



Code of Conduct

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¹ This Code of Conduct applies to the Lohmann Tape Group. To simplify the wording, the company will hereafter be referred to as "Lohmann".

Preamble

As an international company, the Lohmann Tape Group¹ is in constant contact with a vast number of different people and organisations, and hence to representatives of various interest groups. Consequently, the development and success of our company depends on how our employees behave in their day-to-day business. As a company, we have therefore come to a decision on what is important to us, and how we want to conduct business and be perceived.

Our vision:

we want to be the leading global provider of innovative bonding solutions.

Our core ethos is to develop outstanding adhesive solutions for our **customers** with which they can overcome their challenges as well as to deliver expert professional advice. We are one of the few global providers capable of supplying the entire value chain from a single source in the production of adhesive solutions. This ranges from the formulation and polymerisation of adhesives to coating and converting complex shapes. We support our customers right from the initial idea through to the delivery of a reliable machine application.

Lohmann has been operating successfully since 1851. Family members have a majority holding in the company. As such, we want to fulfil our responsibility for present and future generations. It is this responsibility that prompts Lohmann to actively protect the **environment** by supplying a product portfolio across the planet that is geared towards sustainability, a portfolio whose products are manufactured, transported, used and disposed of safely for humans and the environment.

We have our roots in Neuwied, Germany, but operate increasingly as a global company. For Lohmann, this means respecting national customs and traditions, as well as accepting the different ways of thinking and behaviour of all our **employees** in their everyday life. We use this cultural diversity constructively to create a productive atmosphere within the company.

As a company, we are part of **society**. As part of this interaction, we want to help influence our environment in a positive way. It is thus important for us to emphasise our social responsibility in this guide.

For us, this guide is a code of conduct for all areas where cooperation is involved: with customers, suppliers and every individual inside and outside our organisation. This is our standard, and the one by which we wish to measure ourselves.

Lohmann Executive Board

Neuwied, January 2015



Elma Boeke



Martin Schilcher

1. Our ethical obligation and corporate values

Der Erfolg unseres Unternehmens wird zu 100 % von unseren Mitarbeitern und Führungskräften sichergestellt. Nur wenn wir alle an einem Strang ziehen, wird sich das Unternehmen erfolgreich weiterentwickeln. Dazu gehört aber auch die richtige Einstellung. Wir sind daher der Überzeugung, dass folgende fünf Werte unser Handeln in Zukunft leiten sollen:



Trust

a) Trust

Trust is the basis for a creative and advanced way of working.
Trust is the basis of everything. When we trust each other, we become a strong team.



Accountability

b) Accountability

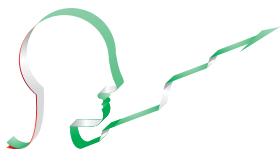
Commitment and accountability characterize our actions.
We do what we say and say what we do. Only when employees can count on each other in an organisation and take responsibility for their actions can work be carried out efficiently.



Performance

c) Performance

Our ability to perform makes our company culture distinct.
The result matters. Problems are addressed head on. We are tough in business, but fair with people. We set ourselves ambitious goals and are not satisfied with average results.



Entrepreneurship

d) Entrepreneurship

We ensure our success through entrepreneurship.
Our philosophy is to take an active approach towards subjects. Like an entrepreneur, we must all be prepared to fearlessly address and deal with new subjects, and do our very best to advance the development of the company.



Global Thinking

e) Global thinking

Our group growth is based upon global thinking.
Even if we are in charge of a local business, we always think beyond our national borders. We maintain our international contacts and thereby ensure the growth of the group.

2. Our social responsibility

a) Respecting laws and social norms

As an international company, Lohmann is represented in numerous markets and in many regions of the world, and is thus subject to different jurisdictions.

Since we are a responsible company, it goes without saying that we must comply with all applicable laws and regulations, regardless of whether they are local or international.

- As managers, we are obliged to know the underlying laws and regulations, and the company's internal rules, that are relevant to our area of responsibility. In-depth knowledge is required, particularly for managers who are responsible for compliance with applicable laws and internal regulations.
- We always apply the stricter regulations if there are conflicting requirements in our day-to-day business due to different legal systems or national customs. It may be that in some countries, business units or fields, stricter or more comprehensive laws or regulations than those described in this code of conduct apply. In cases of doubt, a legal expert from the company will be consulted.
- We ensure that the applicable laws or regulations are complied with, as violations of them may have serious repercussions, including criminal prosecution, compensation for damages or damage to our reputation.

b) Protection of human rights

Lohmann is part of society, promotes its overall development and that of each one of its members if possible, and respects the personal dignity of every individual. This means:

- We respect the personal dignity, privacy and rights of our employees, customers, suppliers and other people with whom we are in contact.
- We completely reject any form of forced and child labour.
- We comply with the laws and regulations regarding the protection of human rights, fair working conditions, the statutory minimum wage and other requirements pertaining to labour law.
- We do not tolerate any form of exploitation, the abuse of people because of their age, gender or health, or the disregard of requirements concerning safety at work or workers' rights.

- We welcome without qualification employees of all races, ethnic groups and nationalities. All employees are encouraged to foster an atmosphere in which they treat each other with respect. We strongly oppose any form of discrimination on grounds of race, ethnic background, gender, religion, world-view, political affiliation, disability, age or sexual orientation.
- As a company and as individuals, we consider high ethical standards to be essential.

c) Environmental protection, health, work and product safety

Lohmann has long pursued the following fundamental corporate goals: to protect humans and the environment and to conserve resources. *As a company from the German chemical industry, we are actively involved in the global initiative "Responsible Care". This initiative signifies the will to continually improve the conditions for protecting health and the environment, and the safety of employees and the surrounding area – regardless of any statutory requirements. "Responsible Care", which since 1995 has been mandatory for all companies that are members of the Chemical Industry Association, updates the 1986 environmental guidelines and develops them in terms of the global "Responsible Care" initiative for the chemical industry.*

- We consider environmental protection and health and safety at work to be an important aspect of our social responsibility. We define the standards of the European Union as minimum requirements in these areas. Stricter local regulations naturally apply in accordance with 2.a). Environmental management systems, as stipulated by DIN EN ISO 14001, which have effective programs for reducing emissions and waste and for conserving resources, are used to enhance environmental protection. With this in mind, an environmental policy was drawn up that takes the impact of our company on the environment into account and forms a framework for concrete environmental protection measures and environmental goals.

- We strive to use and procure natural resources responsibly when manufacturing and selling our products and services. We also use the ongoing new and further development of our products and production processes to effectively improve environmental protection. We ensure that we handle energy, water, materials and spaces responsibly.
- We respect the legal regulations governing environmental protection by adhering to the limit values of harmful substances that are released into the air, ground and water.
- We ensure that our waste is collected, sorted and disposed of properly with the aim of steadily increasing the amount of waste that can be recycled and reused in the flow of materials. During this process, particular attention is paid to hazardous waste.
- We ensure that a safe and healthy working environment is provided for our employees. We therefore comply with the health and safety laws and regulations in the workplace, and check and actively improve safety standards. We therefore place great importance on compliance with our health and safety guidelines.
- We see it as an essential task of senior management to ensure that appropriate procedures and protective measures are put in place to guarantee health and safety in the workplace.
- We are required to provide our customers with perfect and safe products and services that have a high standard of quality. This is extremely important. They must not have any faults or hazardous properties that could affect the health of our customers or other people or damage their property.

d) Corporate citizenship (corporate social responsibility)

To enhance its identity and its social responsibility as a successful business, Lohmann supports selected projects at home and abroad. We are involved in a number of ways in social affairs, health, sport, education, art and culture. We incorporate our social commitment into our company strategy and make it an integral part of our corporate culture. Our social commitment involves as many of our areas of the business and employees as possible.

- We have defined the following criteria for our active involvement within the area of corporate social responsibility:
 - Need
 - Within an overall context, donations or sponsorships are ringfenced entirely for use on tightly structured projects.
 - Making a sustainable impact by taking long-term measures that meet specific requirements and situations in the respective region
 - The public, recipient and purpose of the donation must be known
 - No contributions or donations are made to organisations, associations, etc. that do not pursue generally recognised goals
 - No contributions or donations are made to political parties or individual politicians

3. Our responsibility towards our customers

a) Customer satisfaction

The customer is always the focus of Lohmann business processes, projects and activities. We adapt locally and globally to the needs of our customers and the requirements of the market. We know that we are judged by our ethical, social and ecological conduct, as well as by the quality of our adhesive solutions. We aim to perform outstandingly in all these areas in order, as Bonding Engineers, to be the first port of call for our customers.

- We expect similar management standards from our suppliers and demand dependable levels of cooperation.
- We monitor the overall performance of our system based on aggregated key figures and aim to achieve process excellence.
- We regard innovation as one of our most important success drivers to secure the growth of our global group in the future and as an advantage over international competition.

b) Quality

Lohmann sees its commitment to quality as a key aspect of its business. We are constantly working on improving our structures and procedures for the benefit of our customers in order to achieve the top standards of quality. This applies to our products, services, management and naturally our corporate behaviour.

- We design all our processes involving product creation, sales, manufacturing and deliveries so that they conform – due to our quality policy – to ISO 9001 requirements at least.
- We view continuous improvement in all processes as a requirement for providing services with an agreed and consistently excellent and fault-free standard of quality.
- We monitor our production processes and provision of services, irrespective of the production sites, using the same global standards.
- We all ensure that the standards are adhered to and that any deviations are identified and corrected as soon as possible.
- We ensure that in all areas and functions of the Lohmann Tape Group, all employees have the necessary knowledge by providing them with documented and understandable training and instructions.



4. Our conduct in the business environment

a) Fair dialogue with business partners

Lohmann treats all business partners honestly and fairly. We are committed to promoting dialogue and partnership with our business partners throughout the world.

- We share the basic principles of ethical conduct, social commitment and environmental responsibility with our suppliers, subcontractors, representatives and consultants.
- We are committed to the principles of the free market and fair competition. We operate our business exclusively according to the performance principle and on the basis of free unrestricted competition.
- We choose suppliers and service providers by carrying out orderly procedures based on objective and reproducible criteria. Where appropriate and possible, we award our orders on the basis of competitive offers.
- We convey our values to our business partners and motivate them to take similar standards as a basis for their business activities.

b) Dealing with conflicts of interest

When dealing with conflicts of interest, Lohmann expects ethical behaviour to be exhibited by its employees. Private interests and the interests of Lohmann are to be kept strictly separate.

- We expect our employees to proactively inform their superiors of connections with people or companies with whom Lohmann has a business relationship, assuming that these connections could cause a conflict of interest.
- We welcome the social involvement of our employees in youth work, adult education, sports, charities and cultural activities. Our employees undertake to devote all their working time to Lohmann, so their performance must not be impaired by carrying out additional work.
- We notify our superiors if we are carrying out additional work, as consent may be required even if only a small amount of additional work is involved.
- We ensure that our activities as well as the activities of our close family members – either on their own behalf or on the behalf of a third party – are not in competition with the business activities of Lohmann, or violate the interests of the company.
- Our employees must notify their superiors of the substantial interest of even close family members in a competitor, customer or supplier.

c) Offering and granting of benefits

In the competition for orders, we rely on the quality and the benefits of our products and services for our customers, and on fair pricing. We support national and international efforts not to influence or distort competition by means of bribery.

- We refrain from carrying out any illegal business activities, such as corruption or bribery. We do not grant any financial support to officials or employees from other companies with the intention of obtaining orders or unfair benefits for the company or a third party.
- We treat courtesy gifts that comply to a certain extent with standard business practices according to the law, which we are bound by.
- We ensure that these are always made in such a way that recipients must not conceal the fact that they have accepted a gift, and that they do not feel placed under any obligation.
- We only reimburse the business and project-related travel expenses of officials or non-officials within reason. The applicable legal requirements are to be observed. Reimbursements are to be made in such a way that the recipient does not feel obliged to conceal them.
- Asking for charitable donations or offering them must be handled with the utmost care. A careful check must be carried out to ensure that this is not a concealed attempt to commit bribery.

d) Demanding and accepting benefits

Lohmann is aware that gifts from business partners comply to a certain extent with standard business practices. However, accepting gifts may lead to conflicts of interest and may endanger the excellent reputation of our company.

- We stipulate that an employee may not use his/her position or role within the company to demand, accept or gain any personal benefit.
- We allow occasional courtesy gifts to be accepted within a generally recognised framework. Beyond this, any gifts and other benefits, particularly cash, which are offered to employees or closely related persons must always be refused.
- In such cases, our employees are obliged to inform their superiors that gifts or benefits have been offered to them.

e) Suppliers

Lohmann also expects its suppliers to follow this code of conduct.

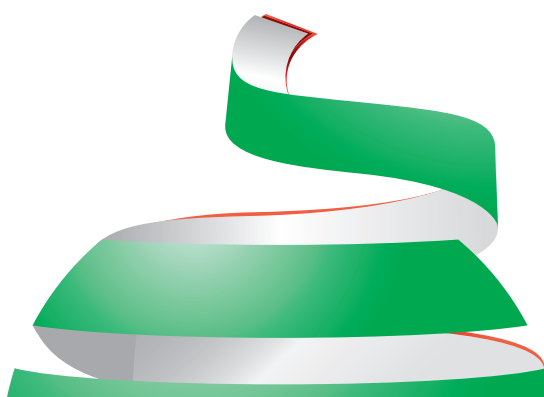
- We have outlined this in a "Supplier Code of Conduct" that is based on this document.
- We recommend that our suppliers, for their part, ask their suppliers to follow this code of conduct.

f) Protection of company resources, data protection & IT

Lohmann considers the careful handling of company and personal data to be the basis of all its actions. We treat the personal data of our employees and customers as strictly confidential and with the utmost care.

- Within their areas of activity, our employees are obliged to handle the tangible and intangible assets of the company appropriately, economically and responsibly. Tangible assets include premises, land, vehicles, business equipment and products. Intangible assets include patents, intellectual property rights, technologies and other information to be protected.
- We stipulate that all commercial or trade secrets be treated as confidential. They must not be divulged to unauthorised third parties during or after termination of employment.
- When we collect, store, process or transfer personal data and information, we comply with all applicable laws and regulations.

- We prohibit confidential business information from being used directly or indirectly during employment for personal benefit, for the benefit of a third party or to the detriment of Lohmann. Following termination of employment, confidential business information must not be used by former employees of the company.
- We use the IT systems provided by our company to perform our tasks and contribute to protecting these systems and devices from internal and external misuse. This particularly concerns the use of the internet and social media.
- We are aware that digital information is disseminated quickly, can be copied easily and is virtually irrevocable. For this reason, we pay special attention to the content of e-mails, attachments, downloaded files and stored voice messages.
- We point out that consideration is always needed when storing or transferring any data, electronically or printed, and whether this data requires special protection and whether insofar specific authorisation is required in order to use the data. The creator and user of the data must ensure that the data is secure. In cases of doubt, the superior or data security officers must be consulted.



g) Legal procedures

Lohmann strictly complies with laws and always approaches the resolution of possible legal disputes with care.

- We prohibit our employees from engaging in any activities that could involve Lohmann or its workers in any illegal practices. This concerns the deployment of staff and the use of business assets.
- We respond to complaints, lawsuits and investigations concerning Lohmann quickly and appropriately to protect and defend the company.
- We demand that any employee who is threatened with a complaint, lawsuit or an investigation concerning a business-related matter to contact the Human Resources (HR) department immediately.

h) Accounting and reporting standards

Lohmann bases its decision-making processes on the correctness and accuracy of the records in the accounting system.

- We ensure that all statements of expenditure, bookkeeping documents, financial, research and sales reports, environmental and safety reports, and any other company documents show the relevant facts and nature of business transactions in a correct, unambiguous and timely manner.
- We would like to emphasise that it is particularly important to treat safety data, personal data, invoices and financial data as confidential. All business transactions must be shown on our books according to the stipulated procedures, auditing standards and generally accepted accounting standards.
- All the employees responsible, including the relevant accounting and auditing departments, are obliged to treat the auditors with confidence and to provide them with all the information they require.

i) External communication

External communication plays an important role in Lohmann.

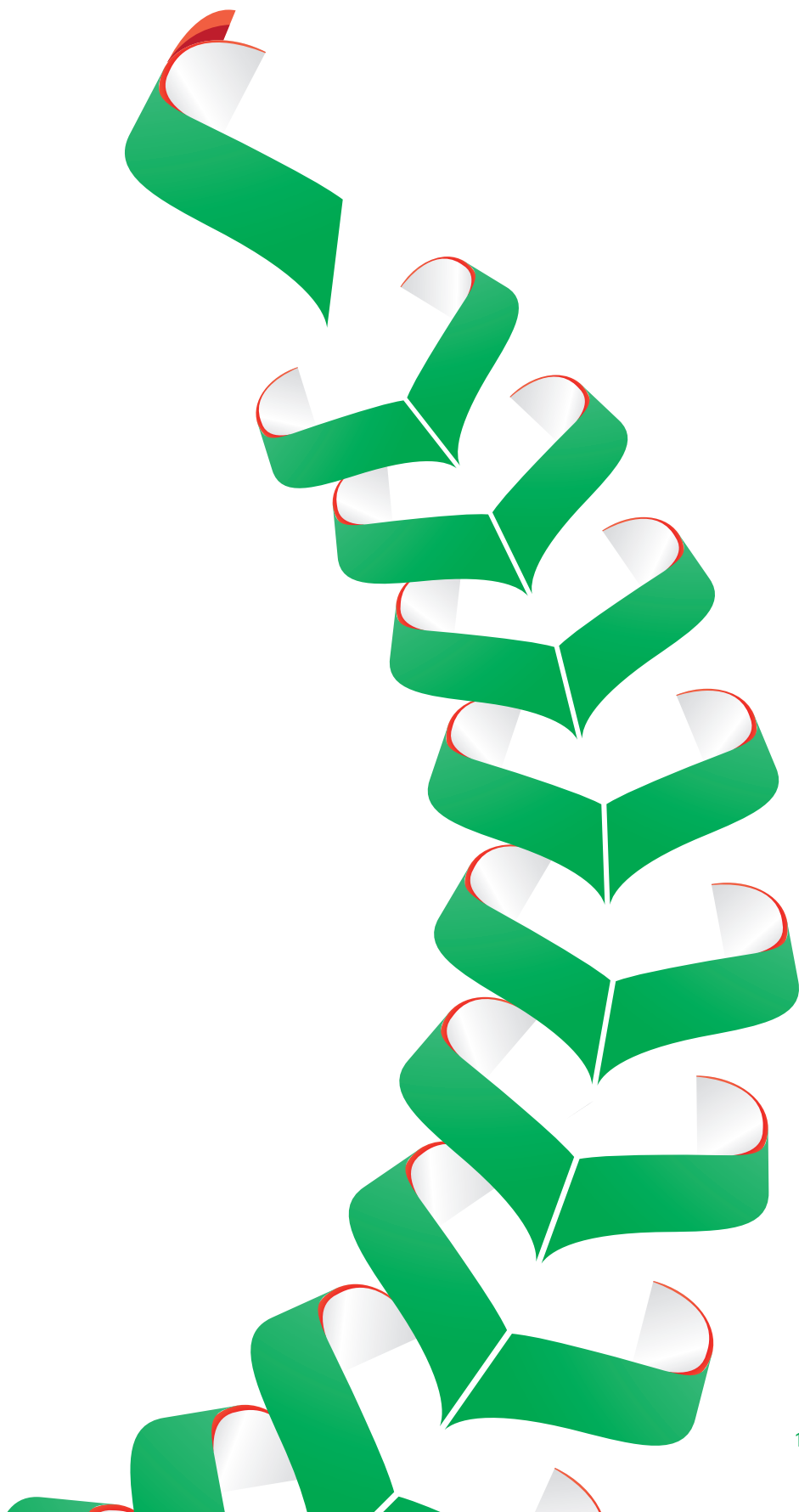
- We only authorise certain individuals to make official oral or written statements to the authorities, business partners and the media.
- We would like to emphasise that as a representative of the company, each employee has a responsibility towards Lohmann. This also applies to the private domain and especially for social media (including personal communication).

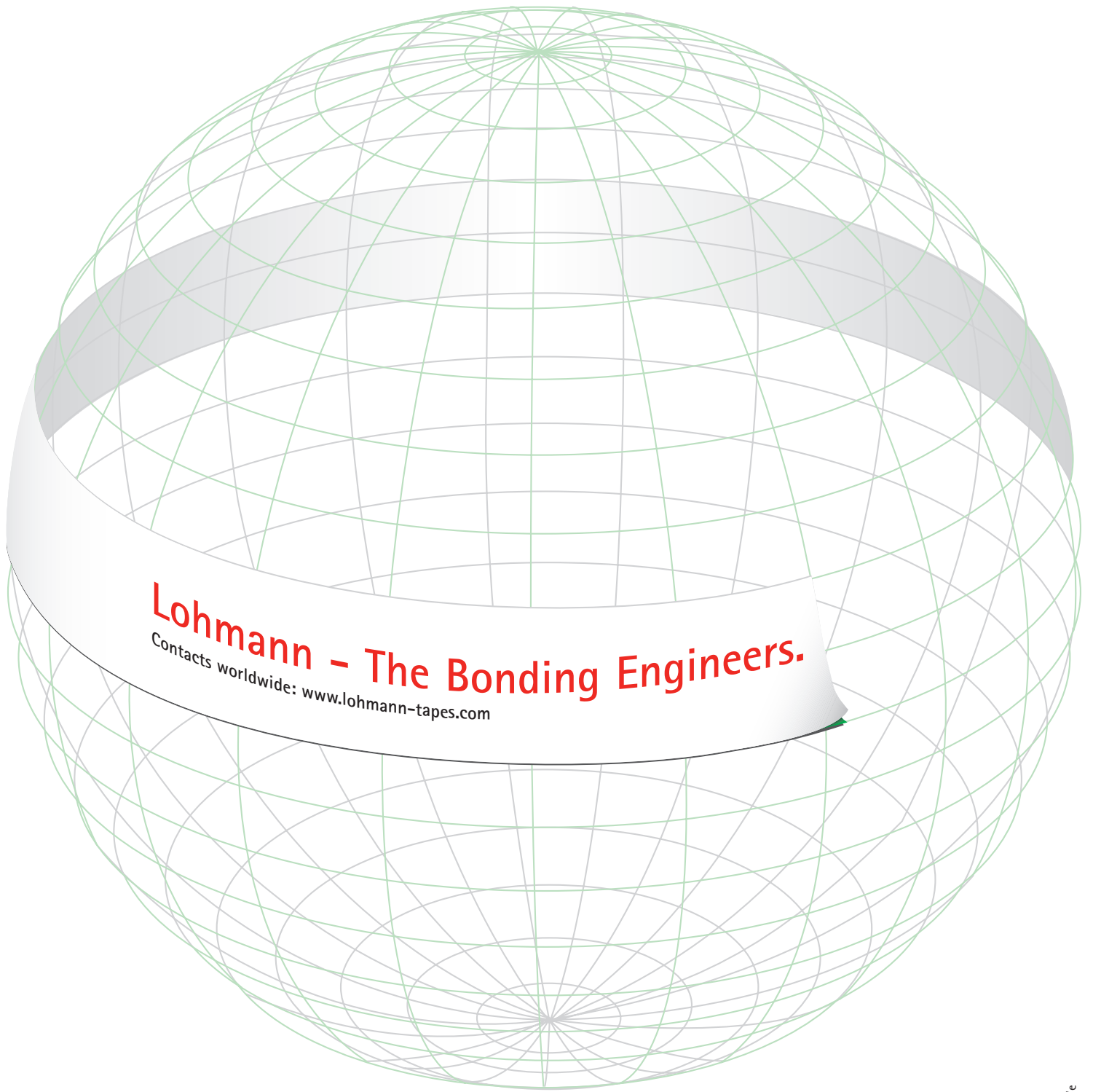
j) Compliance with competition law

Compliance with competition law is a priority for Lohmann.

- We respect the fact that relationships and agreements with competitors, suppliers, distributors and dealers that unfairly affect competition are prohibited by law in nearly every country.
- We are obliged to comply with the applicable competition law and seek advice from experts regarding issues pertaining to this law. This includes price agreements, the sharing of customers or sales areas among competitors, anti-competitive boycotts and other methods of unfair competition.
- We are obliged to compete fairly and abide by these laws and regulations. Due to the complexity of the matter, all employees – particularly senior managers and sales and marketing employees – are obliged to seek appropriate legal advice when problems concerning competition law arise.

For Lohmann, this Code of Conduct is a behavioural guideline for all areas where cooperation is involved and describes the essential aspects of the corporate culture. However, it is not the basis on which to demand certain behaviour from Lohmann or to substantiate contractual claims against Lohmann.





Lohmann - The Bonding Engineers.
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