



**CODE OF CONDUCT**  
**PARAT GROUP**

Dear employees,

We put the confidence shown by our staff and our external business partners in the first place. In order to preserve this trust, a legally correct and responsible conduct towards management, executives and colleagues and also towards the public at large and our customers, suppliers or other third parties is absolutely necessary.

Therefore we have signed this ‚Code of Conduct‘ and established basic principles of conduct to adopt a responsible and legally compliant attitude to laws and other regulations in our daily work.

Legally and ethically correct behavior is the basic of our company’s economic activities at all times. We would like to encourage you to join us in our endeavor because PARAT’s good name and reputation depends on each and every one of us.

Neureichenau, April 10, 2019



Frank Peters  
Managing Director



Martin Kreamsreiter  
Managing Director



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Geschäftsführer

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# 1. SCOPE

This ,Code of Conduct‘ applies to all subsidiaries and business units of PARAT Group. The guidelines set out below are binding on all top executives, line managers and employees.

# 2. MANAGEMENT COMMITMENT

The management of each site is encouraged to make every appropriate and reasonable effort to implement and to apply the principles and values described in this ,Code of Conduct‘ both now and in the future and to eliminate identified shortcomings as quickly as possible.

# 3. COMMUNICATION

We insist on compliance of this ,Code of Conduct‘ at all our sites and we are open for dialogue on its contents towards employees, business partners and other interest groups.

## 4. WE ARE COMMITTED TO FAIR DEALING WITH OUR BUSINESS PARTNERS

We respect the laws and regulations of those countries in which we operate. In those countries which do not provide a satisfactory level of regulations, we will thoroughly verify the good German business practice to be applied to support a socially responsible corporate management there. Our employees are required to give priority to company interests over private interest in their everyday occupational activities. Each member of staff shares responsibility for compliance with all statutory regulations in his or her work environment.

### REPORTING OF INFRINGEMENTS OF LAW (WHISTLE-BLOWING SYSTEM)

In order to give our employees a fair chance to report any violations of law, of what kind so ever, we have appointed an external ombudsman to whom our employees can report misconduct.

### COMPETITION LAW

We pursue clean and recognized business practices and fair competition. We do not enter into anti-competitive agreements with our competitors nor do we tolerate any conduct that violates German or European cartel law or anti-trust laws of any other state where we conduct business.

### ANTI-CORRUPTION

We do not tolerate bribery in any form within our Group. We promote transparency, trading with integrity as well as responsible leadership and supervision of the company. The interests of our employees and the interests of our enterprise shall be kept entirely separate. Therefore, our staff members are requested to accept or make gifts and invitations only in the course of common business practice.

### PRODUCT LIABILITY AND PRODUCT SAFETY

Quality and safety of our products are the basis of our business. We ensure along the entire value chain that we only deliver top quality products that meet the specific needs of our customers and consumers.

## FISCAL LAW

In every activity, all regulations related to national and international taxation, as well as any voluntarily agreed commitments, must be observed.

All employees and executive bodies have a duty to know, understand and to comply with the laws applicable to their job responsibilities within the Group and, in case of doubt, to collect any additional information and advice from the competent authorities in this regard.

Any violations against the Code of Conduct will not be tolerated and may result in appropriated action taken by the employer.

# 5. WE ACT IN AN ENVIRONMENTALLY AWARE AND SUSTAINABLE MANNER

We act in an environmentally conscious way at all locations where we are in operation. As a minimum standard, we adhere to the respective national laws applicable at the sites in question. At locations where applicable provisions do not ensure an adequate level of protection to guarantee sustainable enterprise management, we will adopt measures within economically reasonable limits to achieve a satisfactory level of protection.

Every employee shares responsibility for protecting human beings and the environment in his or her area of work.

# 6. WE TAKE RESPONSIBILITY FOR OUR EMPLOYEES ALL OVER THE WORLD

Our company's reputation comes down on how our employees behave and especially how we behave towards them as an entrepreneur. We respect human rights based on the UN Charta of Human Rights and we also promote them. Discrimination or harassment of any kind will not be tolerated. Every employee shall respect the dignity, privacy and personal rights of every individual.

## HEALTH & SAFETY

We support a healthy workplace environment and ensure the health of workers in order to avoid accidents and injuries.

## HARASSMENT

We protect our employees from corporal punishment, physical, psychological, sexual or verbal harassment and from intimidation or abuse.

## FREEDOM OF OPINION

The right to freedom of expression and freedom of opinion shall be protected and guaranteed.

## COMPLIANCE WITH ILO CORE LABOR STANDARDS

The enterprises comply with the eight ILO 5 core conventions. These concern the following criteria:

- prohibition of child labor
- prohibition of forced labor
- promotion and, where possible, securing of equal pay for men and women for work of equal value
- observance of workers' basic rights, as long as this is legally permitted and possible in the respective country
- prohibition of discrimination; The ban refers in particular to the discrimination against employees on grounds of gender, race, disabilities, or due to their ethnic or cultural background, religion, ideology or sexual orientation.

## EQUAL OPPORTUNITIES

We guarantee equal employment opportunity for all our employees. Hereby, we will comply with all applicable national laws on equal opportunities.

# 7. WE MAKE RESPONSIBLE USE OF DATA AND INFORMATION

## PROTECTION OF COMPANY AND TRADE SECRETS

Company and trade secrets have to be kept confidential and must be protected from inspection by unauthorized third parties. This also applies to any other information that is expressly labeled 'confidential' and that the company, its partners and customers may not wish to disclose. Such information is not permitted to be passed to unauthorized persons without the appropriate approval.

## PRIVACY

Personal data may neither be processed, disclosed, made available nor used in any other way without authorization. Members of staff are required to observe the rules on data protection and, in particular, to help actively ensure that personal data are reliably secured against unauthorized access.





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FIRST PUBLISHED: Neureichenau, February 2018