

CODE OF CONDUCT

Achieving technological top performance, being economically successful and, in addition, assuming social responsibility are our company's goal. They are not severable from each other. A responsible and fair conduct towards employees, business partners, society and environment are an integral part of our value system.

Our Code of Conduct contains important rules of conduct helping us in everyday business, in decision-making processes or in strategic considerations to decide and act correctly, appropriately and sustainably.

The Code of Conduct describes the standard of behaviour which we expect from each other and equally from you as a business partner of the Achenbach Group. It reflects Achenbach's values and witnesses our obligation to ethical, legal and responsible conduct in business life.

By the integrity of our personal behaviour we can contribute to the continuity and further development as well as to the protection of the high public image of the Achenbach Group.

EXECUTIVE BOARD OF THE ACHENBACH GROUP



André E. Barten
Achenbach Buschhütten Holding GmbH
Achenbach Buschhütten GmbH & Co. KG



Sebastian Groos
Achenbach Buschhütten GmbH & Co. KG

1. Human rights, respect and integrity

Diversity is an essential component of our everyday work and our corporate culture: We are in constant relationship with a variety of different people, cultures and organisations as well as with representatives of different interests. Our encounters are always characterized by respect and observation for human rights as well as for social values.

We undertake to respect human dignity and the personal rights of our employees and of third parties being in contact with us. We respect origin, culture and religion and work together regardless skin colour, gender, sexual identity and ideology.

We undertake to respect international working standards as well as valid legal and collective regulations as a minimum requirement and to obey local rules if they are more strict. We rigorously reject any form of forced or child labour.

2. Environmental protection

Sustainable environmental and climate protection are fundamental company goals. We pay attention to the protection of air, water, soil and the health of our employees and third parties during both, production process and machinery operation.

We rely on environmentally friendly, progressive and efficiently economic technologies and implement these systematically. Already during the planning and development phase we pay attention to a careful use of natural resources and to the minimization of possible negative environmental impacts.

3. Corruption

Our success is significantly based on our leadership in technology and quality being developed by highly qualified specialists in close co-operation with customers and suppliers.

Compliance to regulations against bribery and corruption is not only a legal requirement but also reflects our fierce determination to act with utmost of integrity and honesty.

No employees shall offer, promise or grant something for bribery during business activity. No unusual or unapproved payments or incentives of any kind are allowed to be offered or presented in order to influence decisions dishonestly.

It is forbidden to use Achenbach resources or assets for illegal, inadmissible or unethical purposes.

The official status shall not entitle to demand or receive benefits. Any type of bribery which is offered in the context of business activity is to be rejected and reported immediately.

According to applicable law, even modest gifts can be considered as bribery or incentive. Promotional items as well as seasonal gift are allowed to be accepted in appropriate limits but must be offered to the complete company and explicitly for internal, interdepartmentally use or consumption.

In any case, dealing with gifts, invitations or hospitality should not contrast to law, the principles of the donor or local customs.

Achenbach expects each employee to act in an honest and prudent way with business partners and third parties. Any payment or other types of considerations are to be documented with receipts.

4. Conflicts of interest

Each employee has to carry out its work in a way that real or potential conflicts between personal or third party interests and the interests of Achenbach are avoided. In case that conflicts of interest arise or are foreseeable the company must be informed immediately in written form.

Employees are not allowed to lead or to work for a company which is in competition with Achenbach. The same applies to participations in such companies if it has influence on business decisions. It is also forbidden to pursue an activity which is in competition with Achenbach causing or maybe causing a competition with it.

Further secondary employments are to be reported to the company and must be approved in written form in advance.

5. Competition and cartel law

Achenbach is obliged to respect the valid competition laws and does not approve agreements with competitors or concerted practices causing prevention or limitation of competition. This includes, but not conclusively, agreements on prices, offers, customer allocations, conditions of sales and purchase, production and sales quota or geographic market sharing.

The violation of competition laws is a serious infringement which may lead to disciplinary measures or extraordinary termination and prosecution and civil sanctions. All employees are responsible for the observance of the applicable competition law.

6. Imports and exports

The delivery of our machinery to foreign countries is only possible if customs and international trade regulations are respected reliably. Furthermore, internal specifications concerning foreign trade control and especially, but not finally, of the delivery area are to be respected.

We support this by training and certification measures. The relevant valid work instruction and company directive concerning export control must absolutely be observed and is accessible to all employees at any time. In case of any questions, the export control officer or the executive board is to be contacted unsolicitedly.

7. Data protection

Achenbach only collects and processes personal data in accordance with statutory provisions. The principle of data economy is observed and persons concerned are granted information on its collected and processed personal data.

Each employee has to get used to the internal privacy and IT policy. The access to and use of personal data is granted to the authorised personnel for the sole purpose of Achenbach business operations.

8. Protection of business and company secrets

We hold internationally protected patents and have comprehensive technological know-how being the basis of our commercial success. Information on this is always to be kept secret. We neither tolerate the unauthorized sharing of this know-how nor its private storing.

Information of projects are solely used for this project as for numerous project non-disclosure agreements (NDA) are concluded.

9. Money laundering

Compliance with existing laws to fight money laundering and financing of terrorist or criminal activities is also a reflection of our commitment to professional and fair conduct and to integrity.

Achenbach is obliged to report the suspicion or the positive knowledge of money laundering or financial crime. Each employee is requested immediately to report suspicious transactions or activities that could expose Achenbach to money laundering.

10. Information and reporting

In case that an employee faces significant irregularities in the context of his activities, he can report them to codeofconduct@achenbach.de. In addition this way can be used in case of questions.

There will be no disadvantage for the whistleblower by reporting unless he himself violates the rules of the Code of Conduct or applicable law.

The contact persons of the Code of Conduct keep every report confidential and sensitive.