

Code of Conduct

The symptom of our time seems to make it necessary that we express and declare what is an obviousness for our corporate society. Our mercantile conduct follows principles which are neither new nor need to be discussed. We keep what we promise, we imply sustainable solutions for our partners, the environment and for our corporation which includes our employees and we act forwardthinking in an always effective manner. This given, it is self understanding that we obey laws and where these are not sufficient we have set internal corporate guidelines

1. Business Policy

Our corporate responsibility also includes the ethical dimension in particular. The code of conduct documents our belief that we can only be successful as an enterprise if we act with integrity. The good reputation of our company and the trust of our partners can only be maintained through responsible conduct.

The rules of conduct below describe the ethical and legal framework for our actions by way of principles and rules: Based on these rules of conduct, we want to pursue clean business policies with all our partners and also with our employees, everywhere, and at all times.

The code of conduct applies for all of us working at or for Kluthe ("employees"). These are the bodies, leadership, employees (including temporary workers and similar) and other staff of Kluthe GmbH.

2. Tolerance, fairness, equal opportunity

We ensure that our employees are as diverse as our client base. The diversity of our employees as well as an appreciative attitude and respectful treatment are foundational components of our corporate philosophy as far as they are not negatively influencing our code of conduct. This includes fair working conditions, wages above the statutory minimum requirements and other labor law regulations in each country. We value all employees equally depending on their productiv commitment to our corporate society - regardless of ethnic origin, race, gender, disability or age. We keep private opinions separat from professional business behaviour. We also expect our suppliers and all other companies that we work with to act ethically and in compliance with the law.

3. Bribery and corruption

We reject any type of bribery and corruption. Employees of Kluthe GmbH are not allowed not accept any personal favors from any representative or employee of another company and must not demand or accept personal favors (e.g. presents) in conjunction with any activities. Our obligation concerning anti-corruption applies to all business sectors without any exceptions, independent from cultural customs or local laws. We also expect from all third parties acting under our name, that they adhere to this basic principle. Our business partners trust the professional judgment of our staff.

4. Safety at work, protection of health and environment

Our employees are our most valuable resource. We therefore take all necessary measures to create attractive and optimal working conditions to prevent accidents and injuries that may arise in conjunction with the activity, and to ensure a safe and healthy work environment. We apply the highest standard on all of our regional sites.

To ensure health and safety at the work place is therefore an important objective for us. Our employees are therefore tasked to apply all safety regulations at the work station. Particular diligence is required when handling hazard sources, such as for example during all working activities. Respective training sessions are carried out.

While carrying out their work, employees are instructed to protect natural resources and to ensure that the business activities of Kluthe impact the environment as little as possible by saving material, low-energy design as well as waste recycling. Every responsible party needs to consider ecological and social criteria with regards to the selection of suppliers, advertisement materials and other external services in addition to economic considerations.

5. The protection of personal data and confidential information

The respective legal regulations are have to be obeyed. To express them once more in our own words: We strictly enforce the adherence of the regulations to protect personal data and we respect the general human rights of all persons concerning their personal data.

Confidential information and documents about clients, the company or employees must be protected in a suitable manner against the eyes of third parties as well as non-involved colleagues in a suitable manner. Personal data must only be collected, processed or utilized to the extent that such is required for the brand. The use of data must be transparent for the affected party. Your right to information and correction as well as objection, blocking and deletion must be granted as applicable. Employee data are protected through respective operational agreements.

An appropriate standard must be maintained during the technical safeguarding against unauthorized access to data and information as well as the loss or the destruction in accordance with the current state of technology.

6. Implementation

As part of the respective activities on behalf of Kluthe, every employee is obligated to adhere to the basic principles specified in this code of conduct. Violations against these principles or against statutory regulations may have serious consequences for the company.

Heidelberg, den 13.04.2017 *gez. Martin Kluthe*