



CODE OF CONDUCT

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The STOCKO Group is aware of its social responsibility towards its customers, business partners and employees. This Code of Conduct is intended to expand upon the guidelines already in place within the STOCKO Group. The company as a whole and the individual employees' alike are committed to following transparent principles. The following guidelines are provided as standards of conduct, indicating the framework for corporate and social behaviour and setting out values underlying actions within this context. The company places great importance on compliance with ethical standards, including creating and maintaining a fair working environment based on respect.

1. SCOPE OF APPLICATION AND EMPLOYEE RESPONSIBILITY

This Code of Conduct is obligatory for all employees of the STOCKO Group (hereinafter referred to as “employees”).

2. ETHICAL CONDUCT AND COMPLIANCE WITH APPLICABLE LAWS

All employees must comply with high standards as far as ethical conduct is concerned and must follow all applicable national and international legislation. Every employee has a responsibility to behave in a fair, respectful and trustworthy manner in all of their actions and business relationships. They must protect and strengthen the reputation of the STOCKO Group. All employees have a duty to respect human rights. Discrimination in any form is impermissible above all – whether it is based on race, ethnic origin, age, religion, ideology, gender, sexual orientation, marital status, disabilities or any other characteristic should this be in breach of any applicable law.

3. FAIR WORKING CONDITIONS

All employees of the STOCKO Group have a responsibility to maintain a safe and healthy working environment. This means that all safety regulations and practices are to be strictly followed. As an employer aware of its social responsibility, the STOCKO Group regards its employees as a major asset. The STOCKO Group personnel policy reflects this in that every employee is offered opportunities for professional and personal development. Furthermore, employees are encouraged to openly share their opinions, criticisms and ideas. All forms of child and slave labour are strictly prohibited as are working conditions and ways of treating others that violate national and international laws and customs. Harassment, intimidation and workplace bullying are strictly prohibited in any form.

4. PROTECTION OF THE ENVIRONMENT

Protecting the environment is high on the list of priorities at the STOCKO Group. With this mission in mind, we are responsible when it comes to the use of resources and pollutants. Our factories in Andlau and Hellenthal have been certified as complying with the strict requirements of the ISO 14001 environmental management standard since 2011 and 2012 respectively. As part of this, we are committed to a voluntary reduction of environmental risks, such as waste, waste water and emissions, that extends far beyond the standard scope. With a view to continually increasing energy efficiency levels at our sites whilst lowering CO₂ emissions and energy costs and consumption, STOCKO has developed a smart energy management system. Gaining certification for this in accordance with ISO 50001 is the logical addition to ISO 14001 for STOCKO.

5. PROTECTION OF COMPANY ASSETS

All employees are responsible for protecting company assets against misuse and loss. Company assets must only ever be used for business purposes, unless permission has been granted for private use. All employees are also expected to protect the intellectual property of the STOCKO Group, including patents, trademarks and expertise, against attacks or loss. Respect must also be shown towards the intellectual property of others.

6. HANDLING OF INFORMATION

Trade secrets and other sensitive information must be treated as confidential and protected to prevent disclosure to unauthorised persons. This also applies to inventions and other expertise. Employees who are entrusted with trade secrets and other sensitive information are not permitted to pass them on to third parties without authorisation or use them for any other purposes outside of their work. Company documents and data storage media should be protected to avoid unauthorised third parties gaining access to them. Personal information should only be collected, used and stored in line with the currently applicable data protection provisions.

7. COMPETITION

Competition law is in place to create and maintain a free and fair competitive environment in the interest of all market players. On this basis, all employees are required to comply with the applicable competition legislation and any other laws relevant to the regulation of competition.

8. CORRUPTION

Corruption is not permitted within any business dealings on a national or international level. We will turn down any business deal or any opportunity to achieve in-house targets in the event that this would require the law to be broken. The following are prohibited in particular:

- Offering, promising or giving national or international officials a personal, financial or any other gain in return for performing or neglecting to perform an official act
- Offering, promising or giving employees or representatives of national or international companies a personal, financial or any other gain
- Having any act of corruption performed with the help of others, including family members, friends, dealers, advisers or intermediaries
- Helping others with any illegal practice
- Demanding or accepting a personal, financial or any other gain from business

Gifts and invitations given within the context of business relationships with business partners that fall within the scope of standard business practice in terms of hospitality, customs and courtesy are excluded from the list of banned actions given above provided that no laws are broken.

9. THE FIGHT AGAINST MONEY LAUNDERING

The STOCKO Group works only with reputable business partners who operate within the confines of the law and who do not rely on any illegal finances. All employees are required to comply with the laws against money laundering. Should they have any reason to suspect money laundering, they must report this immediately.

10. IMPLEMENTATION AND MONITORING

The regulations set out within this Code of Conduct are at the heart of STOCKO's company culture. Every single one of these principles must be complied with at all times and every individual employee is responsible for ensuring that this is the case. There will be repercussions for anyone who is found to be in breach of this Code of Conduct and in serious cases this may lead to the termination of employment.

STOCKO Group
The Management Team

1) To make these guidelines easier to follow, the term "employee" is used throughout to refer to both male and female employees collectively.