

Rules of conduct
for employees
of the RENOLIT
Group worldwide



The RENOLIT Group: Our Code of Conduct



Rely on it.

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A winning team!

The key to our success is a trusting and partnership-based co-operation, both within our organisation and with our business partners. Trust, respect and commitment are fundamental to this.

As a family company we bear a particular responsibility. Our good reputation is founded on the day-to-day commitment of our employees in their daily work. This Code of Conduct assists us in observing rights and complying with laws, in doing so caring for people and the environment. We foster employee interaction in our daily work that seeks to avert harm resulting from non-compliance of laws or a lack of transparency.



Michael Kundel
CEO

Sven Behrendt
Executive Board Member

Karsten Jänicke
Executive Board Member

Thomas Sampers
Executive Board Member



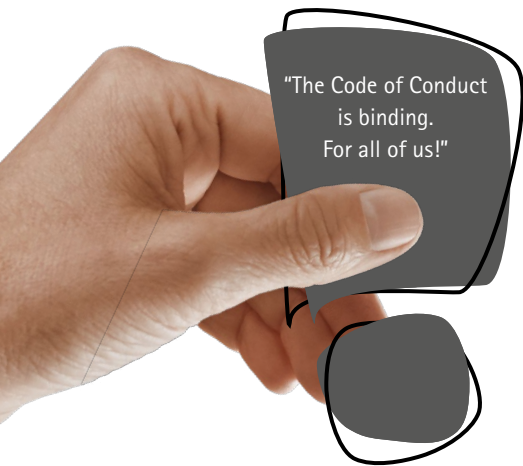
FAQ's

Is a Code of Conduct really necessary?

The **RENOLIT Group** operates in a wide variety of markets and legal structures, with hugely diverse cultures throughout the world. This operating environment calls for a uniform approach in the form of a common **RENOLIT** culture, on which basis our business operates and ensures respectful interaction with one another. In view of this, such a Code of Conduct is both pertinent and essential in affirming our expectations and obligations, whilst providing clear guidelines.

1 Scope of application

Every employee of the **RENOLIT Group** must meet the requirements of the Code of Conduct. Failure to comply with the Code may lead to disciplinary measures and legal consequences.



FAQ's

Does the Code of Conduct apply to all employees?

The Code is binding for all employees of the **RENOLIT Group**. This also includes staff from temporary employment agencies.

2 Laws and regulations

We adhere to values such as honesty, integrity and human dignity. The **RENOLIT Group** informs its employees about legal regulations, working conditions, environmental protection, anti-trust law, fair competition, the prevention of bribery and corruption and the protection and recognition of intellectual property.



3 Business conduct and reputation of the company

All employees are committed to acting responsibly and fairly in their daily business dealings with customers, suppliers, colleagues and all other stakeholders. All **RENOLIT** employees are ambassadors who contribute to the company's reputation.



4 Dealings with third parties

4.1 Business partners, authorities and consumers

RENOLIT's business practices are based on the universal values of fairness and honesty. We are trustworthy in our dealings with business partners, authorities and consumers and maintain political neutrality.



FAQ's

Does the Code of Conduct also apply to our external business partners (trading partners, suppliers, etc.)?

The Code of Conduct provides the basis for our business relations. As such, behaviour in line with our Code is desirable. As our trading partners are fully independent legal entities, however, this Code is not binding for them.

4.2 Competition and anti-trust law

FAQ's

A competitor grants its customers large discounts to boost its market share. Is it expedient to agree to a cap on discounts with them?

Agreements on discount levels or absolute prices both fall under price fixing and are thus in breach of anti-trust law. Such agreements are unlawful and may result in anti-trust fines amounting to up to 10% of consolidated annual turnover.

National and international fair competition rules and anti-trust law are to be adhered to. Agreements on prices and conditions are not allowed. Allocations of customers and territories are also unlawful, as are the submission of sham bids for tenders or other forms of collusion with competitors.



4.3. Trade secrets

All trade secrets must be treated confidentially. They must not be publicly communicated or passed on to third parties (except where a corresponding exemption applies). This provision shall continue to apply to employees after they end their employment with our company.



FAQ's

A friend recently started working for one of our competitors and is very interested in organisational details at RENOLIT.

Am I allowed to talk to him about that?

No, as you would be disclosing confidential company information.

4.4 Granting and accepting benefits and gifts

FAQ's

I won't receive a large order in another country unless I bribe a local official (customs, import, etc.). Bribery is commonplace in the country concerned. How should we approach this matter?

As a fundamental principle, we do not pay bribes. Either we find a legal way of obtaining the order or we will have to do without it.

Persons acting on behalf of RENOLIT must not use their official position to directly or indirectly promise, accept or demand benefits in an unauthorised manner (e.g. gifts of money or other benefits). This also applies to RENOLIT contracts with advisors, intermediaries or agents.

A blue speech bubble with a black outline. Inside the bubble, the text reads: "Not sure whether you're permitted to accept a gift? Ask your supervisor or line manager."

It is permissible to give and accept business gifts of minor value, provided that they do not give rise to any obligation. Where giving presents is a matter of courtesy in a country, it must be ensured that no obligations arise as a result and that the local laws and regulations are adhered to.
If in doubt, contact your supervisor or line manager.

FAQ's

A customer invites me out for a meal and afterwards it is planned to go to a nightclub for a couple of drinks. As it's my first time in the town, I would like to check out both places. Am I allowed to accept the invitation?

In principle, yes, as long as the nature and price level of the establishment would not give rise to any compromise or obligation on your part. As a company representative you are expected to behave in an appropriate manner, since RENOLIT's reputation is a consequence of the daily engagement of its employees and must be upheld. If in doubt, ask your supervisor or line manager.


4.5 Handling donations and sponsorship

FAQ's

The volunteer fire brigade where I live has asked me whether RENOLIT would like to help fund their anniversary celebration. To whom should I refer the matter?

Please contact your site manager, who will consult the Board on the amount of any contribution.

The local management decides on any donations which are to be made. The amount to be donated is to be cleared with the Board. Donations to church institutions and political organisations such as parties, trade unions or NGOs are prohibited without exception. Sponsorship of sports associations and sporting events is not generally allowed. An exception however may be made for individual sporting events in which there is a substantial participation of RENOLIT employees.



"Sponsoring requires the approval of the Board and Corporate Communications."

"The management and the Board decide on donations and the amounts to be donated."

4.6 Money laundering

RENOLIT supports all measures required to prevent money laundering taking place in its sphere of influence.

4.7 Embargo and export control

RENOLIT complies with the regulations in the area of export control in national and international trade.



4.8 Avoidance of conflicting interests

In order to avoid any conflicts of interests or loyalty, RENOLIT must be informed of any secondary employment with or investments held in business partners or competitors of RENOLIT. This does not apply to exchange-traded securities.



FAQ's

In the course of my daily work at RENOLIT, I have become aware that a business partner of ours will be in a more unfavourable position in the future. I own shares in this company. Can I sell these shares, even though I obtained this information as a result of insider knowledge?

As a general principle, you are not allowed to use information obtained from your daily work for your own purposes. In the case of share dealing, this is further compounded by the fact that you would be in breach of legislation by profiting from insider knowledge. Therefore the sale of the shares is not permitted.

5 Interaction with employees and colleagues

5.1 Principles of cooperation

- Internationally recognised human rights
- Core Labour Standards of the International Labour Organization (ILO)
- The ten principles of the UN Global Compact OECD guidelines for multinational companies

We oppose:

- Forced labour
- Child labour
- Exploitation of children or young people in any form in the company or by business partners

FAQ's

I have learned unofficially through third parties that one of our business partners uses child labour. How should I deal with this matter?

Ensure that you inform your supervisor or line manager and also the ombudsman's office.

5.2 Rights and responsibilities of employees

Personnel decisions are made on the basis of qualifications, performance records and the required skills.

Employees must not participate in or support discrimination in any shape or form.

All employees have a right to:

- Fair treatment, courtesy and respect
- Equal opportunities
- Equal treatment
- Respect of personal dignity and privacy

All employees are obligated to:

- An objective, purposeful and partnership-based cooperation with managers, business partners and colleagues
- Demonstrate openness, respect and honesty
- Go about their work in a conscientious manner
- Contribute to a positive working environment
- Comply with the principles of the Code of Conduct



FAQ's

People are scheming against a female colleague behind her back. What should I do?

Inform your direct supervisor/line manager or the local HR manager. You are also entitled to contact the ombudsman's office.

5.3 Health and safety of employees

FAQ's

What should I do if I have misgivings regarding health, safety or the environment in connection with a matter which concerns me or other employees?

Inform your supervisor and/or the safety officer without delay, so that the situation can be appropriately assessed to find a solution.

All RENOLIT sites follow internal standards and applicable legal requirements in order to ensure the necessary occupational health and safety. Employees are to exercise due care in handling equipment and with regard to their own health and safety.



5.4 Particular responsibilities of senior management

Senior managers actively and rigorously pursue the set corporate objectives.

They additionally have the following responsibilities to:

- Duly consider their employees' skills and interests
- Inform their employees about important matters in a timely manner and sufficient detail
- Delegate tasks, authority and responsibilities clearly and unambiguously
- Strengthen employee engagement and identification with the company
- Promote trusting relations with business partners and employees
- Refrain from exploiting employees who rank below them within the given hierarchic structure
- Challenge and support their employees on an individual basis and to appraise their performance fairly and regularly
- Treat all employees in a fair and objective manner

FAQ's

As a senior manager, what additional Code of Conduct responsibilities are applicable to me?

You are required to instil due awareness and understanding of the Code of Conduct in your employees, ensuring that the guidelines are implemented in your area of responsibility. In addition, you must be available to your employees, should they have any questions or wish to voice any ideas in this regard.



5.5 Salaries and working time

Important aspects of working conditions at RENOLIT:

- They are in accordance with local/legal requirements
- They are legally binding in accordance with customary practice in the country concerned
- Before signing an employment contract, employees must be informed in writing about the provisions of the contract and their pay
- Working hours must comply with the applicable national law
- Overtime must be undertaken in a legally compliant framework and therefore be properly requested and approved



FAQ's

A member of my team answers business e-mails from home in the evenings. He is now demanding that this time be officially credited to him as working time. How am I to deal with this matter as an executive?

In general, working hours must comply with the applicable national legislation, and any overtime must conform to a legally compliant framework. If you have not explicitly instructed your employee to check and answer his e-mails, e.g. on account of an important project or an urgent matter, this time cannot be claimed as working time.

6 Sustainability and protection of the environment

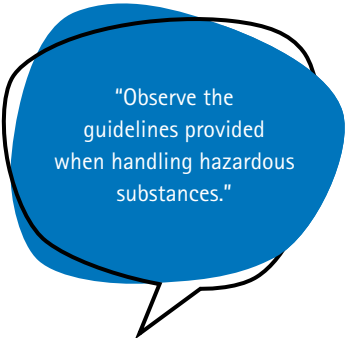
6.1 Sustainable business practice

Sustainable business practice is about meeting our responsibility towards society, our employees, consumers, owners and business partners with due regard to economical, ecological and social aspects. Our focus is on the conservation of resources and the innovation of environmentally sound products and processes. All RENOLIT sites observe both internal guidelines and legal requirements.



6.2 Handling chemicals


In dealing with hazardous substances, all laws and regulations applying to the purchase, storage, handling and transport of chemicals are to be adhered to. Employees who purchase, store, transport and use chemicals must be trained accordingly. Chemicals are to be stored, handled and transported in such a manner as to avoid pollutive impacts and to rule out any risk of ignition or explosion.



"Observe the guidelines provided when handling hazardous substances."

6.3 Hazardous and non-hazardous waste

In handling, storing, transporting, recycling and disposing of hazardous and non-hazardous waste, all legal requirements must be met and all necessary licenses and approvals must be presented. Waste is to be stored, handled and transported in such a manner as to rule out any contamination of the air, soil or water and any risk to employees' health and safety.




"Observe the statutory regulations when handling hazardous and non-hazardous waste."

FAQ's

I've noticed on the shop floor that waste which cannot be recycled is disposed of with the general waste rather than with the special waste, in order to cut costs. Must I intervene, and who should I report this to? Definitely. Report the matter either to your direct supervisor or the site management.

6.4 Fire protection

All RENOLIT sites must ensure compliance with all statutory and other legally binding regulations relating to fire protection, reporting and inspection by the relevant authorities.



"Observe the statutory fire protection regulations."

7 Handling company property

7.1 Software, e-mail, internet

The software used by the companies of the RENOLIT Group is protected by copyright. The applicable laws must be observed when using and copying computer software. The internet is to be used for business purposes only. Exceptions to this are stipulated in company agreements. On no account is information to be accessed or forwarded that advocates racism, glorifies violence or other criminal acts or whose content may be deemed indecent in the given cultural context.



FAQ's

A friend has sent me a computer programme. May I install it?

No. Only software which has been checked and approved by the central IT department and is duly licensed may be used within the company.



7.2 Use of company property

Tools, equipment and materials provided by RENOLIT are to be handled with due care in an efficient and appropriate manner. Tools and equipment are not to be used privately, except where this is permitted in individual cases or by virtue of a company agreement.

7.3 Fraud, theft and misappropriation

The misappropriation of RENOLIT property is not permitted under any circumstances and will result in disciplinary and legal action.



FAQ's

An employee needs batteries for his private use and considers taking some from the company. Does this constitute theft?

Yes, as you must not misappropriate any company property, irrespective of its value.

7.4 Handling information

In the interests of maintaining a trustworthy and positive image for the company, all internal and external communications of the **RENOLIT Group** must be truthful and factually correct. The publication of company-related press releases requires prior approval from Corporate Communications at all times. Internal company information, such as trade and business secrets, which is entrusted to or made accessible to employees in connection with their work must not be passed on to third parties at any time.

The confidential handling of internal matters and sensitive information is essential to the ongoing competitive position of **RENOLIT**. The obligation to maintain confidentiality shall continue to apply beyond the period of employment with the company. The relevant provisions of the **RENOLIT Data Protection Guidelines** shall also apply. **RENOLIT** observes all obligations towards third parties regarding confidential matters and complies with the relevant statutory data protection regulations.

FAQ's

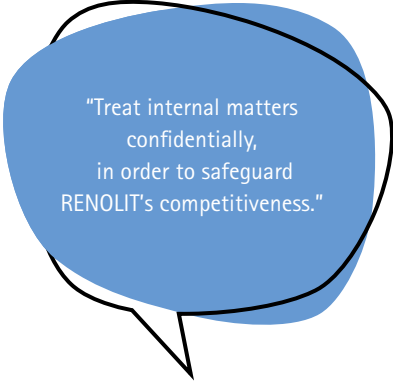
A colleague is telling me details of an order which I am not actually permitted to know. Should I tell her to stop?

Tell her that she is not permitted to pass on this information and that you are not supposed to receive such information.


FAQ's

A former employee has asked me whether I could send him copies of various documents. Am I allowed to send them to him?

As a general principle, you must not pass on any internal information, including documents, to third parties. Should the former colleague enquire about a business contact (e.g. a supplier's address), check with your line manager, if you are unsure.



"Treat internal matters confidentially, in order to safeguard **RENOLIT's** competitiveness."



"Please refer any queries regarding current company agreements to your local employees' representative body."

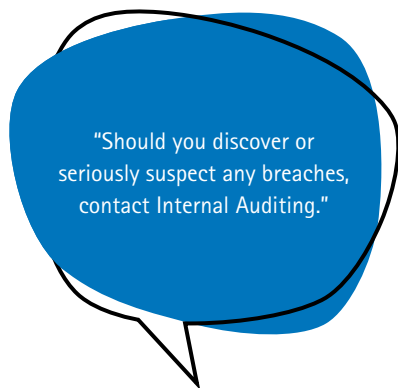
7.5 Effect on existing company agreements

Existing arrangements with employees' representative bodies shall remain unaffected by this Code of Conduct.

8 Ombudsman's office

RENOLIT employees who discover or seriously suspect any breaches of this Code of Conduct can refer such matters to Mr. Bolz as stated below, if necessary with the assistance of the local human resources management or employees' representative body:

Mr. Alexander Bolz
Head of Internal Audit, Risk Management & Compliance RENOLIT Group
alexander.bolz@renolit.com
Tel.: +49.6241.303.1295



Where the reporting employee's anonymity is to be safeguarded within the company, RENOLIT employees can speak to female or male contacts as necessary at the following external institution:

SZA Rechtsanwälts AG
renolit-compliance@sza.de
Tel.: +800.101.101.11
Tel.: +49.621.496.378.43 (India, Mexico, Ukraine, Kazakhstan)

FAQ's

I'm wary about reporting an incident that concerns my colleague/superior, rather than myself. Is it possible to report the incident anonymously? If so, how can I go about this?

To report an incident anonymously, please contact the external ombudsman's office. You will find the e-mail address and telephone number in the Code of Conduct.

renolit.com



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