

TRAXIT International GmbH

Corporate Social Responsibility Manual

TRAXIT International GmbH provides the wire industry with a complete range of dry drawing lubricants, emulsions and coatings for all fields of application. From simple beginnings in 1881 in Schwelm, Germany, TRAXIT International GmbH has grown into the largest wire drawing lubricant producer in the world. Operating from our manufacturing bases in Germany, China and the United States, our lubricants are sold throughout the world with our own companies, agents and representatives present in over 150 countries.

We, TRAXIT International GmbH and all affiliated companies, maintain longstanding business relationships founded on mutual trust and confidence with all of our customers, suppliers and service providers. One very important factor in maintaining these relationships is having clear rules regarding the international requirements on corporate responsibility. We aim to give our customers insight into how we work to further expand on the trust and confidence between us.

To work with various global regulations regarding our actions and meet the resulting requirements optimally, we have decided to publish a manual for our business partners' information. Our aim in publishing this manual is to lay out all our expectations and our stance toward manufacturing our products and providing our services for our customers and suppliers.

Values

Employees

The employees of TRAXIT International GmbH and all affiliated companies are the factor that makes the company strong and successful. The company traditionally emphasizes long-term employee retention and forward-looking personnel planning.

Quality

The quality of the products we supply, the customer service we provide, and our internal dealings with one another is the standard by which we measure ourselves and by which others measure us. Our customers' requirements and wishes are our top priority.

Innovation

We are innovators in our field, and we use the latest technologies and machinery so that we can continue to be successful, now and into the future. Our in-house research and development department ensures that we will be able to meet the requirements of the market and our customers now and in the years to come.

Tradition

Our headquarters have been located in Schwelm for more than 135 years. This gives us strong ties to the city, the local area, and Germany as a base for our operations.

Cooperation

Close cooperation with local authorities, regional and national industrial associations, the works council and the union is an important element of the corporate philosophy of TRAXIT International GmbH and all affiliated companies.

Legal compliance

We view compliance with national and international standards, laws and regulations as a matter of course.

Trust and confidence

TRAXIT International GmbH and all affiliated companies emphasize successful working relationships founded on mutual trust and confidence with their employees and business partners.

1. Social responsibility

Child labor

We comply with the requirements of the Youth Employment Protection when hiring and employing our employees. Child labor is not tolerated. All employees of TRAXIT International GmbH and all affiliated companies are called upon to report all violations or suspicions to the executive management, even if the issue in question is noticed outside their own business site. We expect our business partners to comply with applicable laws and regulations, just as we do.

Forced labor

TRAXIT International GmbH, all affiliated companies and their business partners are prohibited from utilizing forced labor in any form whatsoever, whether performed by prisoners, slaves or in any other manner. Employees must not be forced to work through violence or intimidation of any kind. This prohibition also applies to all impositions of obligations to work as sanctions for freedom of expression or political views.

Equal opportunity

TRAXIT International GmbH and all affiliated companies respect cultural differences. The company does not discriminate against anyone in its hiring or employment practices. Decisions regarding hiring, pay, social benefits, continuing and professional education opportunities, work assignments, promotions, disciplinary measures and dismissals must be based solely on the knowledge, skills, abilities and behavior of the applicant or employee. As a basic principle, these decisions are not made on the basis of personal characteristics or views, race, national origin, gender, religion, age, disability status, marital or family status, membership in any organization, sexual orientation or political beliefs. We set the same requirements for ourselves and for our business partners.

Requirements regarding the workplace

All workplaces are designed in accordance with occupational safety and health rules and regulations. Site inspections are conducted at regular intervals for review, including asking employees about their working environment in the process. Risk assessments are performed and any adjustments resulting therefrom are made. TRAXIT International GmbH and all affiliated companies will not tolerate any unacceptable treatment of employees or workers, including psychological hardship, sexual or personal harassment or discrimination. This also includes behavior – including gestures – that is sexual, coercive, threatening, abusive or exploitative.

Working hours & compensatory time

TRAXIT International GmbH and all affiliated companies ensure strict compliance with the legal rules and regulations and with collective agreements regarding working hours. The company guarantees its employees fair pay; minimum wages established by law are guaranteed. Compensatory time is provided promptly when employees work beyond the regular working hours.

Health & safety

TRAXIT International GmbH and all affiliated companies ensure that the working environment is safe and does not pose a threat to human health. This includes prevention and protection against possible risks such as fire, accidents and hazardous materials. Appropriate precautions have been and continue to be taken. Personal protective equipment is available, and all employees receive regular training. Lighting, ventilation and heating systems and equipment are present and adequate and comply with all necessary regulations. Employees have free access at all times to clean restroom facilities in sufficient numbers. The company has issued clear health and safety rules and care is taken to ensure compliance with these rules.

2. Ethical principles

Fair trade

TRAXIT International GmbH and all affiliated companies are committed to engaging in fair trade with business partners e.g. we avoid dealing with conflict minerals and also business relationships with companies dealing with conflict minerals. This also applies with regard to ethical principles. We expect our business partners to abide by and uphold the same standards.

Conflicts of interest

The interests and opinions of employees must be kept separate from those of TRAXIT International GmbH and all affiliated companies. Especially during working hours, the business interests of TRAXIT International GmbH and all affiliated companies must be promoted. Conflicts must be avoided wherever possible. If a conflict arises nonetheless, employees are required to bring the matter to the attention of their supervisor or the executive management and the works council and to work with these individuals and bodies to find a solution.

Corruption

TRAXIT International GmbH and all affiliated companies are committed to sustainable business and fair transactions. All those within the company are prohibited from offering or accepting any contributions, benefits or perquisites that may affect the employee's own behavior or the behavior of a business partner in an impermissible manner. Furthermore, contributions, benefits and perquisites of all kinds are prohibited if they are made with the aim of influencing a decision made by an officeholder, authority or government agency in an impermissible manner.

Supplier relations

TRAXIT International GmbH and all affiliated companies award contracts and place orders exclusively with respect to the quality, suitability and costs of a product or service. We do not accept any inappropriate gifts from suppliers. We expect the same behavior from our business partners.

Legal certainty

TRAXIT International GmbH and all affiliated companies pledge to comply observe with and all national and international standards, regulations and laws.

Data protection and privacy

Protecting privacy is a top priority for TRAXIT International GmbH and all affiliated companies. With this in mind, we protect the personal data in our possession by using state-of-the-art security systems, abide by applicable data protection and security provisions, and process or use data only for the purposes for which we have been authorized to do so.

3. Management

Suppliers, subcontractors and service providers

Suppliers and service providers are regularly evaluated by TRAXIT International GmbH and all affiliated companies.

Further interest groups

TRAXIT International GmbH and all affiliated companies maintain good relationships founded on mutual trust and confidence with all parties that influence the company or are themselves influenced by the company and engage in ongoing dialogue with these parties at all times.

Documentation

TRAXIT International GmbH and all affiliated companies abide by the time limits for storing documentation as provided by law.

Business continuity

TRAXIT International GmbH and all affiliated companies take numerous measures to ensure the continuity of the business operations and production.

Plant and equipment safety

TRAXIT International GmbH and all affiliated companies perform regular checks, inspections, service and maintenance on all plants and equipment. All relevant service, maintenance, inspection and testing intervals are monitored with the help of software. The checks, maintenance and service required by law and those required by internal company rules and regulations are documented. Replacement parts are kept in stock to the greatest possible extent in order to minimize potential downtime.

IT security

Several systems located at different sites are used. Our IT security concept includes, but is not limited to, replication of systems, regular data backups, service and maintenance agreements that ensure fast restoration and storage of critical data outside the company.

Security of supply

To be able to ensure that no production failures or delivery bottlenecks occur as a result of lack of raw materials, TRAXIT International GmbH and all affiliated companies maintain alternative suppliers and alternative raw materials to the greatest possible extent.

Continuous improvement

TRAXIT International GmbH and all affiliated companies are committed to continuous improvement of products, services and processes.

4. Compliance in environmental matters & responsibility

Emissions

TRAXIT International GmbH and all affiliated companies affirm that all plants, equipment and working materials have been tested, inspected and approved in accordance with the legal stipulations. The threshold values set by government agencies for emissions are complied with, checked regularly and documented. We strive to eliminate emissions entirely where possible and to, at the least, minimize them.

Environmental protection / occupational safety and health

TRAXIT International GmbH and all affiliated companies are aware of their responsibility for protecting the environment as well as human health and safety. TRAXIT International GmbH therefore commits to observe environmental protection with regard to legal rules and regulations and international standards and, in keeping with this commitment, to minimize environmental impact, continuously improve environmental protection, mitigate risks and ensure optimum precautions against accidents and occupational illnesses, and offer and hold training in order to ensure that all employees are up to date on the subject of occupational safety and health.

Recycling

Byproducts arising from the manufacturing of our products are recycled within the production process to the greatest extent possible. As a basic principle, we strive to avoid generating byproducts and to reduce the generation of byproducts by optimizing individual processes.

Transportation

TRAXIT International GmbH and all affiliated companies comply with national and international rules, regulations and laws on transportation. Employees who engage in transportation activities or load containers and trucks have been trained accordingly. To the extent necessary, training and appointment of a hazardous materials officer and regular training for employees ensure that transportation of hazardous materials can also be performed properly and in accordance with the legal rules and regulations. In addition, TRAXIT International GmbH is certified as a known consignor of air freight shipments. Officers have been trained and appointed, and employees have received appropriate training.

Hazardous materials

TRAXIT International GmbH and all affiliated companies comply consistently with the currently applicable legal provisions with regard to hazardous materials. Safety data sheets from suppliers are on hand for all raw materials that are used. A safety data sheet is available for each product for our customers, and standard operating procedures and instructions exist for our employees for all hazardous materials that are used. Our suppliers are also expected and required to ensure the same level of legal certainty.