

CODE OF CONDUCT

FISCHER  **PLATH**

Die Kunst des Dichtens.



CODE OF CONDUCT

The basis of our actions

Table of Contents

	Page
The basis of our actions	01
Table of Contents	02
Introduction	03 / 04
Preamble	05
1. Complying with the laws (Compliance)	06
2. Respect and equal treatment	07
3. Human rights and fair competition	08
4. Fighting corruption	09
4.1. What is corruption?	09
4.2. Behavioural guidelines - The dos and don'ts	09 / 10
4.3. We remain upright and act honestly	10
5. Treatment of donations and sponsoring	11
5.1. Donations	11
5.2. Sponsoring	11
5.3. Transparency and documentation	11
6. Avoiding conflicts of interest	12
7. Environmental protection	13
8. Work safety and health protection	14
8.1. Secondary employment	14
9. Protecting company property	15
10. Protecting trade secrets	15
11. Data protection and data security	16
12. Guidelines and reporting	17

Introduction

Dear Colleagues,

in this Code of Conduct document, Fischer & Plath GmbH describes the rules in relation to behaviour and ethical principles that form the basis of all economic activities of Fischer & Plath and its employees.

Responsible and ethical behaviour within the company, but also toward business partners, the company and the environment are an integral part of the value system Fischer & Plath. We also make the adherence with the laws and the guidelines listed here a precondition for our business partners.

Fischer & Plath places great importance on conveying clarity through the goals it sets itself and the strategy it pursues, but also through its values. In the course of the social development, values and standards are today more explicitly emphasised and more stringently handled.

The fact that we fully comply with all laws and legislation in our corporate actions is of course a given. Any infringements, on the other hand, are not compatible with our values, they also damage our reputation as a company and could furthermore result in serious legal consequences.

It is important for Fischer & Plath to always act in a way befitting its role as an economic and social player.

The behaviour of each individual employee has an influence on the way that third parties view us and our business activities.

In order to remain successful, I expect that each employee, irrespective of their position and department, assumes responsibility and adheres with the laws that are in place and with the company's own regulations.

Please continue to help guarantee and retain the integrity, the reputation and credibility of the company going forward into the future.

I'm relying on you!

I would like to extend my warm thanks to you all for your valuable contributions and your commitment to fostering and maintaining the values of Fischer & Plath.



Ralf Mertens
Managing Director
and Owner

Preamble

"We always behave honestly, reliably, we always pay close attention to our integrity and uphold these at all times. We always set a good example."

It is important for Fischer & Plath to have a common language and to have guidelines in order to strengthen our values and maintain these.

This code of Conduct has been drafted for all company employees. It is set down in this Code of Conduct what we at Fischer & Plath understand to be correct behaviour on the part of our company and employees - legally, economically as well as ethically. Our Code of Conduct supports the common corporate philosophy and sets standards for conduct in accordance with which we manage the company.

The guidelines are binding for all employees!

Each employee is obligated to comply with the applicable company-specific and legal regulations in the course of their professional actions and to actively ensure that the company's Code of Conduct is implemented. Fischer & Plath takes an open and transparent approach to management. It is for this reason that no employee may be put at a disadvantage when they comply with the provisions of the Code of Conduct and inform the management or a superior about any possible infringements of or conflicts with such Code of Conduct. Actions that are in contradiction of the principles of the Code of Conduct will not be accepted and can damage the company's reputation and result in serious consequences. Employees who violate applicable law or this Code of Conduct will have to expect disciplinary consequences.

It is for this reason that each individual employee receives a print-out copy and is obligated to learn the content and to apply and adhere with it at all times.

1. Complying with the laws (Compliance)

The word "Compliance" stands for the adherence with all legal provisions and regulatory standards, as well as for the adherence with all further important ethical standards and requirements that a company voluntarily imposes upon itself and in accordance with which it acts.

Fischer & Plath always acts honestly and in compliance with the law.

Our business partners can fully rely on our law-abidance and we equally expect from our customers, suppliers and business partners that they comply with all laws and legislation in their business practices.

All actions, contracts, measures and all other procedures at Fischer & Plath are subject to the strict rule of law.

Fischer & Plath strictly forbids the prompting of third parties to undertake any illegal actions or to knowingly partake in such illegal actions. Should you become aware of any such actions, you are obligated to immediately notify your superior, the HR department of the company management of such actions.

All department heads and members of management are responsible for ensuring that no violations of legal regulations or these Code of Conduct take place within the departments for which they are responsible, which they could have prevented or at least hampered through appropriate supervision and proper discharging of their duties. They are required to make it absolutely clear that a "Zero Tolerance Principle" exists when it comes to violations of the law and that any violations will invariably result in disciplinary consequences.

2. Respect and equal treatment

"Human dignity is inviolable."

The first article of the German Constitution

Fischer & Plath respects and protects the personal dignity of each individual and expects from each single employee that they behave in a polite, friendly and pertinent manner toward colleagues and, of course, toward our business partners.

We live and foster a diverse working environment, where all employees are treated with respect and dignity.

This is why we do not tolerate any form of discrimination or harassment within our company. No one may be incorrectly treated, harassed, disadvantaged or excluded, and in particular not because of their sex, age, ethnic background, skin colour, nationality, religious beliefs, ideology, physical constitution, disability, appearance or sexual identity. The same applies with respect to the principles of equality and equal opportunity.

All decisions made with respect to members of staff such as, for example, recruitment, hiring, transfers, promotions, remunerations, disciplinary measures or dismissals are carried out in accordance with the same premise.

Furthermore, sexual molestation or any other form of harassment in the work place is strictly forbidden. Harassment should be understood to include verbal, physical or visual actions whose purpose or effects are offensive, hostile or threatening situations.

The superiors or HR managers are to be involved in the event of conflicts. The personal dignity, the privacy and the right to privacy of each individual employee must be respected. Absolutely no form of discrimination whatsoever will be tolerated.

3. Human rights and fair competition

3.1 Human rights

The compliance with and support for international human rights is always, at all times, a fundamental component that influences our business relationships with both customers and suppliers, but first-and-foremost with respect to our employees.

We strictly reject forced labour, child labour and all forms of exploitation or discrimination and ensure compliance with the corresponding laws. We make it a precondition that our customers, suppliers and business partners have also made the commitment to comply and support international human rights.

3.2 Fair trade and antitrust law

Fischer & Plath fully supports the principles of free enterprise and we pledge to adhere with the principles of free and fair competition. We do not conspire to make secret agreements with respect to process, markets, customers, products or any other aspects or topics that have relevance for the market.

All Fischer & Plath employees are obliged to comply with the provisions of antitrust and competition laws. The company forbids every type of action or behaviour that has the goal or effect of hampering, limiting or distorting free and fair competition. This means, for example, that none of our employees may have meetings or discussions with competitors during which prices, quality or other relevant internal production matters are discussed and coordinated. Arrangements with competitors and third parties in relation to non-competition agreements, the submission of sham offers or the distribution of customers, sales regions or production programmes are also not allowed. Beyond this, we also expect that our business partners fully recognise and comply with their own responsibility with respect to ensuring fair competition.

Our company has enjoyed over 55 years of success, and this success has been based solely on our entrepreneurial success factors, our ethical behaviour and, in particular, our quality, reliability and fairness.

4. Fighting corruption

"Corruption and bribery, granting and accepting advantages is in complete contradiction of our entrepreneurial principles and ethical maxim, and are strictly forbidden as a result. Corruption counteracts fair competition and can damage Fischer & Plath not just in a business sense, but also in terms of its reputation."

Quote from Ralf Mertens

4.1. What is corruption?

Corruption is defined as a form of behaviour that aims to influence the actions or decisions in the business world in a certain way. Corruption is criminal offence.

4.2. Behavioural guidelines - The dos and don'ts

- Gifts and/or contributions provided within the framework of invitations or in conjunction with advertising measures that have the sole purpose of fostering business relationships or in order to present our products or services are - as long as they are modest - allowed if they correspond with our standards and are common in the given business arena and are ethically impeccable.
- Such gifts and/or contributions may, however, only be provided or accepted as long as they serve as justified business purpose and are not provided or accepted as quid pro quo and for an illegal advantage. Gifts (promotional items), such as, for example: pens, notepads, wall calendars, etc. may be provided and received.

4.2. Behavioural guidelines – The dos and don'ts

- The value of the gift should not exceed a maximum of €10. If, due to marketing activities, a different, higher value should come about, than this needs to be approved in advance with marketing management.
- If you receive personal gifts of a higher value, or if you are unsure whether you may accept a gift, please consult your superior or ask in the HR department.
- Gifts that exceed the value of €10 and which appear suspicious upon further examination should be handed in to the HR department and Fischer & Plath will either return the gift to whoever provided it or it will be donated to charity within the framework of the company's sponsoring activities.
- If Fischer & Plath becomes aware that an employee has gifts sent to their private address in order to circumvent this regulation, the employee will have to expect disciplinary consequences or even dismissal.

4.3. We remain upright and act honestly

It is for this reason that Fischer & Plath, and on its employee's behalf, pledges never to illegally influence, or have others illegally influence, suppliers, business partners or third parties through benefits in kind, monetary payments, services, hospitality or gifts and to always comply with this regulation. No personal advantages may be demanded, accepted, offered or provided within the framework of our business activities.

5. Treatment of donations and sponsoring

5.1 Donations

We are aware of our social responsibility and contribute donations in order to foster education, culture, social or humanitarian projects. Fischer & Plath makes donations – this means payments made on a completely voluntary basis without any expectations in return.

5.2 Sponsoring

We use our sponsoring activities in order to regularly pursue, also our own company-related, advertising goals or public relations work. With our sponsoring activities, we support art, culture, education, scientific, sport and social projects.

When it comes to donations and sponsoring, we ensure a correct and transparent approach and we only make donations and provide sponsoring within the respective valid laws and in compliance with our own internal regulations that govern this issue. We only make donations to institutions that are recognised as charity organisations or which are entitled to accept donations on the grounds of a special regulation.

The provision of donations and sponsoring is done transparently. Purpose, donation recipient and confirmation of the receipt of donations by the recipient are to be documented and need to be verifiable at all times.

5.3. Transparency and documentation

We at Fischer & Plath stand for absolute transparency when it comes to absolutely all procedures, decisions and actions. We guarantee this through maintaining written documentation and regular controls. Internal as well as external data acquisition, recordings and reports need to be true, correct and complete. In all processes we expect our employees to demonstrate a level of care, as well as the compliance with laws, internal regulations and standards.

6. Avoiding conflicts of interest

In our daily work, we could well be faced with situations where we must make decisions where the interests of the company are in contradiction to our personal interests, which means that decisions can no longer be taken in an unbiased manner in the best interests of the company.

We expect from all employees that they adhere with these highest of ethical standards. Private interests and the interests of Fischer & Plath need to be distinguished between in the strictest sense. It is for this reason that all employees should avoid situations which could lead to such conflicts of interest.

In the course of their contacts with existing or possible future customers, suppliers, business partners and third parties, these employees must act in the best interests of Fischer & Plath in exclusion of any and all personal advantages.

Each employee is obliged in the event of any possible conflict of interest to inform their superior or the HR department in order to bring about a fast clarification of the situation.

7. Environmental protection

The responsible use of energy, natural resources and sustainability have a very significant importance both for the economy and wider society in general. Companies are no longer judged just on their financial success alone, but also on their ecological and social related actions.

Fischer & Plath has already been assuming its responsibility towards its employees, the environment and society and has been working consistently to reduce its environmental impacts, as well as optimising its environmental protection measures. The compliance with all laws in place to protect people and the environment is one of our fundamental corporate principles. This applies to our work processes and our products.

Each employee is obliged for this reason to use natural resources responsibly and to protect the environment in their particular work area/department, not to waste energy and to avoid waste or to reduce the amount produced as much as possible.

Detailed information on the Fischer & Plath Environmental Management-System (UMS) in accordance with ISO 14001 is openly available for you to view in our Intranet.

8. Work safety and health protection

Health and safety are of elementary importance to us. We act in keeping with our responsibility for the safety and health of our employees. We guarantee work safety and health protection within the framework of the respective valid provisions, as well as on the basis of our internal health and safety at work policy.

Our high safety standards, industrial safety measures and the constant qualification and training should provide our employees with the best possible protection against injuries and accidents.

Our goal and our daily challenge is to reduce the amount of accidents to close to 0% as possible.

Through constant improvements to the working environment and through diverse training measures, we maintain and foster the health, performance capabilities and job satisfaction of our employees.

Each of our employees contributes to their own health and safety in their workplace and is personally responsible that they are always safe while working and that they comply with all laws and provisions, as well as the company's own internal guidelines governing health and safety.

8.1. Secondary employment

Employees may pursue secondary employment, but each employee is, however, required to adhere with the legal provisions of work-safety law. The secondary employment is only allowable, however, as long as it does not result in an impairment of the work performance, the duties within and toward the company, or when the danger of a conflict of interest exists. Holidays are for the purpose of fostering health and/or regaining full health, and it is for this reason that secondary employment on those days when holidays have been taken is not allowed. It is one of the obligations in an employee's work contract that they are required to collect an approval for secondary employment from the HR department.

9. Protecting company property

Each employee is obligated to treat all company property with care and respect.

No Fischer & Plath employee is entitled to use company equipment, irrespective of what it is, for personal purposes, unless this personal use by the employee is authorised by the employee's work contract, a separate agreement or has been expressly allowed by the respective employee's superior.

This applies principally to the use of telephones, computers (e.g. the installation of non-company software), the use of the internet, as well as the sending of e-mails and the use of company cars. No company property may be removed from the company grounds/premises without express allowance to do so being acquired first in advance.

Each employee is obliged to protect the company's property from loss, theft or misuse.

10. Protecting trade secrets

Our know-how and our experience are fundamental for the long-term success of our company.

It is strictly forbidden to pass on internal company information on topics such as prices, suppliers, customers, employees and business partners, as well as to unauthorised parties both inside and out of Fischer & Plath. This applies in equal measure to business strategies, constructions, developments or contents of internal reporting.

Each employee is obliged to keep all information in relation to operating and business activities of which they become aware, completely confidential.

This applies to both the duration of the employment with the company, as well as for the time after this employment has ceased.

11. Data protection and data security

11.1. Data protection

The protection of confidential and personal data is one of the cornerstones of how we conduct our business.

If and when we record, save, process or transfer personal data, this happens exclusively in full compliance with all applicable laws and legal provisions.

We pledge that our use of their data is completely transparent for the person affected, and that their rights with respect to receiving information pertaining to them and correction, and possibly also contradiction, blocking and deletion of such personal data is guaranteed.

11.2. Data security

We protect personal and business-related information against unauthorised access, loss or manipulation. In order to ensure this, we use a variety of the very latest technological and organisational means available, while complying completely with all applicable laws at the same time.

We ensure that the data available to us is not passed on to third parties and that all the personal rights of our contact partners are safeguarded.

Each of our employees is obliged to adhere with the data-protection provisions, as well as the legal and operational regulations in relation to information security, and to protect the confidential, secret and personal data entrusted to Fischer & Plath against abusive use and to prevent unauthorised internal and external use.

12. Guidelines and reporting

Nothing can replace the personal integrity and plain old common sense on the part of each employee at Fischer & Plath.

If you should be unsure if a decision or an approach is in keeping with the requirements of our Code of Conduct, the answering of the questions with the thumb up - thumb down" method serves as an initial pointer with respect to what behaviour is permissible:

- Is my behaviour legal and is it in compliance with the company's guidelines?
- Am I acting in the best interests of the company and free of any competing or other reasons for my actions?
- Do my actions correspond with those of my colleagues and the values promoted by Fischer & Plath?
- Would I pull myself up due to my behaviour?
- Is the good reputation of Fischer & Plath maintained due to my behaviour?

If you can answer all questions with "yes", then your behaviour is with great probability in conformity with the regulations, responsible and acceptable. If, however, in your case any doubts still exist in relation to one of these questions or if your doubts are due to something completely different, please go to your superior or the HR department for advice and assistance.

Openness, trust and transparency with respect to possible conflicts and the discovery of violations help during the implementation of this Code of Conduct. Violations that are reported will be carefully examined and will result in disciplinary consequences for the affected employee should they be confirmed. The intentional reporting of false claims will also be punished with disciplinary measures.

Employees who honestly report violations will be protected by Fischer & Plath and will have no personal consequences to fear.