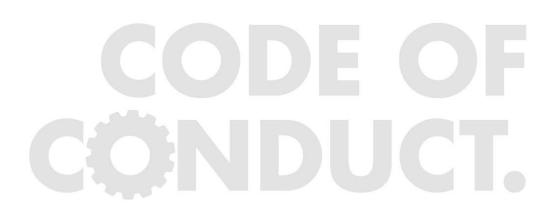


NOERPEL-GROUP -CODE OF CONDUCT

For service providers, suppliers and other third parties

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1. NOERPEL-GROUP CODE OF CONDUCT FOR SERVICE PROVIDERS, SUPPLIERS AND OTHER THIRD PARTIES

1.1 Responsibility of service providers, suppliers and other third parties

The recipients of the Code of Conduct are responsible that employees of the corresponding regional, national or international company or the responsible departments receive this Code of Conduct. In the following, service providers, suppliers and other third parties will be referred to as "partners".



1.2 Content of the Code of Conduct

Noerpel co-operates with many partners. The way in which we work together is an indicator of our success. The partners of Noerpel play a central role in achieving a sustainable growth and the success of the Noerpel-Group as a whole.

To ensure long-term success for Noerpel, the following principles apply for the co-operation with our partners.

1.2.1 Legal and ethical standards

Partners should conduct their business in an ethical way with integrity that is in accordance with national and international laws and regulations. This includes the following aspects in particular:

Partners must always comply with all laws of 1 the respective legal system. Partners must especially follow valid anti-cor-2 ruption laws and standards that includes e.g. the prohibition of kickback-payments or facilitation payments. This also includes the prohibition to offer services, payments, gifts or other unjustified advantages to Noerpel employees with the aim to influence them. Partners must encourage their employees to 3 report any suspicion of an illegal activity. Partners must always comply with all laws and Δ regulations concerning anti-money laundering, sanctions/embargoes, foreign commerce regulations as well as export controls. Partners confirm that all competition and anti-5 trust laws are complied with. Partners confirm that all requirements from the Supply Chain Due Diligence Act are complied with.

1.2.2 Human rights and working conditions

Partners must commit to protect the human rights of their employees. That includes:

- Prohibition of child labour and treatment of underaged employees: Partners should not employ children under the age of 15. If local laws and regulations permit that children between 13 and 15 perform lightweight tasks this is also not tolerated if that prevents children form visiting schools, apprenticeships or if the tasks harm the health or physical development of the children.
- Protection from slavery, forced employment and torture / freedom of choice of occupation: Partners must not use forced or involuntary labour, especially not by torture. Furthermore, the freedom of choice of occupation is guaranteed.
- 3 Working hours and compensation / prohibition of withholding adequate compensation: Partners must apply national binding laws and regulation concerning working hours, salary, and other compensation. We clearly commit to the legal minimum wage that must be applied locally and internationally. Partners commit themselves to not circumvent these regulations by reducing the salary with extraordinary high costs for accommodation or other operational costs ensuring that the minimum wage is received by the employees.
 - Prohibition of bogus self-employment: The regulations on bogus self-employment are known and it is confirmed that further orders in addition to the orders for the Noerpel Group, will be carried out.
 - Prohibition of discrimination: Partners must have a recruitment process and working environment that is free from discrimination and harassment. That includes that women's rights are respected. Discrimination due to colour, age, gender, sexual orientation, ethnical origin, disability, religion, political beliefs, union membership or family status is not tolerated.

Freedom to unionize: Partners respect the right of employees to unionize in order to follow common interests. Employees participating in such unions or groups will neither be discriminated nor favoured.

1.2.3 Safety and Health

Partners must follow all applicable regulations concerning occupational safety and security and must provide a working environment that is safe and does not pose a safety hazard in order to protect the employees' health and prevent working related injuries and diseases.

That includes among others:

- Personal safety equipment is provided (PSE)
- Regular training regarding accident prevention in accordance with national regulations (e.g. DGUV1)
- Adequate handling of chemicals and hazardous materials
- Conduct in case of an emergency, e.g. accidents (first-aid) or fire
- Application of secure working equipment (machine safety)
- Ergonomics at the working place

1.2.4 Environment

Partners must comply with all applicable environment laws, regulations and standards. Our partners should protect natural resources, limit the usage of dangerous materials as much as possible and make use of environmentally friendly technologies that lead to a positive ecological balance sheet.¹

1.2.5 Supply Chain

Our partners must conduct adequate efforts resulting from the German supply chain act so that also sub-contractors and tier suppliers follow the principles of the Code of Conduct, including the non-discrimination when selecting and dealing with partners.

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¹ That includes topics like: energy efficiency, usage of renewable energy, reduction of greenhouse gasses, careful usage of natural resources, waste management (reduction and recycling as well as separation), water consumption- and quality and air quality

2. DECLARATION OF ADHERENCE

- We confirm that we received a copy of the Noerpel Code of Conduct for service providers, suppliers and other third parties und confirm that additional to our obligations resulting from our contract with Noerpel, we will adhere to the principles and rules stated in the Code of Conduct.
- 2. We confirm that a violation of the Code of Conduct would be seen as a serious violation of our contractual duties with Noerpel.
- This declaration should follow the same legal system and procedures and the same place of jurisdiction as in the contract that was signed with Noerpel.

Place and Date

Company stamp and authorized signature

www.noerpel.de