

# Code of Conduct of the Eckert & Ziegler Group

## Preamble

The Eckert & Ziegler Group conducts its business responsibly and in line with all legal requirements and official regulations in the countries where it operates. The Group Executive Board pledges its absolute commitment to complying with all legal and corporate regulations concerning responsible and lawful conduct as well as to preventing business practices that contravene any of the following principles.

### Principles of responsible and lawful conduct

The Eckert & Ziegler Group respects the law and expects the same from its employees and business partners. The following principles concern areas of particular relevance to our day-to-day operations.

#### 1. Fair and respectful working conditions

All employees are expected to speak to their colleagues and other individuals in a friendly, objective, fair and respectful manner. Discrimination or harassment of any kind will not be tolerated.

#### 2. Sustainability

The Eckert & Ziegler Group is aware of its responsibility for protecting the environment and the health and safety of all individuals. Efficient use of resources makes a valuable contribution to sustainable development. All rational means of process optimization must be taken to minimize the consumption of energy and raw materials in the production process while restricting emissions at the same time. Air, water and the ground may only be utilized if approved in advance. All relevant employees therefore undertake to operate our production systems within the scope of regulatory requirements.

#### 3. Integrity in business relationships

All forms of corruption and bribery are strictly forbidden. This applies to all employees, business partners, suppliers, distributors and sales agents. Failure to comply with this requirement on the part of employees regularly leads to termination of employment and criminal proceedings.

#### 4. Fair competition

The Eckert & Ziegler Group pledges its absolute commitment to fair competition and, in particular, to strict compliance with antitrust law. It is a fundamental principle of the Group that all employees act in accordance with applicable antitrust law. Suppliers, representatives or other intermediaries are only selected following a meticulous and objective performance assessment. The Eckert & Ziegler Group takes very seriously its legal obligation to make business decisions in the best interests of the company and independently of agreements with competitors.

**5. Respecting the law**

The Eckert & Ziegler Group undertakes to comply with all relevant local, national and international laws as well as laws governing foreign trade. All employees must respect and adhere to the law and other official regulations, as well as all internal instructions and guidelines issued by the Eckert & Ziegler Group. In the case of activities and transactions abroad, employees must follow all relevant social customs in the respective country as well as comply with all valid laws and regulations.

**6. Respecting fair conditions in securities trading**

All employees are obliged to treat internal information that could influence share prices with the utmost confidentiality. The Eckert & Ziegler Group does not permit its employees who have knowledge of material, undisclosed information to conduct any securities transactions whatsoever. Members of the Supervisory Board, the Executive Board and the management are obliged to comply with all legal obligations concerning the prevention of insider trading. Breaches of insider trading laws can have severe implications under employment and criminal law for the employees or bodies involved.

**7. Proper records management and reporting**

All operative, accounting and quality-related business process must be suitably documented by means of an internal control system. The control system should ensure that all necessary documentation is prepared accurately, in full and in the appropriate manner.

**8. Protecting our competitive advantage and respecting third-party property rights**

Trade secrets may not be passed on to third parties or otherwise disclosed. The same applies to third-party property rights.

**9. Separation of company interests and private interests**

All employees must ensure that their own private interests and those of the company remain separate at all times. Decisions on personnel or third-party business transactions should be based on objective criteria only. Secondary employment is only permitted if declared in advance.

**10. Cooperative approach to authorities**

The Eckert & Ziegler Group aims to maintain a cooperative relationship with all relevant authorities. Information should be disclosed in full, openly, correctly, promptly and coherently.

Breaches of the law can be reported in German or English language to:

[compliance@ezag.de](mailto:compliance@ezag.de)

or

to an external law firm\* appointed by Eckert & Ziegler.  
The lawyer will transmit the information – anonymously if so desired –  
to Eckert & Ziegler.

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Last revised January 2016