

Code of Conduct / Company Profol Group

I. General regulations

1.Validity

This code of conduct is valid for all branches and production sites of the Profol Group.

2.Laws, standards and ethic behaviour

The Profol Group adheres to the valid laws and standards of the respective countries it is active in. It takes guidance from the general ethic values and principles, especially integrity, righteousness as well as human dignity.

3. Business partners, authorities and consumers

The Profol Group practices according to the generally recognised business practices of fairness and honesty. It deals truthfully with authorities. Standards protecting consumers are adhered to.

4.Trade secrets

Trade secrets of business partners will be treated strictly confidentially by companies and their members. Passing on confidential information to third parties or making this information publicly available is forbidden. This continues to be the case for company members even after the employment has been terminated.

II. Antitrust and competition law guidelines

1.Antitrust law

The Profol Group is committed to a fair competition. Laws protecting fair competition, particularly antitrust law and other competition regulating laws, are adhered to. Collusion on prices or other conditions, sales areas or customers as well a misuse of market power contradict the principles of the company.

2.Bribery, bribability and corruption

The Profol Group opposes bribery and corruption and does not tolerate such behaviour. The employees are to take care not to create personal dependencies or obligations towards customers or suppliers. In particular, employees are not allowed to accept or make gifts which, under reasonable contemplation, could influence business decisions.

In case gifts are part of a country's custom, it is important to note that no binding dependencies are created and local legal standards are adhered to. Contravention will routinely have legal consequences.

III. Global guidelines

1.Human Rights

Internationally recognized human rights are supported explicitly and consistently. Equally, in the case of disciplinary measures, all company personnel are to be treated with dignity and respect. Such measures must only take place in accordance with the current national and international standards and internationally recognized human rights.

2.Child Labour

Child labour and any kind of exploitation of children and adolescents is rejected. The corresponding laws are adhered to.

3.Forced labour

Any kind of forced labour, debt bondage, slave work or slavery or similar situations are rejected. Company members must not be forced to work through means of violence or intimidation, neither directly nor indirectly.²

4.Wages

All employees in full time employment receive a fair salary covering at least their basic needs. The wages are paid in a practical way (cash, cheque, bank transfer) and payroll accounting has to be made available to a reasonable extent.³

5. Working hours

Working hours correspond to valid national laws, industry standards or relevant ILO conventions. Extra work is done on a voluntarily basis.4

6. Health and employment protection

The national and international regulations for securing health and safety at work are adhered to. Relevant systems to avoid risks for health and safety are to be set up.⁵

7. Environmental protection

The company adheres to the goals of sustainable environmental protection. Environmentally friendly production methods are aimed for in this context. In accordance with the principles of the Rio Declaration on Environment and Development of the United Nations⁶, the company deals responsibly with natural resources.

IV. Ethical and social principles

1.Non-discrimination

The company opposes discrimination on employment or occupation, in particular a discrimination because of race, ethic or national origins, colour of skin, gender, or mental and physical disability, age, creed, membership of a trade union or any other personal traits.

2. Molestation

The company disapproves of physical, psychological or sexual violence.

3. Freedom of opinion

The right to freedom of opinion and free expression of opinion is warranted.

4. Privacy

Privacy is respected.

V. Observance of the code of conduct

1.Measures

The company presents the code of conduct to company members in a suitable form and given intervals, and ensures that it is adhered to.

Halfing, 27.01.2015 Location and date

ürgen Eisele, general manager

Holping 26.01.2015

Location and date

Helmut Bayer, general manager

² See. ILO Conventions 29 and 105

See. ILO Conventions 26 and 131

See ILO Conventions 1 and 14

See ILO Convention 155

⁶ 27 principles of the Rio Declaration on Environment and Development, decided upon by the United Nations Conference on Environment and Development (UNCED), Rio de Janeiro, 1992

⁷ See ILO Conventions 100, 111, 158 and 159