

CODE OF CONDUCT FOR ETHICAL BUSINESS PRACTICE AT RÖDER HTS HÖCKER GMBH

Preamble

All Röder HTS Höcker GmbH employees are bound to the rules of this code of conduct which outlines the values, principles and conduct which determine the company's corporate action. The objective of the company management encompasses the adherence of ethical norms and the creation of a working environment which promotes integrity, respect and fair behaviour. A strict law- and principle-abiding business policy serves the long-term company interests.

Adherence of laws and other provisions in Germany and abroad

In all its business dealings and action, Röder HTS Höcker GmbH strives to observe all valid laws and other relevant regulations in Germany and abroad. Integrity and honesty promote fair competition also in relation to our customers and suppliers.

Obligation of company management

Röder HTS Höcker GmbH views it as its duty to act economically, socially and environmentally aware. The company therefore strives to operate its business competently and ethically and to protect fair competition in all the markets in which it is active by adhering to all valid laws on cartel bans, competition and competition restraints. Unfair advantages towards customers, suppliers or competitors are to be avoided.

Conflict of interests

Röder HTS Höcker GmbH expects its employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests conflict with those of Röder HTS Höcker GmbH. It is therefore prohibited to acquire an interest in competitors, suppliers or customers or enter business relationships with them in a personal context in so far as this could lead to a conflict of interests. The interests of Röder HTS Höcker GmbH should not be affected by conflict situations.

Such conflicts of interest can occur in many situations: employees are not, for example, permitted to accept benefits – in whatever form – where it may be assumed that this could influence the business decisions or transactions of Röder HTS Höcker GmbH. Invitations should also remain within the limitations of normal business hospitality. Employees should not gain any personal direct and/or indirect advantages due to access to confidential information based on their position at Röder HTS Höcker GmbH. All employees are obliged to promote the legitimate interests of Röder HTS Höcker GmbH in so far as is possible. Any competitive situation with the company is to be avoided.

Any actual or possible conflict of interest must be reported and discussed with the relevant managers.

Prohibition of corruption

Röder HTS Höcker GmbH is against all forms of corruption and bribery. Any conduct whereby business occurs with unfair means will not be tolerated. Röder HTS Höcker GmbH employees are not permitted to offer or accept any benefits which could lead to an impairment of an objective and fair business decision. Gifts or invitations must be kept within an appropriate frame. Gifts or benefits which result in a service in return will not be tolerated.

All employees are encouraged to immediately report any occurrences which violate these guidelines.

Fair working conditions

Röder HTS Höcker GmbH employees must ensure a safe and healthy environment. Safety regulations and practices should therefore be strictly adhered.

As a socially responsible employer, Röder HTS Höcker GmbH regards its employees as a great asset. The Röder HTS Höcker GmbH personnel policy aims to offer every employee the opportunity for professional and personal development. An open exchange of opinion, criticism and ideas is encouraged.

Röder HTS Höcker GmbH condemns unlawful discrimination or harassment of any kind.

Child labour

Röder HTS Höcker GmbH does not tolerate child labour. No-one under the legal minimum working age is permitted to be employed in the company.

The company has a responsibility to take the necessary measures to ensure that no-one who is younger than the minimum working age is employed.

Employee rights

Röder HTS Höcker GmbH does not accept any form of forced or compulsory labour. We do not accept the occurrence of prison or illegal work in the production of goods or in services.

Each employee must be treated with respect and dignity. We do not accept the use of physical, sexual, psychological or verbal violence in any circumstances. No employee should be subject to harassment or mistreatment.

Wages must be paid regularly and on time and represent appropriate remuneration for the work performed. Each employee receives at least the legal minimum pay. Unfair deductions are not permitted. Employees are entitled to receive a written pay slip which indicates how the salary has been calculated.

Handling of internal information

All Röder HTS Höcker GmbH employees are obliged to ensure a fast and smooth exchange of information within the company. The information must be passed on to the relevant departments correctly and completely in so far as no other priority interest exists in exceptional cases in particular due to approval obligations. The relevant knowledge must not be unlawfully withheld or falsified or forwarded selectively.

Dishonest reporting within the company or to external organisations or persons is strictly prohibited. All annual financial statements and reports, business papers and accounts of Röder HTS Höcker GmbH must accurately represent business dealings and transactions and correspond to legal requirements as well as the accounting principles and internal accounting procedures of Röder HTS Höcker GmbH.

Handling of assets

All Röder HTS Höcker GmbH employees are responsible for the correct and careful handling of the company's property. Each employee is obliged to protect the property of Röder HTS Höcker GmbH against loss, damage, misuse, theft, embezzlement and destruction. All employees have a duty to inform their supervisors immediately if company assets/materials are used in a way which conflicts with the aforementioned.

Confidentiality and data protection

The majority of the business information of Röder HTS Höcker GmbH is confidential or legally protected which means a confidentiality obligation exists. This does not apply if a publication of the information of Röder HTS Höcker GmbH has been approved or laws or regulations require otherwise.

The obligation to confidentiality refers particularly to intellectual property. This includes business secrets, patents, brands and copyrights as well as business and marketing plans, drafts, business papers, salary data and all other financial data and reports which have not been published or released.

All personal information concerning employees, customers, business partners and suppliers as well as other third parties is used by Röder HTS Höcker GmbH with the utmost care and treated confidentially with complete adherence of data protection laws. The protection of this information must be ensured with the utmost care.

Implementation and monitoring

The rules which are included in this code of conduct form a core of the corporate culture of Röder HTS Höcker GmbH. The uniform compliance of these principles must be ensured and each employee is responsible for this.

If an employee has concerns or complaints concerning the points listed in this code of conduct or is aware of a possible violation of the guidelines for conduct included in this, he must inform his supervisor immediately for clarification. This may also occur anonymously or confidentially. If the employee is not satisfied with how the matter has been clarified, he can also inform the legal department or the human resources department of the complaint. Röder HTS Höcker GmbH does not permit any reprisals which may occur as a result of complaints which have been made in good faith within the framework of this code of conduct.



Environment

Röder HTS Höcker GmbH is obliged to ensure it always has the required environmental approvals and licenses for business.

Chemicals may only be used in unison with the chemical restrictions valid for the product type concerned. Chemical containers must be correctly labelled and stored.

Freshwater is a scarce resource in many parts of the world and should be used as efficiently as possible. All wastewater from processes involving water must be processed/treated accordingly before discharging this into the waterbody.

All waste, in particular hazardous waste, must be disposed of responsibly and in accordance with legal requirements.

Responsibility

All Röder HTS Höcker GmbH employees and members are bound to the rules of this code of conduct and any infringements of this will result in consequences for the individuals involved.