

Compliance guidelines

Preamble

The company requires all of its employees to always act in line with the applicable law as well as the internal company guidelines. The basic pre-requisite for compliance in the company is the clear instruction of the company management to all employees that the laws are to be complied with and the – also clear - warning that breaches will not be tolerated. The compliance guidelines do not only require a conduct from all employees that is loyal to laws, but also include stipulations regarding the compliance with the anti-corruption law, for the avoidance of conflicts of interest when carrying out work, for the protection of the corporate assets and for data protection. The following guidelines include minimum standards for all employees.

§1 Principle

- (1) The employees must comply with all laws, regulations, internal instructions and guidelines, which are relevant in their field of work.
- (2) Employees are required to behave in an honest and fair manner in their working environment, with decency and integrity and to avoid any conflict between private and business interests. In addition, they should also pay attention in their private lives that they do not harm the good reputation of the company.

§2 Non-discrimination

The company does not tolerate any discrimination or harassment in the working environment whatsoever, whether owing to age, disabilities, background, gender, political beliefs or activity in a union, race, religion or sexual orientation.

§3 Data protection

- (1) The employees, who come into contact with personal details, i.e. with individual details about personal or factual circumstances of certain and definable natural persons within the framework of their activities, shall safeguard the data secrecy according to the current legislation. Personal data will not be processed, collected or used without authorization.
- (2) Confidential information and business documents must be protected against the insight of third parties and non-involved colleagues in a suitable manner.

§4 Communication

The forwarding of information about the company to the public may only be carried out with the approval of the management.

§5 No activities in violation of the law

- (1) The company does not tolerate any form of corruption or bribery whatsoever.
- (2) Employees may neither allow themselves to get involved in illegal processes, nor may they tolerate illegal acts in the working environment.

§6 Acceptance of gifts and invitations

- (1) The acceptance of gifts and other benefits is principally prohibited, if the interests of the company are affected negatively or the professional independence of the employees could be endangered, whether actually or apparently.
- (2) The acceptance of gifts and other benefits is permitted if the following pre-requisites apply:
 - The value of the gift is less than an orientation factor of € 25.00

§7 Granting of gifts and invitations

Granting of benefits or invitations to events without a prevailing business character may not be granted or announced with the intention to obtain unfair business advantages. The ban shall also apply even if there is only concern that such an intention is assumed or a conflict of interests could be assumed.

§8 Business partners

Before commencing business relationships with business partners, all business units must ensure by suitable measures that the business relationships have been reasonably examined, documented and are thus conducted.

§9 Report of breaches of compliance

The company expects its employees and business partners to report breaches of compliance, of which they gain knowledge, to the management.

§10 Disciplinary consequences of breaches of compliance

(1) The compliance with these guidelines is mandatory for all employees. Therefore, disciplinary measures will be initiated against each employee – irrespective of the sanction stipulated by law – owing to the breach of obligations under labour law. In particular the following disciplinary measures can be applied.

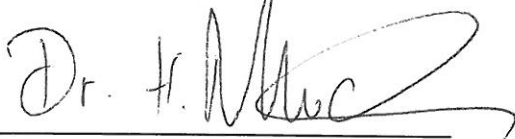
- Reprimand
- Warning
- Loss of voluntary remuneration components
- Loss of variable remuneration components
- Transfer to another position
- Termination

(2) The company can hold the employees responsible for the consequences of breaches of compliance and assert damages.

(3) Breaches of compliance can lead to consequences under criminal law for the employees.

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