

## CORPORATE PRINCIPLES REGARDING RESPONSIBILITY, ANTI-CORRUPTION, GENERAL BEHAVIOR AND ETHICS

To comply with ethical values is necessary for long-term economical success. Fair mutual treatment and doing business according to given norms are part of conducting our daily business. The success of our customers is key to generate a long-lasting and sustainable corporate success. We therefore strive to fulfill the requirements of all interest groups.

Executive management is responsible for a sustainable corporate strategy and its implementation. Integrity, the abiding to the law and to ethical principles are characteristic elements to keep and secure the authenticity of our corporation.

The guiding principles as well as the quality, safety and environmental policies describe norms and directives that guarantee a mutual conduct of respect and dignity, safe working and sustainable environmental conditions.

### **Our Code of Conduct is comprised of:**

- How our management carries out their responsibility
- Our interaction with and treatment of staff and colleagues
- Which behavior our customers are to expect of us
- How we treat our suppliers
- How we deal with the public and the environment

Each manager and individual employee is responsible to stick to this Code of Conduct. The behavior and conduct of our managers stand exemplary for everybody – they live to and promote the principles and have role-model character.

### **Human Rights**

We respect and enhance the dignity of each individual and protect the compliance with international human rights. We oppose child labor and forced labor. We do not tolerate working conditions that oppose national and international laws and practices.

### **Discrimination**

We do not discriminate against race, ethnic origin, sex, age, marital status, religion, ideology, disability, pregnancy, sexual orientation or party membership of our employees during the process of employment, compensation, training, promotion, termination or retirement. We expect our employees to act accordingly.

### **Disciplinary Measures**

We vehemently oppose physical punishment, mental or physical pressure or verbal slander.

### **Motivation and Training of our Employees**

Motivated employees that identify themselves with the goals of our corporation are an essential success factor. That is why we emphasize the training and promotion of our staff. We concentrate on applicable, job-related training and development and the support of future leadership potential.

### **Health and Safety**

We take care of the health and safety of your employees by providing a healthy and safe working environment. Everybody complies with our current safety regulations and thus contributes to keep the high standard of working conditions.

### **Compliance with Antitrust and Competitive Regulations**

Our high quality surfaces, service orientation and reliability measure up to an open and fair competition. We do not and in any case engage in illegal and/or criminal practices like bid rigging to exclude, distort and limit competition.

### **Conflict of Interests, Bribery and Corruption**

All our employees avoid situations in which their own personal and financial interests become a matter of conflict with our corporation. It is strictly prohibited to become involved in corporations of competitors, customers and suppliers or to foster business relations in a private environment if these relations trigger a conflict of interest. A conflict exists if nature and extent of a participation are used to influence the pursuit of our business activity in any way. Our employees dissociate themselves clearly from demanding and accepting of unjustified and illegal advantages to influence corporate decisions and transactions. Our employees at the same time will not offer or grant business partners, their staff or other third parties undue benefits and will not make arrangements of such kind.

### **Protection of Assets and Confidentiality**

We expect that every employee protects material and non-material corporate assets, treats operational, industrial and customer-related information confidentially and abides to the effective regulations of data protection.

### **Suppliers**

We have high expectations of our suppliers and request them to apply the same principles to conducting their business and treating their employees as we do.

### **Environment and Recycling**

As a corporation engaged in surface technology we are obliged to nature and the environment. Our state-of-the-art technology actively protects the environment. Each employee contributes to produce high quality surfaces in environmentally compatible processes and responsibly handles energy as a vital resource.

### **Social Commitment**

As an active part of the communities we work and live in, we take over responsibility and commit ourselves to communicate openly with all kinds of authorities, social and public interest groups.

### **Compliance**

The present Code of Conduct was approved by the executive board and was distributed to each employee. Without exception, our staff sticks to this code. For specific regions, countries or functions stricter and more detailed rules may apply, which are completely in line with our corporate principles. Please, refer questions in regards of application or interpretation as well as notifications of potential violations to the respective superior.

### **Non-Compliance**

Methods, procedures and practices of employees, that do not comply with this codex, need to be corrected and may entail disciplinary measures. Depending on the severance of the violation or the repetition beforehand, the non-compliance may result in verbal or written warning or even in written notice.

Should suppliers or other business partners not comply with our principles, we will discuss the violation and eliminate it. Depending on the severance of the violation or the repetition beforehand, the non-compliance may result in a termination of the business relation.

Please, immediately inform the executive board if employees, suppliers or other business partners do not comply with our principles or if their behavior gives rise to particular concern.