



# COMPLIANCE RULES

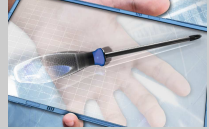
## KIRCHHOFF GROUP



**April 2010**

### Preamble

The employees of the KIRCHHOFF Group commit to always act in coherence with the actual national guidelines and conventions dealing with ethical aspects and social responsibility.



## We commit to integrity in business connections

Integrity means that employees of our company do not try to influence their business partners or get influenced in an illegal way. We do not tolerate any corruption or commercial bribery. We are not doing business if this business means to break any laws or corporate rules.

The acceptance or permission of benefits always has to be in harmony with laws and our international rules. Every contribution is a benefit, even though it occurs indirectly.

## Fairness in competition is always the basis of our actions

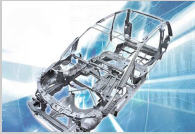
Violation of the antitrust law can cause enormous damage to the corporation. We do not tolerate price arrangements, price commitments, market allocations or any forms of unfair restraints of competition.

## We arrange fair working conditions and commit to interact respectfully with each other

Nobody may be benefitted, disadvantaged, excluded or preferred because of his or her race, ethnic background, gender, religion or ideology, handicap, age or sexual identity. We make a positive contribution to improve business standards dealing with integrity, transparency and responsibility in every field of activity.

## We separate between corporate and business interests and thus avoid conflicts

Business decisions and actions have to follow the corporation's best interests and may not be influenced by personal interests and relationships.



An independent and substantiated decision in the company's interests must not be influenced by relationships to current or prospective suppliers, customers, contractors, competitors, authorities or other employees.

## Environmental protection, operational safety and health protection are fundamental core values our company feels obliged to

Our employees' health is a valuable asset. The adherence to the relevant safety rules is self evident to us. The efficient usage of all resources and the introduction of all necessary measurements to environmental protection is an important contribution for us to a sustainable development.

## We protect the mental property of our corporation and respect third parties' trademark rights

Confidential information and business secrets are protected against the access of third parties. This is also valid for information entrusted by customers and suppliers.

## Our company's file management is correct and our financial reporting is clear and transparent

The essential business processes are documented in a proper way and the relevant financial report information about business actions are correctly and completely detected.



**WE.MOVE.FUTURE.**



**We work  
with people  
for people**



**Our employees ensure our profitability and competitiveness**

**WE.DEVELOP.INNOVATIONS.**

If you have questions or remarks regarding compliance, please contact the KIRCHHOFF Group's compliance representative, Uwe Hartmann, phone: +49 2371 820 255, email: [compliance@kirchhoff-group.com](mailto:compliance@kirchhoff-group.com) or directly your local compliance representative.