutory anti-corruption regulations and currency or money market regulations of a country must be observed without exception.

Donations and sponsoring may only take place if they benefit charitable organisations and are approved by the senior management.

## 12. Implementation in the organisation of the Böllhoff Group

---

### 12.1 Compliance Officers and Compliance Management System in the Böllhoff Group

**“Compliance requires responsible support and further development.”**

We will bolster the measures and organisational precautions we have taken so far in that we appoint Compliance Officers in Germany and at the subsidiaries worldwide. By doing so, we strengthen our present prevention and control measures, which include, among other things, the principle of dual control, strict separation of trading and control systems, as well as regular audits.

The management teams of the affiliates of the Böllhoff Group are called upon to implement these clearly defined principles in their companies and to develop them further while observing regional, legal and socio-cultural aspects and values.

### 12.2 Information and training

**“Further development of the Compliance System requires the input of us all.”**

The Compliance System will develop best if we accept and live the notions and guidance defined in the system as a guideline for our work in the company. For that reason, every employee has a duty to observe the rules set out in this Policy.

In addition, all employees will be informed of contents, current guidance and topics in connection with this Compliance Policy.

Internal training will be offered on important topic areas, or we will allow our employees to attend external training. This is the case, for example, for contract law, product liability law, occupational safety and environmental law or other risk-sensitive areas.

### 12.3 Reporting of irregularities, sanctions and remedies

#### **“We want to define the rules and ensure compliance with them.”**

If an employee observes circumstances which may imply a breach of the rules included in this Compliance Policy, he has the right and the duty to point them out to his manager in an appropriate form; this may also take place anonymously.

If contact persons have been named for such information, such as Compliance Officers, employees can also contact them with their observations.

All indications of a breach of the rules will be investigated; if necessary, measures to remedy them will be established and taken.

Any breaches determined will entail consequences for the employees involved. Regardless of further regulations under criminal or civil law, breaches can be sanctioned disciplinarily or result in termination of the employment relationship.

### 12.4 Control

#### **“Responsible implementation in the Böllhoff Group”**

All employees of the Böllhoff Group are responsible for ensuring that the stipulations included in this Compliance Policy and other rules established internally are complied with.

The operational lead companies of the Böllhoff Group and the Compliance Officers in the regions have an unrestricted right to information and audit to the extent this is not in conflict with the statutory regulations or arrangements agreed internally. At the same time, they are required to carry out or initiate investigations of individual cases or audits to ensure compliance with the Policy.

**Böllhoff International with companies in:**

Argentina  
Austria  
Brazil  
Canada  
China  
Czechia  
France  
Germany  
Hungary  
India  
Italy  
Japan  
Mexico  
Poland  
Romania  
Russia  
Slovakia  
South Korea  
Spain  
Switzerland  
Thailand  
Turkey  
United Kingdom  
USA

Apart from these 24 countries, Böllhoff supports its international customers in other important industrial markets in close partnership with agents and dealers.

Böllhoff Group  
Archimedesstraße 1–4 · 33649 Bielefeld · Germany  
Phone +49 521 4482-01 · Fax +49 521 449364  
[www.boellhoff.com](http://www.boellhoff.com) · [info@boellhoff.com](mailto:info@boellhoff.com)

