



BLEI STAHL Group – Code of Conduct

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Preface

*The **BLEISTAHL** Group has created this Code of Conduct which summarizes our fundamental principles of behavior. It leads us through legal and ethical challenges and guides our Employees in the right direction at work. Each of our employees is equally responsible for compliance with these principles.*

To reach our goals we will:

- *act responsibly to benefit our customers and employees.*
- *understand the strict observance of international conventions, law and our internal rules as a basis for sustainable, successful and profitable performance.*
- *assume full responsibility for our performance and we will adhere to the following code of conduct.*

We also expect our business partners to adhere to the same standards as our employees for Human rights, allegiance to the law, legal protection for child labor and young workers, interactions with others, equal opportunities, and health and security.

Area of Application

This Code of Conduct extends to all company locations of the **BLEISTAHL** Group.

General Behavioral Requirements

Respect for Human Dignity

We respect internationally accepted human rights and support their compliance. Each employee is required to ensure compliance to the constitutional rights of others as defined below.

Equal Opportunity, Anti-Harassment, and Non-Discrimination

We guarantee equal opportunities and equal treatment without regard to ethnic background, skin-color, sex, disability, religion, citizenship, sexual orientation, social background or political ideology.

We are committed to ensuring that every employee is treated with respect and dignity and has the freedom to work in an environment free from physical, sexual, psychological, or verbal harassment. Concerns will be investigated with strict protection of the interests of all parties. Retaliation toward any employee who reports a valid concern will not be tolerated.

Employees are selected, hired and promoted on the basis of their performance, qualifications, and skills. The right to freedom of opinion and freedom of expression is protected and guarantees protection and privacy.

Compliance with Child Labor Laws

We prohibit child labor. We adhere to the minimum age for admission to employment in accordance with applicable regulatory obligations. No use of forced or compulsory labor in any form, including human trafficking, is tolerated. No employee may be directly or indirectly forced by violence and/or intimidation to employment. Employees are only hired if they provide themselves voluntarily for employment.

Employees, Employee Representation, and Respecting Employee Communication

We create an environment that offers our employees personal and professional development. We invest in the skills and competencies of our employees in an appropriate manner.

At the same time, we expect every employee to have high demands on their performance as well as on their health and to be actively involved in a further development.

We value open communications with employees. In locations where employees are not represented by a recognized representative, we will provide opportunities for employee concerns to be heard, without fear of reprisal, intimidation or harassment, to promote a productive work environment. Where employees have a recognized representative, we will work constructively with that representative to promote a productive work environment. We respect the rights of employees, consistent with applicable law, to join or assist a labor union/workers' council or refrain from doing so.

Employee Behavior

It is important to us to ensure that all employees maintain a trusting and open relationship with each other. The behavior among employees should be guided by collectively established rules such as team rules and meeting rules. Tensions or problems that occur should be addressed through open debates in a respectful and appreciative manner - assistance can be given by the Supervisor or the Human Resources Department.

Management Culture and Cooperation

Each manager of the **BLEISTAHL** Group is responsible for his/her employees. Due to their role model function, our executives will function as role models and will ensure that their actions embody the principles of the Code of Conduct.

Working Conditions

Working Hours

We will comply with applicable wage and hour law regulations regarding the assignment of work hours and schedules including overtime. We will do our best to balance the needs of our employees with those of our customers.

Compensation and benefits will comply with applicable regulatory requirements, including those related to minimum wages, overtime compensation and legally mandated benefits.

Occupational Safety and Health Protection

We are committed to create a healthy and safe work environment that meets or exceeds all applicable standards. To ensure this, we conduct regular training and audits of health and occupational safety status according to established norms.

Avoidance of Conflicts of Interests

Conflicting Interests

It is very important that our staff is not influenced by any conflict between their private interests and those of the **BLEISTAHL** Group. Therefore all situations, in which conflicts of interest may arise, should be avoided.

Our employees are expected to avoid activities that may cause conflicts with business interests. They do not abuse their position, by using corporate information or corporate property of the **BLEISTAHL** Group for personal use or for inappropriate advantage of third parties.

BLEISTAHL will not tolerate the giving or receiving of money, gifts, or favors to influence improperly the behavior of another individual, organization, government employee, politician, or government body in furtherance of a commercial or personal advantage. Bribery is never permitted, even in countries or regions where it may appear to be tolerated or condoned.

All potential and actual conflicts of interest, material transactions or relationships that reasonably could be expected to give rise to such a conflict or the appearance of such a conflict must be promptly communicated to the Chief Legal Officer of **BLEISTAHL**. Employees should take care to report conflicts to a person who they believe is not involved in the matter giving rise to the conflict.

Business Conditions

Behaviors with Business Partners and Third Parties

In accepting and giving gifts and other benefits (eg. participation in events without direct business relevance), including invitations (to and from suppliers and customers) the financial framework should be such, that their acceptance by the

recipient does not need to be confidential and it does not create an obligatory dependence. In each case it is necessary to obtain written approval for the activity in advance.

Fair Competition

We are committed to the fair treatment of our business partners and third parties; furthermore we support a fair and undistorted competition and compliance with competition and antitrust law. Each of our employees is obliged to observe the rules of the competition law and the antitrust law. This means, for example, that none of our employees will discuss prices or capacities with market partners.

Agreements with business partners and third parties over a non-competition, over submitting unauthorized offers or over the distribution of customers, territories or production programs are not allowed. Also the improper preference or the exclusion of contractual partners is not allowed.

In addition, we expect our business partners to be aware of their full responsibility to ensure fair competition.

Business Relationship with Suppliers

The **BLEISTAHL** Group strives to conduct transactions with its suppliers and its business partners that are mutually beneficial. New business connections should be made only with suppliers and business partners who comply with the applicable laws in the countries in which they operate, who comply with this code of conduct, and who, in addition, feel obligated to act fairly and sincere towards its shareholders.

Dealing with Information

Data Privacy

We ensure the protection of privacy in the use of personal data and the security of all transaction data, taking into account any applicable legal requirements. We will take reasonable actions to guard against unauthorized access utilizing currently available technology.

Confidentiality

We keep all propriety and personal information of the **BLEI STAHL** group confidential. This obligation applies to both current and former employees.

Dealing with Internal Knowledge

We share information with other groups on a need to know basis. Information that needs to be shared will be done quickly, respectfully, efficiently and with a high degree of accuracy. Information that is personal or confidential will only be shared with those who have a legitimate business need to know.

Dealing with Corporate Property

Each of our employees is allowed to use the property of the **BLEI STAHL** Group for official business use only. Furthermore, each of our employees must use the company's property in an appropriate and careful way and to protect it from loss. When using company provided resources, employees do not have any expectation of privacy.

Environmental Protection

We are environmentally conscious and we will comply with the applicable regulations for environmental protection that affect our operations.

If the regulations do not reach a level of protection that ensures sustainable business, we will take commercially reasonable measures to achieve a satisfactory level of protection. Furthermore, we will act responsibly towards nature and natural resources.

We will pursue effective environmental protection throughout the supply chain in order to reduce the environmental footprint of our products through-out their life-cycle. All products manufactured within the supply chain and the applied materials and substances used in the process met environmental standards for design, development, distribution, use, disposal or recycling. Our approach includes but is not limited to:

- Reducing energy and water consumption
- Reducing greenhouse gas emissions
- Increasing use of renewable energies
- Enhancing appropriate waste management
- Training of employees

We support a proactive approach to environmental challenges, encourage development and diffusion of environmentally friendly technologies.

Conflict Minerals (CM)

We act in compliance with the CM provisions of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act. As of 2012. Act. We will be conduct a reasonable country of origin inquiry (RCOI) and, depending on the results, we will further conduct due diligence and provide disclosures to the SEC.

The Conflict Minerals, regardless where they are mined, are:

- Columbite-tantalite (tantalum)
- Cassiterite (tin)
- Gold
- Wolframite (tungsten)

Also included are potentially other minerals - **BLEI STAHL** is committed to this effort and participates in our annual reporting utilizing an online reporting tool.

Dealing with the Code of Conduct

We will take all appropriate and reasonable efforts to continuously implement and apply the principles and values set out in this Code of Conduct and - where appropriate - remedy existing deficiencies as soon as possible. We will communicate the Code of Conduct to employees, business partners and other stakeholders, for example, by publications in our own internet presence and the company's intranet.



Dr.-Ing. Ekkehard Köhler
CEO **BLEI STAHL** Group

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