



Introduction

As a global and successful company, we not only have the clear vision “Leadership in Filtration by inspired people delivering outstanding solutions and superior results”. But also, a special obligation.

In the future, we wish to embrace these ideals in a more conscious and determined manner.

The solid foundation for all decisions and corporate action are our values and our commitment to valid laws and generally accepted social and ethical principles.

Now they are written down in the Born Coating GmbH Code, consisting of the Code of Conduct and a joint statement on the Principles for Social Responsibility of the Born Coating GmbH (Social Charter).

The aim of this Code is to create a standard which unites all the members of the Born Coating GmbH.

It is therefore also an example of our vision of thinking and acting in the global Born Coating GmbH network.

The Social Charter describes the Principles for Social Responsibility and commitment.

In the Code of Conduct, the principles of behavior at Born Coating GmbH are summarized, the Social Charter describes the principles of social responsibility and obligation.

Together they form the “**Born Coating GmbH Code of Conduct**”. Comprehensive validity. For everyone.

The overall goal is to govern, communicate, respect and preserve the basic principles of human relations and labour for everyone who works with and Born Coating GmbH. A great benefit for all of us. For the benefit of values-oriented corporate management. And for the benefit of our company’s success, workforce security and competitiveness are thus safeguarding our long-term future.

Guidelines and principles are only as good as the commitment behind them and must be fully integrated into everyday tasks. We ask for your support in achieving our goals. If you have any questions about the Born Coating GmbH Code or wish to draw attention to wrongdoings, please take advantage of the opportunities provided by the Born Coating GmbH Code – either via your supervisors, company executives, external ombudspersons, or for questions regarding the Social Charter also the local workers’ representative.

The following document contains all the important information you need to adhere to and implement the Born Coating GmbH Code: The Code of Conduct and the Social Charter.

Born Coating GmbH

Mr Damian Janczyk und Mr Ansgar Link, Managing Directors

Code of Conduct

The Code of Conduct and the Principles for Social Responsibility are part of the Born Coating GmbH vision and the foundation for the internal and external actions of the company and its employees.

The Born Coating GmbH is aware of its responsibility as a global company and its social and ethical obligations.

The success factors of Born Coating GmbH are:

- External and internal customer orientation,
- Cross-functional thinking and actions,
- Goal and result orientation,
- Motivation and achievement orientation, as well as development and promotion.

The Code is a mandatory guideline for all employees and companies of the Born Coating GmbH worldwide, including all directors, officers, company managers, executives, employees and all of our representatives including all agents, consultants, independent contractors, as well as persons fulfilling functions equal to employee functions (e.g. temporary staff), and suppliers of the Born Coating GmbH worldwide.

The policies in this Code apply to all companies affiliates of the Born Coating GmbH in all business divisions and countries.

If a local law conflicts with a policy in the Code, you must comply with the local law. If a local custom or practice conflicts with a policy in the Code, you must comply with the Code.

Each employee is expected to act in accordance with this Code. The Born Coating GmbH shall not tolerate violations of these principles. If in doubt, employees may contact their supervisors, the responsible organization within Born Coating GmbH or the management or the appointed ombudspersons, who will keep their exchange confidential.

The Born Coating GmbH provides the Code to its employee's worldwide for their guidance in recognizing and resolving the ethical and legal issues they may encounter when conducting the company's business. The Code may be modified or annulled at any time by Born Coating GmbH. Directors, officers and employees and other representatives of the company must be familiar with its contents.

The Code does not include all the policies of the Born Coating GmbH, which remain applicable in addition to the Code.

1. Basic Rules of Conduct

1.1 Adherence to laws

The Born Coating GmbH complies with laws, statutes, and agreements it enters and expects the same from its business partners. Each employee must comply with all applicable laws and regulations of the respective legal systems. Violations of the law, agreements or the Code are not tolerated and may result in work sanctions.

1.2 Respectful conduct

The basis for the success of Born Coating GmbH is the diversity of its employees as well as the respectful approach and manner in which it treats people. Born Coating GmbH acknowledges and values the personal and individual differences of all its employees.

Born Coating GmbH aims to provide challenging, meaningful and rewarding opportunities for personal and professional growth to all employees. All kinds of discrimination, sexual harassment, bullying or verbal abuse are not tolerated. Interactions between employees are open and honest, marked by respect and responsibility.

These principles apply both to internal cooperation as well as the cooperation with external partners.

1.3 Management, Responsibility, Supervision, and Integrity of the Company

Executives have special responsibilities. It is their task to conscientiously exemplify our success factors and to promote these among our employees. Executives will promote the success of Born Coating GmbH, acknowledge their special responsibility and exemplify our success factors by actively promoting the employees' attention to customer focus, by always placing the interests of the Born Coating GmbH above the interests of their own department, by actively searching for and improving collaboration with other departments and by continuously developing their own department according to the company strategy. They will pursue the company's objectives and goals in a competent, active and persistent manner, inform their employees regarding all important issues in a comprehensive and timely manner, clearly and transparently delegate tasks, competencies, and responsibility, reinforce the identification with and loyalty to the company, develop an honest and open interaction among team members, regularly evaluate their employees in a fair manner, and challenge and assist each and every one of them as their coach.

All executives will competently execute their organizational and supervisory duties and will be responsible for any legal violation occurring in their respective area of responsibility that could have been prevented by proper supervision. This also applies to the delegation of individual tasks.

1.4 Dealing in the social networks

The use of social networks is also becoming increasingly important for us. Born Coating has therefore adapted its procedures for a modern image. To prevent possible risks, it is important to comply with legal requirements. WE stand for an open communication culture. It is important to us those sensitive topics such as hate speech and fake news are avoided. Since we are known as a reputable company beyond the region, the importance of the Code of Conduct is essential. Information

in the form of pictures or references to possible sources on the internet are subject to copyright or, if applicable, personal rights. Since a so-called digital footprint cannot be deleted on the Internet without great effort, it is important to always protect your private data. Therefore, be careful when passing on (your) sensitive data. These are e.g. address, telephone number, bank details, etc.

In order to counteract the anonymity on the net and the associated low inhibition threshold, not every comment/post deserves a reaction.

Keep a cool head

1.5 Private internet use

Private internet use is to be prohibited during working hours; surfing the internet is permitted during break times. We would like to point out that private internet use should not interfere with personal work performance. In order to protect our information system, it is important not to open insecure and unknown file attachments.

If the data security situation is unclear, the system administrator should be contacted.

It is forbidden to distribute or download any form of pornography, glorification of violence or formal insults through the operating system of Born Coating. To prevent possible costs arising from private internet use, we would like to point out that in the event of a violation, these will be forwarded to the employee. Depending on the severity of the violation, the management reserves the right to impose consequences under labour law.

2. Our Relationship with Business Partners and Third Parties

2.1 Compliance with the legal requirements of Competition Laws

Solid business partnerships for the benefit of all the parties involved can only exist in an environment of fair competition and strict compliance with laws and regulations. Each employee shall comply with the domestic and international antitrust and competition laws. Employees specifically cannot discuss any prices or capacities with competitors.

The distribution of customers, regions, or product programs is also prohibited, as is the submission of sham offers in the event of calls for bids or the agreements with competitors concerning prices or a competition waiver.

2.2 Offering and Granting of Advantages

The Born Coating GmbH is very convincing due to its prices, service, its quality and the suitability of its offered products and services. Employees may not offer, promise, grant or approve directly or indirectly any advantages to another party in connection with any business transaction, neither in the form of monetary gifts nor as other services. Promotional gifts should not have a value that makes the recipient feel obligated in any manner. Should there be any doubt, the recipient should ask his supervisor to approve acceptance of the gift in advance. Even customary gifts of little value must be approved by the respective supervisor in advance. If there are any doubts, the responsible company or divisional manager should also be asked to approve the gift.

No gifts shall be made to governmental agencies and other officials.

When cooperating with approved consultants, intermediaries, or agents, this will be done based on a contract only, thus ensuring they do not offer or grant any unauthorized benefits, comply with local laws and regulations and the requirements of the Code.

2.3 Requesting and Accepting of Advantages

Employees may not use their official position to request benefits or have a third party promise these or accept these. They are permitted to accept customary occasional gifts of low value. If there are any uncertainties regarding gifts of a higher value, the respective employee must inform his supervisor of the offer made to him.

2.4 Invitations

Invitations made and accepted for events or business dinners (of lower value) must be issued voluntarily, serve a justified business purpose, and take place within the context of the usual cooperation. In case of doubt, the approval of the supervisor must be obtained.

2.5 Donations

Company management will decide on the allocation of charitable and political donations.

2.6 Money Laundering

The Born Coating GmbH supports all the necessary measures to prevent money laundering activities in their domain of influence, i.e., channelling illegally obtained money into the legal financial cycle to hide its true nature or source.

2.7 Embargo- and Export Control

The Born Coating GmbH is committed to ensuring that its business activities never violate international embargo and export control laws established within or applied by the countries where it operates. In cases where embargo legislation diverges, the opinion of the legal department should be sought, and the issue then be submitted to the general management of the company.

3. Conflicts of Interest

The Born Coating GmbH does its utmost to prevent its employees from being exposed to conflicts of interest or loyalty within the context of their business activities.

However, situations of conflict of interest between employees or persons close to them (family members) and the company may appear. To prevent such conflicts, the Code sets procedure principles to balance an employee's right to privacy and the interest of the company. For this reason, employees will report any situation that may affect their professional objectivity and independence, such as secondary jobs and participations in the ventures of business partners or competitors.

These possible conflicts of interest will be examined by Born Coating GmbH. Employees are not obliged to report the purchase of shares traded on a stock exchange or small asset investments.

4. Safeguarding of Company Property

Equipment and operating resources, including but not limited to the physical and intangible property of the Born Coating GmbH, must be treated in an economic, proper, and careful manner. Unless expressly approved, company property may not be used for private purposes.

5. Handling information

The basis of trusting and effective cooperation is truthful and accurate communication, both internally as well as externally. Press releases may only be published after having first been approved by the company management or a representative of the company management. The same applies to the forwarding of internal information to third parties.

For the ability of the Born Coating GmbH to compete, it is essential that internal matters and information deemed in need of protection are treated confidential. The obligation to maintain confidentiality remains in force after the working relationship has been terminated.

The Born Coating GmbH considers all existing obligations towards third parties as confidential.

The Born Coating GmbH is aware of the importance of information security for the Company as well as for individual employees and guarantees effective information security and protection of personal data. Personnel-related data is only requested, processed, or used as far as necessary for clearly defined purposes and in accordance with local data protection laws.

The protection from unauthorized access to personnel-related data and company data must be guaranteed. The use of data must be transparent for the individual concerned, this also applies to the individuals' rights to information and corrections, as well as appeals, blocking and deletions.

The Born Coating GmbH has approved guidelines for information and data protection for this purpose that addresses additional details.



6. Environment, Safety and Health

The protection of the environment and natural resources as well as proper waste management are very important, both within the context of the development as well as the production of our products. The company will comply with all requirements regarding the protection of the environment. It is the Born Coating GmbH policy to implement and establish occupational health and safety protection measures. We are aware of the responsibility for our employees and undertake to take precautions against accident hazards, as the employees will also make sure, that they can perform their daily jobs in a safe and healthy work environment. The company will comply with all legal requirements regarding health and safety and, within the context of internal processes, provide a health-oriented workplace.

Any potential deficiencies will be addressed immediately.

7. Internal Organization, Guideline Implementation

An integral part of the internal organization of the Born Coating GmbH is the application of the four-eyes principle, the separation of incompatible activities (separation of functions), and strict standards guaranteeing seamless documentation to prevent irregularities, especially regarding order processing and shipping. Alternative offers will be obtained, if appropriate and logical. The Born Coating GmbH financial, accounting, and other reports and records will accurately and fairly reflect the transactions and financial conditions of the company in reasonable detail, and in accordance with generally accepted and company-approved accounting principles. There must be no “off the books” or secret accounts. All employees are routinely informed and receive regular training regarding the content, logic, and purpose of the Code. Compliance is, first and foremost, the individual responsibility of every employee. Every director, officer and employee of the company has the personal responsibility to know and understand the Code and the other policies of the company relevant to his or her job or position. All executives and employees who do not live up to this responsibility, or who violate the provisions of the Code are subject to disciplinary action, and possibly legal consequences. Experience has shown that organizational principles are only successful if they are accompanied by appropriate control measures. These are, among others, appropriate verifications, and plausibility checks to be conducted by the internal audit department. The internal audit department is required to verify compliance with the Code as part of their audits and to apply the appropriate auditing criteria.

8. Complaints and Comments

Employees should address their supervisor in case of questions or comments regarding the Code or ambiguities about how to use and interpret them. The supervisor will clarify any questions after consulting with the legal department and the company management to the extent necessary. Employees wishing to file a complaint or to report a possible violation of the Code should directly address the company management or the internal audit department by e-mail, phone or in writing, who will treat this matter confidentially, if requested to do so. Employees who report a potential legal violation or a violation of the Code in good faith do not have to fear any reprisals.

Social Charter

Joint Declaration on Fundamentals of Social Responsibility of the Born Coating GmbH.

Preamble

The continued globalization of the markets in goods and capital enables transnational Born Coating GmbH to set up global production and distribution networks. These global networks imply social responsibility and respect for the fundamental principle of people co-existing and working together in harmony.

The Born Coating GmbH management, along with national and international workers' representatives, recognizes this social responsibility of the Born Coating GmbH as a global company.

Values oriented corporate management should help utilize the opportunities of success for both the company and the workforce, while limiting any risks present. Ultimately, this is also important for international competitiveness and thus for the future of the Born Coating GmbH and its employees.

The Born Coating GmbH management and the national and international workers' representatives have established the following goals and implementation measures for the Born Coating GmbH corporate activities worldwide. These will be implemented while complying with laws in force in the different countries and locations and while recognizing different cultural traditions.

1. Aims

The following basic goals and principles of implementation are inspired by the International Labour Organization's core labour standards and in addition to national legislations take account of ILO Conventions No. 29, 87, 98, 100, 105, 111, 138 and 182.

The Born Coating GmbH will comply with internationally recognized human rights.

1.1 Freedom of Choice for Employees

Working for the Born Coating GmbH is a matter of choice. Forced and bonded labour, including slave labour and prison labour, will be rejected in accordance with ILO Conventions 29 and 105.

1.2 No Discrimination

The Born Coating GmbH will guarantee equal opportunities and equal treatment regardless of ethnic origin, skin colour, gender, religion, nationality, sexual orientation and political beliefs insofar as the basis is democratic principles and tolerance towards those with different opinions.

Employees shall be placed neither at an advantage nor a disadvantage because of membership in a trade union or an inhouse staff association.

1.3 No Child Labour

Pursuant to ILO Conventions 138 and 182 children should not have their development inhibited; they should be treated with dignity and their safety and health should not be put at risk. The Born Coating GmbH will adhere to the general rules regarding the minimum age for admission to gainful employment.

1.4 Freedom of Association

The right of all employees to form associations to protect their collective interests and to engage in collective bargaining to agree working conditions is recognized.

The Born Coating GmbH and the respective employee organizations will co-operate constructively in a spirit of good faith. Even in cases of disputes the goal shall always be to maintain viable cooperation in the long term.

1.5 Remuneration

Remuneration in the Born Coating GmbH complies with current minimum rates of pay as guaranteed by law with no differentiation based on gender. The Born Coating GmbH observes the minimum standards currently in place in the respective branches at national level and follows current trends on the respective labour markets.

1.6 Working Time

The Born Coating GmbH will comply with the respective national rules and agreements on working time and paid leave.

1.7 Occupational Health, Safety and Environmental Protection

Occupational health, safety and environmental protection are an important feature of the corporate policy of the Born Coating GmbH. In the area of occupational health and safety the Born Coating GmbH will as a minimum comply with national regulations in respect of health and safety in the workplace; decent and human working conditions are an important feature of the corporate policy.

A right of nomination regarding occupational health, safety and environmental protection for the national workers' representation is honoured.

1.8 Qualifications

Employees of the Born Coating GmbH are selected, hired and promoted on the basis of their job-related qualifications and skills. A targeted, continuous, demand-oriented skills enhancement for employees is supported to ensure high output and work of high quality.



2. Implementation Principles

The goals and principles of implementation set out in this joint declaration apply for the Born Coating GmbH.

Just like the principles outlined in the “Code of Conduct”, they are an integral part of the corporate culture and an expression of the corporate identity of the Born Coating GmbH and serve as a basis for internal and external actions of the company and its employees.

2.1 Communication

The contents of this joint declaration will be disseminated within the Born Coating GmbH in the appropriate manner in the respective local language. The information type will be discussed with the workers’ representative on site within the framework of the overall communication strategy of the Born Coating GmbH.

2.2 Business Partners and Suppliers

The Born Coating GmbH business partners and suppliers will be encouraged to introduce comparable principles in their corporate structures and to apply them in the context of their own corporate policy.

The Born Coating GmbH expects its business partners and suppliers to use these principles as a basis in their mutual dealings and regards them as a suitable criterion for lasting business relationships.

2.3 Complaints and Indications

In case of complaints or indications regarding a possible breach of this joint declaration, each employee can turn directly to his supervisor, the respective local workers’ representative or the external ombuds-person appointed by Born Coating GmbH, who will also treat the matter confidentially upon request. Employees that report a possible infringement or the breach of this joint declaration bona fide will not face reprisals.

2.4 Final clauses

This joint declaration shall enter into force on the day of its signing. No individual or third-party claims can be derived from this joint declaration. Only the German version of this declaration is binding.

