

CODE OF CONDUCT

THIS CODE OF CONDUCT IS BASED ON THE VALUES OF THE COMPANY. THE PURPOSE IS TO ENSURE THAT ALL EMPLOYEES, MANAGERS AND EXECUTIVES WITHIN THE FREIBERGER-GROUP (FREIBERGER, PRIMAS, GREAT STAR, STATESIDE) WILL LIVE AND ACT IN ACCORDANCE WITH THESE VALUES AND PRINCIPLES. THE CODE IS DESIGNED TO GIVE A BROAD AND CLEAR UNDERSTANDING OF THE CONDUCT EXPECTED FROM ALL OUR EMPLOYEES EVERYWHERE WE DO BUSINESS.

The Freiberger-Group is committed to conduct its business in an ethical, legal, and responsible manner. The Freiberger-Group, therefore, has established this Social Responsibility Code of Conduct as an application and is committed to ensuring that this code is respected in all its facilities, all over the world. The Freiberger-Group expects at the same time its suppliers and/or contractors to be in line with the requirements set by these policies. Recognized standards as the Universal Declaration of Human Rights (UDHR) or the International Labor Organization (ILO) conventions were used as references in preparing this code. The principles there below refer to these standards.

LEGAL COMPLIANCE

All business activities of the Freiberger-Group must conform to all applicable national and international legal requirements Freiberger-Group standards pertaining to employment and manufacturing. The Freiberger-Group shall also comply with applicable anti-bribery/anti-corruption rules and regulations in all their business activities.

PROHIBITION OF DISCRIMINATION AND HARASSEMENT

The Freiberger-Group shall not engage in any discriminatory practices. Discrimination means any distinction, exclusion or preference limiting equality or opportunity of treatment in employment or occupation, which may be based on color, sex, religion, political opinion, age, national, social or ethnic origins, family obligations or any other considerations in this matter. The Freiberger-Group also commits to a workplace free of any kind of harassment.

COMPENSATION & BENEFITS

The company ensures that no wage is lower than the applicable legal minimum. The Freiberger-Group does not deduct or withhold pay for disciplinary

reasons or force terms and conditions for employment. Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

WORKING HOURS

The Freiberger-Group ensures that applicable legal restrictions on working hours are met. The maximum allowable working hours in a week are as defined by national law and the corresponding standards of the International Labor Organization. Overtime is restricted according to local legal and contractual obligations. Employees have at least one day off each week, apart from exceptional circumstances and for a limited period of time. The work organization provides for rest breaks as necessary, in order not to affect the safety and health of the employees.

PROHIBITION OF CHILD LABOUR

The Freiberger-Group does not accept employment of children aged under 15, except where permitted by law but in no case below 14. If an applicable law sets a higher minimum working age or compulsory schooling is to a higher age than 15, it is this limit that applies. General educational and training programs followed by children in schools or other institutions are not included in this limitation. All young employees must be protected from performing any work that is likely to be hazardous or to interfere with the child's education or that may be harmful to the child's health, physical, mental, social, spiritual or moral development.

PROHIBITION OF FORCED LABOUR

The Freiberger-Group does not use forced or compulsory labour, meaning all work or service which is exacted from any person under the menace of any penalty and for which the said person has not



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offered himself voluntarily. Also retention of identity documents from personnel upon commencing employment is forbidden.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Freiberger-Group recognizes and respects employees' freedom of association and their right to freely choose their representatives and ensures that employee representatives do not suffer any discrimination. The company also recognizes employees' right to collective bargaining.

HEALTH & SAFETY AT WORK

The company ensures that the workplace and its environment (machinery, equipment and processes, chemical agents ...) do not endanger the physical integrity or health of employees. Action to reduce the causes of accidents and improve working conditions is the object of ongoing programs. Training related to safety and health in their work occupation is provided to employees. Employees must have access to drinking water, sanitary equipment and social rooms, built and maintained in accordance with applicable legal requirements. The workplace and environment has to provide for emergency exits, fire protection equipment and proper lighting. Additionally adequate protection for non-smokers has to be provided.

ENVIRONMENT

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment shall at least meet legal requirements or exceed them.
