

OUR GUIDING PRINCIPLES

Code of Conduct



ZSCHIMMER & SCHWARZ

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PREFACE

Since its founding in 1894, our company's success has always been based on three factors: economic efficiency, due consideration of ethical principles, and due compliance with the applicable laws and regulations. In the future, we will continue to attach great importance to being a role model for our employees and our business partners in terms of corporate culture and success.

This brochure is intended as an explicit expression and guide for the exemplary behaviour of our employees, both internally and externally. Compliance with these rules is a duty and obligation for all. With these guidelines, we want to continue our long-standing corporate tradition, and establish a common understanding of fairness, tolerance and social and economic responsibility.

[Lahnstein, 1 March 2018](#)

Dietmar Clausen
Manager

Wolfgang Nowak
Manager

Dr. Martin Haberl
Manager



1 HUMAN RIGHTS AND INTEGRITY

We respect the personal dignity, rights and privacy of every individual.

We expect all employees, customers and business partners to treat each other fairly and to respect their mutual rights and privacy.

Discriminatory treatment not based on factual and objective reasons – in particular because of sex, race, disability, origin, religion or belief, age or sexual identity – must not occur.

Zschimmer & Schwarz does not tolerate sexual harassment at work or any related discrimination; nor is any form of bullying tolerated, such as rumour-mongering, threatening or humiliating behaviour, insults, defamatory or unworthy treatment.

2 COMPLIANCE WITH THE APPLICABLE LAW

We always observe the law worldwide, both as individuals and as a company.

We aspire to be a model company in every respect. Our responsibility is therefore to ensure compliance with all applicable laws and regulations, both at national and international level.

Zschimmer & Schwarz executives set an example. They are therefore required to know and abide by basic laws, regulations and internal rules. Every manager bears responsibility for the employees entrusted to him or her.

The management must ensure that employees comply with applicable rules and regulations. They are therefore required to carry out regular training programmes, to uphold monitoring and to be approachable. The general management does not tolerate any violation of legal or internal regulations.

The Code of Conduct sets a minimum standard. The specifics of the laws, policies, and practices in other countries, business areas or markets may include stricter requirements, and must be observed.



3 FAIR COMPETITION

We face up to fair competition with the breadth and quality of our products and services.

Therefore, all our employees are prohibited from discussing the following with competitors: pricing, production, capacity, distribution, profit, margins, tenders, costs, business relationships, competitive behaviour, contracting, distribution of customers, markets, areas and production programmes, or other factors that determine or influence the competitive behaviour of companies in the market. Giving preference to certain customers and suppliers over others, or excluding contractors, is prohibited. Similarly, employees may not acquire competitive information through industrial espionage, bribery, theft or wire-tapping.



4 GIFTS AND CONTRIBUTIONS, DONATIONS AND SPONSORING

We always act with integrity in all areas, and do not tolerate dealings related to any form of corruption.

As a principle, gifts and gratuities should neither be bequeathed nor accepted: this applies to financial gifts in any currency and gifts of property. Promotional gifts may only be accepted if they conform to customary practices, and do not appear to convey dishonesty. Travel, free tickets for sporting and cultural events, invitations to meals, services, promotional bonuses and discounts are also considered gifts. If necessary, line managers should be informed and their judgement obtained.

Gifts and contributions to public officials are prohibited.

Donations and sponsorship measures must comply with legal requirements. Free gifts must always be transparent, i.e. recipients of donations and their specific use by the recipient must be known and documented. In the case of sponsoring, an appropriate relationship between the financial contribution and the agreed return service must be ensured.

The Corporate Communications department as well as the line managers must always be involved in planning and assessing donations and sponsoring measures.



5 PREVENTING MONEY LAUNDERING

We combat money laundering by abiding by applicable rules, and working only with reputable partners.

Money laundering is understood as the channelling of illegal proceeds from organised crime into the legal financial and economic cycle, while concealing its origin.

To counteract money laundering, we do not conduct any questionable financial transactions.

Payments for deliveries and services are made exclusively to the contracting party and, as a rule, in the country in which the contracting party has its registered office. Cash payments are generally prohibited. Duly signed receipts must be submitted when cash payments are necessary within socially acceptable dimensions. Additionally, the Compliance & Risk Management department must be informed immediately and, if possible, in advance of any payment transactions and/or agreements that deviate from this.





6 EXPORT AND EXPORT CONTROL

We export our high-quality products worldwide, reliably and in accordance with foreign trade law.

To prevent our products from being misused for the propagation of acts of terrorism or war, we respect and support national and international export regulations, embargoes, sanctions,

prohibitions, licensing requirements and other restrictions imposed by trade control regulations.

In doing so, we have an effective organisation with corresponding internal export processes and control systems, and employ appropriate, highly qualified personnel.



7 DATA PROTECTION

We commit to the conscientious protection and security of personal data.

We adhere to strict standards when processing the personal data of our employees and business partners. We use these only for the intended purposes and in accordance with applicable data protection laws.

We process a great deal of data in our daily business. In particular, personal and sensitive data may only be collected, processed or transmitted in accordance with the legal guidelines and our own strict specifications.

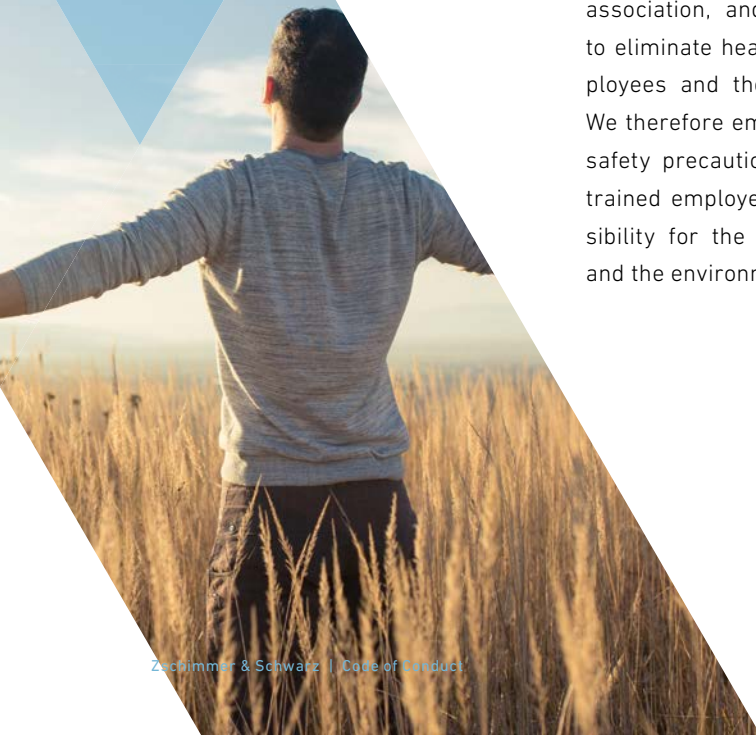
The Data Protection Officer or the Compliance & Risk Management department must be consulted in case of doubt.

ENVIRONMENTAL PROTECTION, SAFETY AND HEALTH

We are aware of our responsibility to the environment and society, and act responsibly and sustainably in order to protect resources.

As a traditional family business, we stake our reputation on conscious responsible action. One of our most important tasks is therefore compliance with all laws and regulations for the protection of people and the environment.

Safety is always the top priority for our company. We cooperate closely with the authorities and the trade association, and make every effort to eliminate health risks for our employees and the people around us. We therefore employ state-of-the-art safety precautions, and each of our trained employees assumes responsibility for the protection of people and the environment.





9 PROTECTION OF COMPANY AND THIRD-PARTY PROPERTY

We treat company property and other company assets with great care. We protect and respect the property of others, in particular our business partners.

In our offices and working areas, the company's property is made available to the employees to carry out their work. The numerous facilities and other equipment (such as telephones, copiers, computers, software, internet) are used exclusively for work-related activities. Any private use of these facilities and equipment must

be previously approved, or must be stipulated in internal codes of conduct. Every employee commits to handling company property and the property of others (e.g. customers, colleagues) responsibly and carefully.

10 INFORMATION PROTECTION AND CONFLICTS OF INTEREST

We always keep confidential information secret, and avoid conflicts of interest.

As an innovative industrial company, we protect our development and all our intellectual property. We therefore restrict the disclosure of our confidential information to the bare requirements, and exclusively in connection with our business activities at Zschimmer & Schwarz. We conclude confidentiality agreements with third parties before disclosing any such information. We also observe the data confidentiality of our contractual partners.

We always act in the interests of our company. To uphold our reputation and to act with integrity, we keep our professional and private interests strictly separate. Our personal decisions must not conflict with our corporate

interests or negatively impact them. Such conflicts of interest may arise, for example, when taking part in competitions, in certain ancillary activities or in employment and business relationships with relatives and acquaintances. If you are unsure, ask your line manager or the Compliance & Risk Management department.



YOUR CONTACTS FOR COMPLIANCE QUESTIONS

If you have questions about the Code of Conduct or are uncertain about appropriate conduct, you should consult your immediate line manager or their superior. If this is not possible or not desired by the employee, the staff of the Compliance & Risk Management department or Human Resources can provide support. Further contacts can be found here:



Topics	Contacts
Employee and partner privacy, personal data, occupational safety, environmental protection and sustainability	Reiner Brückner Head of EH&S, Data Protection Officer
Energy Management	Gudrun Niebergall Energy Management
Abuse of and unauthorised access to data, electronic communications and security	Dr. Jürgen Schäfer Chief Information Officer
Antitrust, corruption and bribery, cooperation in legal investigations, conflicts of interest	Rebecca Dimsic Head of Compliance & Risk Management
Suspected money laundering and terrorist financing (cash payments)	Jörg Preißmann Compliance & Risk Management, Treasury, Cash Management
Respect, human dignity, equal rights, work environment, professional development	Marcus Mensing Director Human Resources Katja Marx Works Council Chairwoman
Volunteering and community activities, donations and sponsorship	Hedwig Blomeier Head of Corporate Communications
Hazard prevention and fire protection	Sascha Lauer Head of Plant Fire Brigade



Chemistry tailor-made

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