

CODE OF CONDUCT

LIVING OUR VALUES

POLICY OF INTEGRITY IN CONDUCT



emz – THE SMILING COMPANY



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DEAR COLLEAGUES,

As a company with a longstanding tradition, we have a significant obligation to society.

It is extremely important that the reputation we have built up among our business associates and in society with enormous energy, perseverance and constant commitment does not get damaged. We therefore adhere to ethical principles, applicable legislation, our values and internal rules.

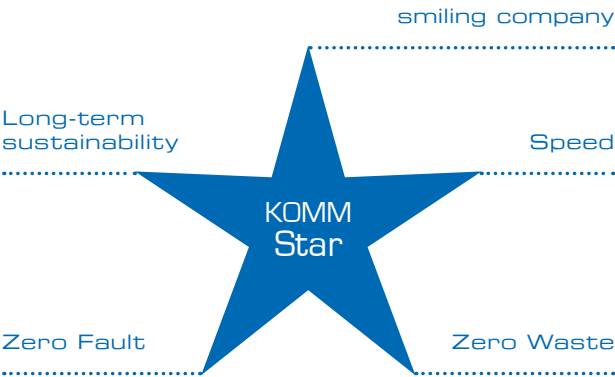
The following Code of Conduct is mandatory for every employee of the emz group.

We expect from all employees that they are familiar with the contents of this Policy as a basis for their daily work and that they act accordingly.

I. APPLICABILITY

This Code of Conduct sets out the essential principles of conduct for all emz employees (hereinafter referred to as “employees”) at all levels of the hierarchy in a clear and binding fashion.

II. GENERAL PRINCIPLES OF CONDUCT



1. Law-abiding conduct

Employees must not only comply with the applicable legislation and regulations of the countries in which we operate, but also with all internal regulations, standards and guidelines of emz. We attach particular importance to the observance and protection of human rights, the protection of fundamental rights at work, sustainable environmental protection and the fight against corruption. We expect all employees to always act lawfully in all matters regarding emz - regardless of whether

this benefits the company. Each employee is personally responsible for compliance with the laws in his or her area of work. It is strictly prohibited to induce third parties to commit unlawful acts or to knowingly participate in such acts. Within their area of responsibility, our executives in particular ensure that in addition to ethical principles, legal and internal provisions are also observed. Any non-compliant conduct will be punished regardless of the hierarchical position of an employee and independently of legal sanctions. We also expect our business associates to comply with the requirements of this Code of Conduct in view of acting with integrity.

2. Human rights

emz respects and supports internationally recognized human rights. Employees advocate a climate of mutual respect, trust, tolerance and fairness in their dealings with one another and with our business partners. They respect the dignity, privacy and personal rights of each individual.

3. No forced labour and no child labour

emz disapproves of all forms of forced labour, child labour and slavery. At emz, the minimum age for admission to employment in accordance with the statutory regulations is always observed.

4. Equal treatment and equal opportunities

emz does not tolerate discrimination based on age, political or religious opinion, disability, trade union activity, gender, colour, social or ethnic origin, sexual orientation or nationality. These

principles apply to the hiring of new employees, to employees in existing employment relationships and to the professional advancement of our employees. Only performance, personality, abilities and suitability are decisive in this respect.

Employees respect and protect the personal dignity of each individual. They shall not tolerate discrimination or harassment of other employees or third parties.

III. CONDUCT TOWARDS BUSINESS ASSOCIATES AND THIRD PARTIES

1. Competition and antitrust law

Employees of emz undertake to comply with the rules of fair competition and antitrust law within the framework of statutory regulations.

As a matter of principle, competitors are prohibited from colluding on, for example, territorial or customer allocation, agreements or the exchange of information on prices/price components, supply relationships and conditions thereof, capacities and supply behaviour, as well as market and participation strategies. In this regard, neither written contracts nor verbal agreements or tacit agreements are permitted. Agreements or the exchange of information on research and development projects are only permitted in very limited exceptional cases and upon consultation with the superior.

emz's market position must not be unlawfully exploited, for example, in order to enforce price

discrimination, the supply of unsolicited products or the refusal to supply.

2. Ban on corruption

Corruption is the collective term for all forms of bribery, along with accepting and granting favours. emz will not tolerate corruption or other conduct which could give the impression of illicit influence. An employee may not exploit the business connections of the company for his or her own benefit or for the benefit of others or to the detriment of the company. Conduct regarding the acceptance and distribution of gifts and other favours, including invitations, must be extremely restrictive.

In particular, none of our employees may grant or accept benefits in business operations (such as money, assets, services or other benefits, including invitations from or to suppliers or customers) which are likely to influence informed decision-making or compliance with regulations. Any other gifts or invitations must be approved by the superior or the Management. In the case of civil servants and other office-holders, benefits are on principle ruled out. In order to avoid legal consequences not only for emz and for the business associates involved, but also for themselves from the outset, each employee is responsible for informing him or herself about emz's internal guidelines in connection with favours. This essentially includes accepting and giving gifts, invitations and hospitality. Every employee must seek advice and/or assistance from his or her superior in the event of suspicion or legal doubt as to the existence of corruption or white-collar crime. Employees may also contact the Works Council or the Human Resources department.

3. Supplier and customer relations

Agreements met with customers and suppliers shall be complete and unambiguous. Subsequent changes and additions must be documented in writing. Suppliers shall be selected solely on a competitive basis after comparing price, quality, performance and suitability of the products or services offered. In this context, we pay particular attention to antitrust and competition law as well as international trade regulations. Commissions and remuneration paid to contracting parties, agents or consultants must be absolutely proportionate and reasonable in relation to the activities in question and must respect the principle of dual control.

4. Handling donations and sponsoring

emz donates money and goods for science and education, for culture and sport and for social concerns. As part of our social responsibility, we only donate and sponsor within the framework of the applicable legal regulations. We only make donations to institutions which are recognized as charitable or authorized to accept donations by special regulations. In order to ensure a transparent allocation of donations, the purpose, recipient and their donation confirmations are documented in writing.

IV. HANDLING INFORMATION

1. Data protection and data security

The protection of confidential, secret and personal data is a fundamental principle at emz. Our company collects, processes and uses personal data only to the extent necessary for specified, clear and legitimate purposes. emz makes sure that the use of data is transparent for those concerned, that their rights to information and correction as well as to objection, blocking and erasure are safeguarded.

2. Confidential Information

Our constant striving for innovation is a sustainable success factor in international competition. Intellectual property is very important to us and is protected accordingly against external access. Every one of our employees is obliged to keep confidential any business and trade secrets which have been entrusted to them or which have otherwise become known to them in the course of their business activities. Confidentiality shall be maintained with regard to work and matters (e.g. development or planning) which are essential to emz or its business associates and have not been made accessible to the public.

V. OCCUPATIONAL SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION

At emz, we pay attention to the applicable legal regulations and standards for a safe working environment and take appropriate measures to achieve this. It is the task of all employees to avoid endangering people and the environment, to minimize the impact on the environment and to use resources sparingly. It is the duty of the employees to ensure that processes, operating sites and equipment are in accordance with the applicable statutory and internal regulations about occupational safety and health and environmental protection.

VI. PRODUCT QUALITY AND SAFETY

At emz, the quality of our services and safety for our customers have the highest priority. All quality inspection requirements relevant to us must therefore be complied with. This includes the applicable legal requirements and regulations as well as internal control procedures.

VII. PROTECTION AND APPROPRIATE USE OF emz ASSETS

Every one of our employees may only use emz property for business purposes, unless exceptions allow private use. We expect our employees to handle emz property responsibly and with reasonable care and to protect it from damage and loss.

VIII. INFORMATION AND TRAINING

Our executives inform their employees about this Code of Conduct. They are responsible for ensuring that their areas of responsibility do not infringe upon any legal regulations or this Code of Conduct which could have been prevented or made more difficult by appropriate supervision. They must make it clear that violations of the law are disapproved of and lead to disciplinary consequences regardless of the hierarchical position of the employees in the company. As part of their role model function, they actively exemplify integrity in business life.

Employee training courses are held and documented on a regular basis in specific subject areas and risk areas.

IX. REPORTING AND NOTIFICATION

In order to protect employees, business associates, the environment and society, we consider it imperative that deviations from the principles of conduct set out in this Policy are reported immediately. In principle, all employees can use the following reporting channels for this purpose: 1. HR Department, 2. Management, 3. Superior 4. Works Council 5. Compliance Officer. Reports can also be sent by e-mail to **compliance@emz-hanauer.com**.

The Directors and the Management will not allow employees who make such a report in good faith to be discriminated against in any way. Each employee receives an appropriate feedback/response to his or her

notification. Upon careful examination, we will take appropriate measures to remedy the deficiencies as quickly as possible in each case reported.



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