



# Code of Conduct (CoC) for employees

of OCS Optical Control Systems GmbH und der OCS Service GmbH

# Preface

The Code of Conduct (CoC) of OCS Optical Control Systems GmbH and OCS Service GmbH establishes rules for daily behaviour in a range of areas. These rules must be posted and adhered to by OCS employees. The purpose of the CoC is to determine the behaviour and actions of all employees of OCS Optical Control Systems GmbH (referred to in the following as 'we') on the basis of common principles and values, today and in the future. Our employees have identified and formulated these three core convictions as essential values of the company:

- 1. We encounter each other in our daily cooperation at all times with respect and tolerance and expect this from our business partners as well.**
- 2. We conduct ourselves in a reliable and absolutely incorruptible manner at all times.**
- 3. We approach all of our interest groups with openness and appreciation.**

This applies both to our internal relationships – that is, our interactions as colleagues – and to our relationships with third parties – our dealings with customers, suppliers and the relevant segments of the public. The requirements that have been formulated in the following Code of Conduct additionally serve as orientation for the appropriate behaviour of all personnel in order to uphold the good reputation of OCS Optical Control Systems GmbH and OCS Service GmbH, and to further strengthen it in the market in the future. All of our employees are committed to adherence to the CoC. We expect all employees to identify with our principles and always behave in accordance with them. As a matter of course, our management personnel are expected to set an example by acting in accordance with, and outwardly communicating, our fundamental convictions. Just as our business partners can expect full adherence to the CoC by all OCS employees, we also expect our business partners to adhere to the CoC for suppliers.

## **1. Compliance with laws and regulations**

Compliance with laws and regulations is the most important fundamental prerequisite for the successful operation of our business. Every employee is obliged to behave in accordance with the rules of this CoC. In case of doubt, the upholding of laws and regulations takes precedence over the attainment of company objectives. Non-compliance can result in civil and criminal penalties not only for the individual employee, but for the entire company and thus for all of our employees. For this reason, employees must reckon with strict disciplinary measures for infractions of any laws or regulations.

## **2. Cooperation with our customers and business partners**

### **2.1. Fair competition and prohibition of corruption**

Integrity and fairness are always among our forefront concerns, including in the context of business competition. We consistently comply with the existing laws in the countries in which we conduct business. In particular, we do not enter into anti-competitive agreements – for example, on setting contractual terms or on dividing up target groups and target markets – and we do not tolerate such agreements as a business practice.

### **2.2. Dealing with confidential business information**

Trade secrets and confidential information of our customers are always kept secret and protected from becoming known to unauthorised persons within the company. Trade secrets and confidential information also must not be passed on to unauthorised third parties, for example family members or relatives. This obligation continues to apply after an employee has left the company. Just as we expect our employees to protect external business information and the intellectual property of third parties, we also hold the protection of the intellectual property and confidential business information of our company to be indispensable.

### **2.3. Data protection**

We take the protection of customer and employee data very seriously. We treat personal data confidentially and in accordance with data protection legislation as well as our data privacy policy.

### **3. Dealing with our employees**

OCS bears responsibility for all of our employees. We recognise every colleague as an independent personality. The personal strengths of our individual employees form the basis for our company's business success.

#### **3.1. Equal treatment and non-discrimination**

Respect and tolerance are the foundation for daily cooperation in our company. The personal rights of all colleagues are a precious asset and, as such, held in esteem. As a responsible employer, OCS promotes equality of opportunity between men and women. All employees are treated equally by superiors and colleagues, regardless of their ethnic affiliation, skin colour, gender, religion, national and social background, personal circumstances, health status or age.

#### **3.2. Public presence and communication**

Communication, both internally and externally, is one of the most important tasks of company management. At the same time, we consider all employees of OCS to be communicative multipliers and brand ambassadors, and we promote this self-understanding on their part. The most important premise for communication in our company is that it be transparent, honest and credible. For us, transparent communication includes the up-to-the-minute content that OCS disseminates on social media channels. We regard the direct feedback and communication with customers and followers in this context as especially valuable.

#### **3.3. Occupational health and safety**

It is our conviction that the safety and health of our employees are essential for our success as a company. In the interests of our employees, we place the greatest importance on the observance of our health and occupational safety guidelines. This applies especially to our colleagues who work on the machines and technical systems. Caution and prudence are the defining parameters for all operational procedures in the company as a whole. Our primary goal is a productive and dedicated workforce with the lowest possible rates of illness and workplace accidents. We therefore implement internal health-promotion measures and regard this commitment as a key element in the productivity and quality of our work.

## **4. Sustainability**

Since the company's founding, actively shaping the future has been at once an ambition, a challenge and a guiding principle of OCS. Both the company as a whole and each individual employee put this into practice by assuming responsibility daily in all areas of the company and taking on the major challenges of our time: dealing responsibly with resources and ensuring fair cooperation, including between generations.

### **4.1. Environmental responsibility**

Environmentally conscious action and economic management are the basis for strengthening OCS in the future and sustainably securing the business success of the company. We constantly shape our operational procedures so that their impact on the environment and the climate are as small as possible. Every single employee at OCS is urged to adapt his or her individual behaviour in accordance with the special responsibility for the protection of resources that a modern recycling operation requires. At OCS, we aspire as a community to harmonise human, ecological and economic interests and to contribute to a sustainable world. This includes concrete steps to optimise processes, such as 'Think before you print'.

### **4.2. Dealing with machines and technical plants**

The repair and maintenance of our plants always take precedence over possible new acquisitions. We see digitalisation in plant construction as an additional opportunity to produce in an even more environmentally friendly manner.

### **4.3. Social commitment**

We view our company as an active member of society. Accordingly, we are socially involved in diverse ways at the regional and local levels. Our active promotion of the Löwenzahn outpatient hospice service for children and youth in Dortmund and Bochum, SOS-Kinderdorf e. V. and similar organisations are projects that are very close to our heart.

## 5. Implementation and contact partners

OCS Optical Control Systems GmbH and OCS Service GmbH actively promote communication of the CoC and ensure that no disadvantage arises for any employee through adherence to the guidelines or agreements.

Our management personnel have a special exemplary function and, to a particular degree, adhere to the CoC as the standard for their actions. They are the first points of contact in case of questions on interpreting the regulations, and they undertake to ensure that all employees are familiar with and understand the CoC. Within their executive function, they guard against unacceptable behaviour and take appropriate measures to prevent infringements in their area of responsibility. Good cooperation between employees and management personnel on the basis of trust manifests itself in honest and open exchange of information and mutual support.

For further questions around the Code of Conduct, the central e-mail address [info@ocsgmbh.com](mailto:info@ocsgmbh.com) is additionally available to all employees as well as third parties (customers, suppliers, etc.).

OCS Optical Control Systems GmbH and OCS Service GmbH

signed  
Fatah Najaf  
Director

signed  
Merdan Sariboga  
Director

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Optical Control Systems

OCS Optical Control  
Systems GmbH  
OCS Service GmbH  
T +49 2302 95622-0  
F +49 2302 95622-33  
info@ocsgmbh.com

[www.ocsgmbh.com](http://www.ocsgmbh.com)

