



Corporate Compliance Policy

Applicable to:

KLEBCHEMIE M.G. Becker GmbH & Co. KG

General:

To meet our global responsibility and to be successful through innovation, quality, reliability and fairness in competition, company specific goals and regulations are needed. The Corporate Compliance Policy serves as the basis for the actions and decisions of our employees and management.

Fundamentals:

1. Fair and respectful working conditions/ basic employee rights

- Friendly, professional, fair and respectful interaction with colleagues and third parties is expected from every employee.
- Discrimination, harassment and intimidation of any kind, whether physical, sexual or psychological, will not be tolerated.
- Freedom of speech and expression will be protected and ensured.
- Employees freedom of association in employee organizations (trade unions) will be protected.
- The statutory maximum working hours will be adhered to.
- Slavery and human trafficking: Child labor, slavery and human trafficking is prohibited. Compliance with applicable EU regulations concerning slavery and human trafficking (e.g. Directive 2011/36/EU – preventing and combating trafficking in human beings and its victims; The Modern Slavery Act 2015 – transparency in supply chains) is essential.

2. Principle of sustainability

- The company KLEBCHEMIE M.G. Becker GmbH & Co. KG is aware of its responsibility for the protection of the environment as well as the health and safety of the people.
- To ensure occupational health and safety, all employees are requested to implement the internal and legally required safety regulations in their workspace. Every employee is jointly responsible for safety in their area. The active involvement of employees and trainings regarding occupational safety are essential for continuous improvement and accident prevention.
- Sustainable development is only made possible by the efficient use of all resources. In order to keep emissions as low as possible and at the same time to reduce the use of energy and raw materials, our employees are requested to use all reasonable options regarding viable process optimization. Our production lines may only be constructed and operated in accordance with the legal requirements.
- Conflict minerals in terms of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank-Act): we are aware of the social responsibility with respect to the environment and human rights. To facilitate the peaceful and fair use of worldwide resources, we support the provisions specified in the Dodd-Frank-Act concerning the exclusion of “conflict minerals” in our products.
- We ensure high plant safety through careful plant planning and well-trained and instructed employees. To avoid accidents or breakdowns, the equipment is systematically inspected and maintained.



Corporate Compliance Policy

3. Business integrity

- Corruption or bribery will not be tolerated in any form.
- Fairness in competition (with fair means).
- Protection of our proprietary data and respect of third party property rights: trade secrets may not be disclosed to third parties or made public. The property rights of third parties shall also be respected.
- Separation of corporate and private interest: All employees must segregate their private and company interests. In addition, decisions regarding personnel or business relations are only based on objective criteria.
- The foundation of our business relationships is compliance with legal requirements and partnership agreements

4. Cooperation with government agencies

- The company KLEBCHEMIE M.G. Becker GmbH & Co. KG strives to maintain a cooperative relationship with all responsible government agencies. Information will be provided in a complete, open, correct, timely and understandable manner.

5. Proper record keeping and financial reporting

- Business processes are documented in an internal control system. Complete and correct recording of accounting related data is ensured through controls.

Implementation:

Every manager must organize their department so that it complies with the rules of the Corporate Compliance Policy, internal company rules as well as legal requirements.

All employees are required to immediately communicate any violation of the Corporate Compliance Policy to our "Corporate Compliance Policy Representative" or our executive management.

Executive management will decide and initiate appropriate measures with the cooperation of the "Corporate Compliance Policy Representative".

KLEBCHEMIE M.G. Becker GmbH & Co. KG's suppliers and contractors will be requested to comply with the points in the Corporate Compliance Policy.

The Corporate Compliance Policy will be reviewed on a regular basis and adapted according to current requirements (e.g. legislative changes).

Weingarten, 11.06.2018

Klaus Becker-Weimann
CEO

Dr. Achim Hübener
CEO