



Code of Conduct

Code of Conduct

Table of Contents:

| | |
|---|---|
| Code of Conduct | 1 |
| Foreword | 2 |
| Staff Members | 2 |
| Human Rights | 3 |
| Environment | 3 |
| Child Labour | 4 |
| Occupational Safety | 4 |
| Discrimination | 4 |
| Self-Commitment Corruption | 4 |
| Fair Trade | 5 |
| Your Points of Contact | 5 |
| Points of Contact Compliance Management | 5 |
| Whistleblowing Hotline | 5 |
| Supplier's Statement | 6 |

Foreword:

The SPÄH group of companies is a globally active company with a strong internal and external focus on binding ethical guidelines. In this context, good working conditions for the staff members are a fundamental and indispensable criterion.

The keys to success of the SPÄH group of companies are staff members¹. The companies are convinced that especially initial and ongoing formation measures will ensure future economic success. The SPÄH group of companies offers training and development opportunities within the entire organisation, irrespective of gender, origin, age or religion. A secure and healthy working environment for the staff members is ensured at all locations. The SPÄH group of companies is endeavouring to achieve a zero accidents rate for each production site. In order to achieve this goal, processes are audited, analysed and continuously improved in all areas on an ongoing basis.

To ensure that the principles of the ethical guidelines of the SPÄH group of companies are known and complied with throughout the entire organisation, the staff members undergo regular training. The SPÄH group of companies strives to also establish these principles among their suppliers. This is the reason why the top suppliers are informed of the obligation to comply with the principles of the Code of Conduct and are asked about their attitude.

The following pages shall serve the purpose of explaining the ethical principles of SPÄH to you.

Our efforts ensured progress in many areas, which is why we are determined, where possible, to also continue our endeavours in the future. We are firmly convinced that our adherence to the principles mentioned above will lead to the SPÄH group of companies becoming a better supplier for the customer, a better customer for the suppliers and a better partner for the community and will finally offer a better place of work for our staff members.

Employees:

The basis of our company's success is formed by the people in our companies who, with their knowledge, symbolise what we have been standing for – for more than 50 years now. Thanks to numerous initial and ongoing formation measures within the framework of employee qualification, we support our staff members both internally and externally.

We encourage our staff members to address issues openly and without any fear of sanctions. Staff members who express their concerns with regard to given processes within the company in good faith may therefore suffer no disadvantages. The earlier misconduct is identified and remedied, the better this is for us. Staff members who have reservations to give their direct superior or the company management account of their concerns have the opportunity to notify the chosen person of confidence or the point of contact "Code of Conduct" either personally or by e-mail (phone: +49 (0)7572/602-141, compliance@spaeh.de).

¹ To the extent that the masculine form is used hereinafter for the sake of simplification, this shall include all female and male gender forms equally.

Our working environment is characterised by tolerance and respect. The staff members treat each other with politeness, honesty and dignity. Intimidation, harassment and mobbing in any form whatsoever are prohibited.

Human Rights:

The promotion of and compliance with the international laws on human rights are integral parts of our business relationship with our customers and suppliers at all times, but also vis-à-vis our staff members in the first place.

We respect the rights to freedom of association in accordance with the applicable laws and regulations. We condemn the use of forced labour and any form of exploitation and discrimination, and we pay attention to strict compliance with the corresponding laws.

Environment:

Our environment is our dearest asset, and this is exactly the way we want to treat it. We spare no effort to work in the most resource-saving manner possible, in all areas of our group of companies. We are responsible for informing our staff members of all measures in the field of environmental protection and for ensuring implementation of the different measures.

By integrating our environmental management in our corporate mission and management handbook, we are demonstrating how important our actions are with regard to our environment. Additional information and current developments with respect to environmental issues can be found on our website at <http://www.spaeh.de/>.

Child Labour:

We will not recruit staff members who cannot proof having reached a minimum age of 18 years. Exempted from this shall be staff members who are employed within the framework of their vocational education and have already completed their 15th year of life. We will not enter into business relationships with customers or suppliers who employ children under the age of 15 years. In those countries which fall under the exemption for developing countries in ILO Convention 138, the minimum age may be lowered to 14 years.

Occupational Safety:

High security standards, occupational safety measures and the continuous qualification and training of staff members are the best protection against injuries and accidents. We will further develop and fine-tune our benchmarks with respect to occupational safety by way of ongoing measures. The aim is an accident rate towards 0% and at least below the industry average. Our executive managers are obliged to train appropriate behaviour and to ensure protective measures within the different areas.

Discrimination:

Any form of discrimination in respect of recruitment and employment is prohibited. In particular, any distinction, exclusion or favouritism on the grounds of racial origin, caste, skin colour, gender, age, creed, political opinion, membership in a workers' organisation, physical or mental handicap, ethnic, national and social origin, nationality, sexual orientation or other personal characteristics is prohibited.

Self-Commitment Corruption:

The SPÄH group of companies does not tolerate any form of bribery or corruption whatsoever. All business partners and their employees must behave in such a manner that no personal dependency, obligation or influence can arise. All parties are expected to engage in a commercial conduct based on fairness and compliance with the respective applicable national and international standards. Furthermore, the business partner shall implement an anti-bribery and anti-corruption policy to be observed throughout all business divisions.

If in some countries gifts are normal and polite practice, it should be ensured that such gifts do not create binding dependencies and that they do not infringe the statutory regulations applicable under the respective national laws. Gratuities, for example within the framework of invitations or in connection with advertising measures, which serve the purpose of promoting business relationship or presenting products or services are permitted to the extent that they remain moderate.

Nevertheless, such gratuities may be accepted or granted only if they serve a justified business purpose and are not accepted or granted in return for any potential undue advantage. The gratuity must not have an unreasonably high value and must neither go beyond usual business practice nor exceed the recipient's normal standard of living to a disproportionate extent. As a general rule, gratuities to public officials should be avoided.

Donations to charitable activities or sponsoring activities in any form whatsoever should be carefully examined. It must be ensured that such measures are not a hidden attempt of bribery.

The SPÄH group of companies should be notified of any indication of corrupt behaviour via the whistleblowing hotline (phone: +49 7572 602 261). If you have any questions with respect to the receipt of gratuities from one of our partners, please also contact the hotline mentioned above.

Fair Trade:

Compliance with agreements and the acknowledgment of the established case-law go without saying for our global business relationships. Our business partners (customers, suppliers, representatives and consultants) expect that they can rely on us as a partner who acts in conformity with the law. This also requires that we are familiar with our contractual obligations vis-à-vis our business partners.

We make sure that our business partners observe both law and legislation within the framework of their business practices. National and international laws regulate the import, export or domestic trade in goods and services, the handling of specific products, as well as capital movements and payments.

By taking appropriate measures, we are ensuring that transactions with third parties do not violate applicable economic embargoes or regulations concerning trade, import and export control or provisions on the fight against terrorist financing.

Your Points of Contact

As already mentioned in the foreword, you will always find doors open for dialogue on the topic of compliance at the SPÄH group of companies.

The following points of contact are available to both staff members and third parties:

Points of Contact Compliance Management

- Compliance Manager for the entire SPÄH group of companies
- Compliance Officer for the individual subsidiaries

Whistleblowing Hotline

To report fundamental violations of our compliance guidelines, in particular illegal business practices, you also have the possibility to contact our telephone hotline.

- Hotline: +49 7572 602 261

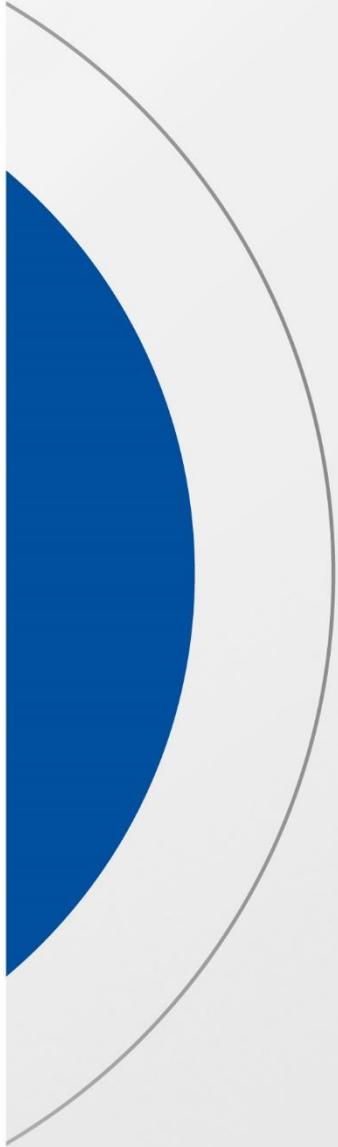
Supplier's Statement

We hereby confirm as follows:

1. We have received the Code of Conduct for suppliers of the SPÄH group of companies and hereby undertake, in addition to our obligations from the delivery agreements with the SPÄH group of companies, to comply with the principles and requirements of this Code of Conduct and to also implement them within our company.
2. At the request of SPÄH, we will complete a written self-assessment in the form required by SPÄH within a reasonable period of time.
3. We agree that SPÄH may perform unannounced audits on our business premises at any time to verify compliance with the Code of Conduct.
4. We will use our best endeavours to pass the contents of the Code of Conduct on to our suppliers and to convince them of the importance to comply with the principles and requirements of the Code of Conduct.

Place, date

Company stamp, signature



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