



CODE OF CONDUCT

WE CREATE CONNECTIONS FOR SUCCESS

Location Einhausen



Location Warstein



1.0 PROLOG

Dear employees,

this Code of Conduct is intended as a summary and basis of our important fundamental rules and principles, which are already binding for us today and will continue to be binding in the future. They apply to us internally and to our stakeholders (customers, suppliers, shareholders, business partners, employees). We are pleased to present to you the Code of Conduct of JUNG Gummitechnik GmbH.

Our mission statement describes the values we share and how we want to work together. The relationship between our employees and our above-mentioned stakeholders is determined by mutual respect and trust. As a company that dates back to 1982, we attach great importance to sustainability and further development/innovation. We place long-term success above short-term profits. Integrity is firmly anchored in our corporate culture, and each of us helps to promote it in our day-to-day business activities. Only together as a team can we preserve the values and together create something great in terms of our corporate purpose.

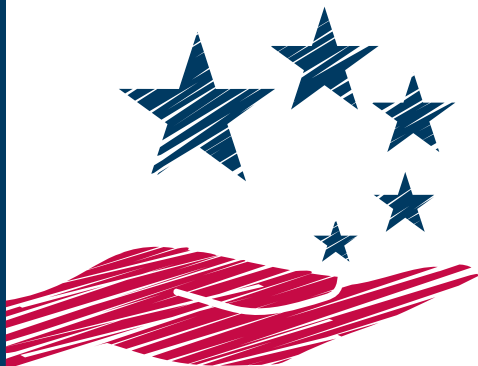
Our focus continues to be on delivering first-class products and services and ensuring the satisfaction of our customers and partners. We strive to deliver innovative products while promoting responsible and lawful conduct on the part of our employees. Each of us has a personal responsibility to act lawfully and with integrity. The principles and rules of conduct listed do not exhaust all possible events that may occur in everyday business, but contain binding values that should serve as guidelines in daily work.

The misconduct of individuals can not only harm us as a company, but can cause great damage to each individual. Therefore, we ask you, dear colleagues, to read the Code of Conduct carefully and use it together with us as a guideline for our daily behavior and actions. In case of doubt, advice and support should always be sought from the appropriate responsible parties.

Management of JUNG Gummitechnik GmbH

2.0 OUR VALUES

transparency
integrity innovation
customer focus respect
commitment sustainability
openness flexibility trust
honest dealings with each other
quality awareness



CONTENTS

1. Applicable scope	6
2. Our principles	7
2.1. Acting lawfully and with integrity	
2.2. Equal opportunities and tolerance	
2.3. Responsibility for the reputation of JUNG Gummitechnik GmbH	
2.4. Management culture and culture of trust	
3. Interacting with business partners and third parties	9
3.1. Complying with competition and cartel law	
3.2. Supplier and customer relationships	
3.3. Donations and sponsorship	
4. Avoiding corruption and conflicts of interest	11
4.1. Fighting corruption	
4.1.1. Offering and granting advantages	
4.1.2. Requesting and accepting advantages	
4.2. Avoiding conflicts of interest	
4.2.1. Secondary employment	
5. Handling of company property and information	14
5.1. Handling of company property	
5.2. Handling of information and data protection	
5.2.1. Reporting	
5.2.2. Confidentiality	
5.2.3. Data protection and data security	
6. Occupational safety, health and environmental protection	16
6.1. Occupational health and safety	
6.2. Environmental protection and sustainability	
6.3. Product safety	
7. Implementing the JUNG Gummitechnik GmbH Code of Conduct	17
7.1. Responsibility for implementation	
7.2. Responsibility for compliance	



1. APPLICABLE SCOPE

JUNG Gummitechnik GmbH is operationally active in different legal systems and diverse cultures. Wherever we operate, we observe applicable laws and respect generally accepted customs. This is the only way to secure our business success. Any violation of applicable laws or regulations can have serious consequences for both the company and its employees. The fundamental laws, regulations and internal company rules relevant to your area of responsibility should be known, in particular by managers. Our Code of Conduct applies at all locations and uniformly to all business units of JUNG Gummitechnik GmbH.

**We comply with applicable laws at the local,
national and international levels.**



2. OUR PRINCIPLES

2.1. Acting lawfully and with integrity

In the day-to-day business, we are bound by the standards set out in this Code of Conduct and any further statutory requirements. Every person has the right to be treated fairly, with dignity and respect. We absolutely do not tolerate discriminatory behavior on the basis of ethnic origin, nationality, gender, sexual orientation and identity, pregnancy or parenthood, marital status, age, religion, ideology or disability, or on any other grounds covered by non-discrimination principles. Integrity is one of the core values by which we abide. It requires us to act ethically and with common sense. Each employee is responsible for adhering to the Code of Conduct. We would like to emphasise that we do not tolerate any kind of violation of this Code of Conduct. A violation of this Code of Conduct may result in action being taken under labour law. Such action would be separate from any statutory sanctions. We also strive to ensure that our business partners abide by our principles.

**We respect each and every one of us,
treat each other with trust and do not tolerate
harassment or discrimination.**

2.2. Equal opportunities and tolerance

As an international company, we are proud of our diversity. People of different ethnic origin, nationality, age, gender, sexual orientation and identity, pregnancy and/or parenthood, marital status, religion, ideology and disability are part of JUNG Gummitechnik GmbH and enrich us. We ensure that our employees enjoy equal opportunities and are all treated the same, and do not tolerate any kind of discrimination with regard to legally protected characteristics; nor do we tolerate sexual harassment or any other personal attacks. We stand for a working environment that is characterized by respect and tolerance. Any decisions that we make concerning our employees, customers, business partners and other third parties are always based on appropriate considerations. The protection of fundamental rights at work is particularly important to us. We strictly oppose forced and child labour.

2.3. Responsibility for the reputation of JUNG Gummitechnik GmbH

We know that JUNG Gummitechnik GmbH's reputation is shaped to a significant extent by the demeanour, actions and conduct of each and every one of us. Inappropriate or illegal conduct can result in substantial financial loss and damage the reputation of JUNG Gummitechnik GmbH. Every single JUNG Gummitechnik GmbH employee is a representative of the company. We expect each individual to respect, maintain and promote JUNG Gummitechnik GmbH's reputation around the world by ensuring that he or she acts lawfully and ethically.

**We are committed to the principles of the Universal Declaration of Human Rights.
We also expect our suppliers and business partners to share these values
and commit to upholding them.**

2.4. Management culture and culture of trust

Each of us is responsible for adhering to the Code of Conduct. Statutory and internal regulations are just as obligatory as ethical conduct. In this regard, we place a great deal of importance on the obligations of employees in management positions. We require managers at all levels to act with integrity. Each manager is responsible for his employees. The relationship between manager and employees is built on mutual respect and trust. Our managers promote a culture of trust and, as role models, are available to answer any questions that their employees may have.



3. INTERACTING WITH BUSINESS PARTNERS AND THIRD PARTIES

3.1. Complying with competition and cartel law

The rules of fair competition within the scope of statutory regulations must be observed by every single employee who has contact with competitors, customers, suppliers or other business partners. Anticompetitive arrangements such as pricefixing agreements, agreements on market shares, agreements on capacity and the allocation of areas/customers among market participants are strictly prohibited, as is price fixing. As well as such arrangements, deliberately concerted action that may restrict the competition is also prohibited. This includes the informal coordination of actions and the exchange of information with the intention or potential effect of restricting competition. Even the appearance of this type of conspiratorial behaviour between competitors must be avoided. Cartel law regulations must also be observed when reaching agreements with suppliers and customers. It is particularly important to examine restrictions on usage or sale, exclusivity agreements, and clauses that will influence resale prices from a legal perspective. The sharing of confidential market and company information that could influence events on the market (e.g. information regarding customer relationships, capacities, prices, strategies) is also prohibited. Caution is not only required in market research and benchmark projects, but also when participating in association conferences and other industry events. We behave fairly with respect to our competitors. We forbid our employees from spreading incorrect information about a competitor or acquiring information about the competition through situations liable to criminal investigation.



3.2. Supplier and customer relationships

We expect our suppliers and customers to share our values and observe all statutory provisions. We select our suppliers in accordance with substantive law and assess all quotes without bias. The business activities of our customers, advisers and business partners must be conducted in accordance with statutory regulations. As an international company, we pay particularly close attention to money-laundering legislation, antiterror legislation and any applicable export control and customs legislation.



3.3. Donations and sponsorship

We view ourselves as a member of society and stand by our corporate social responsibility. We seek to make a positive contribution to the development of society through the targeted support of humanitarian, social and cultural causes. All donations that we make, as well as our sponsorship activities, are voluntary and are undertaken in accordance with the applicable law and internal regulations. Our donations and sponsorship activities must also be agreed in advance with the Group Risk & Compliance Office. When making donations, we observe the requirement for transparency and document relevant information such as the intended use, the identity of the recipient and the donation receipt provided by the recipient. We do not ask for anything in return. Donations to individuals (including employees and their relatives), to organisations controlled by individuals and to organisations with a political purpose are prohibited.



4. AVOIDING CORRUPTION AND CONFLICTS OF INTEREST

4.1. Fighting corruption

Our business relationships are based on integrity and we impress solely through the quality of our products and services. Corruption distorts the competition and causes significant damage to the economy. We do not accept corruption at JUNG Gummitechnik GmbH. We know that corruption would damage our reputation and have consequences under criminal and civil law, as well as result in penalties – both for the company and for the employees responsible.

4.1.1. Offering and granting advantages

We always take care to ensure that our business activities comply with the applicable anti-corruption laws and regulations and with the OWG Beteiligungs AG guidelines. The JUNG Gummitechnik GmbH employees therefore refrain from attempting, directly or indirectly, to wrongfully influence business partners, persons in the private sector or public officials, neither through preferential treatment nor by offering, promising or granting gifts or granting any other advantages. We protect our reputation and want to avoid even the mere appearance of dishonest or inappropriate conduct when interacting with our business partners. When dealing with public officials and elected representatives, particular caution is required owing to their role in society. Public officials and elected representatives include civil servants, judges, politicians, members of parliament and other representatives of official institutions. Our focus is on developing transparent and reliable business relationships. We also require our business partners to be aware of, and comply with, our anticorruption requirements.

4.1.2. Requesting and accepting advantages

Our employees are not permitted to use their position to receive advantages. Low-value gifts in an appropriate business context (socially acceptable gifts for an occasion or invitations to a meal or event) are generally not a problem, as long as local customs are observed. Any gifts that go beyond this and are not commensurate with the occasion and the position of the business partner must be declined. Furthermore, the independence of neither party must be compromised. It is important to note that corruption offences are still punishable even if approval has been given by a superior authority. If in doubt about whether gifts, contributions or invitations are appropriate, always seek the relevant manager's advice.

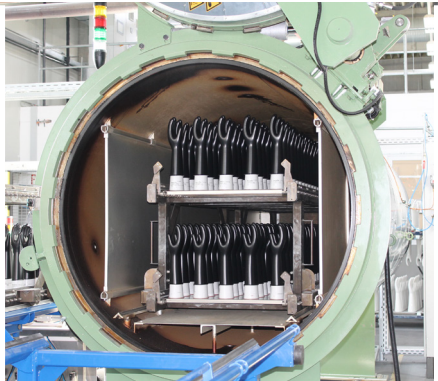
4.2. Avoiding conflicts of interest

We want to avoid the personal and private interests of our employees conflicting with the interests of JUNG Gummitechnik GmbH. For this reason we avoid any situations that may lead to a conflict between an employee's personal interests and the business interests of JUNG Gummitechnik GmbH. We therefore expect our employees to immediately report any potential conflicts of interest to their manager. Conflicts of interest may arise from secondary employment or from business relations or involvement with a competitor or customer of JUNG Gummitechnik GmbH.

We disclose potential or actual conflicts of interest and resolve them as quickly as possible. We reject any form of corruption and bribery and will not tolerate it.

4.2.1. Secondary employment

Secondary employment that prevents employees from fulfilling their duties for JUNG Gummitechnik GmbH, and in particular secondary employment with a competitor, is not permitted. Our employees must check in advance and obtain written approval before taking up paid secondary employment. Approval may only be given if the secondary employment is in accordance with the legitimate interests of JUNG Gummitechnik GmbH, and if the regulations on maximum working hours are observed. We support and encourage the undertaking of voluntary activities by our employees in their free time.



5. HANDLING OF COMPANY PROPERTY AND INFORMATION

5.1. Handling of company property

Company property may only be used for business purposes. All employees must handle company property properly and with reasonable care, and must protect company property against loss.

5.2. Handling of information and data protection

Discussing confidential information in public or the unauthorized disclosure of information about the company or its customers to third parties constitutes a breach of confidentiality and may, for example, constitute antitrust violations. Confidential information is non-public information that is intended only for a restricted group of people and not for internal dissemination or external publication. In particular, employees who have access to particularly confidential information are required to observe strict confidentiality, both externally and internally. We take the utmost care, observe strict confidentiality, and comply with applicable laws and rules when collecting, storing, processing or transferring personal data of employees, customers or other third parties.



We protect confidential information from unauthorized disclosure and misuse. All of us must comply with applicable laws and regulations when collecting, storing, processing or transmitting personal data and information.



5.2.1. Reporting

It is extremely important for the JUNG Gummitechnik GmbH that our reports and records are complete, correct and truthful, and that they are completed in a timely manner. We observe the principles of generally accepted national and international accounting regulations.

5.2.2. Confidentiality

We are responsible for protecting business and trade secrets. Our employees are obligated to keep secret any confidential or protected information regarding the JUNG Gummitechnik GmbH. We treat non-public information from and/or about our employees, customers, suppliers, business partners and other third parties as confidential and use it in accordance with applicable laws and contractual requirements. If the obligation to maintain confidentiality is breached, the obligation extends beyond the end of the employment relationship.



5.2.3. Data protection and data security

The protection of privacy and the security of data are extremely important to us. We observe the applicable laws and regulations, as well as internal regulations on data protection and IT security. We collect, process and use personal data in accordance with the intended purpose, and solely to the extent permitted by law. Furthermore, we ensure a high level of security when processing information. We make sure that the use of personal data is transparent for the parties involved. The rights of access of such parties and, if applicable, their rights of objection, blocking and deletion are preserved.

6. OCCUPATIONAL SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION

6.1. Occupational health and safety

The health and safety of our employees is valuable to us. We always strive to promote the health, job satisfaction and efficiency of our employees. To achieve this goal, we observe the regulations and laws on occupational health and safety. We set objectives for continual improvement and we encourage our employees to look after their own health.

Ensuring fair working conditions and health and safety in the workplace are an integral part of our corporate culture.

6.2. Environmental protection and sustainability

Our actions are based on environmental sustainability and the maximum conservation of resources. Not only do we adhere to the applicable local environmental legislation when manufacturing our products and ensure the efficient use of raw materials and energy, we also support our customers and suppliers in efforts to use the products we supply to them or they supply to us in a safe and environmentally friendly way. It is in everyone's interests that we strive to keep our impact on mankind and the environment to a minimum, and help to optimise environmental friendliness for all. We advocate sustainable development.



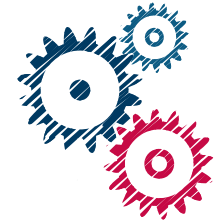
6.3. Product safety

The products must not have defects or hazardous properties that could affect health or damage property. It is very important to us to provide our customers with safe and high quality products of impeccable quality.

7. IMPLEMENTING THE REMA TIP TOP CODE OF CONDUCT

7.1. Responsibility for implementation

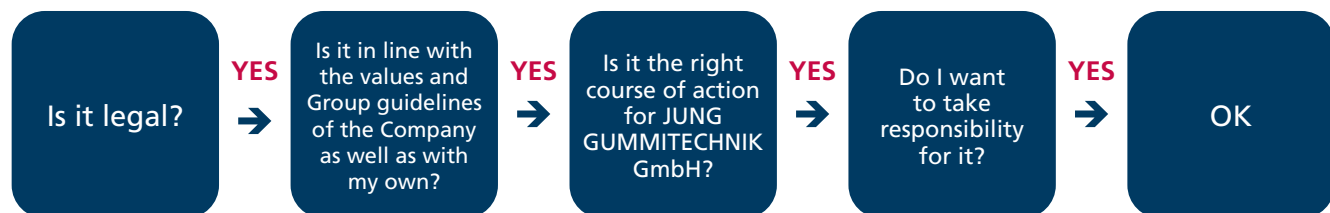
In day-to-day business the decisions made by all employees at JUNG Gummitechnik GmbH must comply with the Code of Conduct, as well as with statutory provisions and internal regulations. The JUNG Gummitechnik GmbH promotes the communication of the Code of Conduct and ensures that it is implemented and appropriate training is provided. We also encourage our business partners, customers and suppliers to incorporate the principles of our Code of Conduct in their company policy.



7.2. Responsibility for compliance

All JUNG Gummitechnik GmbH employees are obligated to familiarise themselves with this Code of Conduct and to abide by its requirements in their daily work. Our managers support employees in their compliance with this Code of Conduct and are available to help with any questions concerning lawful conduct and acting with integrity.

The four questions below can be used for guidance when making individual decisions:



If one of the answers is “no”, the behavior should be abstained from. Employees are required to report violations of the rules of conduct set out in the Code of Conduct to their manager without delay. There is a possibility of anonymous and confidential reporting. The information given must be as accurate as possible and must describe

the situation in detail so that a thorough investigation can be conducted. The information provided will be investigated and appropriate action taken. We ensure that employees who report information in good faith do not suffer any disadvantages as a result.

Einhausen



JUNG Gummitechnik GmbH

Plant I

Robert-Bosch-Str. 2-6

Plant II

Robert-Bosch-Str. 12

D-64683 Einhausen – Germany

Phone: +49 (0) 6251 | 9634-0

Fax: +49 (0) 6251 | 549-38

Warstein



Plant III

Friedrich-Harkort-Str. 12

D-59581 Warstein – Germany

Phone: +49 (0) 2902 | 97916-0

Fax: +49 (0) 2902 | 97916-19



www.jung-gt.de
info@jung-gt.de