

## "Anti-Corruption" Code of Conduct of the Aumann Group

Our success is based on trust, reliability and responsibility: between one another and towards business partners and investors – all around the world. We convey all of this by way of legally compliant business conduct. We are committed to convincing business partners with the quality of our products and services and to obtaining orders through fair competition.

When dealing with business partners (customers, suppliers) and governmental institutions, business and personal interests are strictly separated from each other on both sides. Actions and purchasing decisions are carried out without taking into account any irrelevant considerations. We expect compliance with applicable anti-corruption regulations from all employees, regardless of their position in the company, as well as from our business partners.

Customers, business partners, or third parties may not be offered, promised or granted, directly or indirectly, advantages in order to improperly obtain orders or any other kind of benefit in the course of business transactions.

The sole exceptions are generally accepted commercial gifts of demonstrably low value. Any appearance of dishonesty and impropriety must be avoided.

Officials may not be offered, promised or granted, directly or indirectly, any advantages. Nor may they receive commercial gifts.

In turn, employees of the Aumann Group may not use their position in the company to improperly demand, receive a promise of, or accept advantages.

Payments with no legal or objective basis may not be made or accepted.

The improper provision and acceptance of gifts and other benefits is not permissible to the extent that it indicates or suggests – whether through the type, value or circumstances of the gift – any kind of undue influence. Therefore, a strict standard must be implemented in order to completely avoid any appearance of irrelevant considerations. Gifts that do not appear appropriate in accordance with this strict standard and that also cannot be politely declined due to the specific circumstances will be raffled off within the Aumann companies through a sweepstakes with neutral criteria.

Invitations to business, information and ongoing education events, plant tours, etc., as well as cost coverage in this context are allowed, provided there is a legitimate business purpose and that the costs remain within reasonable limits, as well as in direct connection. Invitations to any



sporting, cultural or similar events that are not in direct connection with any kind of professional appointments may only be accepted after receiving the approval from your superiors beforehand. In particular, as a general rule, the involvement of personal guests contradicts the professional nature of the occasion.

Hospitality in the context of professional events is provided only to an appropriate and socially adequate extent.

Orders, releases or similar elements to and from a business partner with whom there is a familial or other close relationship require the approval of a superior.

Employees of the Aumann Group shall pay the usual market price and document the payment when and if they procure goods and services from suppliers, dealers or customers for private purposes.

Sponsorship for the purpose of promoting the image and the products of the Aumann Group is never done for the benefit of individuals involved in business decisions.

For us, donations are not a means to further business interests.

Every private and personal interest that might come into conflict with the fulfilment of professional duties must be reported to a superior.

In the event of professional activity extending outside of Germany, stricter local regulations may potentially apply. The distinction between the private and the public sector and the public service status as well as the circle of duties must also be based on local law.

For any contracts with consultants or intermediaries, it must be ensured that they also do not improperly offer or accept advantages.

Every Aumann AG employee is responsible for the lawfulness of their own actions. In case of doubt, the immediate superiors must be contacted. If there is any need for clarification regarding rules and regulations, the companies' compliance officers are also there for you. They can also provide assistance in cases of doubt and tip-offs, and are also available to our business partners, from whom we naturally also expect legally compliant conduct.

Beelen, June 2018  
The Executive Board

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