



Maßgeschneiderte
Lacktechnik

Code of Conduct Lackfabrik Bäder GmbH & Co. KG 03/2020

Foreword

Dear employees,

Respectful and cooperative cooperation and the conscious perception of social responsibility are an important part of our long-term corporate success. We can only maintain this basis if we ensure that unfair conduct is excluded from all employees of our company. After all, even individual acts of unfair conduct can jeopardize economic success.

With this Code of Conduct, we have defined basic rules of daily cooperation for managers, employees and business partners. The rules apply to each of us.

Please abide by the rules, contact us with questions and comments and support us actively in implementing them. Only in this way can we remain successful together!

23.03.2020

The management

Lackfabrik Bäder GmbH & Co KG



I. General information

Violations of laws and other binding regulations can result in criminal, labor and civil law consequences for the acting employees of our company. For Lackfabrik Bäder GmbH & Co KG such violations can lead to high fines, contract award blocks, official sanctions, claims for damages from customers or competitors as well as to serious damage to reputation. Official investigations, internal investigations or negative press coverage due to violations of applicable law or other regulations can also impair our business operations. Such risks and damage can have a lasting effect on the profitability and viability of our company. Ultimately, such conduct endangers the jobs of our employees.

We expect our employees to behave in a law-abiding, honest and loyal manner in their business activities and in all situations related to these activities. All regulations in this Code of Conduct are binding. Deviations from the regulations in this Code of Conduct are only permitted with the prior approval of the management.

II. Important individual regulations

1. Combating corruption

Corruption prevents progress and innovation, distorts competition and can seriously damage the reputation and financial integrity of our company.

We therefore reject and fight all forms of corruption.

It is forbidden for any employee of our company to influence decisions by granting benefits of any kind. This applies both to public officials and to employees of other companies and other institutions in Germany and abroad. Corrupt conduct is often directly related to the granting of benefits from and to business partners (invitations, gifts, donations, etc.). These matters are therefore subject to special regulations.

Both the acceptance and the granting of benefits of any kind must be agreed with the management in advance and requires its approval.

2. Prohibition of money laundering

A targeted fight against terrorism, drug crime and organised crime begins on the financial side.

We expressly prohibit all forms of money laundering and participation in such laundering.

Money laundering is the infiltration of illegally earned money or illegally acquired assets into the legal financial and economic cycle. Our company combats all forms of money laundering and takes precautions to avoid becoming involved in money laundering activities. It may be a criminal offence for someone to accept, invest or hold assets if these assets originate from certain criminal activities.

It is particularly important to note that it is also a criminal offence for anyone who carelessly fails to identify the origin of the item. Therefore, if you disregard what is actually a strong suspicion about the origin of certain assets out of particular carelessness or particular indifference, you may be liable to prosecution.

You should therefore always obtain information about your customer or other business partner in accordance with the legal requirements (know your customer principle).

3. Fair competition and purchasing

Fair and free competition is protected by national and international competition and antitrust laws. Violations of competition and antitrust laws are prosecuted worldwide by antitrust and criminal prosecution authorities and can lead to sanctions threatening the existence of the company amounting to millions of euros, as well as prohibitions on awarding contracts for participating companies and substantial sanctions for managers and employees.

Anti-competitive and competition limiting behavior is not tolerated in our company. Rather, customers and the market are to be protected by the quality of our products and services.

4. Avoidance of conflicts of interest

Our company is dependent on the performance of its employees in everyday business. Successful business activities are therefore only possible if the employees act in the interest of the company. We trust that all employees make their decisions solely on the basis of objective criteria and that they are not influenced by personal interests and relationships when making business decisions.

5. Fair employment

Our company is committed to fair employment conditions and combats undeclared work and other illegal employment of workers. Illegal employment can endanger legal jobs and prevent the creation of new legal jobs.

The protection of children is an essential anchor of international human rights. Our company is committed to these fundamental rights and categorically rejects all forms of child labor.

The employees of our company can only perform the services they are required to perform in a safe working environment. Therefore, every employee of our company is obliged to comply with the regulations on occupational health and safety.

6. Protection of company assets, trade and business secrets and confidential information

The company assets of Lackfabrik Bäder GmbH & Co KG serve to achieve business objectives. They may only be used for operational purposes; their use for purposes outside the company is expressly prohibited. We expect our employees to handle the company assets with care and in the interest of our company. Each employee is responsible for ensuring that company assets are not damaged, misused or wasted.

In addition, each employee is required to be vigilant and report theft, embezzlement, fraud and other offences.

These rules apply equally to assets of our company and to assets of third parties to which you are granted access in the course of your work or on occasion.

Confidential information is all information about our company as well as our customers and business partners which is not known to the public and which is communicated to our company on a confidential basis or which becomes known to us in any other way. The existence of a contractual relationship with a customer may already be covered by this.

Our company recognises the intellectual property of competitors and business partners without reservation. Every employee is obliged to keep the know-how as well as business or trade secrets of third parties secret and to use them only within the scope of business disclosure and within the agreed framework.

Confidential information may not be misused by employees for their own benefit or passed on to third parties without permission.

You are prohibited from disclosing such confidential information during and even after termination of the contract and, in case of doubt, only in agreement with the management. Even with your consent, such information may only be disclosed to persons who have a justified and appropriate interest in the disclosure of such information ("need-to-know" basis).

It may also be a criminal offence to obtain confidential information from third parties (e.g. competitors or even customers) without the consent of the third party. This would be the case, for example, if you asked a poached employee to secure his or her customer base or other data from the competitor before leaving the company.

7 Data Protection, Data Security and IT Security

Special legal regulations exist for the protection of personal data. Our company is aware of the special importance of data protection and data security and is fully committed to compliance with these regulations. Personal data of all kinds must therefore be carefully protected against unauthorised access and misuse.

The company continuously reviews the application of the rules of data protection and data security and their practical handling and updates them as necessary.

Information technology (IT) and electronic data processing (EDP) have become an integral part of everyday working life. However, they entail a large number of risks. Our company takes these risks very seriously in its own interest and in the interest of its business partners, and combats corresponding weaknesses as soon as they become known and takes precautions to protect itself. Our employees are obliged to familiarize themselves with applicable IT/EDP guidelines and to take into account the specifications contained therein. In particular, always ensure that the IT systems used by you are adequately secured against access by third parties. Do not leave your workplace without locking the screen. Change your passwords regularly and only use passwords that comply with current security standards. Do not pass on passwords to third parties.

Be aware that e-mail is not a secure means of communication. Confidential information should therefore only be sent by e-mail in exceptional cases and should be encrypted.

Do not use the IT systems provided by us for your private affairs. In particular, do not save or load any content from the Internet or other third-party systems in our network, unless this is required for professional reasons. The use of our EDP systems for illegal purposes is not permitted.

8. Equal opportunities, equal treatment and mutual respect

We recognize the principles of respectful, fair and loyal interaction with each other. In particular, the principles of equal opportunities, equal treatment and mutual respect play an overriding role. All employees are offered equal opportunities in their recruitment and in the course of their further work. Our company rejects any form of discrimination and takes action against it. No one may be discriminated against or harassed on account of their origin, gender, sexual orientation, religion or belief, disability, age or similar factors. Instead,

we expect our employees to be tolerant, polite and respectful with one another, thus contributing to a productive and pleasant working environment.

9. Dealing with business partners

Our company cooperates with its business partners in a spirit of trust and on a basis of business that is fair for both sides. We also expect law-abiding and honest conduct from our business partners.

In particular, suppliers, subcontractors, sales consultants and other third parties of our company are obliged to acknowledge our Code of Conduct before they become active and to comply with the regulations contained therein.

10. Environment

Our company is aware of its ecological responsibility, appreciates the value of global environmental protection and complies with all legal regulations and principles for environmental protection.

III. compliance organization

1. Responsibility for compliance

Compliance is a task for the entire company. It is important that every employee takes responsibility for complying with laws, regulations and corporate principles. Always remember that breaking the law can have significant consequences for you and for our company.

2. Questions of doubt

This Code of Conduct cannot answer all the questions you may encounter on a daily basis. We trust that in case of doubt you will seek advice from the management and report any violations of laws or company principles that you have identified.

Persons who ask for advice or make a compliance report in case of suspicion need not fear any action on the part of Lackfabrik Bäder GmbH & Co KG. Our company is particularly concerned that possible problems are addressed

promptly. Our top priority is to comply with the law and protect the company. Through a prompt and, in your opinion, justified inquiry or report, you not only protect the company, but also yourself and the safety of your workplace.

IV. processing status

23.03.2020.

