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**Commitment declaration:**

**Andreas Daub was founded 1872 in Pforzheim and is directed in the 5th generation by Kurt Daub. The company management and employees commit themselves to the ethical, human rights, social and ecological guidelines of this code of conduct.**

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## **Andreas Daub GmbH & Co. KG**

### **Code of Conduct**

#### **1. General and human rights**

Andreas Daub GmbH & Co. KG believes that success depends upon creating and maintaining a relation of trust and professionalism with its main stakeholders namely its employees, commercial partners, government authorities and the public.

Andreas Daub GmbH & Co. KG believes that this Code of Conduct is fundamental to creating and maintaining such trust.

The main purpose of Andreas Daub GmbH & Co. KG's Code of Conduct is to ensure that all persons acting on behalf of Andreas Daub GmbH & Co. KG perform their activities in an ethical way and in accordance with laws and regulations and with the standards Andreas Daub GmbH & Co. KG sets through its policies, guidelines and rules.

This Code of Conduct provides a framework for what Andreas Daub GmbH & Co. KG considers responsible conduct, but is not exhaustive. As a Andreas Daub GmbH & Co. KG employee, you should always strive to exercise good judgment, care and consideration in your daily work.

The base of this code of conduct are the principles of the Conventions of the International Labor Organization, the Declaration by the United Nations, the OECD Guidelines and the UN Global Compact.

#### **2. Scope and responsibility**

The Code of Conduct applies to all employees. In case of noncompliance, the situation must be reported and the continuation of our relationship will be assessed.

Each employee shall receive a copy of the Code of Conduct. It is the duty of management to promote and monitor compliance with the Code.

You shall avoid acting or encouraging others to act contrary to this Code of Conduct, even if such deviations under the circumstances may appear to be in Andreas Daub GmbH & Co. KG's interest. If you are uncertain whether a particular activity (including that of an existing or prospective business partner) is legally or ethically acceptable, you should, as far as practicable, consult in advance with your immediate superior or with the Head of the Corporate Legal Department.

Violations of this Code of Conduct will not be tolerated and may, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal or even criminal prosecution. Each case shall be reviewed objectively in full recognition of the circumstances.

Should improper practices or irregularities occur within the Group, necessary corrections and remedial action to prevent recurrence will be taken.

All violations of the Code of Conduct should be recorded and reported. In the list "violations against the code of conduct" the violations and the measures that have been taken are written down.

### 3. Complaints & expressions of concern

Andreas Daub GmbH & Co. KG wishes to stimulate open discussions about responsible conduct. In this context you have the responsibility to report any concerns or complaints to your direct supervisor, the worker representation, by written means to the open letter box or directly to the company's head of management. They may be reported in your preferred language.

It is a violation of this Code of Conduct to discriminate against or harass anyone for making a report that brings to light a violation of law or a Andreas Daub GmbH & Co. KG policy. If you feel that your bringing forward of any such violation is in any manner used against you, you should contact your superior or the Head of the Corporate Legal or Internal Audit Department. Anyone submitting a false report with the obvious intention to harass will, however, be subject to disciplinary action.

### 4. Personal conduct

As a Andreas Daub GmbH & Co. KG employee or representative, you are expected to conduct business and behave impeccably towards business partners, colleagues, and others. This includes being sensitive to and respecting foreign cultures and customs. Andreas Daub GmbH & Co. KG does not accept any form of harassment, discrimination or other behavior that colleagues or business partners may regard as offensive or degrading.

### 5. Equal opportunities and diversity

Andreas Daub GmbH & Co. KG is committed to an inclusive work culture and appreciates and recognizes that all people are unique and valuable, and should be respected for their individual abilities. Andreas Daub GmbH & Co. KG does not accept any form of harassment or discrimination on the basis of gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.

Andreas Daub GmbH & Co. KG shall provide equal employment opportunity and treat all employees fairly. Andreas Daub GmbH & Co. KG employees and business units shall only use merit, qualifications and other professional criteria as the basis for employee-related decisions in Andreas Daub GmbH & Co. KG, regarding for instance recruitment, training, compensation and promotion.

### 6. Conflict of interest and integrity

#### 6.1. Fraud and conflict of interest

As a Andreas Daub GmbH & Co. KG employee or representative you shall not seek to obtain advantages for yourself (or related persons) that are improper or in any other way may harm Andreas Daub GmbH & Co. KG's interests. Andreas Daub GmbH & Co. KG's interests include financial performance, environment health and safety considerations, security and commercial and public reputation.

You may not take part in or seek to influence any decision under circumstances that can give rise to an actual or perceived conflict of interest. If you become aware of a potential conflict of interest you shall, without delay, notify your immediate superior.

#### 6.2. Bribes, gifts and favors

You shall not, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise or give any undue advantage to a public official (or a third party) in view of making such official act or refrain from acting in relation to the performance of her/his official duties. This applies regardless whether the advantage is offered directly or through an intermediary.

Gifts and other favours can only be given or granted to business partners provided that they are modest, both with respect to value and frequency, and provided the time and place are appropriate.

As a Andreas Daub GmbH & Co. KG employee or representative, you are not permitted to accept from business partners monetary or other favors that may affect or appear to affect your integrity or independence. Gifts and other favors can only be accepted to the extent they are modest, both with respect to value and frequency, and provided the time and place are appropriate. If you are offered, have received or feel pressured to provide such favors beyond common courtesy gifts you shall, without delay, notify your immediate superior.

**6.3. Activities with a competitor, supplier or other business associates**

Before engaging in any activity that may be perceived to promote the interests of a competitor or a supplier or other business partner at the expense of Andreas Daub GmbH & Co. KG's interests, including serving on the board of such company, you shall consult with your immediate superior. You may not market products or services in competition with Andreas Daub GmbH & Co. KG's business activities or broader interests.

**6.4. Confidential information**

Information, intellectual property such as copyrights, trade secrets and trademarks and innovative ideas are valuable Andreas Daub GmbH & Co. KG assets. These intangible assets must be appropriately managed and protected. Andreas Daub GmbH & Co. KG's general policy of openness and transparency shall not prevent appropriate protection of information that may be of value to Andreas Daub GmbH & Co. KG's business interests.

Information other than general business knowledge and general work experience that becomes known to you in connection with performance of your work shall be regarded as confidential and treated as such. Of particular relevance are the rules against disclosing or using confidential information for personal gain for yourself or others.

**6.5. Safeguarding assets and records**

Safeguarding assets and records of Andreas Daub GmbH & Co. KG's, customers and other business partners is the responsibility of all Andreas Daub GmbH & Co. KG employees and representatives. All such assets shall be used and maintained with care and respect while guarding against waste and abuse. The use of Andreas Daub GmbH & Co. KG time, materials, financial assets or facilities for purposes not directly related to Andreas Daub GmbH & Co. KG business is prohibited without authorization. The same applies to the removal or borrowing of Andreas Daub GmbH & Co. KG assets without permission.

**7. Compliance****7.1. Compliance with laws – general**

You shall comply with all applicable laws and regulations when conducting business on behalf of Andreas Daub GmbH & Co. KG. You shall not assist or participate in breach of laws by business partners, whether it constitutes an illegal act, for Andreas Daub GmbH & Co. KG or yourself. It is your responsibility to seek to acquire a sufficient understanding of the applicable laws and regulations as they apply to your job.

**7.2. Antitrust and competition**

You shall comply with the antitrust and competition laws applicable. You should seek advice from the Corporate Legal Department in all matters involving risk of antitrust exposure for Andreas Daub GmbH & Co. KG, yourself or any of your reports.

**8. No rights created**

This Code of Conduct is a statement of certain fundamental Andreas Daub GmbH & Co. KG principles, policies and procedures that govern Andreas Daub GmbH & Co. KG's employees and representatives. It does not create any right for any customer, supplier, competitor, shareholder or any other person or entity.

Kurt Daub

**Andreas Daub GmbH & Co. KG**

Esslinger Str. 16  
75179 Pforzheim  
Germany

Tel. +49 7231 / 142 96 - 0  
Fax. +49 7231 / 142 96 28  
E-Mail: [info@andreas-daub.com](mailto:info@andreas-daub.com)  
Homepage: [www.andreas-daub.com](http://www.andreas-daub.com)