

## CODE OF CONDUCT

### A. WORKING CONDITIONS

#### 1. General Conditions & Compensation

Forced or bonded labour or involuntary prison labour are not used at PENOX Group. All work is voluntary, and workers are free to leave upon reasonable notice. There is no inhuman treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and there is no threat of any such treatment. Child labour is not used. Working hours are in line with local laws and practices. Compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

#### 2. Non-Discrimination

PENOX is committed to a workforce free of harassment and unlawful discrimination. PENOX does not allow any discrimination based on race, colour, age, gender, sexual orientation, gender identity or expression, ethnicity, disability, pregnancy, religion, political affiliation, or marital status in hiring and employment practices such as promotions, rewards, and access to training.

### B. HEALTH and SAFETY

#### 1. Safety

Worker exposure to potential safety hazards are controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment. Workers are not be disciplined for raising safety concerns and are even encouraged to raise concerns on health and safety. PENOX, at its operations, identifies potential emergency situations and implements emergency plans and response procedures.

#### 2. Occupational Injury and Illness

Procedures and systems are in place to manage, track and report occupational injury and illness, in accordance will applicable laws and standards.

#### 3. Industrial Hygiene

Worker exposure to hazardous chemical, biological and physical agents are identified, evaluated, and controlled. When these hazards cannot be adequately controlled by engineering and administrative means, workers are provided with appropriate personal protective equipment.

#### 4. Physically Demanding Work

Worker exposure to physically demanding tasks are identified, evaluated and controlled in accordance with applicable laws.

#### 5. Machine Safeguarding

Physical guards, interlocks and barriers are to be provided and properly maintained for hazards in machinery used by workers.

## **C. ENVIRONMENTAL**

### **1. Environmental Permits, Regulations and Standards**

All required environmental permits and registrations are obtained, maintained and kept current and their operational and reporting requirements are followed. Chemicals and other materials posing a hazard if released to the environment are identified and managed in accordance with applicable laws and standards related to their safe handling, movement, storage, recycling or reuse and disposal. Wastes and emissions generated from operations, industrial processes and sanitation facilities are monitored, controlled and treated as required by applicable laws and standards, prior to discharge or disposal.

### **2. Product Content Restrictions**

In transferring any goods to the customer, PENOX ensures that such goods comply with all applicable laws and regulations, including those related either to restrictions of specific substances or to labeling for recycling and disposal.

## **D. INTEGRITY**

### **1. Non Acceptance of Corrupt Practices**

PENOX does its utmost to gain market share thanks to the quality of our products and to the service we provide to our customers. We believe that the only way to gain new businesses or keep our existing market is thanks to the quality of our products, services and people. We totally reject unethical business behavior and especially any kind of corruption. We do not tolerate bribery and our people do not offer or accept any gifts of material value.

### **2. Respect of competition rules**

In a competitive market with increasing expectations from customers on product quality, on value of services and innovative approach, PENOX values fair competition and believes that respectful competition can only lead us to improve our offer towards the market. Therefore, we reject any unethical attitude towards competitor to gain market share. PENOX does respect antitrust and competition laws in every country we operate and sell.

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