

## **Code of Conduct**

of ILUDEST Destillationsanlagen GmbH

The following Code of Conduct applies to all companies of the ILUDEST group. It may be supplemented by further operational rules and regulations, provided that these are in line with the requirements laid down herein.

### **1.) Essentials**

#### **1.I) General Principles**

Economic success, ethics and integrity are defined corporate objectives that are unalterably interlinked with each other.

Therefore, responsible and fair behaviour towards our employees, business partners, governmental authorities and institutions and the general public determine our actions at all times.

We direct another important focus of our attention at the protection of the environment, by minimising the use of hazardous substances and striving for extensive reuse of such substances.

It goes without saying that we comply strictly with all applicable laws and regulations at all times.

This Code of Conduct serves as a binding guide for all our decisions and forms the basis of our responsible actions and behaviour. It governs both internal corporate issues and requirements and the interaction with our business partners, governmental authorities and institutions and the general public. This Code of Conduct applies to all people working with or on behalf of ILUDEST, i.e. for executives, non-executives and suppliers alike who are expected to adapt their behaviour to these principles.

#### **1.II) Management Board and Executives**

The members of the Management Board and the executives shall set a leading example for all employees with respect to ensuring compliance with this Code of Conduct. It is incumbent on them to inform their team members about the contents and the importance of this Code of Conduct and raise their awareness for its significance, as well as to ensure compliance with this Code of Conduct within the Company.

## 2.) Regulations

### 2.I) Ethics and Integrity

Any kind of bribery, blackmail or extortion, misappropriation, defalcation, embezzlement or the accepting of advantages is strictly forbidden. Applicable antitrust and data-protection laws and regulations shall be observed at all times; in particular, this means, that any market-relevant fixings concerning prices, offers, business relationships or market shares will not be tolerated.

We shall exclusively use sober, business-like and faithful advertisement and promotion and, following this, only engage in fair competition.

We respect the personal rights, dignity and privacy of everyone and support the compliance with and the protection of human rights. Each employee is obliged to ensure compliance with this Code of Conduct.

### 2.II) Equal Opportunities and Prohibition of Discrimination

We ensure equality of opportunities and of treatment. Any discrimination of people because of the colour of their skin, their age, gender, sexual orientation, ethnicity, their disability, religion, political commitment or engagement in a trade union or their civil status will not be tolerated.

We expect fairness from all our employees in dealing with their fellow employees, requesting them to create an atmosphere of respectful cooperation and refrain from any kind of discrimination (e.g. by prejudicial treatment, mobbing, sexual harassment/abuse), and to report any such occurrences to the management bodies immediately.

Any form of forced or indentured labour, involuntary prison labour, and particularly child labour, will not be tolerated.

### 2.III) Wages and Salaries

Our employees shall be remunerated exclusively in accordance with their qualifications and, by mutual agreement, shall receive contractually agreed benefits, with the payment of the minimum wage prescribed under statute being strictly observed.

### 2.IV) Conduct towards Competitors and Business Partners

Our dealing with business partners is characterised by trust and fairness; we shall take a correct and business-like line with any competitors. Our business decisions are not biased by private interests or personal advantages.

We expect our suppliers to observe and implement this Code of Conduct accordingly.

**2.V) Foreign Trade and Payments Rules**

As holders of an AEO certificate (Approved Economic Operator; in German: Zugelassener Wirtschaftsbeteiligter) we are obliged to strict compliance with applicable laws and regulations concerning foreign trade and payments (e.g., customs law, import/export control, embargoes, but not limited thereto). The respective standards are shown in an "Internal Compliance Programme - ICP", with ILUDEST's organisational structure complying with these requirements.

**2.VI) Data Protection**

We protect both our corporate data and personal customer and employee data against unauthorised access, use or loss with all suitable and appropriate measures. We collect and process personal data only to the extent required and only for the purposes intended.

Any individual, enterprise/organisation (particularly suppliers) acting on behalf of ILUDEST shall comply with the provisions under data protection law accordingly.

**2.VII) Secrecy**

Each staff member is obliged to keep strictly confidential any and all operating and business secrets of the Company. This duty to maintain secrecy shall continue to apply after the termination of the employment relationship.

**2.VIII) Health and Safety at Work**

To provide a healthy and safe working environment for our employees is our highest priority and subject to constant monitoring by an external qualified occupational health and safety practitioner and a company medical service. Thus, strict compliance with all occupational health and safety laws and regulations is ensured.

Emergency plans and behavioural rules that have been brought to the notice of all employees are in place for exceptional situations/accidents. Compliance trainings are conducted at regular intervals.

**2.IX) Quality**

Professional technical advice by engineers in line with the recognised rules of technology as well as highest product quality and continual product improvement are paramount to ILUDEST's success. The standard we set ourselves is to satisfy our customers' high quality requirements.

**2.X) Usage of Company Property and Resources**

The misuse of personnel or of company property for non-company-related purposes is not permitted.

**3.) Implementation**

**3.I) Management**

ILUDEST have implemented a system that continually monitors the requirements of this Code of Conduct. The senior management's and the employees' knowledge, skills and competences required for this are taught in external seminars.

**3.II) Disciplinary Measures**

Any violation of this Code of Conduct shall be subject to disciplinary action or sanctions under labour law and punished in accordance with the existing employment contract regulations and the then current statutory provisions.

Waldbüttelbrunn, October 2016

Udo Interwies

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