

# EURO-LOCKS BASTOGNE



**LOWE&FLETCHER**  
LOCKING SYSTEMS FOR INDUSTRY



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## Locking Systems Division



**L&F**

# CODE OF CONDUCT

EURO-LOCKS SA 8, Rue de la Fontaine B-6600 BASTOGNE Belgique



## CODE OF CONDUCT

### INTRODUCTION

Euro-Locks Bastogne (Belgium) is one of the entities of the « Locking Systems Division ».

In 1889, John Lowe and his son-in-law Thomas Fletcher began their lock making business in Willenhall, England. At the time they were one more than 300 similar lock making businesses in this industrial area.

Today the company they founded employs 1,000 staff across two divisions and has operations in the UK, Belgium, France, Germany, Poland and the USA. The Locking Systems Division supplies specialised locking Systems for a wide range of industrial customers worldwide, and the Safety and Security Systems Division focusses on smoke and fire curtains for building.

The group has come a long way since 1889 yet it is still a family business with strong family values. Our Chairman, Mr. Hugh TREVOR-JONES, is the fifth generation of his family to lead the business. Mr. TREVOR-JONES believes these values are embedded in their family business ethos and can be summed as follows:

- We act with honesty, openness and a respect for others;
- We act with care and consistency;
- We take responsibility for our actions.

Together with our long heritage our values enable us to develop as a team, invent new products and plan for the future with confidence and conviction. Why you can be confident in doing business with us.

**Euro-Locks** believes in social and environmental responsibility.

**Euro-Locks** expects from all the members of its staff (the managing director, all its managers, all its employees, all the interested parties), to respect the European national regional laws, and the rules defined in our internal work regulations. **Euro-Locks** expects from all its business partners to do the same and that they respect this Code of Conduct. **Euro-Locks** also expects its business partners to work themselves with suppliers and subcontractors who undertake to respect this Code of Conduct.

Our internal work regulations as well as our rules, and our Code of Conduct are based on:

- The ten UN (United Nations) Global Compact principles (Annex I).
- The OECD (Organization for Economic Cooperation and Development) guidelines.
- The ILO (International Labour Organization) guidelines.
- The UN Universal Declaration of Human Rights and connected UN Conventions.
- The European, national and regional legislations.



## CODE OF CONDUCT

### **1. Human Rights - Code of Well-Being - Respect for the Worker**

- Every worker deserves respect and dignity.
- Employing children under 15 years old in the company for any purpose is prohibited.
- The definition of « a child » is based on ILO's (International Labour Organization) Convention. This Convention and the also ILO's Recommendation N° 146 which state that a child is a person under the age of 15, unless national legislation defines the age limit of a child as 14 years old, unless national legislation prescribes a higher age or demands the completion of compulsory schooling. In any situation only the national legislation shall apply.
- Any discriminatory treatment of the worker is forbidden as regards nationality, age, ethnicity, race, sex, complexion or skin color, religion, pregnancy, disability, sexual orientation. No harassment (moral, sexual, physical, psychological, etc.) is tolerated.
- Forced labor, the use of illegal workers or prisoners are prohibited.
- The applicable labor legislation must be respected for working hours and including overtime. Working hours must be planned to allow everyone to freely organize his life outside the company.
- Compliance with pay legislation is imperative and the minimum wage must at least correspond to the minimum wage defined for each sector in each country. There can be no payroll deduction for disciplinary action.
- Every worker has the right and the freedom to join a union, an association of free choice.
- Protections against noise, against air pollution, against throwing of filings and biting products, etc., must be ensured by the obligation to use approved professional equipment for protection against the risk of hearing damage, respiratory, ocular, etc.

### **2. Environment**

- Each company must respect the rules, impositions and legal obligations with regard to the protection of the environment.
- Each company must comply with all environmental permits and licenses required for its activity.
- Euro-Locks promotes the development and diffusion of environmentally friendly technologies and tries to support preservation measures in the face of environmental challenges. Euro-Locks works for sustainable business conduct (ISO 14001). Euro-Locks recommends to all its trading partners (suppliers, subcontractors, others) to implement certifiable environmental management systems. Euro-Locks expects all business partners to reduce their resource consumption, prevent pollution and work to improve the overall environmental impact of their business and products throughout their business cycles life.



**3. Règles contre la corruption**

- EURO-LOCKS undertakes to never resort to corruption. Our Ethics Policy states that we cannot accept gifts of money under any circumstances, nor request non-monetary gifts, tips or other personal benefits in any business relationship with our customers or suppliers. Any non-compliance with this ethics policy will be punishable by a disciplinary sanction. Regardless of whether the gift or tip is accepted, any customer, supplier or subcontractor who violates this policy may immediately lose all cooperation with the company and be reported to the relevant supervisory authorities for attempted bribery.



## Annex I

Les ten Principles of the Global Compact are:

### Human Rights

1. Promote and respect the protection of international law on human rights within their sphere of influence.
2. Make sure not to be complicit in human rights violations.

### Labor

3. Respect the freedom of association and recognize the right to the collective bargaining.
4. Contribute to the elimination of all discrimination in employment.
5. Contribute to the effective abolition of child labor.
6. Contribute to the elimination of all forms of forced or compulsory labor.

### Environment

7. Apply the precautionary approach to environmental issues.
8. Undertake initiatives to promote greater responsibility for the environment.
9. Promote the development and diffusion of environmentally friendly technologies.

### Fight against corruption

10. Take action against corruption in all its forms, including extortion and bribery.



## Annex II

### Approbation of the Code of Conduct

Euro-Locks asks the authorized signatory / legal representative of your company to read the Euro-Locks Code of Conduct contained in this document. By affixing your signature to this document below and by affixing the stamp of the company, you confirm that you have read and understood the Euro-Locks Code of Conduct.

I, the undersigned, the authorized signatory / legal representative of the company described below, confirm that the company has analyzed and understood the Euro-Locks Code of Conduct and confirms that the Euro-Locks Code of Conduct will fully respected by the company described below and by its suppliers and subcontractors.

Place and Date: \_\_\_\_\_

Name of the Company: \_\_\_\_\_

Signature: \_\_\_\_\_

Name of the legal representative: \_\_\_\_\_

Title: \_\_\_\_\_

Company Stamp:

