

# Code of Conduct

## 行为准则

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**PÖPPELMANN**

## Preamble | 序言

### The Pöppelmann Corporate Groupe – Your reliable partner

波佩曼集团，您可信赖的合作伙伴

Since 1949, the family-owned company of Pöppelmann, with its five production sites and 665 injection molding machines and thermoforming lines and extruders, has grown into a leading manufacturer in the plastics processing industry. In more than 90 countries people value the quality we offer, “made by Pöppelmann”, which is driven by our more than 2,000 highly qualified employees – our “Pöppelmen and Pöppelwomen”.

Driven by the motto **“We do it. Better.”**, we are fully committed to face all challenges that are driven by our customers and business partners from a wide range of industry sectors with our four areas of operation TEKU®, K-TECH®, KAPSTO® and FAMAC®.

‘We’ in “We do it. Better.” stands for all of us – all employees, the management team and the executive board – today and in the future.

Our daily business is aligned with our integrated management system, **PPX**. **PPX** determines our conduct; internally to the same extent as externally with respect to our business partners and the public.

Thereby we align ourselves to the following four **PPX** principles:

自1949年以来，家族企业Pöppelmann已发展成为塑料加工行业的领先制造商，现拥有五个生产基地和665台/条注塑机、热成型生产线和挤出机。我们的客户遍布90多个国家，高度认可“Pöppelmann制造”的品质。我们的成功归功于2,000多名高素质员工-“Pöppelmen和Pöppelwomen”努力的成果。

在我们座右铭“我们倾力投入，尽善尽美”的鞭策下，我们致力于应对由我们的客户和业务合作伙伴推动的所有挑战，这些客户和业务合作伙伴来自不同的行业领域，也包括我们的四个运营事业部：TEKU®, K-TECH®, KAPSTO® 和 FAMAC®。

“我们倾力投入，尽善尽美”中的“我们”，代表我们所有人——所有员工、管理团队和董事会——今天和未来。

我们的日常业务与我们的综合管理系统**PPX**是一致的。**PPX**决定了我们的行为。对内，和我们对外部的商业伙伴和公众方是一样的。

因此，我们遵循以下四个**PPX**原则：



**PÖPPELMANN**

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## 1. We create added value for our **customers**.

What is our stance and position:

### **Uncompromising customer orientation:**

Our thoughts and actions are oriented to our customers. We regard their challenges and needs to be our own. In all areas and in all processes.

### **Partnership:**

We are not looking for short-term business, but a long-term partnership that is profitable for both parties.

### **Enthusiasm:**

We are not satisfied with merely fulfilling the minimum requirements of our customers. We want to exceed their expectations and become our customer's favorite partner, who the customer is willing to recommend to other organizations.

## 2. We are successful through our **employees**.

We strive this every day.

### **Result orientation:**

We agree on targets and then give our employees freedom and room to act, without micro-management from above.

### **Management:**

We understand management to be serving and facilitating, not controlling. We lead with a **vision**. We have an objective, we know our strategy and then break this down into our areas.

### **Appreciation:**

As well as clarity about the matter in hand, an extremely high degree of appreciation when dealing with each other is an absolute must for all of us. In every situation, without exception, both internally and externally.

## 1. 为我们的**客户**创造附加值。

是我们的态度和立场:

### **不妥协的客户导向：**

我们的考虑和行动都是以客户为导向的。我们尊重在所有领域和所有过程中来自客户的挑战，并转变为我们自己的挑战。

### **合作伙伴关系：**

我们不是在寻找短期业务，而是一种对双方都有利的长期合作伙伴关系。

### **热情：**

我们不满足于仅仅满足客户的最低要求。我们想要超越他们的期望，成为客户最喜欢的且愿意推荐给其他用户的合作伙伴。

## 2. 我们依靠**员工**取得成功。

我们每天都为此奋斗。

### **结果导向：**

我们在目标上达成一致，然后给予员工行动的自由和空间，而不是自上而下的微观管理。

### **管理：**

我们理解管理是服务和推进，而不是控制。我们以**愿景**为引领。我们有一个目标，我们知道我们的战略，然后把它分解到我们的领域。

### **欣赏：**

除了把手头的事情弄清楚之外，我们所有人都必须对彼此进行高度的欣赏。在任何情况下，内部和外部都不例外。



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3. We actively **shape** our future with creativity and innovation.

### Change as an opportunity:

The status quo is always only the second-best solution.

### 1% better every day:

Continuous small improvements have an enormous effect in total.

### Focus:

We always concentrate our energy on a few important problems or potentials. Thereby, we can devote our undivided attention to these.

4. We achieve outstanding sustainable **results**.

Get to the heart of the matter:

### Result orientation:

We measure our actions by the result: "What was the outcome?"

### Targets:

We set ourselves ambitious but realistic targets.

### Key figures:

We measure and control whether we achieve our targets and the measures that are required by means of clear and transparent key figures.

All companies of the Pöppelmann corporate group are explicitly committed to their corporate social responsibilities during their business activities.

This code of conduct describes how we – the executive board, management team and all employees – want to provide our adherence to global demands regarding ethical and moral conduct, as well as proper compliance with competition and antitrust regulations. This also includes the facilitation of fair and sustainable standards in doing business with our suppliers and customers, as well as all members of the group.

3. 我们积极创新，积极开创未来。

将改变视为机遇：

维持现状永远只是次优解决方案。

每天进步1%：

持续的小进步的积累总能产生巨大的效果。

专注度：

我们总是把精力集中在一些重要的问题或潜力上，因此，我们可以全身心地投入到这些事情中去。

4. 我们取得了卓越的可持续的**成果**。

抓住问题的核心：

结果导向：

我们用结果来衡量我们的行为：“结果是什么？”

目标：


我们给自己设定了雄心勃勃的但现实的目标。

关键数字：

我们通过清晰透明的关键数字来衡量和控制我们是否达到了目标和所需的措施。

波佩曼集团下的所有公司在其商业活动中都明确承诺履行其企业社会责任。

本行为准则描述了我们—执行董事会、管理团队和所有员工—希望如何满足全球对道德和道德行为的要求，以及适当遵守竞争和反垄断法规。这还包括在与我们的供应商和客户以及集团所有成员间开展业务时，促进公平和可持续的标准。

  
Norbert Nobbe

  
Matthias Lesch

  
Henk Gövert



**PÖPPELMANN**

# General rules | 总则

## Scope of application

This code of conduct summarizes the basic rules and principles that are important to us in one document. It applies to all the companies in our globally active corporate group, and in equally to the executive board, management team and each individual employee.

## Compliance with laws, regulations and ethical practices

We comply with applicable laws and regulations of the countries in which we operate. The security and legitimacy of our actions, our products and our processes are always presupposed and not negotiable.

In our day-to-day actions, we are guided by universally valid ethical values and principles, integrity, honesty and human dignity.

## Business secrets and confidential information

We treat business secrets confidentially and take the necessary steps to protect confidential information of our business partners against access and insight by unaffiliated colleagues and other third parties in an appropriate manner.

## Data protection and information security

The protection of personal data is of utmost importance to us, especially when it concerns employees, customers and suppliers. No personal data may be collected or processed without being legally permitted or without the consent of the data subject. The applicable General Data Protection Regulation (GDPR) and current amendments to statutory provisions and the guideline on how to proceed in the event of data breaches are always applied in this regard. These apply to all employees and all business divisions. Information security is binding for all employees and is continuously developed.

## 适用范围

本行为守则总结概述了对我们重要的基本规则和原则。它适用于我们在全球活跃的企业集团中的所有公司，同样适用于执行董事会、管理团队和每位员工。

## 遵守法律、法规和道德规范

我们遵守所在国家的相关法律法规。我们的行为、产品和流程的安全性与合法性始终是预先设定的，不可谈判。

在我们的日常行为中，我们以普遍有效的道德价值、原则、正直、诚实和人格为指导。

## 商业秘密和机密信息

我们以保密的态度对待商业秘密，并采取必要的措施，以适当的方式保护我们的商业伙伴的机密信息不被非关联的同事和其他第三方获取和洞察。

## 数据保护和信息安全

保护个人数据对我们而言非常重要，特别是保护员工、客户和供应商的数据。未经法律允许或未经当事人同意，不得收集或处理任何个人数据。始终适用现行有效的《通用数据保护条例》(DS-GVO)、法律标准的最新变更以及处理数据泄露的指南。这些适用于所有员工和所有业务领域。信息安全对所有员工都有约束力，并会持续深入发展。



# General rules | 总则

## Financial responsibility and integrity

Pöppelmann is obliged to truthfully report to employees, customers, business partners, the public and regulatory authorities. Our company's business transactions and records must be accurate, proper and complete. All business transactions, assets and liabilities are recorded and documented in accordance with the applicable legislation and generally accepted accounting principles. Documentation and record keeping for all business transactions require the highest level of accuracy, completeness and responsibility.

## Protection of company property

We use the company's property and resources appropriately and carefully. Intellectual property represents a competitive advantage and is therefore a valuable asset that we protect against any unauthorised access by third parties (loss, theft or misuse). Tangible and intangible company property is used exclusively for company purposes and not for personal purposes, unless express authorisation is issued.

## Global guidelines

Our corporate group follows the United Nations Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO). Therefore, the following principles apply in particular:

## Basic rules

At all times, all company members and business partners must be treated with dignity and respect. Our daily activities as a global business enterprise are always in accordance with the applicable national and international standards and in compliance with internationally recognized human rights<sup>1</sup>.

## 财务责任和诚信

Pöppelmann 有义务向员工、客户、业务合作伙伴、公众和监管机构如实报告。公司的业务往来和记录必须准确、有序且完整。所有商业交易、资产和负债均依据现行有效的法律和公认的会计准则进行记录和存档。在所有业务流程中，文件的记录和保存都应保证高水平的准确性、完整性和责任感：

## 保护公司财产

我们妥善而谨慎地使用公司的财产和资源。知识产权是一种竞争优势，因此是具有保护价值的资产，我们保护知识产权免受未经授权的第三方访问（遗失、盗窃或滥用）。公司中的有形资产及无形资产仅用于企业用途，不得用于个人用途。除非已经获得明确许可。

## 全球指导方针

我们集团遵循《联合国世界人权宣言》和国际劳工组织(ILO)的核心劳工标准。因此，下列原则尤其适用：

## 基本原则

在任何时候，所有公司成员和商业伙伴都必须有尊严的受到尊重。作为一家全球企业，我们的日常活动始终符合适用的国家和国际标准，并符合国际公认的人权。

<sup>1</sup> Universal Declaration of Human Rights – UN Doc. 217, also referred to as the UN Human Rights Charter  
1 界人权宣言—参考联合国文件217 《联合国人权宪章》



# General rules | 总则

## Child labor

We reject child labor and any kind of exploitation of children and adolescents and strictly adhere to the relevant laws.

## Forced labor

We reject any form or similar conditions of forced labor. Employees must not be forced to work either directly or indirectly by force or intimidation<sup>2</sup>.

## Appropriate compensation

All employees should receive a fair salary for a full-time job that is at least sufficient to meet the basic needs. This must be paid out in a practical manner (cash, check, bank transfer) and a salary statement to an appropriate extent<sup>3</sup>.

## Freedom of association and collective bargaining

All employees have the right to assemble in accordance with the applicable legislation and to form or join trade unions and employee representative bodies. They also have the right to collective bargaining for the resolution of workplace and wage matters. We assure that employees who are involved in this form of unionising and/or collective bargaining will not face any negative consequences.

## Working hours

Working hours comply with applicable national legislation, industry standards or the relevant ILO conventions<sup>4</sup>.

## 童工

我们反对使用童工和任何形式的剥削儿童和青少年的行为，并严格遵守有关法律。

## 强迫劳动

我们拒绝任何形式的或类似条件下的强迫劳动。不得直接或间接地以武力或恐吓的方式强迫雇员工作<sup>2</sup>。

## 恰当的报酬

所有全职工作的员工都应该得到一个公平的，至少是足够满足基本需求的工资，且必须以实际的方式支付(如现金、支票、银行转账)，并在适当的范围内提供工资表<sup>3</sup>。

## 结社及集会自由和集体谈判

所有员工均有权根据相关法律进行集会，并有权组建或加入工会和职工代表机构。员工还有权通过集体谈判解决工作和工资问题。我们保证，以这种方式参与活动的员工不会面临任何负面后果。

## 商业秘密和机密信息

我们以保密的态度对待商业秘密，并采取必要的措施，以适当的方式保护我们的商业伙伴的机密信息不被非关联的同事和其他第三方获取和洞察<sup>4</sup>。

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<sup>2</sup>Cf. ILO conventions 29 and 105

<sup>2</sup>参考国际劳工组织第29号和105号公约

<sup>3</sup>Cf. ILO conventions 26 and 131

<sup>3</sup>参考国际劳工组织第26号和131号公约

<sup>4</sup>Cf. ILO conventions 1 and 14

<sup>4</sup>参考国际劳工组织第1号和14号公约



# General rules | 总则

## Occupational health and safety

National and international regulations for the safeguarding of health and safety at the workplace are respected. Appropriate systems are to be developed and set up to avoid risks to health and safety<sup>5</sup>.

## Ethical and social principles

A culture of equal opportunity, mutual trust and respect is very important to us. Therefore, we pay attention to compliance with the following principles:

### Non-Discrimination

We treat all employees equally regardless of gender, age, skin color, culture, ethnicity, sexual identity, disability, religion or belief. We promote equal opportunities and prevent discrimination in the recruitment of people, as well as in the promotion of people and in the granting of education and training to people.

### Harassment

No employee is subjected to corporal punishment or any other physical, sexual, psychological or verbal harassment or abuse in our corporate group of companies.

### Freedom of speech

The basis for mutual trust and cooperative cooperation is an open and constructive dialogue characterized by mutual respect. Therefore, the right to freedom of expression and opinion is guaranteed.

## 职业健康及安全

尊重国家和国际关于保障工作场所健康和安全的条例。应制定和建立适当的制度，以避免健康和安全方面的风险<sup>5</sup>。

## 道德及社会规范

机会平等、相互信任尊重的文化对我们非常重要。因此，我们应注意遵循以下原则：

### 非歧视性原则

我们对所有员工一视同仁，不分性别、年龄、肤色、文化、种族、性认同、残疾、宗教或信仰。我们促进机会平等，防止在人员招聘、人员晋升和人员教育、培训方面出现歧视。

### 骚扰

在公司集团内，任何员工均不得受到体罚或任何其他身体、性、心理或言语上的骚扰或虐待。

### 言论自由

相互信任与协力合作的基础是以相互尊重为特征的开放的建设性对话。因此，言论和意见自由的权利须得到保障。

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<sup>5</sup>Cf. ILO convention 155

<sup>5</sup>参考国际劳工组织第155号公约





## Privacy

Privacy is respected.

## Sustainable environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. Both in the development of new products and in the operation of production equipment, we make sure that all the resulting effects on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection.

Each employee is responsible for treating the natural resources with care and contributing to the protection of the environment and the climate through their individual behavior.

## Competition and antitrust regulations

We are committed to fair competition. For this reason, we comply with applicable competition and anti-trust regulations.

Impermissible agreements regarding prices or other terms and conditions, sales regions or customers, as well as misuse of market power, contradict our principles.

Every employee is required to cooperate actively in complying with and implementing fair and legal competition in their area of responsibility.

## Prevention of bribery, extortion and corruption

Instances of bribery, extortion and corruption will not be tolerated. Executive board members, management staff and all employees must ensure that no personal dependencies or obligations arise towards customers or suppliers. For example, group members must not accept or bestow gifts in a manner which may reasonably be considered to have the ability of influencing commercial decisions. If gift-giving is considered to be polite and customary in a given country, one must ensure that no dependencies or obligations arise as a result and the regulations of the country are adhered to.

Violations of these stipulations will not be tolerated and will be punished using employment law-related measures.

## 隐私

个人隐私须得到尊重。

## 可持续的环境和气候保护

可持续的环境和气候保护以及资源再利用是我们公司的重要目标。无论是在新产品的开发，还是在生产设备的运行中，我们都要确保对环境和气候的影响尽可能低，为保护环境和气候做出积极的贡献。

每一位员工都有责任通过自己的行为谨慎对待自然资源，为保护环境和气候做出贡献。

## 竞争和反垄断法规

我们致力于公平竞争。因此，我们遵守适用的竞争和反垄断法规。

关于价格或其他条款和条件、销售区域或客户的不允许的协议，以及滥用市场权力，与我们的原则相矛盾。

要求每位员工积极配合，在其职责范围内遵守和实施公平合法的竞争。

## 防止贿赂、敲诈勒索和腐败

不会容忍贿赂、敲诈勒索和腐败的情况。执行董事会成员、管理人员和所有员工必须确保不对客户或供应商产生个人依存关系或义务。例如，团体成员不得以可被合理认为具有影响商业决策能力的方式接受或赠送礼物。如果送礼在特定国家被认为是礼貌和惯例，则必须确保不会因此产生依存关系或义务，并遵守该国的规定。



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### **Avoidance of conflicts of interest**

Business decisions are always made in the best interests of the company based on objective criteria and are not influenced by personal interests or relationships. Conflicts of interest with private interests or economic or other activities, including those of relatives or otherwise close contacts or organisations, should be avoided from the outset. If they do arise, they must be resolved in compliance with the law and applicable guidelines. Transparent disclosure of the conflict is a prerequisite for this.

### **Export controls and economic sanctions**

Governments and international bodies may impose temporary trade restrictions and embargoes that affect specific products and apply to countries or individuals. We comply with foreign trade legislation and regulations for import and export control and strictly observe trade restrictions and sanction lists. Another sub-area of export control is the examination of our goods for their status as dual-use goods. Dual-use describes the main usability of technologies or goods for civilian and military purposes. Export and import controls are also an important aspect in safeguarding international supply chains.

### **Plagiarism**

It is ensured that plagiarism does not apply.

### **Whistleblowing and protection against retaliation**

In the event of doubt concerning the fulfilment of the aforementioned obligations and in order to avoid prohibited activities, employees may contact their direct supervisor or the Compliance Officer. All reports of violations and misconduct will be treated as strictly confidential. All individuals may speak out freely and without fear of retaliation.

### **避免利益冲突**

商业决策用于实现公司的最佳利益，它们是根据事实标准进行的，不受个人利益和关系影响。应始终避免与私人利益、经济活动或其他活动之间产生利益冲突，包括与亲属或其他相关人员或组织之间的利益冲突。如果仍然出现，则必须按照法律和适用的指导方针加以解决。而这样做的先决条件是公开、透明地披露冲突。

### **出口管制和经济制裁**

政府和国际机构可能会施加对特定产品产生影响、并适用于国家或个人的临时贸易限制和禁运。我们遵守外贸法规和进出口管制法规，严格遵守贸易限制和制裁清单。出口管制的另一个下属领域是检查我们的商品是否属于双重用途商品。双重用途描述了技术或商品在民用和军用领域中的基本可用性。进出口管制也是保证国际供应链安全的一个重要方面。

### **剽窃**

保证不进行剽窃。

### **举报和防止打击报复**

如果对上述义务的履行存有疑问，并且为了避免未经允许的活动，员工可以联系他们的直属上级或合规官。报告违规和不当行为受到严格保密。所有人均可畅所欲言，不必担心遭到打击报复。



## Compliance with the code of conduct

Our executive board and management staff have a special role in setting an example and are to be assessed according to the code of conduct to an especially high level in their actions. They are the first port of call in case of queries regarding understanding the regulations, and they ensure that all employees are aware of and understand the code of conduct. They are to prevent unacceptable behaviour as part of their management task and take appropriate measures to prevent violations of regulations within their areas of responsibility.

The following channels may be used to report violations and information:

a. Via e-mail to

**compliance@poeppelelmann.com**

b. In writing (also anonymously) by post (Bakumer Str. 73, 49393 Lohne, Germany) or via the internal post boxes (such as the "ideas box") either to Nadja Kampf or to Jürgen Nordlohne (Compliance Officer) at the Internal Compliance Department of the Pöppelmann Group.

c. By telephone: +49 4442 982 1739 (Nadja Kampf) or +49 4442 982 1735 (Compliance Officer Jürgen Nordlohne)

d. By notification via the Pöppelmann whistleblower system. Further information can be found on our homepage [www.poeppelelmann.com](http://www.poeppelelmann.com)

For any further questions concerning the Code of Conduct, all employees and third parties may write to the central e-mail address **compliance@poeppelelmann.com**.

This code of conduct is continuously checked to see whether it is up to date and is updated accordingly as and when required.

## 遵守行为准则

我们的执行董事会和管理团队有一个特殊的角色，可以在一定程度上衡量他们的行为准则。他们是了解规章制度的第一个联系人，并确保所有员工都了解和理解行为准则。作为其领导作用的一部分，他们防止不可接受的行为或采取适当措施防止在其责任范围内违反规则。

例者将一贯地、公平地受到起诉。在波佩曼集团工作的每一名员工，以及每一名客户、供应商、服务供应商或外部利益相关者，均有权提请注意可能违反本行为准则的行为，可通过以下方式：

可以使用以下方式报告违规和提醒：

a. 通过电子邮件发送至

**compliance@poeppelelmann.com**

b. 书面（含匿名）通过邮寄（Bakumer Str. 73, 49393 Lohne）或通过内部邮箱（例如：“Ideenbox”）发送至 Pöppelmann 集团内部的合规办公室、Nadja Kampf 或 Jürgen Nordlohne（合规官）。

c. 致电 +49 4442 982-1739（Nadja Kampf）或 +49 4442 982-1735（合规官 Jürgen Nordlohne）

d. 通过 Pöppelmann 举报人系统进行举报。更多信息请访问我们的主页 [www.poeppelelmann.com](http://www.poeppelelmann.com)。

所有员工和第三方都可以发送电子邮件至总部电子邮件地址

**compliance@poeppelelmann.com**.

询问更多有关行为准则的问题。



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