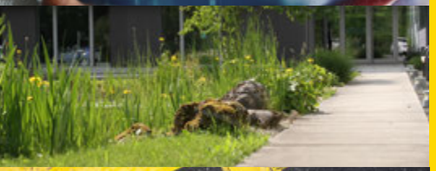
SPANGLER
AUTOMATION

COMPLIANCE



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Foreword

Compliance means that a company adheres to applicable rules and laws – both national and international laws, as well as regulatory requirements and internal company directives.

These compliance guidelines for Spangler have been carefully developed to help managers, employees, and business partners understand the fundamental principles of compliance and to effectively apply them in day-to-day business operations.

Compliance is more than just adhering to laws. It also encompasses the maintenance of ethical standards, the promotion of integrity, and the assumption of responsibility. Robust compliance rules can not only minimize legal risks but also strengthen the trust of customers and partners.

Mission Statement

The values that Spangler pursues are like the guardrails of our business relationships. They provide direction and help us achieve our goals.

OUR GOAL

SPANGLER – the Plus of Success.
We aim to be economically successful so we can provide innovative solutions for our customers and attractive jobs for our employees.

OUR ROUTE

SPANGLER – the Plus of Benefit.
We reliably identify and fulfil our customers' requirements in order to offer clear advantages and benefits over our competitors.

SPANGLER – the Plus of Know-how.
We profit from over 40 years of experience in the manufacturing of customised automation solutions and focus on continually developing our know-how.

SPANGLER – the Plus of Quality.
We only use high-quality components and parts, which have to pass extensive quality controls.

SPANGLER – the Plus of Innovation.
We measure the success of our innovations by the success of our customers, since our company can only remain in the market through satisfied customers.

OUR VALUES

SPANGLER – the Plus of Partnership.
We maintain lasting and partnership-based relations with our customers and suppliers.

SPANGLER – the Plus of Quality of Life.
We consistently work on creating a healthy working atmosphere, thus improving our own health, as well as our quality of life outside the company.

SPANGLER – the Plus of Environment.
We understand the conservation of the natural diversity of our living habitat as a responsibility to pass on an environment worth living in to our future generations.

SPANGLER – the Plus of Family.
We see family-oriented company management as part of our company culture and take this into account when creating our basic conditions.

SPANGLER – the Plus of Constancy.
We are a family-run company with tradition and prospects for working independently as a family on a long-term basis.

Lawful Conduct

Corruption Prevention

Corruption Prevention: An Essential Pillar of Compliance

In our efforts to promote compliance and ethical business practices, we take the prevention of corruption very seriously.

The Importance of Corruption Prevention

Corruption prevention is not only a legal obligation but also an ethical duty. It strengthens the trust of our customers, employees, and other partners. It helps minimize the risk of legal consequences by ensuring that our company complies with national and international anti-corruption laws.

Our Commitment to Corruption Prevention

In our endeavor to prevent corruption, we have developed clear guidelines and procedures for corruption prevention. These include risk assessments, reporting of suspicions, and the implementation of an effective internal control system. Our executives, employees, and partners are encouraged to support our corruption prevention efforts and actively participate in adhering to these guidelines.

"Corruption prevention is not only a legal imperative but also a moral obligation that strengthens trust in our company and protects its reputation.

By working together on corruption prevention, we can uphold ethical standards and build our business activities on a foundation of integrity and righteousness."

Conflict of Interest

Conflict of Interest: Prevention and Ethics in Everyday Business

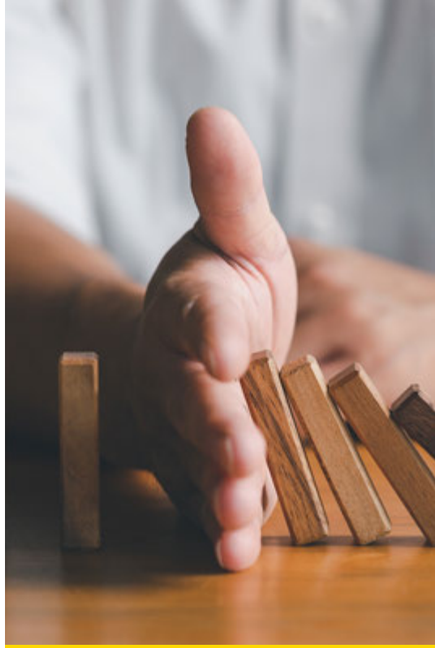
Conflicts of interest are pervasive in the business world and can pose significant ethical and legal challenges. In our pursuit of compliance and integrity, it is essential to identify, assess, and appropriately address conflicts of interest.

What is a Conflict of Interest?

A conflict of interest arises when the personal interests of an employee or manager are at odds with the interests of the company. Such conflicts can take various forms, including financial, personal, or familial interests that could impair a person's ability to make objective decisions in the best interest of the company.

Our Commitment to Conflict of Interest Prevention

All employees and managers are requested to disclose potential conflicts of interest and actively report this information. This enables Spangler to detect conflicts early and act appropriately. It is important to be honest and transparent when personal interests might conflict with professional duties. This helps ensure the integrity of our decision-making processes and maintains the trust of our customers and suppliers.



"The prevention of conflicts of interest is a central part of our compliance efforts.

By recognizing conflicts of interest early and acting appropriately, we can ensure that business decisions are in line with our ethical standards."

Handling competition

In the business environment, competitors are an essential part of the market. However, to ensure sustainable and ethical business management, our dealings with competitors must adhere to the standards of fairness, compliance, and ethics.

Fair Competition

We believe in the principles of fair competition and respect the rights of our competitors. Our goal is to operate in an environment where competitive advantages arise from product quality, innovation, and service, rather than through unfair or illegal practices.
Dealing with competitors in accordance with ethical and legal standards is crucial for maintaining our self-commitment. Spangler strives to act fairly and in compliance with the law, and we expect every employee to adhere to these principles in their daily work. By ethically managing competition, we not only achieve our compliance goals but also strengthen the trust placed in us.

We take data protection and information security seriously and commit to maintaining the highest standards in these areas. Through our commitment to data protection and information security, we can not only preserve the confidentiality and integrity of data and information but also strengthen the trust of our customers and partners.

Knowledge and Information

Data Protection and Information Security

Our Commitment to Confidential Data and Secure Information

The protection of personal data is a priority for us. We commit to strictly adhering to all applicable data protection regulations and laws. This includes compliance with the General Data Protection Regulation (GDPR) in the European Union and all relevant national data protection laws. We collect and process personal data only for business purposes and only when it is lawful and transparent.

Information Security

The security of corporate information and data is crucial to protect our business processes and ensure that confidential information is not compromised. We have implemented robust information security policies and procedures to ensure that data is adequately protected and secured against unauthorized access, theft, or manipulation.

Data Protection through Technology and Processes

We rely on modern technologies and processes to ensure data protection and information security. This includes the use of encryption, firewall systems, access controls, and training for our employees to foster an understanding of the importance of data protection and information security.

Reporting Data Breaches

Promptly reporting data breaches and taking appropriate measures to mitigate the effects of such breaches require quick responses. Our customers, suppliers, and employees are requested to promptly report any potential data breaches or security incidents to enable a quick response.

Confidentiality

Corruption Prevention

Confidentiality and Discretion: Protecting Our Sensitive Information

Confidentiality and discretion are cornerstones of our business practices and our compliance efforts. We are aware of the responsibility to handle sensitive information, whether it's business data, customer data, or employee information, with great care and responsibility.

Confidential Information

Spangler processes confidential information, including process flow plans, financial data, intellectual property, and personal data. These pieces of information are of great value to our company and require special attention.

Reporting Confidentiality Breaches

When employees or partners become aware of a breach of confidentiality or data misuse, they are requested to report it immediately. This allows us to take appropriate measures to minimize the impact of such breaches.

Sustainability

Sustainability and Responsibility: Our Contribution to the Future

Promoting sustainability is a commitment for us that goes beyond adhering to laws and regulations. We firmly believe that our business should not only bring economic success but also have a positive impact on society and the environment

Sustainable Business Practices

We rely on sustainable business practices that ensure our activities are ecologically, socially, and economically responsible. This includes reducing our ecological footprint, promoting ethical working conditions, and creating long-term added value for our customers and suppliers.

Environmental Protection

Spangler is committed to minimizing environmental impacts and promoting sustainable environmental practices. This includes reducing emissions, conserving resources, and investing in eco-friendly technologies and solutions.

Social Responsibility

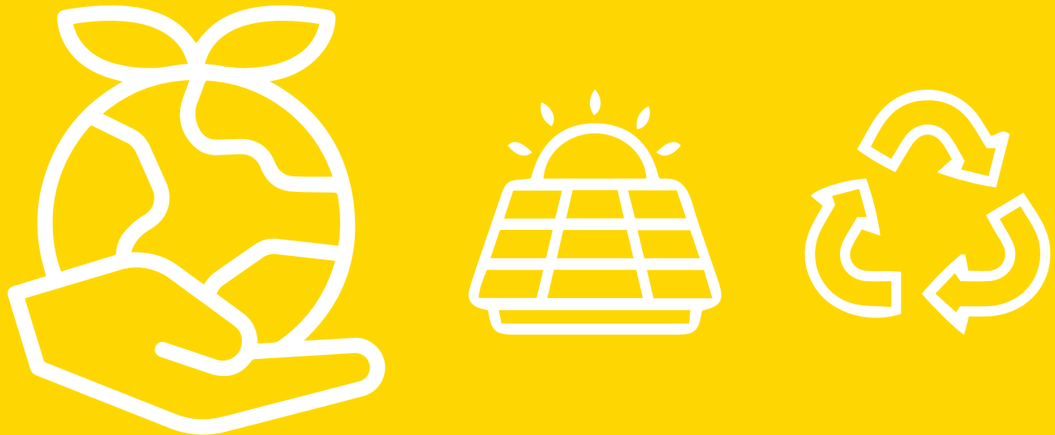
We are aware of our social responsibilities and are committed to promoting ethical working conditions and social justice. This includes respecting human rights, diversity, and inclusion within our workforce, and engaging in community initiatives.

Health and Safety

Our policy regarding environment, safety and health determines the operational principles and sets the framework for decisions, planning, determination of programmes and targets and their implementation.

Environment and Nature

- Our company feels committed to the protection of the environment and the conservation of the natural resources water, air and soil. We prevent environmental pollution.
- It is our aim to continuously improve the operational environmental protection as well as the safety and health at work.
- All applicable laws and regulations are fully observed and adhered to, ensuring that our activities comply with legal and regulatory requirements.
- We regularly analyse possible consequences of our location in respect to the environment and avoid pollutions and risks.



Employees

- We eliminate hazards, minimize risks for the health and train our employees in a suitable way.
- We regularly inform our employees and involve them in decision making processes. We practice a comprehensive individual training of our employees via our Spangler University.
- We consequently work on a healthy working environment in order to strengthen our employees' health and to increase the quality of life in the social surroundings.
- We understand a family-oriented management as part of our corporate culture and take this into account when creating our framework conditions.
- We are a family-run company with tradition and prospects in order to act independently and with a long-term familiar collaboration.
- Our attitude of a friendly and respectful partnership is a factor for our success. We have a flat hierarchy and our sense of community is profound.

Self-Commitment

Whistleblower Protection

Whistleblower Protection: Your Voice for Integrity and Compliance

Spangler places great importance on adhering to applicable laws and regulations. We are convinced that it is crucial to create an environment where concerns, tips, and reports of misconduct can be safely and confidentially handled. The protection of whistleblowers is a central component of our compliance efforts.

Why Whistleblower Protection is Important

Whistleblowers play a crucial role in uncovering violations of laws, regulations, or ethical standards. Their information helps to minimize risks, expose wrongdoing, and preserve the independence of our company. Without adequate whistleblower protection, potential informants could be deterred by the fear of retaliation or negative consequences.

Our Commitment to Whistleblower Protection

We are committed to protecting the identity of whistleblowers and ensuring that they do not suffer disadvantages or reprisals when they report ethical concerns or violations. This includes protection against disciplinary actions, discrimination, or other negative consequences.

Confidential and Secure Reporting Procedures

We have established a confidential and secure channel for reporting misconduct, including anonymous reporting options. These procedures ensure that the identity of whistleblowers is protected and that reports are appropriately investigated. A link is available on our website for use, allowing incidents to be described and for initiating an anonymous dialogue with Spangler.

Responsibility and Transparency

We encourage all employees and partners to report ethical concerns or violations without fear of negative consequences. Our company is committed to appropriately investigating reported violations and taking suitable measures.

Together for Whistleblower Protection

Everyone in our organization plays a significant role in whistleblower protection. Through the dedicated efforts of individuals, we encourage everyone to report ethical concerns and ensure that our company operates in accordance with the highest standards of integrity.

"Whistleblower protection is an essential part of our efforts towards compliance and integrity. By creating an environment where concerns can be safely reported and by protecting the identities and rights of whistleblowers, we can collectively help to maintain the integrity of our company and ensure that violations are appropriately addressed."

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