



Stahlo-Code of Conduct for Social Responsibility

Preamble

The companies of the Friedhelm Loh Stiftung & Co. KG acknowledge their social responsibility within the framework of entrepreneurial activities worldwide (internationally often called "CSR"¹). This Code of Conduct for social responsibility ("CoC") as a company guide describes what this means and in particular with respect to working conditions, social acceptability and environmental compatibility as well as transparency, cooperation based on trust and dialogue. The contents of this CoC are an expression of the joint basis of values of the companies of the Friedhelm Loh Stiftung & Co. KG.

1. Basic Understanding of Socially Responsible Corporate Governance

This CoC is based on a joint basic understanding of socially responsible corporate governance. For the signatory company, this means that it assumes responsibility in that it considers the consequences of its entrepreneurial decisions and actions both from an economical, technological and from a social and ecological aspect and reaches a fair and reasonable reconciliation of interests. Within the framework of its particular possibilities and latitude of action, the signatory company voluntarily contributes to the prosperity and the sustained development of the global company at the locations, where it conducts operations. When doing this, it orients on the universally applicable ethical values and principles and in particular on integrity and probity and respect for human dignity.

2. Scope

- 2.1 This CoC applies to the branch establishments and business units of the signatory company worldwide.
- 2.2 The signatory company is obligated to promote the observation of the contents of this CoC including with respect to its suppliers and the further value added chain within the framework of its particular possibilities and latitude of action.

3. Key Points of Socially Responsible Corporate Governance

The signatory company is to take proactive measures so that the values and principles, which are provided in the following text, are observed and followed on a sustainable basis.

3.1 Observance of the Laws

The signatory company is to observe the valid laws and other legal provisions of the countries, in which it conducts operations. For countries with a weak institutional framework, it is to make a diligent examination as to what good corporate practice from its own home country should be applied as a supporting measure for responsible corporate governance.

¹ CSR = Corporate Social Responsibility

3.2 Integrity and Organizational Governance

3.2.1 The signatory company is to orient its action on universally applicable ethical values and principles and in particular on integrity, probity, respect for human dignity, openness and non-discrimination with respect to religion, ideology, gender and ethics.

3.2.2 The signatory company is to reject corruption and bribery within the meaning of the corresponding UN convention². It is to promote, in a suitable manner, transparency, actions based on integrity and responsible leadership and control in the company.

3.2.3 The signatory company is to pursue clean and accepted business practices and fair competition. In competition, it is to orient on professional behaviour and work, which is of the appropriate quality. It is to maintain relations with regulatory authorities, which are based on cooperation and trust.

3.3 Consumer Interests

As far as consumer interests are concerned, the signatory company is to observe the consumer protection regulations and appropriate sales, marketing and information practices. Groups, which are in need of special protection, such as the protection of minors, are to be given special attention.

3.4 Communication

The signatory company is to communicate openly and dialogue-oriented concerning the requirements of this CoC and its implementation with respect to employees, customers, suppliers and other interest groups and groups having entitlements. All documents and papers are to be prepared in accordance with one's duty and are not to be changed or destroyed unfairly and are to be properly filed. Trade secrets and business information of the partners are to be treated sensitively and confidentially.

3.5 Human Rights

The signatory company is to support the promotion of human rights. It is to observe human rights according to the UN Charter of Human Rights³ and in particular those named in the following text:

3.5.1 Privacy

Protection of privacy.

3.5.2 Health and Safety

The protection of health and work safety and in particular the guarantee of a safe and health promoting work environment to prevent accidents and injuries.

3.5.3 Harassment

Protection of employees against physical punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4 Freedom of Speech

Protection and guarantee of the right to freedom of speech and free expression of opinion.

² United Nations Convention Against Corruption of 2003, in effect since 2005

³ Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948

3.6 Working Conditions

The signatory company is to observe the following core work norms of the ILO⁴:

3.6.1 Child Labour

The prohibition of child labour, which means the employment of persons younger than 15 years old to the extent that local regulations do not require a higher age limit and to the extent that no exceptions are allowed.⁵

3.6.2 Forced Labour

The prohibition of forced labour of any kind.⁶

3.6.3 Compensation

The work norms with respect to remuneration and in particular with respect to the remuneration level according to the valid laws and provisions.⁷

3.6.4 Employee's Rights

The respect of the right of employees to freedom of association and freedom of assembly to the extent that this is legally allowed and possible in the particular country.⁸

3.6.5 Prohibition of Discrimination

Non-discriminatory treatment of all employees.⁹

3.7 Hours Worked

The signatory company is to observe the work norms concerning the maximum permissible hours worked.

3.8 Environmental Protection

The signatory company is to fulfil the provisions and standards for environmental protection, which apply to its particular business enterprises, and is to act in an ecologically aware manner at all locations. In addition, it is to responsibly handle natural resources in accordance with the principles of the Rio Declaration¹⁰.

3.9 Involvement as a Citizen

The signatory company is to contribute to the social and economic development of the country and the region, in which it conducts operations, and is to promote the corresponding voluntary activities of its employees.

⁴ ILO = International Labor Organization

⁵ ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

⁶ ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957

⁷ ILO Convention No. 100 of 1951

⁸ ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949

⁹ ILO Convention No. 111 of 1958

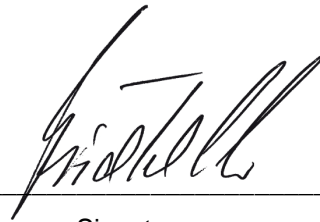
¹⁰ The 27 principles of the "Rio Declaration on Environment and Development" of 1992 as the result of the Conference of the United Nations on Environment and Development in Rio de Janeiro.

4 Implementation and Enforcement

The signatory company is to make all suitable and reasonable efforts to continually implement and apply the principles and values, which are described in this CoC. Contractual partners are upon request and within the framework of reciprocity to be notified about the essential measures so that it is understandable as to how the observation of these is to be basically guaranteed. No claim exists to the disclosure of trade and business secrets, or information, which is related to the competition or other information, which merits protection.

Herborn, 31.05.2012

City, Date

A handwritten signature in black ink, appearing to read 'Friedhelm Loh', written over a horizontal line.

Signature