

Code of Conduct of Arthur Flury AG

The Code of Conduct of Arthur Flury AG forms the foundation on which we conduct our business. It contains the values and principles on which Arthur Flury AG is committed as a global company and on which our daily work is based.

For convenience, only the Male Form is used in the following Code of Conduct.

We are convinced that we can only generate sustainable and long-term values if our behaviour is legally and ethically. We therefore commit ourselves to a sustainable development of our businesses, characterized by respect and responsibility towards all employees, our business partners, the environment and the community.

All employees and partners of Arthur Flury AG are bound by the regulations of this Code of Conduct. It sets the values, principles and methods of action that determine the entrepreneurial activities of Arthur Flury AG. The aim of the company's management is to respect ethical standards and create a work environment that promotes integrity, respect and fair conduct. Strictly based and fundamental business policies serve long-term company interests.

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1.1 Occupational health and safety

As a certified company, Arthur Flury AG takes its responsibility seriously to ensure the safety and health of its employees and visitors at all times. Safety is at the forefront at Arthur Flury AG at all times. In this way, Arthur Flury AG is constantly creating conditions and adaptations to ensure safe working.

Arthur Flury AG is committed to promote the health and well-being of all members during work and private life with ongoing health and occupational safety preventions.

All employees of Arthur Flury AG have to ensure a safe and healthy environment. Therefore, safety instructions must be strictly observed.

1.2 Commitment and Regulations

Arthur Flury AG sees itself obliged to act economically, socially and environmentally consciously. Arthur Flury AG strives to conduct its business competently and ethically and to protect fair competition in all markets where it operates, by complying with applicable laws on antitrust, competition and competition restrictions. Unfair advantages against customers, partners or competitors are to be avoided.

Arthur Flury AG strives to comply with applicable laws and regulations in all business decisions and actions at home and abroad. Integrity and sincerity support fair competition, also in relation to our customers and business partners.

Arthur Flury AG endeavours, together with its business partners, to ensure the following regulations to the best of our knowledge at all times:

REACH (Registration, Evaluation, Authorization and Restriction of Chemicals)

Regulation (EG) No. 1907/2006: Regulates the (non-) use and handlings with dangerous chemicals.

RoHS (Restriction of Hazardous Substances Directive)

According to the current RoHS guideline, restrictions for the following substances apply:

- Lead (1)
- Cadmium (2)
- Hexavalent chrome (1)
- Polybrominated biphenyl (PBB) (1)
- Polybrominated diphenylether (PBDE) (1)
- Mercury (1)

- (1) *No more than 0.1% weight percent with regards to homogenous materials*
- (2) *No more than 0.01% weight percent with regards to homogenous materials*

WEEE (Waste of Electrical and Electronic Equipment)

The WEEE-guideline establishes the legal framework for collecting obsolete electrical and electronic devices from consumers, reducing the number of such devices from household waste and correctly collecting and recycling resources.

ILO (International Labour Organisation)

The ILO develops and regulates legally-binding international working standards and agreements (conventions), as well as recommendations to member states. This concerns various fields of the labor laws: maternity leave standards, protection for temporary employees, age restrictions for certain positions etc.

BSCI (Business Social Compliance Initiative)

Industry code of conduct with 11 key elements: management practice, no precarious employment, working hours, remuneration, child labor, compulsory labor (incl. prison labor and compulsory measures), freedom of assembly (incl. freedom of organization and freedom of tariff), discrimination (gender, race, religion), working conditions, healthcare and social facilities, health and security at the workplace (occupational safety), aspects of environmental protection and particular protection of young employees.

Dodd–Frank Wall Street Reform and Consumer Protection Act

The Dodd Frank act prohibits the use of raw materials, when their production and trade contributes to the financing or other forms of support of armed groups in the DR Congo or its neighboring states (Angola, Burundi, Republic of Congo, Rwanda, Zambia, Sudan, Tanzania, Uganda, Central African Republic). Said raw materials are (Gold, titanium, tungsten, and tin).

1.3 Conflict of interest

Arthur Flury AG expects loyalty by their employees towards the company.

All employees must avoid situations where their personal or financial interests are in conflict with those of Arthur Flury AG. Therefore, it is particularly forbidden to participate in competitors, business partners or customers or to enter into business relationships with them in the private environment as long as this can lead to a conflict of interests. The interests of Arthur Flury AG shall not be affected by conflict situations.

Such conflicts of interests can arise in many situations. Neither of the employees is allowed to accept any advantages, in any form whatsoever, which can reasonably be expected to influence business decisions or transactions of Arthur Flury AG. Invitations must be moving within the limits of commercial hospitality.

Employees, who have access to confidential information at Arthur Flury AG due to their position, should not personally obtain direct and/or indirect advantages. All employees have an obligation to represent the legitimate interests of Arthur Flury AG as far as possible.

Arthur Flury AG is against corruption and bribery. Procedures for dealing with unfair means are not tolerated. Employees of Arthur Flury AG are not allowed to offer business partners any benefits, or accept any advantages from business partners, which could lead to an impairment of an objective and fair business decision or even create such a semblance.

In the event of uncertainty or a clear violation of the above-mentioned cases, the relevant supervisor must be informed and the procedure shall be discussed.

1.4 Environmental management for more energy efficiency and environmental protection

As a certified company, Arthur Flury takes its task about the environmental protection responsibilities seriously and is constantly in progress to develop further.

Together with its business partners, Arthur Flury AG assumes responsibility for the environment, the fellow human beings and the future, and supports and claims all members and partners of Arthur Flury AG to continually set new environmental management goals.

Certified business processes lead to resource savings, prevent waste and strengthen the competitiveness of Arthur Flury AG.

1.5 Fair working conditions

As a socially responsible employer, Arthur Flury AG regards its employees as a great asset. She demands great commitment from its employees. The personnel policy of Arthur Flury AG offers every employee the possibility of professional and personal development. An open exchange of opinions, involvement in decisions, the introduction of constructive criticism and ideas are encouraged.

Arthur Flury AG condemns whatever unlawful discrimination or harassment.

1.6 Privacy and data protection

All employees of Arthur Flury AG are obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to the affected areas, except in exceptional cases, in particular on account of secrecy obligations, priority interests exist. Relevant knowledge must not be unlawfully withheld, distorted or selectively passed on.

Confidential documents and know-how may only be passed on to third parties if they have previously signed the confidentiality agreement of Arthur Flury AG without exclusion.

A large part of the business information of Arthur Flury AG is confidential or legally protected, so that a duty of secrecy exists. This does not apply if the publication of the information has been approved by Arthur Flury AG or is compulsory on the basis of laws or regulations.

The duty of secrecy applies in particular to intellectual property. This includes business secrets, patents, trademarks and copyrights, as well as business and marketing plans, drafts, business papers, salary data and all other unpublished financial data and reports.

All personal information about employees, customers and business partners, as well as other third parties, are carefully used and kept confidential in Arthur Flury AG, in full compliance with the data protection laws. The protection of this information must be met with the utmost diligence.

1.7 Handling with assets

All employees of Arthur Flury AG are responsible for the proper and careful handling of the company's property. Each employee is obliged to protect the property of Arthur Flury AG against loss, damage, misuse, theft, embezzlement or destruction. Each employee has the obligation to inform his superior immediately about the unlawful use of assets.

1.8 Implementation and monitoring

The rules contained in this Code of Conduct form the core element of the corporate culture of Arthur Flury AG. Consistent adherence to these principles is indispensable. Every employee is responsible for this.

If an employee has concerns or complaints about the points cited in this Code of Conduct or is aware of a possible breach of the rules contained in this Code of Conduct, he should immediately submit this to his supervisor for clarification. This may also be done anonymously or in a confidential manner. If an employee is not satisfied with the clarification, he can submit the request or the complaint not only to the supervisor but also to the personnel department. Arthur Flury AG does not allow reprisals due to complaints submitted in good faith within this Code of Conduct.

1.9 Responsibility

All employees and partners of Arthur Flury AG are bound by the rules of this Code of Conduct. Violations of this Code of Conduct lead to consequences. In serious cases, these may lead to a warning or termination of the employment relationship.

Deitingen 05.09.2017

CEO
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