



## Prologue

The CVT Code of Conduct sets out the standards on which we base our ethical behavior. In doing so, we aim to ensure mutual respect, honesty and fairness in our dealings with colleagues and business partners.

This code takes into account the diverse cultures and values of our employees and is a commitment to the social responsibility of our globally oriented family company.

In order to maintain the high reputation our company enjoys with customers, suppliers and the public, impeccable and responsible conduct by each and every employee is essential.

As a globally oriented company, CVT joins the group of internationally active companies that are committed to their social responsibility towards business partners (customers and suppliers), employees, stakeholders and the protection of the environment.

The Code of Conduct and the Compliance Guideline of CVT GmbH & Co. KG is binding for all employees and suppliers. In the event of conflicts in actions or violations, the CVT management is the direct contact.

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Hans Capellmann, CEO

## Field of application

This Compliance Guideline applies to all corporate activities, both in internal cooperation and towards business partners. It is binding for all employees as well as for persons who are temporarily employed by the company.

## Human Rights

CVT respects human rights and promotes their observance. The company supports that human rights are considered universal by employees based on accepted international laws and practices. CVT is committed to respecting and upholding human rights. In recognition and promotion of "Section 1502 of the Dodd-Frank Act," CVT does not source any of the materials designated therein from conflict mines in the Democratic Republic of Congo or adjoining states. CVT ensures that its suppliers also comply with the relevant directive.

## Forced and child labor

CVT rejects all forms of forced and child labor within the company and among its business partners.

## Diversity and respect for others

The diversity of our employees is crucial to the company's success as a global player. CVT is committed to equal opportunity and compliance with anti-discrimination laws.

## Compensation and working hours

CVT respects the right to fair compensation. All employees receive compensation commensurate with their job. Gender-neutral compensation and bonus systems apply to identical jobs. The company follows the valid regulations on working hours in all plants.

## Safety at work and health protection

The safety of employees in the workplace is an extremely important concern for CVT. To avoid health hazards, occupational health and safety regulations must be strictly observed. Occupational health and safety is not a secondary matter, but an obligatory task for each individual. Managers play an important role as role models. Therefore, on the basis of the respective national legislation, all international and site-specific health and safety regulations as well as the respective national working time laws must be complied with. In addition, CVT is committed to the permanent ergonomic and safety optimization of the working environment.

## Quality

Highest quality and continuous quality improvement are essential for the growth and success of the company. Employees are encouraged to continuously improve the quality of CVT products and services.

## Conflict of Interest

CVT makes it a priority to ensure that its employees do not have conflicts of interest or loyalty in the performance of their duties. This occurs when an employee works for or has an interest in another company. Should such a conflict arise, the employee must inform his or her supervisor immediately. The various regulations governing secondary employment, political activity or non-competition are set out in employment contracts and human resources documents.

## Prohibition of corruption

CVT stands for fair competition and rejects any kind of corruption and taking advantage. CVT employees are strictly prohibited from accepting, offering, paying, approving bribes or making such offers themselves. CVT regards itself as a reliable, self-confident company and therefore avoids any appearance of questionable behavior. The prohibition on accepting or granting advantages applies not only to direct financial benefits, but also to other benefits that could call into question the independence of the employee, such as invitations and gifts. Financial and other benefits that exceed the scope of customary and appropriate business practice are therefore to be rejected.

## Environment

Only those who operate sustainably can be successful in the long term. Environmental law in general, and in Germany in particular, sets binding standards for CVT in this regard. It is a principle of CVT to protect the environment for future generations and to comply with all applicable environmental laws and regulations. CVT expects and supports environmentally conscious actions by its employees.

## Data privacy

The use of innovative information technologies raises questions of informational self-determination in many areas, which we regard as a high good. CVT takes comprehensive account of data protection when dealing with the personal data of its customers, employees and business partners. We are committed to the principles of economical storage of personal data and transparency in data processing.

## Suppliers

CVT regards its suppliers as partners who contribute to the success of our company. CVT employees are committed to treating suppliers as we would want our customers to treat us. CVT considers social competence and responsibility to be important criteria for a long-term business partnership. Therefore, CVT encourages its suppliers to adopt and implement similar principles.

Gosheim, 22th July 2016

A handwritten signature in black ink, appearing to read 'Hans Capellmann'.

Hans Capellmann, CEO