

Code of Conduct



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Preface

Dear Employees,
Ladies and Gentlemen

The HUESKER Group claims to conduct all business in an ethically and legally impeccable manner. In order to ensure this claim, this Code of Conduct provides you with a guideline designed to assist you to correctly and appropriately address ethical and legal issues in the strategic contemplations and decision-making processes of every-day business. Please be aware at all times that the image of HUESKER Group is essentially determined by the conduct and actions of each individual employee, regardless of their respective position within the organisation. Also, the improper conduct of an individual can cause significant damage to the HUESKER Group. Personal integrity and a pronounced sense of responsibility are decisive for appropriate conduct in any situation.

You should always ask yourself:

- # Do my actions and decisions comply with the relevant laws and norms as well as the values and standards of the HUESKER Group?
- # Are my actions and decisions appropriate in all cases and free from personal conflicts of interest?
- # Will my decision bear up to a critical examination by the public?
- # Does my conduct promote the reputation of the HUESKER Group as a company obligated to a high ethical and legal standard?

As a global company, we have to observe cultural differences in various countries. We are obligated to apply and comply with local law and regulations. The HUESKER Code of Conduct is designed to provide practical instructions. It is intended as orientation and information, but also as clarification of the special responsibility and obligation of each individual employee regarding compliance with the Code.

The Code of Conduct constitutes a binding guideline for our responsible daily actions and describes the application of these principles for various aspects of our daily transactions. The main concept here is that there may be no discrepancy between our speaking and acting. The Code of Conduct is binding.

Commitment to an open corporate culture, where everyone feels safe in seeking advice and expressing concerns, is a decisive element of our corporate culture. We do not want to create a culture of mistrust; however, if you are unsure of your actions under certain circumstances, or if you fear that the Code of Conduct is being breached, you are obliged to speak out. No one has to fear reprisals.

At the same time, we also want to protect you as an employee with these clear rules of conduct. We are sure that we shall be well prepared for the future with this Code of Conduct. Be a role model and contribute to implementing our principles in day-to-day business.

Your HUESKER Group
Management

Dr.-Ing. F.-Hans Grandin

Gescher, November 2013



The Code of Conduct applies to all employees and representatives acting on behalf of the HUESKER Group.

1. Scope of application of the Code of Conduct

With the Code of Conduct, the HUESKER Group is obligated to fulfil all statutory obligations and comply with the high ethical standard specified here in the context of its corporate activities. Compliance with statutory provisions, as well as further regulations, which are a voluntary obligation for a company, is generally also referred to as "Compliance". In a broader sense, compliance is also interpreted as the avoidance of liability by adhering to the rules of law of any type decisive for the company.

The Code of Conduct contains so-called legal and ethical regulations designed for compliance with statutory provisions. Furthermore, it lists regulations to which the HUESKER Group is voluntarily obligated. In order for all employees and all locations to be able to comply with these obligations, the Code of Conduct of the HUESKER Group clearly and comprehensively defines the conduct expected from all employees.

The HUESKER Group is a global company. The Code of Conduct is applied by all companies and branches of the HUESKER Group. However, the Code of Conduct does not take precedence over local laws and regulations nor existing works agreements applicable at the individual locations. In such cases, deviations from the Code of Conduct may apply.

The Code of Conduct applies for all employees and representatives acting in the name of HUESKER Group. Intentional or negligent violations of the Code of Conduct result in respective disciplinary measures. Information regarding acts contravening the law or our Code of Conduct shall be explicitly welcomed and supported by the management of HUESKER Group. Reprisals against persons providing such information with conscientious intentions are prohibited.

Superiors are particularly responsible in the context of the Code of Conduct. They have to lead by example in compliance with the principles, and demonstrate the moral conduct expected by HUESKER Group with their own behaviour. Executives have to ensure that their employees understand the requirements of the Code of Conduct and possess the necessary resources for their fulfilment. They are furthermore obligated to ensure strict compliance with the Code of Conduct and support their employees.

2. Environment and sustainability

The HUESKER Group is aware of its social and ecological responsibility and considers itself obligated to the principles of sustainability. Sustainability is an inherent component of our corporate culture. For this reason, we are committed in our corporate values to operate sustainably and in a socially responsible manner. We develop products without jeopardising the development options of future generations in the process.





3. Employees

We encourage all employees to follow their common sense and judgement at all times in terms of the Code of Conduct. If you have doubts, please ask your supervisor or a colleague for advice.

3.1 Fairness, tolerance and equal opportunity

The HUESKER Group promotes a working environment of equal opportunity free from any form of harassment and discrimination. Any conduct aiming toward intimidation is prohibited, be it in the office, within the company or relating to customers.

Insulting, slanderous or harmful conduct towards colleagues of a verbal, non-verbal or physical nature shall not be tolerated. Examples for such conduct include derogatory and hurtful comments and actions based on skin colour, ethnic origin, nationality, social origin, any impediments, sexual orientation, political or religious conviction, as well as based on age and gender.

Please speak openly if you are uncomfortable with the behaviour of an employee or colleague and report any harassment immediately. In case of harassment or discrimination, please contact the Compliance Committee, Works Council or Management directly. Here you shall be provided with the immediate, confidential support necessary. If your concern involves management, you may also contact the chairman of the company's Works Council directly.

3.2 Open communication culture

The HUESKER Group attaches particular importance to an open, honest, transparent and valuing communication. This also includes open and constructive handling of problems, passing on information and knowledge to concerned managers and colleagues, as well as collecting information.

3.3 Conflicts of interest

Employees are not permitted to abuse their position or the property of HUESKER Group for personal advantage. Possible conflicts of interest may occur if your own private interests impair or threaten to impair your duties at work or the interests of HUESKER Group. For this reason, you may not represent HUESKER Group in a business relationship where you or a close family member have such a personal or financial interest.

It is furthermore prohibited for you to execute private transactions with customers or suppliers of HUESKER Group if this leads or may lead to an inadmissible impact. Particularly, the price according to market standards has to be paid and the payment has to be documented if employees purchase goods or services for private purposes from suppliers, dealers or customers of HUESKER Group. HUESKER Group employees are furthermore prohibited to accept any activity outside of the HUESKER Group (including membership in executive boards and supervisory boards of other companies), which may impair their obligations toward HUESKER Group or the interests of HUESKER Group. For this reason, all secondary employments have to be approved by HUESKER Group and any possible conflict of interest has to be reported to the superior prior to accepting the activity.





4. Communication and information

4.1 Business documents and communication

All documents and communication (be it in hard copy or electronic) which are composed by employees are corporate documents and may be used as evidence in court processes or investigations by supervisory authorities, and may thus be made public. Operational documents and data of HUESKER Group are the property to HUESKER Group and may not be illegally utilised by employees.

All employees are requested to handle the relaying of information regarding the company extremely careful. Each rushed comment to the media, authorities, business partners or other third parties may be misinterpreted or misunderstood, which may cast a wrong image on HUESKER Group and ultimately even increase the liability risk of HUESKER Group.

Please observe the following guidelines regarding communication:

-  Carefully consider possible comments.
-  Always communicate prudently and according to the law.
-  Never compose anything with which you do not want to be identified.
-  Only speak with authorities or the media if you are authorised to do so. Refer respective requests to the Marketing Division, the Finance Division or the Plant Manager in case of enquiries regarding "environment" or "production".

4.2 Data protection and confidentiality

HUESKER Group attaches great importance to the protection of personal data and the privacy of employees. Personal data may therefore only be processed subject to the applicable Data Protection Act.

If you have doubts as to how to handle personal data, please contact the data protection controller or your superior. Protect personal data from abuse.

5. Health and safety

5.1 Work safety

All employees are responsible to ensure safety at the workplace by complying with Work Safety Regulations and practices. Please report accidents and injuries, as well as dangerous work equipment, practices or working conditions, to your superior or the respective representative for industrial safety immediately.

6. Business partner

6.1 Corruption prohibition

Corruption prevention represents a particularly important aspect of the compliance attempts within HUESKER Group.

All transactions of HUESKER Group are conducted in a fair, legal and morally impeccable manner. HUESKER Group attaches great importance to long-term relationships and associates with business partners, supervisory authorities and government organisation based on ethical principles, performance and trust. Unauthorised payments or other illegal benefits are excluded for HUESKER Group and its employees.

If you are in doubt, please contact your superior and/or the Compliance Committee at all times (see Item 10).

6.1.1 Corruption and bribery - general information

Corruption is possible when dealing with government authorities in the broadest sense (public officials), however also in the course of general commercial transactions (between private parties). They are usually characterised by the fact that the dishonest preference over a competitor or a (legal or illegal) official act of a public official is pursued with the contribution of an illegal advantage.

Corruptive conduct is a criminal offence for the (active) briber as well as the (passive) bribed person.

The (active) bribery and the (passive) corruptibility in commercial transactions (without the involvement of a public official) is regulated in the StGB (German Penal Code) in § 299. The so-called public official offences are stipulated in §§ 331 cont. StGB (German Penal Code).

Corruptive conduct is principally a broad subject. As well as monetary payments and material gifts, it may also include event invitations, restaurant visits or benefits in private transactions by way of special conditions.

In the case of contributions to public officials it is recognised that advantages to ensure "general good will" or mere "sweetening of the climate" may already trigger criminal liability. A quid pro quo is therefore not necessary immediately. Also in the context of employees in the private sector it may be sufficient if the advantage is merely designed to ensure future (however not yet individually conclusively determined) advantages.

The German Criminal Law on Corruption not only penalises the actual contribution to the bribed person and/or its acceptance, but principally permits punishment for upstream acts. For example, in the event of active bribery, as well as the granting of the advantage, the offering and promising of the advantage are also punishable. This also applies conversely for the passive variation, if someone allows someone to promise them an advantage or even demands it. Even the mere speaking about corruptive contributions may substantiate criminal liability.

Therefore, it is important to avoid even any appearance of receipt of contributions as well as the willingness to granting them.

HUESKER Group employees may therefore not promote the sale of HUESKER Group products by offering advantages to the decision makers on the consumer side. Conversely, it is prohibited for members of the company to demand advantages for the granting of orders by HUESKER Group. Some specific examples - also with respect to less obvious and oblique cases of corruption - are illustrated under Item 6.1.3.

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Corrupt behaviour is punishable, both for the person who (actively) offers a bribe and the person who (passively) accepts it.

6.1.2 Possible consequences of corruption

Corruption is liable for prosecution in every country in the world. Corruptive conduct may not only lead to extremely grave sanctions for the directly involved employee. Serious consequences may also affect managers, executive board members and the company itself.

POSSIBLE LEGAL CONSEQUENCES FOR EMPLOYEES

Persons directly involved in corruptive conduct particularly have to expect

- # imprisonment,
- # pecuniary fines,
- # personal compensation claims,
- # occupational bans and prohibition to exercise certain functions or offices
- # consequences under industrial law

Also the following justifications shall not help:

- # Local "customs" or habits opposing anti-corruption laws;
- # "industry-standard" customer care ("they all do it") opposing anti-corruption laws;
- # the initiative with respect to the corruptive conduct was not induced by the employee, but by the opposition;
- # based on blackmail, the employee considered himself induced to corruption, e.g. in order to not jeopardise the current business relationship;
- # the corruptive employee acted without any intention for personal benefits, merely for the good of the company.

Persons applying bribery are utilising company funds for illegal purposes and may furthermore be guilty of breach of trust and/or - if he conceals his act by deception - fraud according to German jurisprudence.

Furthermore, managers - even if they have no knowledge of a culpable corruption act committed by their immediately affected employee - may be sentenced to a pecuniary fine or are even (co-)responsible according to criminal law in case of violation of their organisational and monitoring obligations.

POSSIBLE LEGAL CONSEQUENCES FOR THE COMPANY

If an employee acts corruptively, this may also have serious consequences for the company itself, particularly:

Direct financial damages (not conclusive):

In Germany and numerous other states fines may be imposed against the company as well as the profits or even the turnover generated based on the conduct of its employees, may be withdrawn from the company.

Contracts, which are the result of corruptive conduct, are considered invalid from the onset or may be declared invalid at least retrospectively. In this case, business partners may reclaim any previous performances.

Customers and affected competitors possibly may furthermore assert compensation claims.

There is a danger that the company is placed on a "Black list", e.g. at public principals.

Expenditures for corruptive purposes cannot be asserted as business expenses. They increase the taxable profit and thus the tax burden of the company. The unjustified assertion as a business expense furthermore constitutes a tax offence.

Indirect financial damages (not conclusive):

The processing of corruptive conduct generally leads to enormous costs for a company:

The investigations of public authorities claim considerable internal resources, often interrupt the operational processes and thus lead to additional workloads for many employees.

In addition, the necessary utilisation of external consultants (solicitors, forensic auditors etc.) regularly causes extensive remuneration burdens for the company.

Also subsequent court processes usually protract over several years and generate extensive costs.

Damage to reputation:

Corruptive conduct generally also brings with it the loss of reputation (image damage) for the affected company, which may cause as much hardship to the business as penalty notices or other official measures. Such damage to the company's reputation is conceivable in the sales market, but also in the employment, capital or procurement market. Even the suspicion of corruptive conduct may therefore have serious consequences for the company.

6.1.3 Practical information and conduct instructions

The following explanations are designed as a practical "thread" when making decisions. The mentioned case constellations and information regarding conduct are to be considered examples and should be applied analogously in comparable situations.

HANDLING OF GIFTS, INVITATIONS ETC.

Gifts are considered monetary or material presents. For example, invitations to dinner, to events and trips also represent gifts. Similarly, the discounted provision of products or services is considered a gift in this context.

The granting or acceptance of such gifts has to be carefully examined regarding their innocuousness at all times.

Gifts, whereby it is conceivable that the objectivity and independence of the recipient of the advantage could be influenced or is even intended to be influenced based on their value or the type and manner of the contribution, are inadmissible and are prohibited in the interest of HUESKER Group as well as in the interest of the specifically involved HUESKER employee. Whether this is the case is largely dependent on the specific circumstances of the individual case, particularly considering the following factors:

- # Financial value of the advantage (see description below);
- # Frequency of the contributions;
- # Position of recipient within the company or his office;
- # Plausibility of an alternative - non-corrupt - objective of the contribution;
- # Chronological proximity to commercial decisions of the recipient of the contribution (e.g. current tenders).

General practical guideline:

Even though neither the law nor current adjudication have determined generally valid limits of value for admissible contributions, the following values may be considered benchmarks:


In any case, in commercial transactions among private persons the granting of gifts and invitations from a value of €50.00 (incl. VAT) - or even below - may be considered critical by the criminal prosecution authorities.


Contributions to public officials are generally subject to even stronger restrictions. The administration instructions of the federal states and the Federal Government may represent indications for the limit of admissible invitations and gifts to public officials. In most cases, the respective employer merely allows the acceptance of modest gifts (e.g. promotional gifts such as ball point pens or note pads) and invitations up to a total value of approx. €10.00.


It is not possible to exclude any risk of persecution even when complying with the above mentioned values. It is always a matter of considering the entire circumstances.

It is furthermore important to observe that contributions to one and the same beneficiary may be added up in case of repeated contributions, which may exceed the admissible value limit.

The general policy is that


 money may never be offered or given as a gift;


 gifts may never be given secretly, but only with the consent of the superiors of the giver as well as the recipient; the mailing of gifts to the private address of external business partners or public official has to be omitted in general;


 the economic situation of the recipient must always be considered when choosing the gift. Invitations to dinner should never exceed the presumed customary hospitality standard of the recipient;

 gifts may never be offered or provided in direct chronological and/or factual context with a contract award, a tender or similar.

Even while complying with these rules of conduct, always rely on your common sense as well. Ask yourself whether certain gifts or invitations are acceptable:

 Could this cause embarrassment to the HUESKER Group or the business partner?

 Would I feel comfortable reading about this in tomorrow's paper?

 Does this create pressure to provide a respective quid pro quo, to grant special favours or to take a decision not only based on objective, factual aspects?

If you still have doubts, distance yourself from the act of accepting or providing a gift.

On principle, HUESKER Group properly documents and registers any contribution.

THEORETIC SCENARIO "CONCEALED ADVANTAGES"

An employee of a public authority, where a company of the HUESKER Group is actively involved in their current tender, demands the payment of a cash amount from an external distribution partner (e.g. sales representative). He holds out the prospect that the chances of the awarding of the order to HUESKER would allegedly increase with the payment of the cash amount. The external distribution partner discusses this situation with the HUESKER sales department and reassures to pay the cash amount to the employee of the public authority from his own pocket without "officially" involving HUESKER. The consultant furthermore suggests concluding a supplementary agreement according to which he is reimbursed for the cash amount by HUESKER for supposed consultation services.

Conduct instructions:

HUESKER shall not be blackmailed. The company is rather willing to forego a transaction than react to corruptive offers.

In this respect, also the relationship between the amount of the demanded ransom and the financial significance of the order at issue for HUESKER is irrelevant. The company shall not and cannot respond even to a relatively minor demand.

THEORETIC SCENARIO "DOOR-OPENER"

A technical expert with registered office abroad offers his support to HUESKER in the sale of products in his native country as sales representative with numerous useful contacts to members of official authorities and possible customers in the private sector. As consideration, he demands a cash remuneration, which is to be paid in advance.



Conduct instructions:

In some countries, so-called "door openers", which a company pays to a third party, are established means to even establish contact with a potential business partner. Naturally, this may also include cases whereby the third party provides a reputable and valuable performance as engaged representative of interests. However, he may not be utilised as intermediary for the payment of kickbacks or bribes. Merely the suspicion - particularly conceivable in case of a demanded advance remuneration - that the intermediary intends to use parts of his remuneration to bribe potential business partners is cause enough to refrain from his engagement.

An advance payment has to be omitted in any case. Furthermore, a written agreement has to be executed with sales representatives in general before these begin to act for or in the name of HUESKER. This agreement has to regulate clearly and precisely the specific - legal - performances of the sales representative and the consideration (consultation fee or commission) he receives from HUESKER in turn.

THEORETIC SCENARIO "FACILITATION OR ACCELERATION PAYMENTS"

It is common in some countries to offer or demand modest payments to expedite official acts where an entitlement exists in any case. This may concern sectors such as customs clearance and stamping of import licenses.






Conduct instructions:

Such "facilitation or acceleration payments" have to be omitted. Although, according to German law, they are not considered "bribery" in the actual sense (because the public official is not meant to provide a consideration contrary to his duty), however, they nonetheless also represent a "granting of advantages" liable for prosecution.

6.2 Prohibition of monopoly

The HUESKER Group complies with the principles of fair and open competition. For this reason, the company make no arrangements with competitors regarding economically sensitive issues such as prices, terms and conditions or market segmentation. The competition regulations apply not only for formal, written agreements, they simultaneously apply for casual, informal understandings, confidential agreements and so-called "gentlemen's agreements".

Do not collude with competitors or exchange information concerning the competitive conduct, particularly regarding:

-  conditions (e.g. prices) for business partners or customers
-  the extent or timing of changes to such conditions
-  the division of markets according to contractual areas and/or customers
-  the conduct in case of tenders
-  the conduct in case of application for the awarding of orders

If you are in doubt as to whether the issue pertains to an anti-competitive arrangement, please contact the Finance and Legal Division.




6.3 Participation in associations, amalgamations of companies

Regardless of the fact that the participation in associations and amalgamations of companies may be sensible for HUESKER, it involves the risk of the possible violation of regulations pertaining to the law on competition, as competitors typically also work in such institutions. Employees of the HUESKER Group may only participate in such events which pursue admissible purposes. Protocols should be established and available from such events. Any comparison with competitors or the exchange of information has to comply with the respective statute.




6.4 Money laundering

Money laundering pertains to a process whereby funds from illegal sources are channelled through legitimate financial channels or whereby legal funds are utilised for illegal purposes. In order to prevent that HUESKER Group is involved in money-laundering activities, the principle "know your customer" has to be strictly observed. This determines the identity of the respective customer or business partner.

The determination of the identity of your customer is mandatory. If possible, you should:

-  demand verification regarding the customer's identity including his asset sources and his transactions,
-  verify all authorities of your business partner,
-  determine the underlying purpose of the business.

In particular, the following business practices could be suspicious:

-  payment for deliveries from third party accounts
-  customer's instructions to pay credits to a third party account
-  any form of cash payments

7. Company assets and financial integrity

FRAUD OR OTHER ILLEGAL UTILISATION OF COMPANY PROPERTY

The HUESKER Group does not tolerate any type of fraud (act of deception for personal gain or third party gain) and shall cooperate with investigative authorities and other government organisations if necessary. Any business information or assets of HUESKER Group may not be misused by employees also after the termination of employment.

The property of HUESKER Group, such as financial resources, computers or other valuable items, may only be utilised for admissible transactions or approved purposes and never for illegal purposes. Do not hesitate to inform your superior if you reasonably suspect a fraudulent activity.

COMPLIANCE WITH REGULATIONS ACCORDING TO TAX LAW

The transactions of HUESKER Group comply with the applicable taxation laws and are transparent for all authorities. The HUESKER Group does not support any measures or intentions leading to illegal tax advantages of the company, its employees or customers.

STORAGE OF FILES

The HUESKER Group operates a proper storage of files according to the law. Business documents are a significant asset and we consider it our obligation to treat them with the appropriate care. Business documents, including emails, have to be stored in compliance with relevant legal retention periods of HUESKER Group or have to be destroyed. Business documents, which are subject of a judicial investigation or an investigation under supervisory law, may neither be altered nor destroyed.

FINANCIAL DOCUMENTATION

All transactions of HUESKER Group are verified by way of correct accounting and documentation according to the law. The correct recording and reporting of information according to the law is of crucial importance for our ability to make responsible and correct business decisions.

The statements of account of HUESKER Group as well as the underlying books and documents have to

correctly reflect all transactions of the company,

comply with all regulations of the law and accounting and

correspond with the internal control system of the HUESKER Group.

Incorrect or misleading entries in our books are strictly prohibited.

The financial reporting has to comply with the applicable laws and the principles of proper bookkeeping at any time. All relevant financial data has to be made available to internal and external auditors upon demand.

UTILISATION OF INFORMATION TECHNOLOGY

IT facilities and IT systems may only be utilised for legitimate operational purposes. The HUESKER Group may - if legally admissible and indicated based on security or operational reasons - access the emails and internet activities of employees. All employees are requested to use the IT of HUESKER Group responsibly. Also here, please follow your common sense and do not access and/or send mails and do not save information which is not of an operational nature and which should not be accessible to others.

NON-DISCLOSURE OBLIGATION

Employees are obligated to maintain confidentiality regarding business information with which they were entrusted in the context of their activity at or for HUESKER Group. Confidential business information of the HUESKER Group, including information of its customers, may never be used for personal advantage or misused for inadmissible purposes in any other way. The obligation to comply with the confidentiality of information also continues after the termination of the employment at HUESKER Group.

Please ensure that you only pass on information within the office or externally if the recipient implicitly has to know or use this information and is authorised to receive it. Conclude a confidentiality agreement particularly in case of sensitive information prior to the transfer of this information to the external partner. The Finance and Legal Division shall support you in the process.

Business documentation or other operational documents containing confidential and/or legally protected business information of HUESKER Group may not be utilised illegally. The illegal utilisation of such business information is criminal offence. It may furthermore harm the HUESKER Group or its customers and advantage competitors.

INTELLECTUAL PROPERTY

Just as we protect our own commercial information, we are obligated to respect the intellectual property of third parties and simultaneously endeavour to protect the intellectual property for our own products and brands.

The protection of this intellectual property is secured by so-called IP Law. IP Law is the abbreviation for Intellectual Property Law. It comprises numerous forms of data and media, for example in the Internet, in email systems or other image or written documentation, products, brand names and technical processes - regardless of whether they are recorded in hardcopy or electronically.

Your work products and the associated IP rights, e.g. copy right, trademark rights and patent rights, are the property of HUESKER Group, unless regulated otherwise.



8. Prevention of contractual risks

The HUESKER Group is committed to its obligations based on agreements with third parties. In order to avoid any misunderstandings and unintentional consequences, it is necessary that all employees responsible for the conclusion of agreements and contracts carefully assess the resulting rights and obligations and/or risks prior to the conclusion of an agreement. In light of the complexity and legal implications of agreements, not least with respect to already existing obligations, the Finance and Legal Division has to be involved in the establishment and/or examination of such agreements in due time, unless regulated otherwise.

9. Compliance with the Code of Conduct

Every employee is obligated to comply with this Code of Conduct. Every manager is responsible that the subordinates or allocated employees are familiar with this code. The HUESKER Group shall investigate any reported questionable or unethical conduct. Respective measures shall be initiated in any event of incorrect or inappropriate behaviour.

Depending on the gravity of the violation and compliance with statutory requirements, violations of this Code of Conduct shall result in disciplinary measures up to the termination without notice. If applicable, they may also result in external legal consequences.



10. Contact person

What should you do if you have questions or concerns regarding legal or moral standards? If you are not sure how to behave despite using common sense and your judgement, please contact your superior or the above mentioned special divisions.

If you are concerned to engage your superior or the respective special division as well as in cases where this Code of Conduct explicitly prescribes it, you should contact the Compliance Committee directly. The names and contact data of the members of the Compliance Committee shall be published and made available within the company. In all matters pertaining to the Code of Conduct, the Compliance Committee shall report directly to the Managing Director. The Committee furthermore has access to the chairman of the works council at any time.

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