



CODE OF CONDUCT AT SUMIRIKO AVS

Mindful of their social responsibility toward their companies, toward their business partners, toward the environment and toward society, SumiRiko AVS and its staff all over the world comply with the general principles and human rights as well as with all applicable laws, regulations and statutes, in all business dealings.

Employment and Workplace

- » We oppose forced labor and child labor.
- » We oppose discrimination, in particular unfair treatment on the basis of gender, race, disability, ethnic or cultural origin, religion, world view, age or sexual orientation.
- » We stand for freedom of association and the right to collective bargaining.
- » We stand for fair working conditions: that is, provision regular employment, living wages, no excessive working hours, no workplace harassment, or harsh or inhumane treatment.

Health and Environment

- » We stand for the protection of health: that is, safe and hygienic working conditions to prevent health and safety risks in the workplace.
- » We stand for environmental protection: that is, support for taking a precautionary approach to environmental challenges, undertaking initiatives to promote greater environmental responsibility and encouraging the development and distribution of environmentally friendly technologies.

SumiRiko AVS's Property, Confidentiality and Trade Secrets

- » We respect our companies' property, including records, technical information and communication.
- » We protect trade and company secrets: That is, disclose of confidential information or documents or providing access to them without proper authorization is forbidden.
- » We comply with the laws that govern data privacy protection concerning the personal data of employees, suppliers, customers and business partners.
- » We make a reasonable effort to destroy confidential information that is no longer useful to our business and prevent unauthorized access to confidential information.
- » We report problems concerning data security to the designated data security officer.

Bribery or Corruption

- » Bribery or corruption is not tolerated: The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited. A bribe may involve giving or offering ANY form of gift, consideration, reward or advantage to someone in business or government to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit.
- » Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance).
- » This does not generally apply to gifts and invitations that fall within the bounds of normal lawful business practice with regard to hospitality, convention and courtesy.
- » Some examples of bribes include the following, which is not an exhaustive list:
 - » Gifts exceeding those indicated in the third point above or travel expenses
 - » The uncompensated use of company services, facilities or property
 - » Cash payments
 - » Loans, loan guarantees or other credit
 - » Provision of a benefit, such as an educational scholarship or healthcare, to a member of the family of a potential customer or public or government official
 - » Provision of a subcontract to a person connected to someone involved in awarding the main contract
 - » Engagement of a local company owned by a member of the family of a potential customer or public or government official
- » Suppliers and representatives as well as their employees must comply with all applicable anti-bribery and corruption laws.
- » Suppliers and representatives must have anti-corruption and bribery procedures in place to prevent employees or individuals associated with their businesses from committing bribery or corruption offenses. Suppliers and representatives will properly implement these procedures in their businesses and regularly review them to ensure they are effective.
- » All gifts in each plant must be processed in accordance with the “Gift Procedures at SumiRiko AVS”.

Antitrust Law

We respect fair competition, which, in particular, means the prohibition of:

- » collusion and activities that aim to influence prices and conditions;
- » dividing sales territories or customers or using prohibited methods to inhibit fair and open competition;
- » agreements between customers and suppliers that limit customers’ freedom to determine their own pricing and other conditions when reselling.

Meeting or communicating with a competitor (including any director, officer or employee of the competitor, hereinafter “competitor”) is not permitted unless (i) it is unrelated to business or work; (ii) it is unlikely that sensitive information will be transmitted or received; or (iii) the SumiRiko AVS Legal department has given its approval. Sensitive information is defined as any information related to present or future business competition, including prices, sales volumes, sales territories, production volumes, customers, delivery points, raw materials, profit margins, manufacturing equipment, R&D and other similar matters.

In the event a competitor expresses an interest in transmitting or receiving sensitive information to a SumiRiko AVS employee, he or she must expressly and clearly refuse to do so, leave the meeting and immediately report the event by email to his or her supervisor and the Legal department.

Personal Securities Trading

It is not permitted to use nonpublic material information for the purpose of making profits on trading in the securities (insider trading) of Sumitomo Riko Company Limited (SRK). “Material information” means information that would reasonably be considered likely to cause a significant change in the price of a security if it was publicly known.

It is not permitted to make any trade in an SRK security in the period beginning one week prior to the end of a quarter and ending with the public disclosure of SRK financial statements for that particular quarter.

Consultation Process in Compliance Issues

1. The aforementioned compliance rules refer to all SumiRiko AVS operations that are compliant when they are carried out in accordance with the laws, statutes and other regulations as well as in accordance with business ethics.
2. The effectiveness of the compliance function also depends on the vigilant and cooperation of each employee who should communicate activities and behaviors considered illegal as they violate aforementioned rules. An employee report containing information about illegal activities and behavior that violate the rules is called a “Consultation”.
3. A consultation involves communicating with any of the following individuals or entities; this is called a “consultation window”:
 - » Employee’s direct supervisor or
 - » Supervisor’s direct manager or
 - » HR manager or
 - » Works council or
 - » Data protection officer or
 - » Group compliance officer or
 - » Plant manager or
 - » SumiRiko AVS CEO

All SumiRiko AVS employees are encouraged to make use of these consultation windows.

4. It is also possible to initiate an anonymous consultation using the following resources:
 - » SumiRiko AVS Compliance Helpline
 - » Compliance submission boxes (if available at the site)
5. The SumiRiko AVS Compliance Helpline is operated by a third party on behalf of the Compliance Committee. The helpline receives inquiries about compliance violations and the possible compliance violations and reports them to the SumiRiko AVS Compliance Committee. Complaints can be also made anonymously to the SumiRiko AVS Compliance Helpline. All complaints except involvement of the committee itself will be forwarded to the Compliance Committee. Complaints against CEO or Chairman or CFO will be directly forwarded to the shareholder Sumitomo Riko. This helpline can be used by SumiRiko AVS employees throughout the Group as well as by business partners (suppliers and customers) and regional residents of SumiRiko AVS plants.

The SumiRiko AVS Compliance Helpline is a consultation service operated by two bodies:

(1) An external lawyer by phone or email

Email: helpline@skwschwarz.de

Phone: +49 (0) 69 630 001 26

(All calls will go directly to the lawyer without any storage or tracking of the call.)

Available Monday, Wednesday and Thursday from noon to 4:00 pm, closed on other days and bank holidays.

(2) Compliance Committee by phone or email

Email: compliance@avs.sumiriko.com,

Phone: You can also contact any Compliance Committee member by phone.