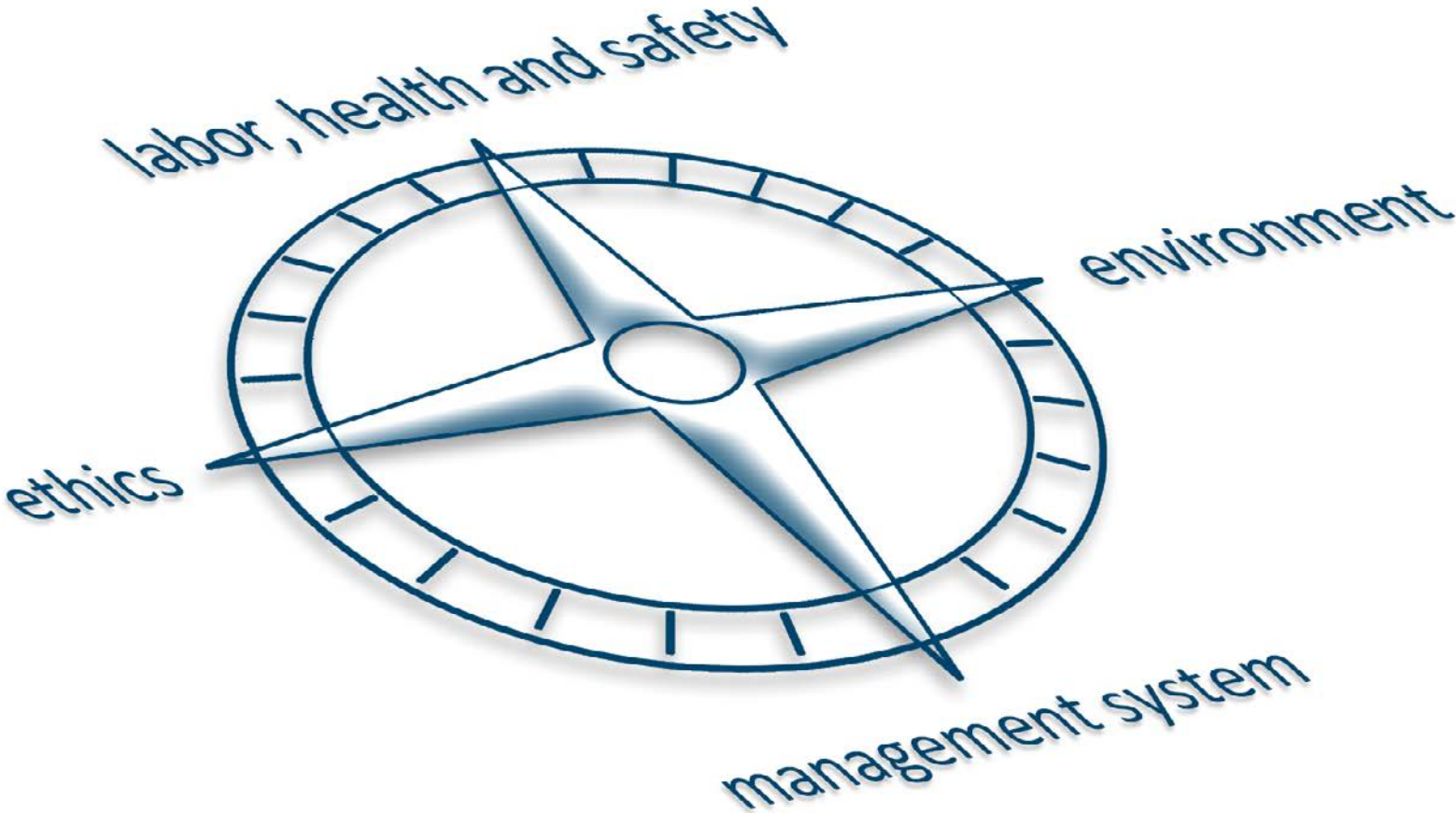


# CODE OF CONDUCT.

GUIDELINES FOR RESPONSIBLE CONDUCT.



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# CODE OF CONDUCT.

## Guidelines for responsible conduct at the Berliner Glas Group.

### SCOPE OF APPLICATION

This Code of Conduct applies to all companies that belong to the Berliner Glas Group. It offers guidance for conduct in our everyday business dealings. We are aware that it is impossible to set our rules for every single detail, but the Code of Conduct does make it easier for managers and employees to ensure proper conduct within the scope of the applicable rules.

The Code of Conduct is a binding set of guidelines on responsible conduct. It covers several topics: health and safety, the environment, leadership, and the management system. It also lays out general ethical guidelines beyond these specific topics.

Our shared conduct guidelines are founded on the principle of compliance with applicable law and respect for the customs and conventions in all countries where we do business.

These guidelines are accessible to all employees of the company. They are posted on the intranet, with examples illustrating how they apply.

Every employee of the Berliner Glas Group is obligated to comply with these guidelines.

Employees are trained to recognize how each and every individual within the company can take responsibility for implementing the guiding principles behind the Code of Conduct.

Employees are required to report violations of the Code of Conduct and the principles on which it is based. As a general rule, the first point of contact for reporting these issues is the employee's direct supervisor or the person of trust designated for this purpose. Employees must not suffer any disadvantage as a result of compliance with the principles of conduct.

# OCCUPATIONAL SAFETY AND HEALTH.

**Safety and health are our top priorities.**

**Having healthy employees is crucial to our performance capacity, the company's economic success, and ensuring job security. We believe protecting our employees' lives and health is our foremost obligation as a matter of course. With this in mind, the company takes all of the necessary and appropriate actions to promote our employees' health and well-being in the workplace.**

## **RESPONSIBILITIES OF OUR MANAGERS**

Occupational safety and health are particularly important areas of responsibility for managers. Managers are obligated to take all actions as required under occupational safety rules and regulations within the areas they supervise. All managers are obligated to set an excellent example through their behavior and to ensure that all employees are informed in detail of instructions, legal provisions, risks, and protective measures.

## **FOCUSING ON PREVENTION**

Safety and protecting employees' health are key aspects of our considerations when planning products, methods, equipment and facilities, work sites, and workstations. This allows us to identify and eliminate safety risks early on. We systematically identify risks and issues that cause strain on the job and take action to prevent adverse health effects.

## **EMPLOYEES ARE PART OF THE WHOLE**

A culture of open communication, orientation toward goals, and constructive criticism connects all employees and managers.

All employees follow the rules, regulations, and instructions that apply in their particular areas. In line with their knowledge and abilities, employees bear personal responsibility for their own safety and the safety of others. This also means there is a duty to report any defects in protective systems or significant direct risks.

## **CONTINUOUS IMPROVEMENT**

We check the status of safety and health as well as compliance with internal and external standards on a regular basis through site inspections and audits. Defects and discrepancies are eliminated as part of our continuous improvement process. We systematically investigate incidents and accidents and consistently apply the lessons learned from these events in our occupational safety and health practices and policies.

# ENVIRONMENT.

**The Berliner Glas Group is aware that all activities associated with the development, production, and sale of our products have a direct or indirect impact on the environment.**

## THE IMPORTANCE OF ENVIRONMENTAL PROTECTION

The Berliner Glas Group is committed to achieving its economic goals while also observing environmentally relevant processes.

## REDUCING ENVIRONMENTAL IMPACT

We conserve and limit our use of natural resources, especially materials and energy. Toward this aim, our processes are regularly analyzed and improved with regard to their environmental impact. Appropriate developments and technologies are employed to reduce waste by stages.

We use the energy that is needed for our building, production operations, and services on a conscious basis, saving energy wherever possible, and use ecofriendly systems and equipment in our production activities. Immediate corrective action is initiated in the case of any incidents that could adversely affect safety, health, or the environment.

## EMPLOYEES

Environmental protection is an important task for all employees. We promote environmentally conscious behavior by providing employees with information.

## LAWS AND REGULATIONS

We are committed to observing all applicable laws and regulations as well as all requirements set by our customers with regard to environmental protection and occupational safety. If there are no specific provisions in place, we set our own standards.

## SUPPLIER INVOLVEMENT

We give preference to suppliers who incorporate ecological aspects into their actions under competitive conditions, and ensure conflict-free procurement of raw materials. We also expect compliance with applicable laws and industrial standards along the entire supply chain.

## COMMUNICATION

With an eye to sustainability, we support cooperation and open communication with our employees, government agencies, institutions, industry associations, and our customers and suppliers.

## ENVIRONMENTAL PROGRAM

We regularly publish an environmental impact assessment that sets out and communicates information on our use of resources and on the emissions and waste generated as a result of our activities. The actions mapped out on this basis are regularly pursued as part of an environmental program.

# MANAGEMENT SYSTEM.

## LEADERSHIP

The executive management, guided by the principles of responsible corporate conduct, sets the bases and objectives that apply throughout the integrated management system. This creates an environment in which employees can employ their skills and abilities freely to achieve goals.

## CUSTOMER-ORIENTED ORGANIZATION

The overriding goal of our corporate policy is to ensure the satisfaction of the Berliner Glas Group's customers all over the world on a lasting basis with our products and services.

Requirements with regard to applications in strategic markets are set out by our customers and translated into concrete products through close cooperation among the departments and employees involved.

## SYSTEM-ORIENTED APPROACH TO MANAGEMENT

A powerful and effective integrated management system identifies, manages, and steers the processes, enabling effective, efficient organization. Our responsible corporate conduct is guided by a long-term focus on success. We take economic, social, and ecological impacts on current and future generations into account.

## PROCESS-ORIENTED ACTIONS

Processes are established in order to translate customer requirements into performance criteria for products and services. Designated process owners monitor and analyze their processes and process outcomes with the goal of ensuring continuous improvement, while privileging prevention over corrective action. To accomplish this, key indicators are developed and analyzed for all relevant processes.

## EMPLOYEE INVOLVEMENT THROUGH TRAINING AND MOTIVATION

The Berliner Glas Group considers promoting quality consciousness among all employees to be a management responsibility. Compliance with quality requirements and making improvements call for motivated employees with outstanding qualifications for their specific jobs. We practice targeted skill development for all employees to boost motivation and strengthen employees' sense of personal responsibility.

## MUTUALLY BENEFICIAL SUPPLIER RELATIONSHIPS

We seek out good business relationships with our suppliers based on a sense of partnership. These kinds of relationships help all concerned to meet goals and create value.

# ETHICS.

**We act with integrity and according to ethical principles.**

**We treat our partners and employees with respect, trust, honesty, and appreciation. We reject all forms of corruption, bribery, unlawful conduct, terrorism, violence, and discrimination. We are guided by the legal provisions on fighting international terrorism and emphasize conflict-free procurement of raw materials along the entire supply chain.**

**We are committed to the United Nations Universal Declaration of Human Rights.**

**All employees of the Berliner Glas Group act fairly and in accordance with the ethical guidelines described in this document.**

## CONFIDENTIALITY

We treat business and trade secrets as confidential. This also applies to any and all information pertaining to our contractual partners and customers. Under our data protection and privacy guidelines, we commit not to disclose any internal data or data of customers to third parties. This commitment extends beyond the scope of the working relationship. It is set out in our dealings with external parties in the form of confidentiality agreements with third parties, and internally, it is included in the provisions of employees' employment agreements.

## BRIBERY AND CORRUPTION

All employees are prohibited from granting advantages to business partners, third parties, or themselves through unlawful acts with regard to possible awards of contracts or decisions, and from exerting an impermissible influence on the actions of others. Tendering processes must be handled openly and fairly, in accordance with applicable guidelines. Any suspicion of corruption must be ruled out.

To rule out any suspicion of bribery, personal gifts and/or invitations must be declined. The company also commits not to offer customers or partners any gifts of value. This does not apply to giveaway items or token gifts that fall within the usual business practices and within the legal limits. Invitations must be within the limits of hospitality customary in business dealings.

## RELATIONS WITH EMPLOYEES

Based on applicable laws, we promote a corporate culture that is free of discrimination, defined by responsibility and respect and based on the skills and abilities of our international workforce. All employees are given opportunities for support and advancement, regardless of gender, family or social status, ethnic or national origin, sexual orientation, religion, age, or disability. We have high regard for the value of education and support our employees' development and their continuing and professional education.

## COMMUNITY AND EDUCATION

Even beyond our own company, we are committed to education and to supporting children and teens. We also promote the welfare of the entire community and take our responsibilities toward the wider society seriously.

## USE OF RESOURCES

We take a conscious approach to our use of resources, conserving resources wherever possible. This includes both environmental aspects and our use of existing resources within the company. The sustainability of our activities is the focus of all these efforts.

## DONATIONS AND SPONSORING

We promise to disclose our donations and sponsoring activities.

## HANDLING OF KNOWLEDGE

Sharing of information within the company is crucial. We make relevant information accessible. The scope of our disclosure of data is governed by confidentiality agreements entered into with our partners. Our business transactions are documented and stand up to review.

## INTELLECTUAL PROPERTY

We respect intellectual property and observe the applicable provisions in this regard. We understand "intellectual property" to mean all information protected under copyright, including developments, patents, and know-how.

Berlin, April 1<sup>st</sup>, 2014

Dr. Andreas Nitze (CEO)