

Code of Conduct



RONAL GROUP

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| Adressee: | RONAL GROUP |
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| Author: | Group Legal & Compliance |

Dear colleagues,

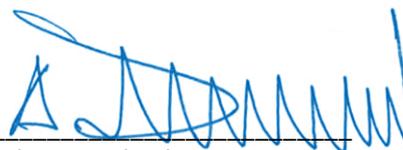
Responsible, ethical and lawful conduct has always been and will continue to be a prerequisite of our Company's success. Such Company culture forms the basis of the trust shown to us by our customers, business partners and the public. The solid reputation of the RONAL GROUP is built on our every day's commitment and responsible attitude.

Due to an increasing number of statutory requirements our business environment is getting more and more complex, and the legal risks are scaling up. The RONAL GROUP is aware of these challenges and has therefore issued the present Code of Conduct which shall apply worldwide at all RONAL GROUP sites. Please read this Code of Conduct carefully. It shall assist you in identifying legal risks and ensuring lawful behavior. Everyone can – now and in the future – make an important contribution towards keeping our Company's actions sustainable and legal.

Härkingen, 1 December 2017



Yvo Schnarrenberger,
President of the Board of Directors



Andreas Wieland,
Member of the Board of Directors

Code of Conduct

1. Scope

The Code of Conduct applies to the RONAL GROUP and lays down fundamental principles that are valid for all employees and all companies of the RONAL GROUP. Each of our employees complies with the laws, regulations, standards and internal regulations and acts in accordance with the mission statement and the company values of the RONAL GROUP.

2. General conduct requirements

2.1. Compliance with laws and responsible behavior

The RONAL GROUP's image is characterized by the attitude, behavior and conduct of every individual. Inappropriate conduct of even one employee can generate considerable damage to the entire group. Each of our employees must ensure that he/she complies with the applicable laws and does not damage the image of the RONAL GROUP in the fulfillment of their tasks and when appearing in public.

2.2 Responsibility for basic social rights and principles

The RONAL GROUP is committed, in its area of influence, to adhering to international human rights. We strictly reject child labor. All staff must have reached the statutory minimum age for gainful employment in their country. We reward good performance with appropriate levels of pay, which depend on skills, responsibility and experience. Any form of forced labor is rejected, all staff must have been recruited of their own free will. We respect the freedom of association of our employees. Regardless of this, we always allow our staff to express their concerns directly.

2.3 Equal opportunities, non-discrimination principle and mutual respect

We guarantee equal opportunities and equal treatment, regardless of ethnic origin, skin color, gender, disability, ideology, religion, nationality, sexual orientation, social status or political views, provided these are based on tolerance and respect towards differently minded people. Our employees are thoroughly selected, employed and promoted based on their qualifications and abilities. Each of our employees is committed to refraining from any

type of discrimination (e.g. by disadvantage, harassment, bullying), and to facilitate a close, respectful working partnership.

3. Health and safety at work

The RONAL GROUP takes its responsibility for the health and safety of its employees seriously. We ensure that all country-specific requirements for health and safety at work are met. We maintain and promote health and safety in our working environment through preventative and health-promoting measures. Each employee contributes towards the promotion of health and safety and adheres to the standards of health and safety at work.

4. Environment and sustainability

The RONAL GROUP respects and protects the environment and consistently practices sustainability, as well as ecological and social responsibility towards its customers, employees and the public. We make efficient use of resources, reduce emissions, continually optimize our processes and comply with all country-specific environmental protection law requirements. We want to have a decisive impact on the future of mobility through our product innovations and working methods. Which is why we are constantly striving to develop and consistently implement new and innovative production technologies, so that our products can become the forerunners of environmentally-efficient manufacture and sustainability over the entire life-cycle. We call upon all employees to become committed to protecting the environment, and to use resources sensibly, sparingly and efficiently.

5. Dealing with business partners and third parties

5.1 Fair competition

We are committed to dealing fairly with our business partners and third parties, and support fair and unbiased competition, in compliance with competition and anti-trust law.

5.2 Donations and sponsorship

We award donations – that means, donations on a voluntary basis without expectation of reciprocity – and sponsor money in compliance with applicable

laws and the internal regulations that apply in this area. Awarding of donations is done in a transparent and verifiable manner. With our sponsorship activities we support culture, education, science and sport.

5.3 Trade control

We comply with the statutory regulations that prohibit or restrict the import and export of goods, or regulate the provision of services and financial transactions.

6. Prevention of conflicts of interest and corruption

6.1 Conflicts of interest

We believe it is important that while performing their official duties our employees are not affected by conflicts of interest between their private interests and the interests of the Company. Therefore all situations where conflicts of interest could arise should be avoided.

6.2 Fighting corruption

We support national and international endeavors to not distort or bias the competition through bribery, and reject all corrupt behavior that harms the Company.

None of our employees may abuse the business relationships of the RONAL GROUP for their own advantage or the advantage of others, or to the detriment of the RONAL GROUP. We are committed not to offer or accept any non-permitted private benefits (e.g. money, tangible assets, services), or to issue or accept invitations and hospitality, that might be prone to influence our decisions.

7. Managing information

7.1. Data protection and data security

We record, process or use personal data only if this is necessary for the specified, clear and legitimate purpose. We therefore take great care that use of data is transparent to those concerned, and that their rights to information and correction, and if appropriate to objection, blocking and deletion, are assured.

We are committed to an adequate level of protection when processing data. All components of data processing must be secured in such a way that confidentiality, integrity, accessibility and

detectability of data is guaranteed, and unauthorized internal and external use is prevented.

7.2 Non-disclosure

Each of our employees is committed to keeping business and trade secrets entrusted or otherwise disclosed to him/her within the employment relationship secret, and not to disclose these to any unauthorized individual, nor use them for non-permitted purposes.

7.3 Reporting

All of our reports, records and communications are clear and comprehensible.

8. Use of RONAL GROUP assets

Each of our employees may use the assets of the RONAL GROUP for business purposes only, unless special provisions permit private use. Each of our employees must handle the assets of the RONAL GROUP carefully and according to the envisaged purpose, and protect them from loss and damage.

9. Responsibility for compliance

Every employee is personally responsible for adherence to this Code of Conduct.

Every line manager must ensure that the employees in his area of responsibility are familiar with and adhere to the principles stated herein.

The first point of contact for employees who have questions or have uncertainties about the contents of this Code of Conduct shall be the respective line manager.

[Status: December 1, 2017]