



Code of Business Ethics and Conduct (Orscheln Europe)

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1. Introduction

Orscheln is committed to a Code of Business Ethics and Conduct which describes our intention on how to behave when we do business and how we interact with our stakeholders. Orscheln strives to maintain a reputation for corporate trustworthiness around the world, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities. Therefore we seek to ensure that all our officers, managers, employees and suppliers operate in compliance with our requirements.

Corporate Social Responsibility (CSR) within Orscheln Group

The Orscheln Group's Code of Business Ethics and Conduct is the company policy and general reference document on ethical issues and appropriate business practices.

It consists of 13 principles in the areas of: business principles, environmental principles and human rights and workplace practice.

The Code of Business Ethics and Conduct formalizes the principles that the Orscheln Group shall commit in relation to employees, business partners and other stakeholders.

All Orscheln Group employees should know about the Code of Business Ethics and Conduct, since the policy is applicable to all employees at all levels.

The Orscheln Group encourages suppliers, dealers, consultants and other business partners within its sphere of influence to adopt these principles. In the assessment of potential and current suppliers, the principles described in this document shall be applied.

Please find Orscheln Group Code of Business Ethics and Conduct in section 2 of this document.

2. Orscheln Group Code of Business Ethics and Conduct

The Orscheln Group maintains a reputation for company trustworthiness around the world, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities. The Orscheln Group values and commitment to sustainable development are, and will continue to be, reflected, promoted and implemented in its policies, decisions and actions.

Scope of Application

The Orscheln Group Code of Business Ethics and Conduct has been adopted to underscore the principles by which the Group conducts its relations with employees, business partners and other stakeholders. It applies to all members of the Board of Directors, and all employed by the Orscheln Group.

The Orscheln Group encourages suppliers, dealers, consultants and other business partners within its sphere of influence to adopt these principles. In the assessment of potential and current suppliers, the principles described in this document shall be applied.

Business Principles

Legal Compliance

In every country in which it operates, the Orscheln Group shall abide by the laws and regulations of that country. In situations where the law does not give guidance, the Group applies its own standards based on its company values and culture. In cases of conflict between mandatory law and the principles contained in this Code, the law shall prevail.

Relations with Business Partners

The Orscheln Group's dealings with its business partners are characterized by fairness.

The Orscheln Group shall not offer customers, potential customers, governments, agencies of governments, or any representatives of such entities, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practices.

Orscheln Group employees must not accept payments, gifts, or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions.

Accounting and Reporting

All financial transactions by the Orscheln Group must be reported in accordance with generally accepted accounting practices, and accounting records must show the nature of all transactions in a correct and non-misleading manner. The Orscheln Group will provide disclosure that is open, truthful, relevant, comprehensible and timely.

Conflicts of Interest

Employees and members of the Boards of Directors of the Orscheln Group shall

conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of the Group. Should such a conflict of interest arise, it must be reported immediately by the person subject to the conflict to his/her immediate supervisor.

Political Involvement

The Orscheln Group observes neutrality with regard to political parties and candidates. Neither the names nor the assets of Orscheln Group companies shall be used to promote the interests of political parties or candidates.

Stakeholder Communications

The Orscheln Group encourages an ongoing dialogue with its stakeholders.

Environmental Principles

Resource Efficiency

Orscheln Group products and processes are designed in such a way that energy and raw materials are used efficiently, and waste and residual products are minimized over the products' life cycles.

Precautionary Principle

The Orscheln Group supports the precautionary principle by avoiding materials and methods posing environmental and health risks when suitable alternatives are available.

Environmental Performance

The Orscheln Group routinely reviews, follows up and reports on its environmental regulatory compliance performance including evaluating the potential risks of present and future products and operations. Orscheln facilities strive to meet or exceed ISO 14001 qualifications/criteria to meet its manufacturing environmental responsibilities. Orscheln's India manufacturing facility is certified ISO 14001 and its Europe facility expects to achieve ISO 14001 in 2010.

Human Rights and Workplace Practices

Human Rights

Within its sphere of influence, the Orscheln Group supports and respects the protection of internationally proclaimed human rights and ensures that it is not complicit in human rights abuses. These principles and practices are communicated through Orscheln employee handbooks and by Orscheln managers, officers and stakeholders.

Non-Discrimination

The Orscheln Group hires and treats its employees in a manner that does not illegally discriminate with regard to gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin. Workplace diversity at all levels is encouraged.

Labor

No form of forced, compulsory or child labor is tolerated in the Orscheln Group.

Freedom of association and the right to collective bargaining and agreements shall be respected in all Orscheln Group operations.

Work Environment

The necessary conditions for a safe and healthy work environment shall be provided for all Orscheln Group employees.

Responsibility of Managers and Employees

It is the responsibility of Orscheln Group managers to communicate and demonstrate the content as well as the spirit of this document within their organizations, and to encourage employees to reveal behavior that may be non-compliant with these principles. Explicit or implicit approval of questionable actions will not be tolerated.

Reports of violations of this Code may be done anonymously and confidentially to the chairman of the audit committee. Persons reporting violations in good faith will not be subject to retaliation.

This Code of Business Ethics and Conduct will be promptly and consistently enforced. Failure to comply with its provisions can result in disciplinary action.

This Code of Business Ethics and Conduct has been adopted by the Board of Directors of Orscheln and can only be amended or waived by the Board. Any amendments or waivers shall be disclosed.

Adopted by the Board of Directors 17 December 2009.

3. Company Social Responsibility Requirements for Suppliers

The Orscheln Group strives to maintain a reputation for trustworthiness around the world, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities. The Orscheln Group values and commitment to sustainable development are, and will continue to be, reflected, promoted and implemented in Group policies, decisions and actions

In the same spirit we want our suppliers to adopt the principles in our Code of Business Ethics and Conduct or similar principles.

Suppliers of materials, equipment, services and consumption goods play a vital part in the development and manufacturing of Orscheln Group's products.

All suppliers and contractors must have knowledge of the Orscheln Group Code of Business Ethics and Conduct coupled with internal working procedures including the following aspects:

- comply with laws and regulations of the countries where the supplier operates; when the local laws and regulations are lacking the principles in the Code shall guide
- the principles described in the Code of Business Ethics and Conduct should be the minimum level to be used in relations with their employees, business partners and other stakeholders
- take responsibility for their respective sub-suppliers for deploying these requirements through their supply chain
- maintain an open dialogue with Orscheln Group companies concerning achievements,

trends and possibilities for improvements in the area of Corporate Social Responsibility

- have a system in place to ensure compliance with the principles outlined in the Code of Business Ethics and Conduct

4. Supplier Self Assessment

The purpose of the Supplier self-assessment is to get an overview of the status of performance in fulfilling the Orscheln Group requirements in this document. As this is an important issue for us, we ask suppliers to fill in this assessment.

We will use the returned self-assessment for follow-up in connection with other visits to you, so please be prepared to show us documentation or evidence to your answers.

Please, send the self assessment to your contact at Orscheln's purchaser department.

If you have questions, do not hesitate to ask your contact at the Orscheln purchasing department!

Company Name	
Location	
Address	
Telephone/ Telefax	
Contact at Supplier	
Your contact at Orscheln	
Evaluation Date	
Submitter (name, title)	
Email address	

Section 1 Company Information

This self assessment is only valid for one Supplier location or facility; please indicate the location or facility.	
Number of employees:	

Number of employees at business partners e.g. cleaning personnel, temporary employees, entrepreneurs included:	
Number of supply chain tiers, including your own company, involved in fulfillment of the customer's contract(s):	
Sector/Industry:	
Contact person for Corporate Social Responsibility (CSR) issues at your facility:	
Contact person responsible for information in this self-assessment:	
Date of submission:	

Section 2 Social Performance

1.	Have audits, with focus on human rights and workplace practice, been conducted in your company?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Has your company signed the UN Global Compact?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3.	Has a senior management representative been appointed to ensure compliance with the requirements in this document?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Does your company have a Code of Business Ethics and Conduct or similar policy?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5.	Does your company place a contractual requirement on its suppliers to be compliant with issues outlines in this self-assessment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6.	Does your company place a contractual requirement on other business partners to be compliant with issues outlined in this self-assessment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7.	Does your company have a procedure in place, where the employees anonymously can report on misconduct or violations relating to any of the principles or issues outlined in this self-assessment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 3 Working Environment and Conditions

1.	Is a monitoring system implemented to identify specific risks for health and safety of the employees and prevent recurrence of work accidents?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Are laws and other regulations regarding working conditions in your country and/or region observed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3.	Are the premises adequately designed for the operation that are conducted e.g. lighting, ventilation, safety equipment, restrooms etc?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Are necessary safety precautions in place to uphold a safe and healthy work environment e.g. safe electrical installations, safe machineries?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5.	Is adequate personal protective equipment such as goggles, gloves, earplugs, boots and protective clothing freely available to all employees?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6.	Are all chemical substances labeled and safely stored?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7.	Is guaranteed that all employees are adequately informed about the danger and trained in proper handling of hazardous and/or poisonous substances and chemicals and safety equipment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
8.	Is information, e.g. data, sheets for chemicals, available in the area where the chemicals are used?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
9.	Are inspection documents for lifts and machinery available?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
10.	Do you keep records of accidents and injuries?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
11.	Do you follow up and take corrective actions due to the accidents and injuries?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
12.	Is fire fighting equipment installed, fire and evacuation drills carried out and are a sufficient number of employees trained in fighting practice?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
13.	Are emergency exits properly marked?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 4 Workforce Rights

1.	Are working hours in your company in compliance with statutory requirements in the country or region?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Is every employee paid at least the statutory minimum wage?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3.	Do all employees receive paid leave according to statutory regulations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Are required overtime supplements paid to all employees?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 5 Child and Forced Labor

1.	Are all employees employed by your company at least the minimum age required by country law or other regulations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Are employees allowed to leave the factory premises after work at any time as far as in compliance with statutory regulations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 6 Freedom of Association

1.	Does your company uphold the employee's right to freely join and legally take action in or form workers' organizations including union(s) of their own choosing without previous authorization of your company?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Section 7 Discrimination

1.	Are all employees treated in a legally non-discriminatory manner regarding benefits, hiring procedure, job assignment, retirement provisions, and access to services etc. (i.e. independent of gender, religion, age, union membership, race, caste, national origin, disability, sexual orientation or political affiliation?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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2.	Does your company regulate inappropriate sexual coercive behavior, including gestures, language and physical contact?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Section 8 Business Ethics

1.	Does your operation have policies and procedures in place to prevent and detect corruption by your employees, officers, managers, and any other working behalf of your operation, including but not limited to bribery, excessive gift-giving, extortion, or embezzlement, on the part of suppliers, contractors or agents representing the facility? If yes, please use the comment field below to describe those policies and procedures.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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2.	Does your operation have policies and procedures to prevent, detect, and eliminate situations in which your employees, officers, managers and others working on behalf of your operation have potential conflict of interest in connection with your operation's activities or dealing with governmental or similar authorities? If yes, please use the comment field below to describe those procedures.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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3.	Has any gifts, payments, or anything else of value for your operation, or anyone working on behalf of your operation, has offered or given, in the last three years, to any government official or employee, political party, political candidates, or any person related by blood, marriage, or otherwise to such persons, in order to obtain some advantage favor, decision, or actions. If yes, please use the comment field below to describe.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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4.	Does any governmental official or employee, political party, political candidates, or any person related by blood, marriage, or otherwise such persons (i) own beneficially, directly or indirectly, the whole or a part of your operation; or (ii) in the last three years served as an officer, director or manager of your operation? If yes, please use the comment field below to describe.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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5.	During the last three years has your operation been involved in any investigation, lawsuit, or other proceeding concerning	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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	the issues addressed in this self-assessment? If yes, please use the comment field below to describe.	
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