

Niterrra EMEA GmbH – We are committed

## COMPLIANCE COMMITMENT

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As the company has succeeded in the marketplace, Niterra has never lost sight of its values and has always been aware of its social responsibility. We know that the long-term success of our company can only be secured if we are able to overcome the challenges of globalisation and internationalisation.

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The Compliance department is also responsible for uniformly implementing a global compliance management system so that threats to compliance can be detected and prevented and any compliance violations disclosed can be investigated and prevented in the future. The fair and reasonable sanctioning of compliance violations is one of the key tasks of an equitable and firm compliance culture.

In particular, the management regards the executives as direct role models who ensure that the decisions made and actions taken within their areas of responsibility, are in line with the self-created and audited compliance structure.

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Damien Germès  
(Managing Director)

Niterrra UK Ltd. – We are committed

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Marko Wowczyna  
(Managing Director)



Niterrra EMEA GmbH – Wir bekennen uns

## COMPLIANCE BEKENNTNIS

Seit der Gründung im Jahr 1936 in Japan ist Niterra stetig gewachsen und als Automobilzulieferer zu einem weltweit agierenden Unternehmen im Automotiv Bereich aufgestiegen.

Trotz dieser Erfolgsgeschichte hat sich Niterra nie von seinen Wertvorstellungen entfernt und ist sich seiner gesellschaftlichen Verantwortung stets bewusst.

Wir wissen, dass der langfristige Erfolg unseres Unternehmens nur in dieser Weise über die Herausforderungen der Globalisierung und Internationalisierung hinweg gesichert werden kann.

Das traditionelle Vertrauen unserer Kunden und der Öffentlichkeit uns gegenüber ist essentiell und wertvoll für uns. Um dieses Vertrauen und den zukünftigen Erfolg unseres Unternehmens zu erhalten sowie rechtfertigen zu können sind wichtige Grundsätze wie Ethik, soziale Verantwortung, Nachhaltigkeit und das Einhalten von nationalem sowie internationalem Recht entscheidend.

Unsere Geschäftsführung bekennt sich somit ausdrücklich zur Einhaltung der gesetzlichen und sonstigen internen und externen Vorgaben (Compliance) als Unternehmenskultur und erwartet dies auch von allen für die Niterra tätigen Personen.

Um diesen selbstgesetzten hohen Standard zu erreichen, zu halten und stetig zu verbessern werden sämtliche Mitarbeiter regelmäßig von der hausinternen Compliance - Abteilung beraten und in Compliance – relevanten Themen geschult.

Darüber hinaus ist die Compliance-Abteilung für die weltweite und einheitliche Implementierung eines Compliance-Management-Systems verantwortlich, um präventiv Compliance-Gefahren erkennen, offengelegte Compliance-Verstöße nachgehen und diese in Zukunft vermeiden zu können. Auch die faire und angemessene Sanktionierung von Compliance-Verstößen gehört zu den wesentlichen Aufgaben einer gerechten und entschieden gelebten Compliance-Kultur.

Besonders die Führungskräfte sieht die Geschäftsführung als unmittelbar agierende Vorbilder an, die sicherstellen, dass die in ihrem Verantwortungsbereichen getroffenen Entscheidungen und Handlungen im Einklang mit der selbsterrichteten und geprüften Compliance- Struktur stehen.

Die Geschäftsführung unterstützt und fördert damit Compliance uneingeschränkt, da Compliance die Grundlage für eine gute Unternehmensführung ist und somit die Basis für Vertrauen und Erfolg darstellt:



Damien Germès  
(Managing Director)

## COMPROMISO DE CUMPLIMIENTO

Desde que Niterra fue fundada en 1936 en Japón, la empresa ha crecido a un ritmo constante como proveedor del sector de automoción, donde desempeña un papel activo a nivel mundial.

Niterrra ha logrado tener éxito en el mercado sin renunciar a sus valores y siempre ha sido consciente de su responsabilidad social. Sabemos que el éxito de nuestra empresa a largo plazo solo es posible si somos capaces de superar los desafíos asociados a la globalización y la internacionalización.

La confianza de nuestros clientes y del público en general es un activo fundamental y muy valioso para nosotros. Preservar y justificar esta confianza, además de garantizar el éxito futuro de la empresa por medio de principios tan importantes como la ética, la responsabilidad civil, la sostenibilidad y el cumplimiento de las leyes nacionales e internacionales, es de gran importancia para nosotros.

La administración de la empresa tiene, por lo tanto, el compromiso expreso de garantizar el cumplimiento de los requisitos normativos y de otros requisitos internos y externos como parte de su cultura corporativa. Y espera que todos los empleados de Niterra asuman el mismo compromiso.

Con el fin de alcanzar, preservar y continuar mejorando este alto nivel de conducta que nos hemos impuesto, todos nuestros empleados reciben periódicamente asesoramiento y formación en materia de cumplimiento por parte del Departamento de Cumplimiento de la empresa.

El Departamento de Cumplimiento también es responsable de implementar de manera uniforme un sistema global de gestión del cumplimiento que permita detectar y prevenir amenazas que afectan al cumplimiento, así como investigar cualquier infracción desvelada, con el objetivo de evitarla en el futuro. La aplicación de sanciones justas y apropiadas en los casos de infracción del cumplimiento es uno de los aspectos fundamentales de una cultura de cumplimiento equitativa y firme.

En concreto, la administración de la empresa ve a los directivos como modelos directos que velan para que las decisiones y las medidas adoptadas en sus ámbitos de responsabilidad sean acordes con el sistema de cumplimiento desarrollado y sometido a auditoría.

Por esta razón, la administración apoya y fomenta sin reservas el cumplimiento, que es la base de una buena gestión empresarial y representa la confianza y el éxito.



Damien Germès  
(Director general)

Niterrra France S.A.S – We are committed

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Shunichi Inamae  
(President)



Niterrra EMEA GmbH – Il nostro impegno

## L'IMPEGNO VERSO LA CONFORMITÀ

Sin dalla sua fondazione in Giappone nel 1936, Niterra ha continuato a crescere come fornitore all'industria automobilistica, diventando un'azienda leader del settore su scala globale.

Man mano che si è affermata nel mercato, Niterra non ha mai perso di vista i suoi valori ed è sempre stata consapevole della propria responsabilità sociale. Sappiamo che il successo duraturo della nostra azienda può essere garantito solo se siamo in grado di superare le sfide della globalizzazione e dell'internazionalizzazione.

La fiducia che ripongono in noi i nostri clienti e il pubblico in generale è un elemento essenziale e prezioso per l'impresa. Per poter mantenere e giustificare tale fiducia e il successo aziendale futuro, il rispetto di importanti principi quali l'etica, la responsabilità sociale, la sostenibilità e l'osservanza delle legislazioni nazionali e internazionali sono di vitale importanza per noi.

Pertanto, la nostra Direzione si impegna espressamente a garantire il rispetto delle disposizioni di legge e di altri obblighi interni ed esterni come parte della propria cultura aziendale, e si aspetta che tutti i dipendenti di Niterra facciano lo stesso.

Al fine di raggiungere, mantenere e continuare a migliorare questo elevato standard che ci siamo auto-imposti, il nostro ufficio Compliance (conformità) offre regolarmente consulenza a tutti i nostri dipendenti e organizza per loro corsi di formazione su argomenti che riguardano la conformità.

L'ufficio Compliance è anche responsabile dell'attuazione uniforme di un sistema di gestione della conformità su scala globale, che consente di individuare e prevenire eventuali minacce a tale conformità e di indagare sulle violazioni segnalate per impedire che si ripetano in futuro. L'imposizione di sanzioni adeguate e ragionevoli in caso di inadempienze è uno degli elementi fondamentali di un'equa e consolidata cultura della conformità.

In particolare modo, la Direzione considera i vertici aziendali delle figure di riferimento diretto che devono assicurarsi che le decisioni e le azioni intraprese nell'ambito delle loro competenze siano in linea con la struttura di conformità creata e verificata dall'azienda.

Pertanto, la Direzione sostiene e promuove incondizionatamente la conformità, poiché è il fondamento della buona gestione aziendale e, quindi, rappresenta la base della fiducia e del successo.



Damien Germès  
(Amministratore delegato)

Niterrra Middle East FZE – We are committed

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Yoshihiro Goto  
(Managing Director)



Niterrra EMEA GmbH – Jesteśmy Zaangażowani

## ZOBOWIĄZANIE DO PRZESTRZEGANIA ZGODNOŚCI

Od momentu założenia Niterrra w Japonii w 1936 r. firma nieprzerwanie rozwijała się jako dostawca dla rynku motoryzacyjnego i z czasem stała się globalnie aktywnym graczem tego sektora.

W miarę osiągania sukcesów rynkowych, firma Niterrra nigdy nie zapomniała o swoich wartościach i zawsze była świadoma swojej społecznej odpowiedzialności. Wiemy, że długoterminowy sukces naszej firmy można zapewnić tylko poprzez sprostanie wyzwaniom globalizacji i internacjonalizacji.

Zaufanie naszych klientów i ogółu społeczeństwa jest dla nas niezbędnym i cennym zasobem. Abyśmy mogli zaskarbić i zachować to zaufanie - a tym samym zapewnić przyszły sukces naszej firmy - przestrzegamy kluczowych zasad, takich jak etyka, odpowiedzialność społeczna, zrównoważony rozwój i zgodność z prawem krajowym i międzynarodowym, ma zasadnicze znaczenie.

Nasze kierownictwo jest całkowicie zaangażowane w zapewnienie zgodności z ustawowymi (i innymi) wymogami wewnętrznymi oraz zewnętrznymi w ramach kultury korporacyjnej i oczekuje, że wszyscy pracownicy Niterrra podzielą to zaangażowanie.

W celu osiągnięcia, utrzymania i dalszego doskonalenia tego narzuconego przez siebie wysokiego standardu wszyscy nasi pracownicy regularnie przechodzą szkolenia i mają dostęp do porad naszego Działu zgodności.

Dział zgodności jest również odpowiedzialny za jednolite wdrożenie globalnego systemu zarządzania zgodnością w celu wykrywania i eliminacji zagrożeń oraz prowadzenia dochodzeń w ujawnione naruszenia i zapobiegania im w przyszłości. Sprawiedliwe i uzasadnione karanie naruszeń zgodności jest jednym z kluczowych zadań słusznej i stanowczej kultury zgodności.

W praktyce, kierownictwo stawia sobie dyrekcję za bezpośredni wzór do naśladowania, co zapewnia, że decyzje i działania podejmowane w ramach swoich kompetencji są zgodne z monitorowaną strukturą zgodności utworzoną przez firmę.

Z tego względu kierownictwo bez zastrzeżeń wspiera i promuje zgodność, ponieważ jest ona podstawą dobrego zarządzania firmą, a stanowi zatem podstawę zaufania i sukcesu.



Damien Germès  
(Dyrektor zarządzający)



Niterrra South Africa (PTY) LTD. – We are committed

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Grant Palliser  
(Managing Director)

Niterrra EMEA GmbH – Kararlıyız

## UYUMLULUK TAAHHÜDÜ

Niterrra, Japonya'da 1936 yılında kurulduğundan bu yana, otomotiv tedarikçisi olarak istikrarlı bir şekilde büyümüş ve otomotiv sektörü içerisinde dünya çapında etkili bir oyuncu haline almıştır.

Şirket pazarda başarılı oldukça, Niterra sahip olduğu değerleri hiçbir zaman kaybetmemiş ve sosyal sorumluluk bilincini her zaman taşımıştır. Şirketimizin uzun vadede başarılı olmasını güvence altına almak için, küreselleşmenin ve uluslararasılaşmanın getirdiği zorlukları aşmamız gerektiğini biliyoruz.

Müşterilerimizin ve genel kamunun güveni, bizim için önemli ve değerli bir varlıktır. Bize gösterilen bu güveni koruma ve hakkını vermenin yanı sıra etik, sosyal sorumluluk, sürdürülebilirlik ve ulusal ile uluslararası yasalara uygunluk gibi önemli ilkeleri sürdürmede şirketimizin göstereceği başarı, bizim için hayati bir öneme sahiptir.

Bu doğrultuda, yönetim kurulumuz kurumsal kültürün bir parçası olarak başlıca yasal olmak üzere diğer tüm iç ve dış şartlara uyumluluğunu açık bir şekilde taahhüt etmektedir ve tüm Niterra çalışanlarının da aynı şekilde davranmasını beklemektedir.

Kendi kendimize getirdiğimiz bu yüksek standardı elde etmek, sürdürmek ve iyileştirmeye devam etmek için, şirket içi Uyumluluk departmanımız tarafından uyumluluk ile ilişkili konularda tüm çalışanlarımıza düzenli olarak tavsiye ve eğitim verilmektedir.

Uyumluluk departmanı, uyumluluğun sağlanmasına karşı tüm tehditlerin tespit edilmesi ve önlenmesini sağlayan bir küresel uyumluluk yönetim sistemini tüm şirket düzeylerinde yürürlüğe sokmak ve bildirilen tüm uyumluluk ihlallerini araştırmak ve gelecekte önlemekten sorumludur. Uyumluluk ihlallerinin yaptırımlarının adil ve makul bir şekilde uygulanması, tarafsız ve sıkı bir uyumluluk kültürünün en önemli görevlerinden biridir.

Özellikle yöneticiler, sorumluluk alanları dahilinde aldıkları tüm kararların ve uygulamaların şirket tarafından oluşturulan ve denetlenen uyumluluk yapısına uygun olmasını sağlayan rol modelleri olarak görülmektedir.

Bu doğrultuda, uyumluluğun iyi iş yönetiminin temelini oluşturmasının yanı sıra güven ve başarıyı temsil etmesi nedeniyle, uyumluluk yönetim tarafından açıkça ve koşulsuz olarak desteklenmektedir ve teşvik edilmektedir.



Damien Germès  
(Genel Müdür)