

# Standards of Conduct

## Preamble

Trust, from our business partners and customers, is something we hold in high value, and must be earned through the acts and deeds of every employee and manager in the organizations of the motan group.

As a global corporation, we are not only obligated to comply with a variety of different laws and regulations, we are also confronted with cultures and mentalities which couldn't be more different.

The purpose of the Standards of Conduct is to provide our business partners and employees a guideline for responsible business behaviour and practice.

Naturally, no single guideline can provide solutions to every situation, so each individual must ask him or herself the following questions:

- Who will be impacted by my actions?
- What are the long term consequences for myself, my colleagues, the company, our partners and customers?
- What would happen if everyone acted in this manner?

The motan group is a trustworthy organization. Responsible behaviour and actions in the spirit of cooperation should be based on mutual respect and consideration.

Common sense is, and will remain, the basis  
of the spirit of cooperation within a company.

Rules are only as good as the people who follow them.

# Standards of Conduct

## **Article 1 Commitment to Rule of Law**

Each and every employee of the motan group is required to comply with our internal rules and guidelines as well as the applicable statutory laws.

Special requests and wishes from customers, suppliers or any other type of business partner will only be fulfilled within the scope of the applicable rules and laws even at the risk of losing a potential business opportunity.

Invoices must reflect the prices agreed upon with the business partner. Rebates or credits must be documented and accounted for.

All business transactions must be transparent and documented.

In case of doubt, a second set of eyes is necessary. Employees should contact their supervising managers or the Holding internal auditors committee.

## **Article 2 Gifts and Benefits**

Personal gifts or other benefits may only be allowed or accepted if they are of minimal value. They may not influence the decision for granting or accepting orders from customers or suppliers.

Invitations to business lunches or events are permitted when relevant to the business at hand.

In case of doubt, approval is required from supervising managers or the Holding internal auditors committee.

Personal gifts or other benefits to elected or public officials are not permitted.

### **Article 3 Corruption and Money Laundering**

Each and every employee is obligated to support worldwide efforts against corruption and money laundering. Here are signs of possible illegal transactions: unusual cash payments, payments via third (non-contractual) parties, use of several bank accounts. Suspicious cases must be reported immediately to the supervising managers or the Holding internal auditors committee.

We respect international embargo or export regulations. Each and every employee is obligated to check the regulations accordingly, and if required, to get necessary approval.

### **Article 4 Fair Competition**

We feel obligated to follow the rules of fair competition. Price fixing or other unfair competitive practices are forbidden as well as agreements to waive competition.

### **Article 5 Conflicts of Interest**

If conflicts of interest arise between an employee and a related party (e.g. family member) during the course of a business transaction, the supervising manager must be informed.

### **Article 6 Discrimination**

Each and every employee, customer, supplier or other business partner is to be handled with respect and deference.

No one may be discriminated against based on colour, race, nationality, sex or ideology.

The personal privacy of every employee must be respected according to the principle, "do unto others as thou shall have done unto you."

## **Article 7 Protection of Company Property and Trade Secrets**

Company property is to be handled with utmost care.

Employee know-how is our greatest asset. Each and every employee is obligated to follow the guidelines re. Trade secrets and confidentiality in accordance with his or her contract. Special care is to be taken when creating and storing data or documentation to keep the information from falling into the hands of third parties.

## **Article 8 Adherence to the Standards of Conduct**

The Standards of Conduct as created by the Holding shall be used binding guidelines for all business transactions of the motan group.

Management and the internal auditors committee are obligated to distribute information about these standards and to oversee their implementation.

Each and every employee is required to report any breach of law or of the Standards of Conduct to his supervising manager as soon as it becomes known. The supervising manager is obligated to provide remedial action when possible. For severe breaches, i. e. breaking the law, the employee faces legal consequences and/or termination of employment.