A vertical stack of five blue geometric shapes on the left side of the page: a light blue circle at the top, a medium blue U-shaped arc below it, a light blue semi-circle below that, a solid dark blue circle below that, and a light blue ring at the bottom.

# Code of conduct

CCV GmbH

For business partners

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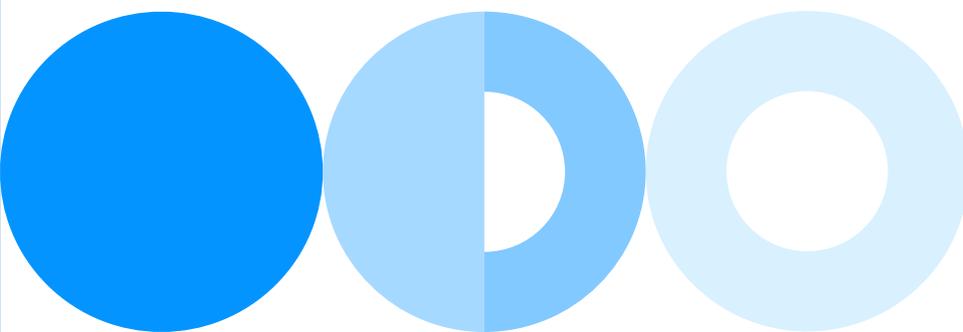
# Code of conduct

Compliance with applicable laws plays an essential role for us. In addition, we put great emphasis to social and ecological aspects. We also attach great importance to business integrity, transparent economic performance, fair procurement practices and competition, anticorruption and responsible location policies.

Environmental sustainability includes our contributions to environmental and climate protection as well as the responsible use of resources, the use of renewable energies, the identification and minimization of greenhouse gas emissions, and waste management. By social responsibility we mean our dealings with our employees, their working conditions, the maintenance and promotion of their health through occupational safety and health protection measures, and not least our social responsibility to society in the regions where our sites are located.

To ensure uniformly high standards in our business relationships, we require our Business Partners to comply with this Code of Conduct and with countryspecific laws. Business Partners are all legal or natural persons with whom we maintain business relations. We strive to maintain relationships only with reputable business partners who are willing to respect the principles of this Code of Conduct.

We place a clear focus on integrity in many respects. Our Business Partners should feel committed to our social and ethical principles and our environmental responsibility.



# 1. Conflict minerals

**We are committed to the goal that the use and sale of “Conflict Minerals” must not contribute to the ongoing conflict in the Democratic Republic of Congo (“DRC”) and neighboring countries.**

“Conflict Minerals” are cassiterite, columbite-tantalite, gold, wolframite or their derivatives, currently limited to tantalum, tin, tungsten and gold. On July 21, 2010, the U.S. enacted legislation requiring companies listed in the U.S. to disclose the use of conflict minerals originating in a “Covered Country.” Covered Countries are the DRC or an adjoining country (currently Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia).

On August 22, 2012, the U.S. Securities and Exchange Commission issued a final rule implementing the new disclosure requirements (“SEC Final Rule”). To meet their obligations under the SEC Final Rule, U.S. listed companies must obtain assurances from their suppliers, and they in turn must obtain assurances from their suppliers. CCV is not listed in the US, but supports the agreement in order to be able to assure business partners of compliance with a sustainable and responsible supply chain. For purposes of the SEC

Final Rule, “DRC Conflict Free” means that the product does not contain conflict minerals that have directly or indirectly financed or benefited armed groups in the named countries. We are committed



to responsible sourcing of materials for our products and expect our Business Partners to also commit to responsible sourcing.

Furthermore, we support greater supply chain transparency, particularly with regard to the sourcing of conflict minerals. Accordingly, we expect our Business Partners to adopt similar policies and comply with our stated principles.

As a result, we require that all of our Business Partners work with us to (i) provide appropriate information and conduct necessary due diligence to ensure compliance with the SEC Final Rule; and (ii) employ appropriate sourcing practices so that conflict minerals are procured only in a manner that is “DRC Conflict Free.”

We expect our Business Partners to follow due diligence measures in accordance with the OECD Due

Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”) or another at least equivalent nationally or internationally recognized supply chain due diligence standard that ensures that parts, components and subassemblies supplied to us are “DRC Conflict Free.”

Based on the foregoing, we require that our Business Partners can reasonably demonstrate that they are fulfilling due diligence obligations to be informed about the origin and supply chain of conflict minerals and to verify this on an ongoing basis, e.g. by participating in established supply chain communication processes such as the “EICC®/GeSI Conflict-Free Smelter Program”.



## 2. Human rights and non-discrimination

**Corporate responsibility and respect for human rights are essential to us at all our sites and in our global supply chain.**

We constantly ensure that our actions are in line with human rights and internationally acknowledged labor and social standards, and we expect the same from our Business Partners. Business Partners respect the United Nations Universal Declaration of Human Rights as a universal norm. In countries where the Business Partner has a presence, human rights are supported in a manner consistent with the country's international obligations and government commitment.

Business Partners do not tolerate any discrimination or harassment in the work environment, regardless of skin color, gender, religious denomination, political opinion, sexual orientation, ancestry or social origin, and exclude child labor and forced labor.



### 3. Foreign trade regulations

**We expect our Business Partners to comply with foreign trade regulations.**

They act in accordance with regulations of foreign trade, tax and customs law, laws for import and export within and outside the EU, national and international sanctions and goods lists, embargoes and applicable EU regulations and directives.



## 4. Occupational health, safety and employees

**Our Business Partners ensure respect for employee-related rights, such as the right to adequate wages, the right to breaks from work and a limit on working hours, regular paid leave, the right to form trade unions and the right to strike.**

Business Partners ensure a safe and healthy workplace for employees. Business Partners protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental and occupational health and safety laws, regulations and policies. Business Partners advocate for fair pay that does not discriminate between genders and enables workers to live self-determined lives. Business Partners respect the privacy of their employees. Control measures that violate personal rights must never be applied.

Business Partners respect the personal dignity of each individual. Employees must not be physically punished or physically, psychologically, sexually or verbally harassed.



## 5. Data protection and confidential information

**We expect all our Business Partners to comply with applicable national as well as international laws, regulations and guidelines regarding data protection law.**

We require our Business Partners to use any data or information provided only within the framework of the business relationship for the agreed purpose and for the fulfillment of the services, unless express written consent has been given for other purposes.

Confidential information and content must be protected from internal and external misuse and may not be published without authorization, passed

on to third parties or made publicly accessible in any other form.

Confidential information is personal data as well as information that is exclusively intended for the organization, could provide a competitive advantage or could lead to the loss of an existing competitive advantage. This type of information may not be disclosed to anyone outside the company and may be made available internally only to those who need to work directly with the information.



## 6. Competition and antitrust law

**We expect our Business Partners not to engage in anti-competitive behavior such as price-fixing, bid-rigging and other forms of illegal corporate collusion.**

When participating in public tenders, the respective legal requirements of fair and free competition must be observed. Likewise, we expect our Business Partners to comply with applicable antitrust and competition laws. Within the framework of applicable laws and regulations, we and our Business Partners conduct activities in a fair manner.

## 7. Anti-corruption

**We do not tolerate any form of corruption or other unfair business practices.**

Payments of bribes, kickbacks, and other improper payments or gifts of value, or the acceptance thereof, shall be completely prevented. No facilitation payments will be made to expedite or enhance the performance of activities or enforcement of claims, even in countries where such payment does not violate local law.

Our Business Partners will not engage in bribery or any other form of corruption. Business Partners must not directly or indirectly offer an improper advantage to any person - including officials of a government or state-controlled company.

Similarly, Business Partners may not accept any

such benefit. Business Partners shall ensure that appropriate measures are taken to prevent money laundering and terrorist financing in their company.

No material, non-publicly disclosed information that becomes known while doing business with us is used as a basis for trading securities. In addition, we expect our Business Partners to make decisions based on factual and business-related criteria and not to be influenced by private or financial interests or personal relationships.



## 8. Environment and sustainability

**We comply with the relevant environmental protection laws and regulations. We ensure that freight is transported in the most climate-neutral way possible in order to avoid greenhouse gases. We also ensure strict waste separation.**

We therefore expect our Business Partners to ensure that all products manufactured and all materials used meet the relevant environmental protection standards. This relates in particular to the reduction of energy and water consumption, the reduction of greenhouse gas emissions, and the increased use of renewable energies. Business Partners also undertake to comply with all applicable environmental protection regulations and standards on environmental protection and sustainability and to actively act accordingly.

Business Partners pay attention to sustainable resource management and waste reduction in production and procurement, as well as responsible chemical management.



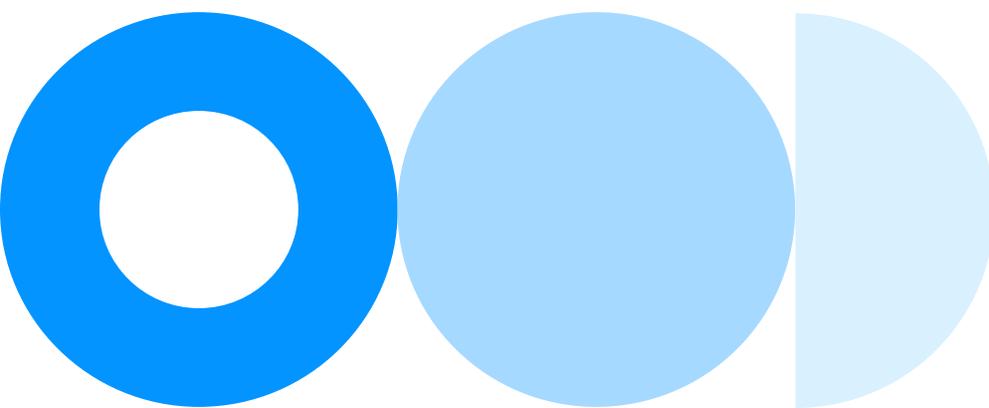
## 9. Whistleblower system

**Our reputation as a reputable, fair and respectful company is critical to our success. Our business development can only be ensured by individuals who place personal integrity high on their priorities.**

If you are aware of a violation of the principles set forth in this Code of Conduct, or if you have concerns about a suspected violation, you are encouraged to speak up. For cases where strict confidentiality or anonymity is desired, we maintain a multilingual SpeakUp Line from a neutral third-party provider (Whistleblower). This is available on the Internet or by telephone.

Free phone number:  
0800-1801733

URL:  
[www.speakupfeedback.eu/web/xaw4ca/de](http://www.speakupfeedback.eu/web/xaw4ca/de)  
with access code: 91814



## 10. Dealing with this code of conduct

**We strive with our Business Partners to comply with environmental, social and compliance rules and standards and to continuously improve them.**

Our Business Partners make reasonable efforts to promote compliance with the Code of Conduct and to prevent and detect corruption in all business arrangements.

If a Business Partner enters into an agreement with us that contains additional or stricter terms and conditions, these terms and conditions shall prevail. We have the right to make inquiries about our Business Partners' compliance with the requirements contained in this Code of Conduct.

The Code of Conduct for Business Partners is published on our homepage and is available as a download, in English as well as in German. If required by legal or regulatory changes, we reserve the right to update the content of the Code of Conduct for Business Partners accordingly.





[www.ccv.eu](http://www.ccv.eu)