

Policies on Corporate Responsibility, Anti-Corruption Measures, Code of Conduct and Ethics

Upholding ethical values is synonymous with respect for basic human rights. We are firmly committed to fair interactions with others and to carrying out business in accordance with prescribed standards day in and day out. We view our customers' success as the key to our long-term sustainable business success and continuous growth. We strive to fulfil the requirements all of our stakeholders as a matter of course. We regard a corporate culture built on mutual esteem as a prerequisite for economic success.

Our management board is responsible for generating sustainable corporate strategy and implementing it accordingly. Integrity, compliance with legal regulations and upholding ethical principles are key elements required to maintain our company's authenticity in an ethical and socially responsible manner.

By using our management principles in conjunction with our quality, safety and environmental guidelines, we define standards and directives which ensure that our employees are treated with respect and dignity while providing safe working conditions and environmental sustainability.

This code of conduct defines:

- How our management should exercise its responsibility,
- How our employees and colleagues should treat one another,
- How we should conduct ourselves toward customers,
- How we should interact with our suppliers, and
- How we should conduct ourselves in interactions with local government agencies and the environment.

Every manager and every employee is responsible for conducting themselves in accordance with the code specified here. Our managers must behave as role models in this respect, setting a good example and acting in accordance with the code of conduct in every situation.

Human Rights

We respect every individual and are committed to protecting and observing international human rights. We firmly oppose all forms of child and forced labour. We do not tolerate working conditions of any kind which do not comply with international and/or local regulations or practices.

Discrimination

In our hiring, remuneration, further training, promotions, dismissals and retirement plans, we do not in any way discriminate on the basis of employees' race, ethnic origin, gender, age, marital or family status, religion or ideology, disability, pregnancy, sexual orientation, trade union membership or affiliation with a political party. We require our employees to firmly oppose any such discrimination as a matter of course.

Freedom of Association & Right to Collective Bargaining

At Lüttgens GmbH & Co. KG we respect the right of all employees to join or leave, be active for or to establish associations and organisations of their choice with the purpose of promoting and protecting their own interests. Accordingly, we observe the applicable

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agreements with collective employee associations in compliance with local rules and regulations.

Disciplinary Measures

We decidedly oppose the use of corporal punishment, mental or physical coercion and verbal abuse.

Motivation & Continuing Training

We believe that motivated employees who identify themselves with our corporate objectives are key for our success. We particularly promote our employees' further development. We concentrate on job-related continuing training that can be applied within the company as well as development and enhancement of future management potential.

Health & Safety

Our employees' well-being is protected with maximum effect by providing a healthy and safe workplace environment. By complying with our company's safety regulations, each employee helps ensure a safe and healthy working environment.

Compliance with Anti-Trust & Competition Regulations

Offering high-quality products, innovative solutions and proven reliability, we accept the challenge of open and fair competition on global markets. We do not in any way participate in collusive tendering or other unlawful and/or criminal practices which exclude, distort or restrict competition.

Conflicts of Interest & Bribery/Corruption

All our employees avoid situations causing conflict between their interests, whether personal or financial, and those of the company. They are in particular not allowed to acquire interests in the businesses of competitors, customers or suppliers or themselves enter into business relationships with competitors, customers or suppliers which result in any conflict of interest. Such a conflict arises from any interest or relationship which due to its nature and scope can in any way affect the employee's actions performed on behalf of our company. Our employees unequivocally refuse to demand, accept or receive any improper or illegal benefit which can influence business decisions or transactions. Also, none of our employees will offer or provide any improper advantage to business partners, their employees or other third parties nor will they make or attempt to make agreements of this kind in any business activities.

Protection of Assets & Confidentiality

Every employee is expected to protect the company's tangible and intangible assets, treat company and trade secrets and customer-related business information confidentially and observe all applicable data protection regulations.

Suppliers

We place high expectations on our suppliers and require them to comply with the same strict rules that we ourselves apply in conducting business, particularly regarding their treatment of employees. When importing products, we expect precise designation and classification of goods and raw materials as well as exact specification of their value and country of origin. We adhere fully to local customs and import laws, regulations and government agency procedures.

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Environment & Recycling

As a plastics processing company, we feel a particular sense of duty to interact very responsibly with nature. We equip our plants with state-of-the-art technologies to protect the environment. Every employee plays a part in realising high product quality by means of environment-friendly manufacturing processes with responsible energy usage.

Social Commitment

We unequivocally assume our responsibility as citizens of the community in which we operate and commit ourselves to open communication with all authorities and other social and public stakeholders.

Compliance

This code of ethics and conduct has been approved by the management board and made available to all employees. Our employees adhere to this code without exception when performing their jobs. In certain regions, countries or corporate positions, stricter or more detailed guidelines may apply which, however, will be basically consistent with these corporate principles. Any questions concerning the application or interpretation of these guidelines as well as reports concerning potential infringements are to be directed to the employee's supervisor.

Actions Taken in the Event of Violations

Employees carrying out or involved in procedures, practices, or acts in violation of this code will be directed to correct this behaviour and will be subject to disciplinary action. Depending on the severity and previous history (e.g. repeated occurrences) of the violation, it may result in an admonishment, a formal warning or even dismissal.

Any supplier or other business partner failing to comply with this code will be contacted with respect to the violation and instructed to remedy the situation. Depending on the severity and previous history (e.g. repeated occurrences) of the violation, it may result in termination of the business relationship.

In the event any LKT employee, supplier or other business partner is known or suspected to be in violation of any of these rules, the Managing Director (holger.luettgens@luttgens.de) must be informed accordingly without delay.

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