

# Wincor Nixdorf

## Supplier Code of Conduct



**WINCOR**  
**NIXDORF**

EXPERIENCE MEETS VISION.



## Dear Supplier,

Operating on a global basis, Wincor Nixdorf is committed to observing the law, complying with social and ethical standards, and to acting in a sustainable manner. This is part of our corporate culture which is based on the value of trust, transparency, reliability and fairness in our dealings with customers, shareholders, suppliers, business associates, employees and the public. We consider it our responsibility to ensure and protect our workers environment whilst ensuring the highest possible ethics in our business practices.

Since it is our responsibility to ensure that our products and/or services are created in a value chain compliant to international standards, we have summarized our expectations regarding labor, health and safety, environment and business ethics in the Wincor Nixdorf Supplier Code of Conduct (WN SCoC). The WN SCoC is based on the Electronic Industry Code of Conduct (EICC).

We expect from all of the companies in our supply chain, from which we buy products and/or services, to fully comply with the WN SCoC. Also please ensure that your suppliers are compliant to the WN SCoC. In the event of stricter regulations or laws these will prevail over this code of conduct.

Wincor Nixdorf is committed to maintaining a close rapport with its suppliers, while at the same time ensuring the highest possible standards of business. Please note that compliance with the WN SCoC is regarded an essential prerequisite for business relations with Wincor Nixdorf.

We trust that this Wincor Nixdorf Supplier Code of Conduct will ensure that we will be considered as a trustworthy partner to our customers and our suppliers.

Kind regards,  
**Eckard Heidloff**

President and CEO of  
Wincor Nixdorf AG

**Dr. Jürgen Wunram**

CFO & COO



**Content**

<b>A. Labor</b>	<b>6</b>
1) Freely Chosen Employment	6
2) Child Labor Avoidance	6
3) Working Hours	6
4) Wages and Benefits	6
5) Humane Treatment	7
6) Non-Discrimination	7
7) Freedom of Association	7
<b>B. Health and Safety</b>	<b>7</b>
1) Occupational Safety	7
2) Emergency Preparedness	8
3) Occupational Injury and Illness	8
4) Industrial Hygiene	8
5) Physically Demanding Work	8
6) Machine Safeguarding	8
7) Sanitation, Food, and Housing	8
<b>C. Environmental</b>	<b>9</b>
1) Environmental Permits and Reporting	9
2) Pollution Prevention and Resource Reduction, Climate Protection	9
3) Hazardous Substances	9
4) Wastewater and Solid Waste	9
5) Air Emissions	9
6) Product Content Restrictions	9
<b>D. Ethics</b>	<b>10</b>
1) Business Integrity and Adherence to Anti-Corruption Laws	10
2) No Improper Advantage	10
3) Disclosure of Information	10
4) Fair Competition and Advertising	10
5) Intellectual Property	10
6) Safeguarding of Trade Secrets	10
7) Protection of Identity	10
8) Responsible Sourcing of Minerals	11
9) Privacy	11
10) Non-Retaliation	11
<b>E. Management System</b>	<b>11</b>
1) Company Commitment	11
2) Management Accountability and Responsibility	11
3) Legal and Customer Requirements	12
4) Risk Assessment and Risk Management	12
5) Improvement Objectives	12
6) Training	12
7) Communication	12
8) Worker Feedback and Participation	12
9) Audits and Assessments	12
10) Corrective Action Process	12
11) Documentation and Records	12
12) Supplier Responsibility	13

**References**

## A. Labor

The contractual partners are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information. The labor standards are:

### 1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work will be voluntary, and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

### 2) Child Labor Avoidance

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

### 3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off per seven-day week.

### 4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

### **5) Humane Treatment**

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### **6) Non-Discrimination**

The contractual partners should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

### **7) Freedom of Association**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation and join workers' councils in accordance with local laws shall be respected. Workers shall be able to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

## **B. Health and Safety**

The contractual partners recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and workers' retention and morale. The contractual partners also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the code and may be a useful source of additional information. The health and safety standards are:

### **1) Occupational Safety**

Worker exposure to potential safety hazards (e.g. electrical and other energy sources, fire, vehicle, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/ tagout), and ongoing safety training. Where hazards cannot be adequately

controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers shall not be disciplined for raising safety concerns.

### **2) Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

### **3) Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

### **4) Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

### **5) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

### **6) Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

### **7) Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the contractual partner or a labor agent are to be maintained to be clean and safe, and provide with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

## C. Environmental

The contractual partners recognize that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

### **1) Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

### **2) Pollution Prevention and Resource Reduction, Climate Protection**

Waste of all types, waste water as well as the consumption of water and energy are to be eliminated or reduced at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, re-using and recycling materials.

### **3) Hazardous Substances**

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, reuse or recycling and disposal.

### **4) Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

### **5) Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

### **6) Product Content Restrictions**

The contractual partners are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

As customer requirements apply the requirements regarding substance restrictions "Environmental Responsibility Agreement", which are communicated by Wincor Nixdorf.

## D. Ethics

To meet social responsibilities and to achieve success in the marketplace, the contractual partners and their agents are to uphold the highest standards of ethics and to continually reflect upon them. This includes:

### **1) Business Integrity and Adherence to Anti-Corruption Laws**

The highest standards of integrity are to be upheld in all business activities. The contractual partners shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be transparently performed and accurately reflected on the contractual partner's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws. To avoid any conflicts of interests the contractual partners make decisions solely on the basis of objective facts and do not allow themselves to be influenced by personal interests.

### **2) No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

### **3) Disclosure of Information**

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

### **4) Fair Competition and Advertising**

The contractual partners ensure fair competition and observe applicable laws and promotion of competition as well as the standards of fair advertising. Appropriate measures to safeguard customer information must be available.

### **5) Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

### **6) Safeguarding of Trade Secrets**

The contractual partners require their employees to safeguard trade secrets. Confidential information may not be released, passed on to third parties or made available in any other way without authorisation.

### **7) Protection of Identity**

Programs that ensure the confidentiality and protection of supplier and employee whistleblower<sup>1</sup> confidentiality are to be maintained.

<sup>1</sup> Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

#### **8) Responsible Sourcing of Minerals**

The contractual partners shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country (see also § 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act about the use of conflict minerals). The contractual partners shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

#### **9) Privacy**

The contractual partners are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. The contractual partners are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

#### **10) Non-Retaliation**

The contractual partners should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## **E. Management System**

The contractual partners shall implement measures to ensure a) compliance with applicable laws, regulations and customer requirements related to the contractual partner's operations and products; b) conformance with this Code; and c) identification and mitigation of operational risks related to this Code. Ideally this should be done by the introduction of a management system which should also facilitate continual improvement.

The management system should contain the following elements:

#### **1) Company Commitment**

A Corporate social and environmental responsibility policy statements affirming contractual partner's commitment to compliance and continual improvement, endorsed by executive management.

#### **2) Management Accountability and Responsibility**

The contractual partner clearly identifies company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

**3) Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

**4) Risk Assessment and Risk Management**

A process to identify the environmental, health and safety<sup>2</sup> and labor practice and ethics risks associated with the contractual partner's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

**5) Improvement Objectives**

Written performance objectives, targets and implementation plans to improve the contractual partner's social and environmental performance, including a periodic assessment of the contractual partner's performance in achieving those objectives.

**6) Training**

Programs for training managers and workers to implement the contractual partner's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

**7) Communication**

A process for communicating clear and accurate information about the contractual partner's policies practices, expectations and performance to workers, suppliers and customers.

**8) Worker Feedback and Participation**

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

**9) Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

**10) Corrective Action Process**

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

**11) Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

---

<sup>2</sup> Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

## 12) Supplier Responsibility

A process to communicate Code requirements to suppliers and to monitor supplier compliance to Code.

# References

The following standards were used in preparing this Code and may be a useful source of additional information. The following standards may or may not be endorsed by each contractual partner.

Dodd-Frank Wall Street Reform and Consumer Protection Act  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit System  
[www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)

Ethical Trading Initiative  
[www.ethicaltrade.org/](http://www.ethicaltrade.org/)

ILO Code of Practice in Safety and Health  
[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO International Labor Standards  
[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

ISO 14001  
[www.iso.org](http://www.iso.org)

National Fire Protection Agency  
<http://www.nfpa.org/categoryList.asp?categoryID=143&URL=About%20NFPA>

OECD Due Diligence Guidance  
[http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_44307940\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html)

OECD Guidelines for Multinational Enterprises  
[www.oecd.org](http://www.oecd.org)

OHSAS 18001  
[www.bsi-global.com/index.xalter](http://www.bsi-global.com/index.xalter)

Universal Declaration of Human Rights  
[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

United Nations Convention Against Corruption

[http://www.unodc.org/pdf/crime/convention\\_corruption\\_signing/Convention-e.pdf](http://www.unodc.org/pdf/crime/convention_corruption_signing/Convention-e.pdf)

United Nations Global Compact

[www.unglobalcompact.org](http://www.unglobalcompact.org)

SA 8000

<http://www.sa-intl.org/>

SAI

[www.sa-intl.org](http://www.sa-intl.org)

**Documentation History**

Wincor Nixdorf supplier code of conduct

First edition May 2007, first revised edition November 2012 with updates for consistency with the EICC version 4.0

**Reference – EICC**

The Electronic Industry Code of Conduct was initially developed by a number of companies engaged in the manufacture of electronics products between June and October 2004.

You may obtain additional information from  
[www.eicc.info](http://www.eicc.info)

**Contact:**

Strategic Purchasing

phone: +49 5251 693 6501

email: [purchasing@wincor-nixdorf.com](mailto:purchasing@wincor-nixdorf.com)

Wincor Nixdorf International GmbH

Heinz-Nixdorf-Ring 1

D-33106 Paderborn

Published by

**Wincor Nixdorf International GmbH**

Heinz-Nixdorf-Ring 1

33106 Paderborn

Germany

Phone: +49 52 51 / 6 93-30

Fax: +49 52 51 / 6 93-77 30

[info@wincor-nixdorf.com](mailto:info@wincor-nixdorf.com)

[www.wincor-nixdorf.com](http://www.wincor-nixdorf.com)

© Wincor Nixdorf International GmbH

**Order No. R40109-J-2741-1-7600**

Printed in Germany, January 2013

**WINCOR**  
**NIXDORF**

EXPERIENCE MEETS VISION.