



## LEISTRITZ Business Code of Conduct

The LEISTRITZ GROUP\* with over one hundred years of history sees itself as a traditional and innovative partner in the fields of aerospace, automotive engineering, energy, plastics, pharmaceuticals as well as machine tools and tools. Our customers include well-known companies from around the world. Not just our customers but our own self-concept and basic social, corporate and legal conditions call for a clear commitment to compliance with statutory regulations and identification with high ethical standards. This Code of Conduct, which will work in conjunction with further compliance policies, handbooks and instructions as may exist or be implemented within the individual companies, describes the generally applicable minimum standards - which are in addition to the compulsory statutory requirements - within the LEISTRITZ GROUP and is applicable worldwide for all Board Members, management, executives and employees.



### Basic principles of cooperation

The behavior of the Board, management, executives and employees must be based on the following basic principles at all times, both inside the LEISTRITZ GROUP and in dealings with our business partners:

- **Trusting and partner-like cooperation**
- **Loyalty**
- **Integrity**

### Compliance with laws / external specifications

Compliance with all applicable laws is the minimum requirement for any action within the LEISTRITZ GROUP. In addition we plan to comply with specific, industry-wide specifications within the individual national companies.

### Human rights

Upholding human rights is an indispensable element of corporate ethics, particularly for such a traditional company that has its headquarters in the metropolitan region of Nuremberg / "City of Human Rights" ([www.metropolregion.nuernberg.de](http://www.metropolregion.nuernberg.de)). Child and forced labor of any kind is totally unacceptable.

### Business ethics in the course of business

- **Prohibition of corruption and bribery**

Any form of corruption/bribery, either through the offering, promise or granting of monetary or other benefits, or their demand or acceptance, is strictly prohibited and will not be tolerated.
- **Appropriate gifts & entertainment**

Gifts and entertainment may not be granted if they

  - a) contradict any applicable laws,
  - b) are aimed at influencing a business decision, or
  - c) are not documented reproducibly in accord with the rules of proper accountancy.
- **Fair competition**

LEISTRITZ faces up to competition openly and fairly and will not be part to any contracts, agreements or other forms of conduct with suppliers, competitors or customers that are deemed to be anticompetitive according to applicable laws.
- **Disclosure of conflicts of interest**

Existing or possible conflicts of interest with LEISTRITZ or our contractual partners are to be reported immediately. All such reports will be investigated and verified and any necessary remedial action will be taken.

\*The LEISTRITZ GROUP is a group of affiliated companies engaged in business worldwide.

## ■ Proper accountancy

All financial transactions must be documented completely, correctly and reproducibly in the records of the LEISTRITZ companies so as to satisfy the transparency requirements of the various authorities and auditors.

## ■ No exploitation of insider knowledge

It is forbidden to use unpublished information from one's working environment or to disclose this to third parties to buy or sell shares in external companies or to otherwise gain an advantage.

## ■ Confidentiality, protection of know-how, data protection

The confidential handling of our know-how and the know-how of our contractual partners forms the basis for the economic success of the LEISTRITZ GROUP despite growing competition. The protection of confidential information and/or any information covered by data protection laws as well as intellectual property rights of our business partners must be respected at all times.

## Product safety, occupational safety & working conditions

LEISTRITZ takes into account all applicable statutes and regulations to ensure product safety in the interests of our employees, customers, their employees and final customers during the development and sales of products. LEISTRITZ is committed to protecting the health and safety of its employees. Any discrimination (e.g. with respect to race, religion, skin color, nationality, gender, age or disability) or the hindrance of statutorily guaranteed rights of co-determination for the workforce/unions will not be accepted.

## Environmental protection & sustainability

LEISTRITZ will observe the applicable environmental and safety laws in all of its activities. LEISTRITZ aspires to an efficient use of resources and reduction of energy, water and raw materials consumption as well as CO<sup>2</sup> emissions. Cost-effective actions and sustainability are not contradictions but represent forward-looking actions.

## Political activities

Any political involvement of companies in the LEISTRITZ GROUP is permissible only if in accordance with the relevant applicable laws, and only if any such involvement is recorded in the account books and undertaken with the written consent of the Board of LEISTRITZ AG and the respective corporate Board of the company in issue.

## Involvement of contractual partners

We encourage and support our suppliers, commercial agents and other business partners to introduce comparable principles. Violations of any laws by companies or persons acting on our behalf will not be tolerated.

## Our obligation

Every person within the LEISTRITZ GROUP is obliged to observe the principles laid down herein and in any further compliance policies, handbooks or instructions. All Members of the Board, managements and executives are also obliged to communicate this Code of Conduct to all of the employees within their companies, to ensure its implementation in daily business through appropriate measures and to check that it is observed.

## Our commitment

Anyone who has any questions or remarks can contact their superior or other designee under an applicable compliance policy, handbook or instruction. Those providing information may not be discriminated against because of their information or disclosure. This also holds true if the remark or information in the end turns out to be unfounded, provided the informant has made his/her remark in good faith.

## Our responsibility

Any breach of this Code of Conduct can damage the reputation of the LEISTRITZ GROUP, its customer relations and financial stability in the long term. Anyone found to be in violation of this Code of Conduct or any further compliance policy, handbook or instruction will be subject to appropriate disciplinary or legal action, which may potentially include termination from LEISTRITZ employment and/or financial liability and penalties. It is expected that all employees will follow the Business Code of Conduct.



In order to remain a reliable business partner, the entire LEISTRITZ GROUP is called upon to assume a responsibility for the long-term success of the company by complying fully with the aforementioned principles.

LEISTRITZ AKTIENGESELLSCHAFT  
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*Executive Board*

*Supervisory Board*

*Owner Family*

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