

The International FROMM group Code of Business Ethics and Conduct represents our professional commitment towards governments, our internal and external customers, our peers and ourselves.

## **ETHICS**

- We will not tolerate bribes, extortion, misrepresentations of business records, false or misleading advertisements, or other unethical conduct designed to obtain unfair advantage.
- Integrity is at the heart of our relationships. We demonstrate integrity by trusting, respecting and empowering our employees, and operating every single day with authenticity, openness and reliability.
- We are relentless in uncovering and sharing the truth and being honest with ourselves, our co-workers, our bosses, all other Snap-on stakeholders and the community at large. We maintain the highest standards of professional and ethical practices.
- We treat others with dignity, and respect their individual feelings and contributions. We thoughtfully consider other's ideas and viewpoints, and recognize our differences. We thrive under high standards, prospering when an individual grows and meets new challenges.
- We respect the integrity and privacy of the intellectual property and proprietary information of our employees, suppliers, and customers.
- We source all materials and supplies from proper and professional sources; suppliers are not from "conflict" regions.
- We encourage all employees, customers, and suppliers to report the improper conduct of any employee or representative of the company.

## **WORKFORCE**

- We are committed to abiding by the laws governing each of our locations.
- We believe that all of our employees deserve to be treated with dignity and respect.
- We maintain a workplace free from harsh, inhumane, or harassing behaviour.
- We encourage a friendly work environment with direct communications between employees and company management.
- We value the expertise of our employees and offer competitive compensation based on skillset and performance.
- We recognize that in almost every action we are part of a team, and through our collaborative efforts we align the workforce. We proactively engage others, which has a dramatic effect on productivity and job satisfaction. We share best practices and ideas, and become involved early in decision-making.
- We pursue and value others' perspectives, and desire to learn about opinions different from our own. Through regular two-way communication, internally and externally, we encourage fresh ways to address business issues, and we make FROMM a better company.

## **HEALTH AND SAFETY**

- We adhere to occupational safety, health, and industrial hygiene standards dictating the proper design and maintenance of equipment, tools, and personal protective equipment; engineering and administrative controls; prevention and reduction of workplace injuries; and the maintenance of safe facilities.

- We train to avoid situations that compromise the health and safety of our employees, both in daily operations and in times of emergencies.
- In addition to being a basic human right, a safe and healthy work environment is essential to providing consistently high-quality products and retaining high-quality personnel.

## ENVIRONMENTAL

- We are each accountable for doing the right thing. The company pledges to protect environmental quality and human welfare in our communities. We are actively involved as a company, and as individual employees, giving time and resources to contribute to the sustainability of the places in which we operate.
- We follow guidelines for the proper content and labelling of products according to legal and customer requirements.
- We practice responsible hazardous substance control and management methods for the reuse, recycling, and proper disposal of these materials.

Cham, May 2019

Reinhard Fromm  
President



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