

Code of Conduct – Compliance

**Corporate behavior policy guidelines for the
Vöhringer GmbH & Co. KG**

and

their customers, suppliers and business partners.

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1. Introduction

Vöhringer is an international company with variant business areas and a nearly 100-years tradition. Consequently, we have as such a company, social responsibility towards our employees, customers and the public, acting sustainably, respecting fundamental ethical values and abiding with any laws. All these belong to the social responsibility that needs to be dealt with from the executives to every employee, anytime and anywhere.

To fulfill this responsibility, we have come up with this current Code of Conduct. It makes out obligatory guidelines for areas in which we should pay particular attention to good governance.

We expect our suppliers, customers and business partners, and their employees to commit to the guidelines of the Vöhringer Code of Conduct, oblige to it and act accordingly. This also applies to the cases whereby suppliers, customers and business partners are in a business relationship with Vöhringer third parties (eg: Subsidiaries). These must also oblige with the Vöhringer Code of Conduct and these conditions.

The ethical guidelines that are described in this Vöhringer-Behavior Guidelines are base primarily on:

- The principles of the UN Global Compact
- The conventions of the International Labour Organization (ILO)
- The Universal Declaration of Human Rights of the United Nations
- The UN Conventions on the Rights of the Child
- The UN Conventions on the Elimination of All Forms of Discrimination Against Women
- The OECD-Guidelines for multinational companies.

The content of the following chapters should not be considered as maximum Requirements, but as a minimum and should be exceeded where possible.

2. General observation of rights and laws

It applies with the respective national and international laws and regulations, as well as the minimum standards in the industrial production. There are conventions of UN and ILO, as well as all other relevant regulations to comply with, making sure that the norm is maintained, which impose the most strictly requirements.

By signing the Vöhringer-Guidelines, you are therefore obliged to observe the respective company in all business actions and decisions, to respect the laws and regulations applicable in the countries in which they operate. Moreover, all contracts are to be complied with (taking into accounts of all changing conditions) and business partners are to be treated fairly.

The said norms and code of conduct should not be ignored as a result of employment contract agreements or other similar measures.

3. General rules for the behavior towards competition (antitrust law)

The role of antitrust law is to protect effective competition between companies and to fight against all types of restrictions by competitors. The prohibition of antitrust in Germany is regulated in the laws against restrictions of competition from §§ 1, 19, 20, 21, 24 et seq. GWB. As a result, all agreements between companies, co-ordinate mode of behaviors and decisions by association of companies, that induce or aims to prevent, restrict or distort are prohibited.

All agreements and activities that influence the prices and conditions that hinder the free and open competition in any manner or allocate sales territories or customers are prohibited in dealing with competitors. These regulations also protect especially customers whilst agreements between suppliers and customers are prohibited, whereby the customer in his free hours, prices and other conditions during resale should autonomously be restricted.

By signing the Vöhringer code of conduct the company commits itself to obey and respect fair competition, the laws that protect and promote competition (especially with all applicable antitrust laws and laws regulating the competition).

4. Social responsibility

From the principles of social responsibility, results in the obligation to comply with the law and all applicable laws. For this reason Vöhringer expects its suppliers, customers and business partners, especially to comply with the following principles.

a) Respect for human rights

By signing, the company declares to regard and respect the internationally recognized human rights. This includes in particular, suppliers, customers and business partners of Vöhringer should not tolerate forced or child labor, and also respect the provided principles contained in the ILO-Convention with regards to the legal minimum age for the employment of children.

b) Discrimination and equal opportunity

Suppliers, customers and business partners of Vöhringer are obliged not to discriminate against anyone on the basis of their ethnic or national origin, religion, gender, race, disability, age, belief, sexual orientation or any other characteristic protected by law.

c) Health and environmental protection

The undersigned company has the duty to provide safe and healthy working environment. Suppliers, customers and business partners take the necessary measures to prevent accidents and ill health, which may arise in connection with the activity. Employees should regularly be informed about current health and safety standards, as well as safety measures and training in this regard. The company assures that work safety and health protection at work corresponds to the context of national policies and support the continuous development and improvement of working conditions.

In terms of environmental protection, suppliers, customers and business partners take the responsibility to comply with all legal requirements which relate to the environment and its sustainability. Also, the undersigned company is obliged to wisely use natural resources and to minimize environmental pollution. An environmentally and socially sustainable production should be promoted, as well as the protection and conservation of natural resources should particularly be considered as important.

5. Protection of data and trade secrets

The supplier, customer and business partner of Vöhringer should observe all applicable laws in protection of personal data of employees, suppliers, customers and stakeholders. Confidential information (written and verbal) and documents may not be made available in any other way or form to a third party; unless an explicit written authorization was granted by the Vöhringer GmbH & Co. KG or this is publicly available.

Trade secrets of our business partners are respected. This includes aspects of manufacturing processes, the supply chain and cost calculations. No business partner should be forced to disclose information in this regard if no directly legally or technically critical aspects can be derived from it and there is therefore no legitimate interest. Conversely, we also refer to our trade secrets should such information be requested from us.

6. Legal consequences of violation of the Vöhringer code of conduct

Suppliers, customers and business partners of Vöhringer are obliged to inform their employees about the contents, which are described in this Code of Conduct and its resulted obligations. If the undersigned company does not comply with the basic principles to the Code of Conduct of Vöhringer, we reserve to exceptionally terminate the existing business relationship with the respective supplier, customer and business partner.