

Code of Conduct



I. Preamble

This Code of Conduct applies for Anton Weiss GmbH, the company's management and the company's employees and shall serve as the basis for all business relationships of Anton Weiss GmbH.

The ethical guidelines described in this Code of Conduct are based, in particular, on the principles of the UN Global Compact, the ILO conventions, the United Nations Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination Against Women and the OECD Guidelines for Multinational Enterprises.

Sections II through V below constitute minimum standards intended to avoid situations which could challenge the integrity of the company and their employees.

Anton Weiss GmbH observe the principles of the Global Compact and work toward achieving its goals through the conduct of their company management.

II. General principles and laws

Anton Weiss GmbH undertake to fulfil their responsibility to society in all their business activities. In all their business dealings and decisions, Anton Weiss GmbH undertake to observe the respective applicable laws and other relevant provisions of the countries in which they operate. Business partners are to be treated fairly. Contracts are upheld, and amendments to the framework conditions are taken into account.

III. 1. Corruption, antitrust law, forced labour and child labour

a) Corruption

In dealing with business partners (customers and suppliers) and state institutions, the interests of the company and the private interests of employees on both sides are to be kept strictly separate. Actions and (purchase) decisions are taken without regard to irrelevant considerations or personal interests.

The respective applicable anti-corruption criminal law is to be complied with. The following, among other things, must be noted:

Offences involving public officials:

The granting of personal benefits (in particular, benefits in kind such as payments and loans, including the giving of smaller gifts over a longer period of time) by Anton Weiss GmbH and their employees to public officials (such as civil servants or public employees) with the objective of receiving benefits for Anton Weiss GmbH or oneself or third parties is not permitted.

Offences in business transactions:

Personal benefits in kind as consideration for preferential treatment in business transactions may be neither offered, promised, granted nor accepted. Likewise, personal benefits may be neither requested nor accepted when dealing with business partners. Anton Weiss GmbH must forbid their employees from allowing themselves to be promised corresponding benefits.

In the course of business, the management and employees of Anton Weiss GmbH may not offer, promise, request, grant or accept gifts, payments, invitations or services which are intentionally granted in order to influence a business decision in an impermissible way or where there is a risk of compromising the professional independence of the business partner. This generally does not apply in the case of gifts and invitations which are part of normal business hospitality, custom and courtesy.

Anton Weiss GmbH can issue a binding guideline on the acceptance and granting of gifts, invitations to hospitality and events. Exceptions with regard to appropriate low-value and symbolic gifts, appropriate business meals and events of the company themselves and from business partners (customers and suppliers) may be regulated in such a guideline. The guideline is to be communicated (published) transparently within Anton Weiss GmbH and to existing and potential business partners.

Anton Weiss GmbH shall make available a contact person who may be contacted should employees of Anton Weiss GmbH experience a conflict of interest or be unsure as to whether a conflict of interest has arisen or could arise.

b) Behaviour toward competitors (antitrust law)

Anton Weiss GmbH respect fair competition. For this reason, Anton Weiss GmbH comply with the applicable laws which protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition.

In dealing with competitors, these provisions forbid, in particular, agreements and other activities which may affect prices or terms and conditions or which in any way present an obstacle to the assignment of sales territories or customers or an impediment to free and open competition. Furthermore, these provisions prohibit agreements between customers and suppliers, by which customers are to be restricted in their economic freedom to autonomously determine their pricing and conditions when reselling (price and condition determination).

In view of the fact that the distinction between impermissible cartels and permissible cooperation can be difficult to determine, Anton Weiss GmbH shall make a contact person available to their employees who can be contacted in instances of doubt.

c) Forced labour and human trafficking

Anton Weiss GmbH reject all forms of forced labour and human trafficking.

d) Child labour

Anton Weiss GmbH observe the United Nations conventions on human rights and the rights of children. In particular, Anton Weiss GmbH undertake to comply with the Convention Concerning the Minimum Age for Admission to Employment (Convention 138 of the International Labour Organisation) and the Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organisation). Should a national provision concerning child labour provide for stricter measures, they shall have precedence.

III. 2. Principles of social responsibility

a) Human rights

Anton Weiss GmbH respect and support compliance with internationally recognised human rights.

b) Discrimination

Anton Weiss GmbH undertake to fight any form of discrimination within the limits set by the applicable laws. In particular, this concerns the discrimination of employees based on sex, race, disability, ethnic or cultural origin, religion or world view, age and sexual orientation.

c) Health protection

Anton Weiss GmbH ensure occupational safety and health protection at the workplace within the framework of the national provisions. Anton Weiss GmbH support continual further development for improving the world of work.

d) Fair working conditions

Anton Weiss GmbH respect the right to freedom of association and the working hours of their employees within the framework of the respective applicable laws.

e) Environmental protection

Anton Weiss GmbH are sustainably committed to the objective of environmental protection for current and future generations. Laws enacted for protection of the environment are to be

observed. Anton Weiss GmbH use resources sparingly and keep the impact on the environment to a minimum. Anton Weiss GmbH support the environmentally conscious conduct of employees.

f) Business secrets

Anton Weiss GmbH oblige their employees to keep operational and business secrets. Confidential information and confidential documents may not be passed on to third parties without permission or otherwise made accessible unless permission has been granted for this purpose or the information concerned is publicly available.

IV. Suppliers

Anton Weiss GmbH are encouraged to convey the principles of this Code of Conduct, Section III 1. and 2., to their direct suppliers, promote compliance with the content of the Code of Conduct, Section III 1. and 2., with their suppliers to the best of their ability and to encourage them to also follow the Code of Conduct, Section III 1. and 2.

Anton Weiss GmbH are also encouraged to recommend that the suppliers of their suppliers also follow the Code of Conduct. Moreover, Anton Weiss GmbH undertake to follow and comply with the principles and provisions of the German Supply Chain Act and to implement these principles in their everyday working life to the best of their ability.

V. Compliance

Anton Weiss GmbH reserve the right to introduce further conduct guidelines with stricter requirements regarding ethical action for themselves and their employees.

Anton Weiss GmbH undertake to make known to their employees the content regulated in this Code of Conduct and the obligations that result from it.

Anton Weiss GmbH undertake to ensure that the company follow the principles of this Code of Conduct, in particular by developing and adapting guidelines and processes if applicable.

Through the use of suitable organisational provisions, Anton Weiss GmbH shall ensure that the Code of Conduct is complied with by Anton Weiss GmbH and their management. This occurs in particular through the introduction of, and adherence to, appropriate checks and plausibility assessments.

APPENDIX

United Nations Global Compact

The ten principles:

The principles of the UN Global Compact are based on an international consensus with regard to

- the Universal Declaration of Human Rights.
- the International Labour Organisation Declaration of Fundamental Principles and Rights at Work.
- the Rio Declaration on the Environment and Development.
- the United Nations Convention Against Corruption.

The Global Compact asks companies to recognise, support and implement, within their sphere of influence, a set of core values in the areas of human rights, labour standards, environmental protection and the fight against corruption:

Human rights

1. Businesses should support and respect the protection of international human rights within their sphere of influence and
2. ensure that they are not complicit in the violation of human rights.

Labour standards

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining and stand up for
4. the elimination of all forms of forced and compulsory labour.
5. the abolition of child labour.
6. the elimination of discrimination with respect to employment and occupation.

Environmental protection

7. Businesses should support a precautionary approach to environmental challenges,
8. introduce initiatives to promote a greater sense of responsibility for the environment and
9. promote the development and dissemination of environmentally friendly technologies.

The fight against corruption

10. Businesses should stand up against corruption in all its forms, including extortion and bribery.