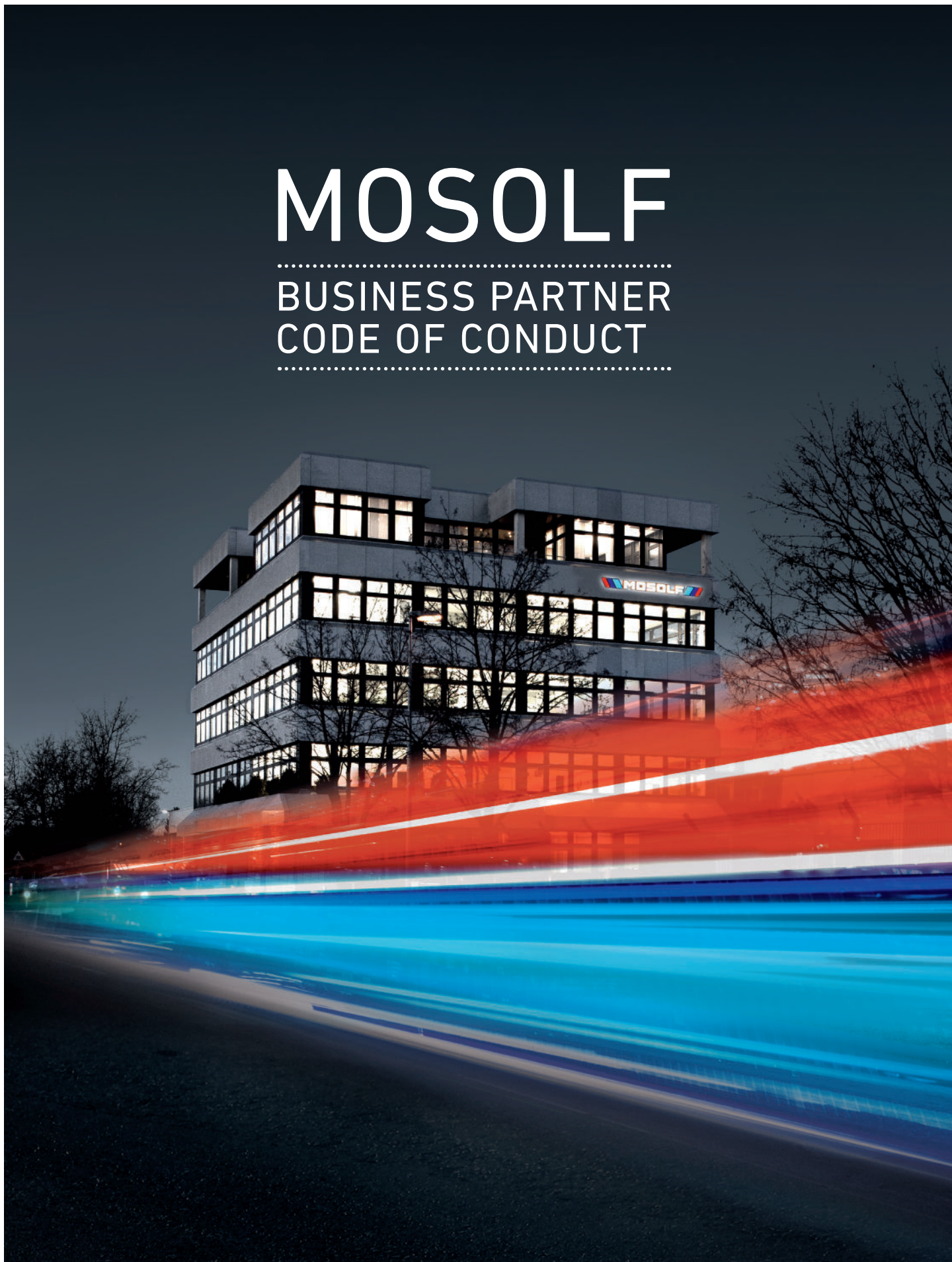


MOSOLF

.....
BUSINESS PARTNER
CODE OF CONDUCT
.....



BUSINESS PARTNER CODE OF CONDUCT

Even before "compliance" became an important concept, it has been a fundamental component of our corporate policy since the establishment of the MOSOLF Group over 60 years ago to

- // conduct business with integrity and fairness
- // take responsibility for our employees and the environment
- // base our activities on the applicable laws and regulations of the countries in which MOSOLF operates.


This fundamental position is the basis of our actions to date and a key factor in ensuring the long-term and sustainable success of our company for the future.

The fundamental tenets of our corporate behavior as set out in this Code are also something that we require of our business partners. In this respect, the Code goes beyond just complying with the laws and regulations. In order to collaborate with our business partners, we therefore consider it to be an absolute prerequisite that they

- // conduct all business on the basis of the applicable law
- // implement the principles of this Code
- // work towards ensuring that this Code is also implemented by their business partners.



Dr. Jörg Mosolf
Chief Executive Officer (CEO)



Gregory Hancke
Chief Operating Officer (COO)



Wolfgang Göbel
Chief Sales Officer (CSO)



Dr. Kersten Ruoss
Chief Financial Officer (CFO)

MOSOLF GROUP



CODE OF CONDUCT

INTRODUCTION

Since the establishment of the MOSOLF Group over 60 years ago – long before the term “compliance” became an important keyword on everybody’s lips – it has been a fundamental component of our corporate policy to

- // conduct business with integrity and fairness
- // take responsibility for our employees and the environment
- // base our activities on the applicable law of the countries in which MOSOLF operates.

This fundamental position is the basis of our actions to date and a key factor in ensuring the long-term and sustainable success of our company for the future.

This Code applies worldwide to all locations in the MOSOLF Group, as well as to us all: executives, managers and employees. Each individual must measure his or her actions according to these principles and be guided by them. It is the binding basis for our daily actions.

I. LAW AND RESPONSIBILITY

We comply with national and international laws, regulations and voluntary commitments, as well as with our internal company policies and guidelines. We thus avoid violating the law, which could lead to serious disadvantages such as claims for damages, reputational damage or fines.

II. FAIR MARKET BEHAVIOR

FREE COMPETITION

We are committed to complying with the applicable antitrust and unfair competition laws and want to continue to impress our customers by the quality of our services. We therefore view fair competition as a permanent motivation to achieve top performance.

Anticompetitive agreements are prohibited. In particular, no agreements are entered into with competitors regarding prices, offers, terms and conditions of business, capacity, sales quotas or market share.

Violations shall entail negative consequences, e.g. imprisonment or financial penalties, fines, absorption of profits and liability claims by third parties under civil law.

FIGHT AGAINST CORRUPTION AND AVOIDANCE OF CONFLICTS OF INTEREST

The initiation of business relationships and the performance of our business activity take place exclusively according to transparent and objective criteria, e.g. according to quality, price, technological standard or reliability of the business partner.

We take the ban on the acceptance and granting of benefits, bribery and corruption very seriously. Benefits granted at the time of important contractual negotiations are particularly critical. We therefore particularly avoid invitations and gifts or other benefits that go beyond the scope of reasonable or usual business practice and that may call into question professional objectivity and independence.

In decisions pertaining to purchasing, personnel and recruitment, there is a transparent and proper selection process in place according to objective criteria and not according to personal interests.



CODE OF CONDUCT

III. EMPLOYEES AND SOCIAL RESPONSIBILITY

Our success is based on our employees. Our dealings with one another and staff management are characterized by mutual esteem, integrity, transparency and equality of opportunity.

Nobody may be placed at a disadvantage, favored or harassed due to his or her race, ethnic origin, skin color, nationality, gender, religion or world view, physical constitution, age, sexual orientation, political or trade union involvement or other legally safeguarded orientation.

We are conscious of our responsibility toward our employees, we ensure safe and healthy working conditions and pay attention to compliance with the applicable legal regulations. Child or forced labor is of course prohibited.

IV. I. BUSINESS ENVIRONMENT DATA PROTECTION

DATA PROTECTION

The foundation for trustful relationships with business partners or employees is to exercise care in handling their information and data. In all of our business processes, we therefore ensure the protection of personal rights, while taking into account the applicable legal requirements. All employees are obliged to comply with the applicable data protection regulations. Personal data shall only be collected, processed or used if this is permitted by law or if the data subject is in agreement. In order to ensure data protection on an ongoing basis, we protect personal data from unauthorized access, loss or manipulation by using all of the technical and organizational means available while taking due consideration of the applicable national laws.

PROTECTION OF PROPERTY

We handle company property gently and carefully so as to protect against loss, damage, destruction, embezzlement, misuse, or theft. Each employee shall use work equipment and other company objects (e.g. computers, data storage media, documents, tools or spare parts, office material) that are company property only within the scope of carrying out his or her work duties, unless private use is explicitly permitted.

Everybody is obliged to keep sensitive business information and trade secrets confidential. When passing on information internally or externally, a check must first be carried out to ascertain if the recipient is authorized to receive this data/information. When dealing with confidential data and information of our customers, business partners and of third parties we also undertake to maintain confidentiality.

ENVIRONMENTAL PROTECTION

The basis of our ongoing economic success is to deal with the environment in a sustainable and responsible manner. Environmental regulations must therefore be strictly adhered to. The consumption of natural resources such as energy, raw materials and supplies should be as low as possible due to our day-to-day work.

V. CONCLUSION

We as a company and each one of us as individuals are responsible for complying with the applicable laws and internal policies and guidelines.

We shall not tolerate any misconduct or violations of this Code. We point out that violations may result in labor law sanctions such as termination, claims for damages, fines or other penalties. We therefore require – **in the interests of everybody** – that each employee adheres to this Code. Furthermore, violations of the applicable law, this Code of Conduct or internal policies and guidelines should be reported to supervisors, the HR department or management. Discrimination against informants shall not be tolerated. Information will be followed up on, and we shall take all necessary remedial measures. While doing so, we will proceed according to the principles of proportionality.

If our employees are uncertain about or have questions in relation to the Code of Conduct, they can contact their supervisor or the Legal or HR department at any time.

We thank our employees in advance for their participation in complying with these principles and for therefore actively contributing to securing the basis for a successful future for our company.



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