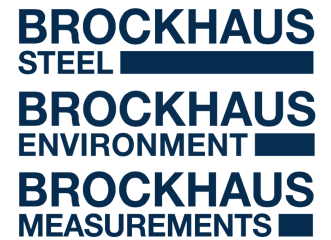


Code of Conduct



Objective and Scope of Application

The present Code of Conduct sets out the details of the requirements we must meet in terms of compliance and ethical conduct. We understand the term “compliance” to mean both adherence to our internal rules, as given in the Code of Conduct and guidelines, and observance of the corresponding statutory regulations. Business conduct is ethical wherever it corresponds to the general principles of integrity and decency, and where the people we deal with perceive it to be right.

Our Mission Statement

„We constantly strive for a better understanding of our customers.

This understanding enables us to optimize our performance. Through this

we will become a partner to our customers and can achieve sustainable success.“

is founded on five values, which were identified by an anonymous voting among our staff. Through this participative approach we were able to identify values that are deeply rooted in the work ethics of our employees. The following values are an essential part of our mission and corporate culture:

Reliability

Responsibility

Teamwork

Respect

**Environmental
Consciousness**

General Principles of Ethical Business Conduct

Compliance with Statutory Rules and Regulations

BROCKHAUS expects all employees to strictly comply with the law, other binding regulations, and our internal rules. Violations of the law may be subject to high fines, they may result in our company being blocked both for public-sector and private-sector contracts and in further-reaching sanctions being levied on us by government authorities, and they may expose us to claims for the compensation of damages – not to speak of the damage done to our reputation. In economic terms, the Group will suffer losses, which in turn places the jobs of our employees at risk. Moreover, violations of the law may lead to the matter being prosecuted under criminal law. Employees who fail to comply with the laws and other binding regulations may be subject to disciplinary action and to claims for compensation of damages. BROCKHAUS will proactively follow up on any reports alleging violations of the law within the Group, will involve the responsible authorities where required, and will cooperate with them.

Ethical Conduct

We at BROCKHAUS believe our responsibility is greater than simply complying with the statutory rules and other binding regulations. We expect our employees to conduct themselves ethically in all of their business activities and in any situations that such activities entail. Supervisors must act as role models. Anyone working with external partners on behalf of BROCKHAUS bears responsibility as a representative of the Group.

Individual Aspects of our Business Conduct

Combating Corruption and Money Laundering

Corruption has devastating effects on societies, markets and businesses all over the world, and may cause significant damage to BROCKHAUS. That is why we are committed to combating corruption and – first and foremost by ensuring transparency – to preventing even the slightest impression of corruptive behavior.

Fair Competition

BROCKHAUS is committed to ensuring that all competition is fair. Our clients choose us because of the high quality of our work, at competitive prices. We refuse to be a party to any impermissible agreements in restraint of trade.

Social Interaction

We are committed to the principles of respectfully dealing with one another in a fair and loyal way. All employees have equal opportunities when they are hired and in further growing their careers within the Group. Discrimination of any form is prohibited.

Fair Employment

BROCKHAUS guarantees that no form of illegal employment and exploitation of employees happens within the Group. BROCKHAUS combats illegal employment and exploitation of employees amongst its suppliers and subcontractors.

Avoiding Conflicts of Interest

All of the employees at BROCKHAUS benefit from our company's success. However, this success is enabled by each individual employee acting in the best interests of the Group. Nobody may pursue private interests that are contrary to the interests of the company.

Implementation of the Code of Conduct

Supervisors' Responsibilities

Compliance is an obligation the entire BROCKHAUS organization must meet. Accordingly, in addition to acting as a role model, supervisors have the task of ensuring that all employees are aware of the Code of Conduct and the guidelines, that they are familiar with them and adhere to them. This requires personal dialogue, as well as organizational measures.

Reporting Misconduct

In light of the significance that the proper conduct of all employees has for BROCKHAUS, adherence to the Code of Conduct and the guidelines is a task that all employees share. Where there are indications that someone within the company has violated them, we expect all employees to report such violation to their supervisor or to the executive management. No employee reporting (presumed) violations of the Code of Conduct or the guidelines in good faith, and who has not himself or herself done any wrong, need fear any reprisals for having filed such a report. Measures will be taken against anyone knowingly raising false allegations.

Business Partners

BROCKHAUS also expects its business partners to act with integrity and to comply with the law. Therefore, we make the compliance with such standards a decisive decision criterion before

entering new business relationships with suppliers, service providers, subcontractors or distribution agents. Current business relationships are revised whenever there is the suspicion that a business partner disregards such standards of compliance.

About UN Global Compact

We are no official participant of the UN Global Compact because we, as a small and medium-sized enterprise, do not want to handle the administrative work and the high costs associated with the official participation in the program. As a family business of our size we are nevertheless able to achieve all main goals in the fields of human rights, labour, environment and anti-corruption.

Our Code of Conduct is based on the UN Global Compact and hence also includes the following declarations and conventions:

The Universal Declaration of Human Rights

The Rio Declaration on Environment and Development

The UN Convention Against Corruption

Additionally, the principles of the **ILO Declaration on Fundamental Principles and Rights of Work** are applied in the labour section of the UN Global Compact.

Version: January 2016

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