

**Code of Conduct for business partners
and employees of SOLLICH KG**

Preface:

Since its foundation, the business practices of SOLLICH KG have been based on integrity, honesty, fair business conduct and compliance with all applicable laws. The employees of SOLLICH KG support and live this commitment in their daily work and the reputation of SOLLICH KG continues to be one of the company's most important assets.

The SOLLICH KG Code of Conduct (hereinafter referred to as the "Code") lays down non-negotiable minimum standards for conduct in important areas.

It is not the task of the code to cover all conceivable situations. Rather, it describes the yardstick by which all activities are to be measured. Employees must seek advice if they are unclear about the correct course of action in a particular situation. It is the direct responsibility of each individual to "do the right thing" - this responsibility cannot be delegated. Employees should always be guided by the following simple principles:

- avoid any conduct that could damage the reputation of SOLLICH KG or the company itself;
- always behave lawfully and honestly;
- reconcile company interests with personal or other interests.

In these guidelines, "employees" refers to all employees, including managers and company representatives of SOLLICH KG and its subsidiaries.

Compliance with laws, regulations and guidelines

Compliance with laws and regulations is an essential basic principle of economically responsible action for SOLLICH KG. SOLLICH KG shall at all times observe the applicable legal prohibitions and obligations, even if this entails short-term economic disadvantages or difficulties for the company or individual persons. Where appropriate, employees must also comply with internal regulations and guidelines. These internal regulations are company-specific and may exceed the requirements of the law. The following requirements of the code shall apply to the same extent to SOLLICH KG and its suppliers and agents.

Conflicts of interest

A conflict of interest arises if the personal interests of an employee or the interests of a third party compete with those of SOLLICH KG.

In such a situation it can be difficult for the employee to safeguard the interests of SOLLICH KG. Employees should avoid conflicts of interest as far as possible.

In the event of a conflict of interest, or if an employee is faced with a situation that may involve or lead to a conflict of interest, the employee shall inform his or her supervisor and/or management or works council to find a fair and transparent solution appropriate to the situation.

Health and safety

SOLLICH KG complies with all applicable laws and regulations on work safety and health protection and is committed to the continuous improvement of work safety and health protection.

Right to fair remuneration

SOLLICH KG and its business partners comply with the statutory and collective minimum wage requirements.

The organisation may not make wage deductions as a result of disciplinary measures.

Ethical standards

SOLLICH KG is guided by general ethical principles. It is committed to not having any relations whatsoever with national or international criminal or terrorist organisations.

Human rights and social responsibility

Sollich KG supports the upholding of internationally recognised human rights. All employees must be treated with dignity and respect. Any kind of physical punishment, threat of violence, harassment or abuse, in particular in physical, sexual, psychological or verbal form, is prohibited. Sollich KG respects the equal opportunities of its employees and opposes discrimination within the framework of the applicable regulations. In particular, no discrimination on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, sex, political opinion or disability shall be during recruitment and employment.

Rejection of child labour

Child labour is strictly prohibited and must be combatted. SOLLICH KG undertakes to comply with the standards of the International Labour Organisation (ILO). For the employment of young employees, the German Youth Employment Protection Act (JArbSchG) shall apply in its valid version.

Rejection of forced labour

According to Convention No. 29 of the International Labour Organisation (ILO), forced labour is strictly prohibited and Sollich respects and supports this.

Freedom of association

The employees of SOLLICH KG have the right to talk openly with the management about the working conditions without having to fear negative consequences. At the same time, they have the right to join a trade union, to join it, to appoint a representative and to be elected to it.

Integrity / Gifts / Fair Competition

We expect integrity from ourselves and our business partners and do not tolerate corruption, bribery or the granting of benefits to influence decisions. Compliance with all applicable laws and regulations, in particular competition and antitrust laws, is mandatory for SOLLICH KG and its business partners. SOLLICH KG will therefore waive any order that can only be obtained by violating the relevant laws. Only catering within the usual limits and gifts not exceeding the value of €60.00 may be accepted. If a rejection appears to be offensive due to cultural traditions, the management has to be informed. Even in cases of doubt regarding the acceptance of a gift, the management must be informed and will decide on how to proceed.

Environmental protection

All applicable laws and regulations as well as internationally recognised standards for the protection of the environment and the obligation to continuously improve environmental protection must be complied with.

Selection of suppliers / service providers

All supplier bids will be checked by SOLLICH KG in a fair and unbiased manner. Likewise, the decision, awarding and execution of a contract must be made according to appropriate criteria and be comprehensible. Preferential treatment, discrimination or obstruction of suppliers are strictly prohibited.

We also require our business partners to adhere to these values.

Information / Communication

Our business partners will disseminate the contents of this code in an appropriate form within their companies. In addition, the code is also available on the Internet at www.sollich.com as a PDF file.

Corporate property

In principle, business premises, furnishings, equipment/tools and data of SOLLICH KG are to be used exclusively for the purpose of fulfilling business tasks. Every employee is obliged to handle the property of SOLLICH KG as well as the property of third parties with care so that it is not used incorrectly, damaged or stolen.

Dealing with authorities

SOLLICH KG shall always act sincerely, transparently and in accordance with applicable law when dealing with authorities. All employees are advised to inform their supervisor immediately before taking any further action in the event of any official enquiries. In the event of anti-trust or competition law inquiries, employees are required to call in the management.

Confidential information

Confidential information is any information that is not, or not yet, publicly available. This includes trade secrets, business, marketing and service plans, ideas and concepts for manufacturing and production, instructions, designs, databases, records, compensation information and any unpublished financial or other data.

The ongoing success of SOLLICH KG depends on the use of confidential information and on keeping it secret from third parties. Unless required by law or approved by management, employees may not disclose or permit the disclosure of confidential information. This obligation shall also apply after termination of the employment relationship with SOLLICH KG. In addition, employees must do everything in their power to prevent inadvertent disclosure by exercising special caution when storing and transmitting confidential information.

SOLLICH KG respects the efforts of third parties to protect their confidential information. If third parties such as joint venture partners, suppliers or customers share confidential information with SOLLICH KG, they will be treated with the same caution as confidential information about SOLLICH KG. In the same way, employees must safeguard confidential information they have learned about during previous employment.

Review

SOLLICH KG reserves the right to have compliance with the principles of cooperation by its business partners audited by independent auditors. If the business partner violates this code, SOLLICH KG will give the business partner a reasonable period of time to remedy the defect and reserves the right to terminate the cooperation irrespective of this.

Bad Salzflen, 14/12/2018

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