

**CODE OF CONDUCT  
MINITÜB GMBH**

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## FOREWORD

Minitüb has a corporate culture that is committed to upholding personal responsibility, mutual respect, and trust. In all its worldwide operations, Minitüb works according to the legal requirements and regulations of the governing authorities to guarantee long term and sustainable success. Every employee must observe all laws and regulations which are relevant within the framework of Minitüb operations.

To ensure exemplary behavior in all its business operations, Minitüb has a code of conduct which is obligatory for all regional and corporate divisions. Respect, tolerance, honesty and openness towards colleagues and customers combined with the willingness to assume social responsibility, form the foundation of the code of conduct. The guidelines apply to all employees, regardless of rank or corporate division.

The essential elements of the code of conduct are the observance of human rights, equal opportunity, and transparency of business operations. A clear position against discrimination, bribery and corruption must at all times be evident.

Tiefenbach, 2016/03/23

Dr. Christian Simmet, CEO

## 1 OUR OBJECTIVES

Our primary objectives are fully described in the text "Vision/Mission", which is published in the intranet.

Responsible and law abiding behavior is the basis for the sustainable and successful development of our business, which in turn supports economic efficiency and entrepreneurial soundness. We will best be able to find accordance with our various customers and business partners interests through upright, fair and honest conduct.

In our business dealings, we shall always abide by the relevant laws and regulations in all regions and countries, regardless if this be deemed ineffectual or uneconomical by any individual at any level in the corporation. We are aware that there are cultural as well as legal differences in the varying countries in which we do business. We shall make every attempt possible to familiarize ourselves with these laws and customs and adapt our behavior and actions accordingly.

We expect all employees to work for the interests of Minitüb in an entrepreneurial and accountable manner. Employees are expected to conduct the business and affairs of Minitüb solely in compliance with the prevailing laws, ethical norms, internal guidelines and our code of conduct.

## 2 OUR STANDARDS FOR TEAMWORK

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### MUTUAL APPRECIATION

"The Golden Rules", a publication which can be found in the intranet, offers guidelines for our code of conduct.

We place high value on involving all employees in our planning and decision making processes. This enables a friendly working environment in which we can effectively pursue and achieve our goals.

### OFFENSIVE BEHAVIOR IS NOT TOLERATED

Minitüb insists on mutual respect and openness among its employees and is totally opposed to any form of harassment at the work place. Bullying and mobbing or any form of terrorizing behavior will not be tolerated, regardless if the perpetrator thinks his/her actions were justified or if the victim had the possibility to avoid the perpetration.

The personal behavior of every manager must always comply with our code of conduct to maintain a fair and productive working environment free from any form of harassment, manipulation, or any other offensive behavior. In the same light, each employee is expected to contribute to a positive working environment by treating one another with respect and dignity.

## 2 OUR STANDARDS FOR TEAMWORK

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### EQUAL OPPORTUNITY

One of Minitüb's main strengths lies in the diversity of its employees. Professional qualification and performance are the key criteria used in the selection and further development of all employees. No one shall be discriminated against based on sex, race, religion, age, physical disadvantage, national origin, citizenship, marital status, sexual orientation, or any other impermissible factor.<sup>1</sup>

### OCCUPATIONAL HEALTH AND SAFETY

We are convinced that the safety and well being of our employees is a major contributing factor to our economic success. We strive to promote the physical and psychological health of our employees. Our goals are efficient and productive employees with lasting good health and correspondingly low illness and accident rates. This strong commitment to health and safety is mutually beneficial.<sup>2</sup>

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<sup>1</sup> Refer also to the QM-Document "Computer Security"; pt. 7.7

<sup>2</sup> Additional information can be found e.g. in the QM-Documents "Safety Instructions for New Employees" and "Handling Hazardous Materials".

## 2 OUR STANDARDS FOR TEAMWORK

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### COMPANY ASSETS

All employees are responsible for protecting the company's assets and for ensuring they are used properly and only for legitimate business purposes. The usage of any company property for private purposes or the removal of such from the company premises is strictly prohibited unless a prior special agreement has been arranged.<sup>3</sup>

Our company possesses valuable patents and proprietary knowledge or "know how", which comprises, but is not limited, to the following areas: company-specific secret information, confidential or restricted information, copyrights, trademarks, logos, customer data including contact information, business plans and internal company documents, and product specifications. These are considered to be company intellectual property regardless if it belongs to Minitüb, one of its affiliated companies or a business partner. Every employee must handle the intellectual property of the company confidentially.

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<sup>3</sup> More information can be found e.g. in the QM-Document "Using Company Vehicles"

## 3 INTEGRITY OF OUR BUSINESS PRACTICE

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### COMPLIANCE WITH LAW AND REGULATIONS

All legally binding regulations applicable to our business and manufacturing operations, including environmental and occupational safety regulations, must be adhered to by all employees.

This is in the interest of both Minitüb and every single employee. Ignoring or disobeying legally binding regulations can lead to criminal investigations and convictions involving not only the individual perpetrator but also the company. Misdeeds in the manufacturing process could lead to heavy fines brought onto the company and severely damage the reputation of Minitüb with customers, suppliers and the general public.

### CONFLICTS OF INTEREST

We expect our employees to maintain a clear separation between private and company interests. Actual or potential conflicts of interest must be immediately disclosed to the management, e.g. when an employee has a relationship to another person working, consulting, or applying for a position at Minitüb. The relationship could involve a friend, a spouse or other family member, or a business acquaintance.

### 3 INTEGRITY OF OUR BUSINESS PRACTICE

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#### FAIR COMPETITION PRACTICE

We work according to the principles of the free market and fair competition. Our business is driven to vigorously compete for all business opportunities that fulfill our performance standards and exercise free and unhindered trading practices. We engage suppliers and distributors only after a fair and careful evaluation of their merits. We are legally bound to make all our business decisions solely in the best interest of the company and without interaction of any kind with our competitors e.g. discussing pricing, business plans, or strategies.

#### BRIBERY AND CORRUPTION

Minitüb will not tolerate or proceed with any business deal that even appears to involve corruption. We rely solely on the merits of our products, not on improper payments, courtesies, or favors, to influence our business partners to do business with us. We exercise transparency in all our dealings with customers, suppliers and government agencies. Our business practice conforms to the anti-corruption standards and all applicable anti-corruption and anti-bribery laws and regulations.

### 3 INTEGRITY OF OUR BUSINESS PRACTICE

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#### GIFTS AND FAVORS

Accepting or offering gifts and favors is particularly prohibited if they appear to have the purpose of influencing business decisions or if they conflict with any law, regulation or guideline regarding ethical business practice.

Gifts, favors or business courtesies are only allowed if they are common in the business, are of reasonable value and conform to accepted ethical business practice.

#### PRIVACY AND DATA PROTECTION

We resolutely adhere to the prevailing data security regulations. All employees must comply with the applicable laws and company regulations regarding the usage and handling of personal data, stored electronically, or otherwise, by the company.

## 3 INTEGRITY OF OUR BUSINESS PRACTICE

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### HONESTY AND LOYALTY

In all business dealings, the employees of Minitüb shall never attempt to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other deceitful practice. All information disseminating from Minitüb must be truthful and correct.

All employees are responsible for supporting the economic interests of Minitüb. Therefore, the disposal of Minitüb assets to third parties without an equal compensation in return is prohibited. In this respect, rebates, bonuses or similar promotions may only be offered within the parameters established by the management of the company. If more extensive concessions are required, they must first be cleared individually with management before they are offered.

## 4 OUR CORPORATE RESPONSIBILITY

Minitüb accepts the corporate responsibility required to make a positive contribution to society and the environment. In particular, we take great care to ensure that all products and practices for use with animals are developed, produced and tested in compliance with animal protection laws and regulations.

As a globally operating company, our business affects the society in which we work and the world in which we live. Our responsibility is reflected by our strong orientation to generally accepted values, laws and guidelines.

We are fully aware that we will be appraised far outside our immediate field and location of work. Therefore, we kindly request that all employees show respect and consideration for the specific culture of the country in which they are doing business..

### **Minitüb GmbH**

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