

SUPPLEMENT TO THE CODE OF CONDUCT OF THE ARBONIA GROUP



PURPOSE OF THE CODE OF CONDUCT

The Code of Conduct sets out guidelines for the worldwide activities of all employees¹ of Arbonia AG and its group companies (hereinafter referred to as the „Arbonia Group“). This supplement to the Code of Conduct applies to all employees of the Arbonia Group, although some of the topics are specifically aimed at employees in production.

BASIC VALUES

The values of commitment, responsibility, trust and cooperation are at the forefront of our activities and are taken into account by all employees in the execution of their work.

We comply with applicable laws and internal standards of conduct to protect our most important asset, our reputation in the market.

WORKING CONDITIONS

We guarantee fair and non-discriminatory working conditions. Conflicts in everyday working life are solved fairly.

We respect each other and do not discriminate against anyone on grounds of nationality, gender, age, religion or personal characteristics.

We refrain from disparaging statements and actions towards other persons as well as bullying, i.e. negative actions directed against a person.

We intervene and prevent employees from being harassed or subjected to bullying by directly addressing or informing the superior.

OCCUPATIONAL SAFETY

We create and maintain a safe working environment in order to avoid accidents as far as possible.

The safety regulations (e.g. wearing special shoes and clothes) must be observed without exception. In particular, safety devices on machines must not be manipulated or removed.

All accidents, hazards or concerns regarding safety at work must be reported to the superior or management board and where possible hazards must be eliminated as soon as possible. In addition, accidents must be reported to the respective insurance companies via the employees responsible within the Arbonia Group.

Drugs and alcohol can endanger your own safety as well as the safety of others. The use of drugs and alcohol before starting work or during working hours is prohibited.

ASSET PROTECTION

Each of us is committed to protecting the assets and financial and other resources of the Arbonia Group from theft, loss, misuse and waste and to handling them with care.

Waste products generated in the course of production or other business activities belong to the Arbonia Group. They may only be used privately or given or sold to third parties with the prior express written approval of the respective management board or a responsible person appointed for this purpose.

PRIVACY

We treat internal information concerning the company and our customers confidentially. This confidentiality obligation applies not only during the employment relationship but also beyond the end of the employment relationship.

Confidential information includes in particular specific details about the organisation and facilities of the Arbonia Group as well as prices, terms and conditions, revenue, profit, market share, customers, business partners, strategy, manufacturing operations, research and development projects and internal figures.

BAN ON BRIBERY AND CORRUPTION

We convince the market with our products and the quality of our services. The payment of bribes and the granting of other personal benefits (e.g. valuable gifts and costly invitations) that are likely to influence business operations are prohibited.

It is also forbidden to accept bribes or other personal advantages. One-off symbolic gifts (e.g. a bottle of wine; but never cash payments) and invitations of small value (e.g. an invitation to lunch) may be accepted exceptionally, provided no consideration is expected in return.

PRODUCT SAFETY

We see ourselves as partners to our customers and attach great importance to long-term customer relationships. Our aim is therefore to offer our customers safe and flawless products and services of high quality.

Products and services must not have defects or hazardous properties that could impair the health of persons or damage property. Defects in products or concerns about their safety must be reported to the superior or management board.

ENVIRONMENTAL PROTECTION AND RESOURCE CONSERVATION

We operate our business as energy- and resource-efficiently as possible and attach importance to the responsible and environmentally friendly use of resources (water, energy, materials, etc.) in the manufacture and sale of our products and services. Every employee has the responsibility to use resources sparingly.

We comply with environmental and water protection laws and regulations and conduct our business in an environmentally conscious manner.

RESPONSIBILITIES AND REPORTING OF INFRINGEMENTS

Each person is responsible for complying with these principles and it is expected that each employee knows and implements them. Superiors support their employees in this and ensure that the principles are known and adhered to.

We cultivate open communication. We are honest and direct and dare to express criticism, but in a way that is constructive, respectful and always for the good of the company.

Based on these values, all employees are required to report violations of these principles to their superiors, managing directors, human resources managers, works councils or employee representative. If it is not possible or desirable to report to these persons, the following persons and bodies can be referred to:

- Head of Division
- Head of Legal & Compliance (wb-compliance@arbonia.com / +41 17 447 45 80)
- Head of Internal Audit (wb-internalaudit@arbonia.com / +41 71 447 45 81)

HELP AND CONTACT PERSONS

Arbonia encourages all employees who are uncertain about the application of the Code of Conduct to seek advice from their superior, managing director, human resources manager, works council, employee representative, head of division or Head of Legal & Compliance.

Arbon, 22 August 2018

¹ If this text refers to employees, it always both male and female persons.