



FreiLacke Code of Conduct

Basic principles and standard of conduct - Emil Frei GmbH & Co. KG



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Preface

Following a long family tradition, Emil Frei GmbH & Co. KG has for decades taken a responsible approach to conducting business in the paint and coating industry.

This code of conduct sets out the basic principles and standards of conduct for our company. Our aim is to ensure compliance with both ethical and legal standards and create a working environment that fosters integrity, respect and fair conduct. A value-based corporate policy in accordance with the law serves our long-term corporate interests and promotes fair competition, including in our relations with customers and suppliers.

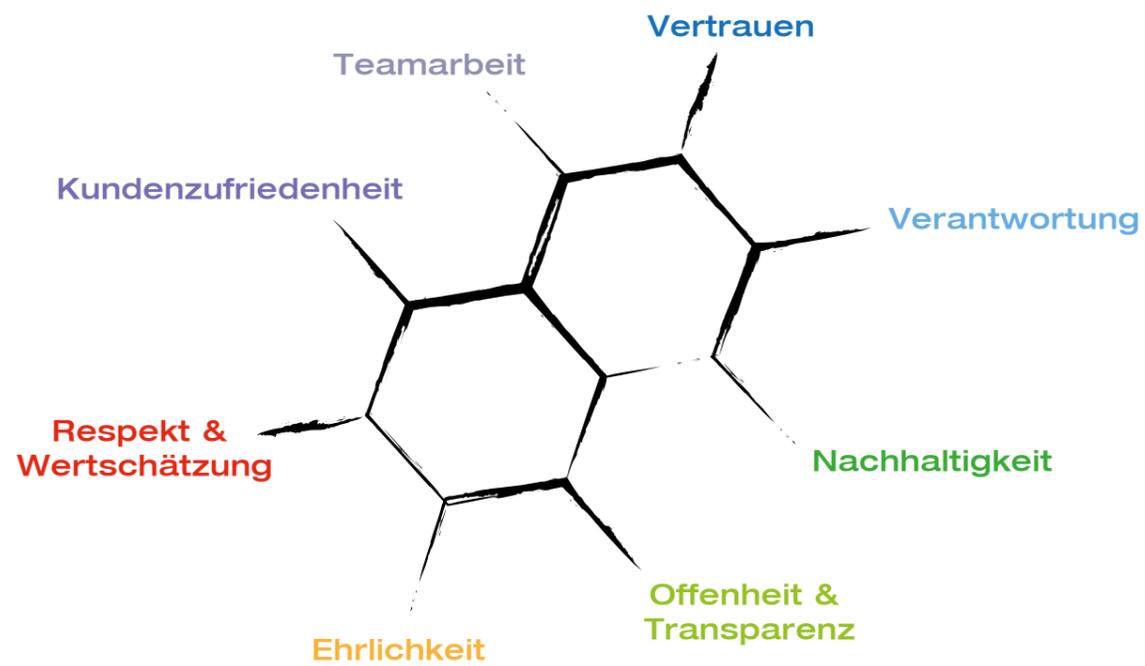
The rules of this code of conduct apply for all employees and management members of Emil Frei GmbH & Co. KG.

Dr. Rainer Frei

Hans-Peter Frei

R. Bäurer

FreiLacke corporate values



Health, safety and environmental protection

Protection of our employees and the environment is an important asset

Health, safety and environmental protection are of major importance throughout the entire value-added chain of Emil Frei GmbH & Co. KG. We uphold the principles of responsible care and constantly seek to improve our processes in relation to health, security and environmental protection. Through our sharp sense of responsibility and exemplary conduct we ensure the

- adherence to safety standards to prevent accidents,
- protection of our employees' health,
- responsible handling of chemicals to safeguard product safety within the product life cycle,
- environmentally and energy-conscious design of our facilities and processes to avoid wastage of material and energy sources

Corporate integrity



Fair competition

We observe fair competition in concordance with international competition rules.

We conduct business in fair competition with our competitors. We respect the rules and standards of competition and anti-trust law and observe important prohibitions on, for example, price fixing, market share agreements, capacity planning or partition of regional markets and customers.

Anti-corruption

We do not tolerate any form of corruption or provision of personal advantage in the exercise of our business activities

We do not tolerate any form of corruption or bribery within national or international business operations. Dealings to conclude business by unfair means will not be tolerated on our part.

We do not afford any preferential treatment to business partners or official representatives and do not accept any gifts from such individuals that could induce the impairment of objective and fair business decisions or give rise to the appearance of such. We are obliged to notify our superior of any instance where a business partner or public official offers or requests any such personal advantage.

This does not apply with regard to the giving or acceptance of symbolic or low value advertising gifts or invitations extended within the scope of normal business hospitality and courtesy. The acceptance of cash is prohibited in all cases.

Anti-fraud

We carry out our work reliably and honestly

We employ internal control systems to detect and avoid fraud. Financial transactions are effected in compliance with internally set authorisation and reporting principles.

We observe local laws to combat money laundering activities and conclude business solely with reputable partners.



Conflicts of interest

Private interests are to be separated from the interests of the company

We are loyal to our company. We avoid situations in which our personal or financial interests conflict with those of Emil Frei GmbH & Co. KG. Consequently, we are specifically prohibited from holding interests in competitor, supplier or customer enterprises and from entering into business relations with such in a private capacity.

Handling company property

We handle company property and assets with due care and attention

We undertake to handle company property with all due care and attention in order to protect the assets of Emil Frei GmbH & Co. KG against loss, damage, misuse, theft, misappropriation or destruction. Should we inadvertently damage company property, we handle the situation openly, with honesty and fairness.

Private use of company property is permitted in certain circumstances subject to the authorisation of the responsible department or superior.

Handling information and data privacy

We protect the intellectual property of the company and the personal data of our employees

We protect the intellectual property of Emil Frei GmbH & Co. KG., including business secrets such as formulations, processes and patents as well as business strategies and unpublished financial information.

We exercise care when using modern communication systems to prevent confidential information inadvertently falling into the wrong hands.

All personal information pertaining to employees, customers, business partners, suppliers and other third parties is handled by us with care and confidentiality in full compliance with data privacy laws.

Imports and exports

We observe globally applicable trade regulation laws

We operate our business in an international environment where the international trade in goods is subject to a plethora of strict trade regulations. In all cases, we observe applicable import and export restrictions as may be associated with national and company embargoes as well as technology or product embargoes.

Social responsibility

We respect international human rights and reject any form of discrimination.

Respectful and fair treatment of employees in their dealings with each other is a mainstay of our corporate culture and is reflected in the key elements encompassing customer satisfaction, sustainability, teamwork, appreciation and respect, responsibility, trust, honesty, openness and transparency in terms of our company values. We treat all employees and business partners equally – regardless of race, nationality, colour, faith, gender, sexual orientation, age, severe disability or physical constitution. Harassment in any form is prohibited at our company. Every employee has the right to be protected from harassment in the workplace.

Moreover, we uphold and support the principles, maxims and conventions of the United Nations.

- Protection of international human rights as well as avoidance and elimination of infringements of human rights arising in connection with activities performed or products produced for our company
- Observance of social standards such as minimum wages and fair working hours as well as upholding the freedom of association
- Elimination of forced labour
- Abolition of child labour



Compliance with the code of conduct

The rules contained in this code of conduct represent an important basis for the corporate culture of Emil Frei GmbH & Co. KG. Compliance with these principles is binding on all employees. Non-compliance with this code of conduct may result in disciplinary action, up to and including dismissal.

Where in your capacity as an employee you have reason to suspect a purported or actual infringement of the rules of conduct contained in this code, this should be reported to your immediate superior where possible. Should this not be possible for material or personal reasons, alternative reporting channels are available to you, which are set out in a works agreement and communicated via the internal company intranet.

All such information is processed in strict confidence and with due diligence. Emil Frei GmbH & Co. KG does not discriminate in any way on the basis of information presented in good faith within the scope of this code of conduct.

Important guidelines of international organisations

- Principles of the United Nations Universal Declaration of Human Rights
- International Labour Standards (ILO)
- United Nations Global Compact
- OECD Guidelines for multinational enterprises
- Core labour standards of the International Labour Organisation (ILO)
- UN Convention on the Rights of the Child
- Responsible Care Global Charter

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