

# **Code of Conduct**

**as of May 2018**

<b>1. General Principles</b>	
<p>The undersigned company bases its business activities and decisions on universally held ethical values, in particular those of integrity, credibility and a respect for human dignity. It uses suitable means to promote transparency, responsible management and company accountability.</p>	<i>Integrity Credibility Transparency</i>
<p>The Code of Conduct applies to all sites and business units of the undersigned company in all countries in which it operates. The management leads by example when implementing and following the guiding principles. The Code of Conduct is based and for reference in managing ethical and legal challenges in daily work. Every employee can turn to with questions and comments in this regard to compliance officer or general manager.</p>	<i>Scope</i>
<p>The undersigned company expects its suppliers to observe the guiding principles set out in the Code of Conduct, will support them in doing so to the best of its ability and asks them to do the same with regard to their supplier chains.</p>	<i>Supply chain</i>
<p>The undersigned company observes the laws and other regulations of the countries in which it operates. This also applies explicitly to provisions of national, European and international legislation on chemicals as well as embargo, customs and export control regulations.</p>	<i>Compliance with laws</i>
<b>2. Conduct towards Competitors, Business Partners and Third Parties</b>	
<p>The undersigned company observes the rules of fair and open competition and does not enter into any agreements that affect competition in an unauthorised manner.</p> <p>Employees are obliged to respect the rules of fair competition. Forbidden is any agreement and any concerted practice with competitors on the following topics:</p> <ul style="list-style-type: none"> <li>- prices and pricedetails</li> <li>- conditions</li> <li>- customers</li> <li>- delivery areas</li> <li>- odds and capacities</li> <li>- agreed market exits</li> <li>- exchanging information on planned innovations</li> <li>- boycotts</li> </ul>	<i>Competition and antitrust law</i>
<p>If the acceptance of a tender is based on a formal contract, the company will deal with other bidders neither deny nor vote. This applies to public tenders or for limited calls for tenders and it is independent of on is a procurement procedure by public sector or by a private body.</p>	<i>Tenders</i>

<p>The undersigned company is expressly opposed to any form of domestic or international corruption and avoids even the appearance of wanting to influence business decisions through unfair business practices.</p> <p>No employee may use his/her position at the undersigned company to demand or accept undue advantages for him/herself or third parties.</p> <p>The provision of tangible or intangible contributions to a business's employees or contractors in return for preferential treatment in commercial transactions is prohibited.</p> <p>Every employee is obliged to contact the compliance officer or general manager in case of suspicious or legal doubts as to the existence of corruption or economic crime.</p>	<p><i>Corruption</i></p>
<p>Invitations, for example to business dinners or events, in line with standard business practices may be offered and accepted under the proviso that they are not used to gain unauthorised preferential treatment. The same applies to the acceptance or offering of gifts.</p> <p>If there are doubts as to the existence of objective reasons or the prevailing level of attention the employee needs to ask the compliance officer or general manager beforehand.</p> <p>This point is internally clearly explained.</p>	<p><i>Invitations and gifts</i></p>
<p>The provision of benefits of any kind to officials, other public officers or representatives of public institutions, including indirectly via third parties, is expressly prohibited.</p>	<p><i>Officials</i></p>
<p>In the event of contributions to parties and political organisations, as well as to elected representatives and candidates for political offices, the applicable laws will be observed.</p>	<p><i>Parties and elected representatives</i></p>
<p>The services of consultants, agents and other business mediators must not be commissioned to circumvent the ban on bribery.</p>	<p><i>Consultants and agents</i></p>
<p>Donations are made only on a voluntary basis and without expectation of return. Donation activities and sponsorship services should not be applied on hidden decisions in the interest of the company to promote.</p> <p>The donation must be transparent. The recipient of the donation and the concrete use of the recipient must be known. About the reason for the donation and the dedicated use must can be stored at any time.</p> <p>Quasi-donations are prohibited. Quasi-donations are grants which are only apparently granted as payment for a service, but exceed the value of the value of the performance significantly.</p>	<p><i>Donations and sponsoring</i></p>

<p>The company does not tolerate money laundering . All employees are required to strictly comply with the laws for combating money laundering. They also have to report suspicious forms of payment and other transactions that could involve money laundering immediately to the compliance officer or general manager.</p>	<p><i>Money laundering</i></p>
<p>The company issues tax returns truthfully. All dutiable goods are cleared properly by the company. The company complies the legal requirements for export control and customs and ensures their proper implementation.</p> <p>From its suppliers, the company expects a qualified and timely allocation of the export control and foreign trade datas and implementing of adequate standards for supply chain security in the context of global customs security programs.</p>	<p><i>Tax law / Customs rules / International trade law</i></p>
<p><b>3. Prevention of Conflicts of Interest</b></p>	
<p>The undersigned company expects loyalty from its employees. It ensures that its employees do not end up in situations in which their personal or financial interests conflict with those of the company or its business partners.</p> <p>The company's employees have to report immediately any personal interest that could arise in connection with their work.</p>	<p><i>Employee loyalty</i></p>
<p>Secondary employment and shares in competitors or business partners must not impair the company's interests. The same applies to shares held by immediate relatives or partners.</p>	<p><i>Secondary employment and shareholdings</i></p>
<p><b>4. Handling Information</b></p>	
<p>The undersigned company obliges its employees to treat any trade or business secrets and any other internal matters as confidential. This also applies to the non-publicly available information about contracting partners and customers. The secrecy obligation also applies after termination of employment.</p>	<p><i>Trade and business secret</i></p>
<p>In addition to the general secrecy regulations (e.g. § 17 UWG), data secrecy according to DS-GVO must be observed. In particular, it is forbidden to process, communicate, make accessible or otherwise use protected personal data unauthorized for a purpose other than that for the respective legitimate performance of the task. This data secrecy commitment continues even after leaving the company.</p>	<p><i>Data protection</i></p>
<p>All reports and other written documentation must be written correctly and truthfully. This applies regardless of whether it is an internal report or they are given out.</p> <p>Data and other records have to align themselves with the principles of proper accounting records and to be always complete and accurate.</p>	<p><i>Truth duty</i></p>

<b>5. Principles of Social Responsibility</b>	
Social responsibility is an indispensable part of value-oriented company management and a key factor in sustainable company success.	<i>Social responsibility</i>
The undersigned company respects and supports internationally recognised human rights. In this context we also keep a permanent dialogue with our suppliers in order to prevent the distribution of products containing raw materials from conflict regions.	<i>Human rights</i>
Our company observes the ban on child labour and forced labour in any form.	<i>Child labour</i>
The discrimination of employees and third parties is not tolerated. The undersigned company takes a strong stance against the unacceptable treatment of employees, in particular sexual or verbal abuse.	<i>Ban on discrimination</i>
The undersigned company promotes equal opportunities among its employees.	<i>Equal opportunities</i>
The employees' freedom of assembly and association is recognised providing it is legally permissible in accordance with national regulations. The undersigned company observes the valid national laws and work standards with regard to appropriate wages and maximum working hours. As a matter of course this also encompasses compliance with all provisions of the German Minimum Wage Act. The undersigned company provides overall fair working conditions.	<i>Employee rights</i>
Occupational health and safety is guaranteed within the scope of national regulations.	<i>Occupational health and safety</i>
The undersigned company is committed to observing the valid environmental standards for its commercial site and ensures that it complies with laws.	<i>Environmental protection</i>
If consumer interests are affected, the company will observe the regulations that protect consumers.	<i>Consumer interests</i>
The undersigned company contributes to the social and economic development of the country and region in which it operates.	<i>Social commitment</i>
<b>6. Observation of the Code of Conduct</b>	
The undersigned company informs its employees of the areas regulated by the Code of Conduct and explains the resulting obligations. It communicates the principles of the Code of Conduct to its business partners.	<i>Communication</i>

<p>The principles enshrined in the Code of Conduct behavioral requirements must be observed binding and therefore necessarily as part of the employment contract for the company's employees .</p> <p>The undersigned company introduces all necessary steps to implement the principles contained in the Code of Conduct in all business areas through suitable organisational measures and appropriate guidelines and processes.</p>	<p><i>Regulations and processes</i></p>
<p>It undertakes to regularly monitor the observation of these.</p>	<p><i>Regular controls</i></p>
<p>All employees are obliged to inform their direct manager, the compliance officer or general manager about any serious breaches of laws, internal regulations or the Code of Conduct. The person reporting the breach must not be subject to any disadvantages.</p>	<p><i>Notification of breaches</i></p>
<p>Depending on their severity, breaches of the Code of Conduct and legal regulations may have consequences under labour and liability laws and also criminal sanctions.</p>	<p><i>Consequences of breaches</i></p>

Hamburg, May 18th, 2018