

# Compliance Policy of the APPL Group

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## 1. Definition

In business terminology, the term "compliance" means that a company's actions are in line with the legal requirements. For the APPL Group, compliance also includes compliance with the values and principles to which we have voluntarily committed ourselves. This is based on Group-wide rules of conduct and a wide spectrum of legal regulations.

## 2. Scope of application

The valid rules of conduct are binding for all employees of the APPL Group.

## 3. Purpose

The purpose of the Compliance programme is to support all employees of the APPL Group in complying with relevant legal regulations and standards of conduct. Clearly defined measures, the implementation of which is organised and coordinated by the compliance officers, help to achieve this.

## 4. Components

The business principles of the APPL Group are an essential component of the compliance program:

- We strictly separate personal interests from those of the company.
- We do not offer any person an unjustified advantage.
- We do not exploit our position for personal gain.
- We treat all information from the company in confidence.
- We respect the rules of fair competition.
- We treat everyone equally.
- We are a fair employer.
- We respect the applicable law.

Employees are provided with a document, both in printed and in electronic form on the intranet, which explains the eight business principles in a readily understandable manner with the aid of practical examples. In addition, employees are trained on the business principles within the framework of operational instruction.

Employees are informed about the standards of conduct and legal regulations relevant to their area of work and supported in fulfilling the resulting obligations. This is done through special training and advice from the Compliance Officer and through information on the intranet.

In cases of doubt, the employees of the Group can contact their respective line managers and a compliance officer. In addition, employees and external third parties (e.g. customers, suppliers

or other business partners) are given the opportunity to report observed compliance breaches to the management. Where necessary, incidents may also be reported anonymously to the Compliance Officer.

## **5. Equal treatment**

Discrimination on the grounds of race, ethnic origin, gender, religion, belief, disability, age or sexual identity is strictly prohibited. This applies in particular to dealings with colleagues, employees and business partners as well as when hiring, promoting or dismissing employees.

## **6. Prohibition of bribery and corruption**

It is strictly prohibited:

- to offer, promise or grant a personal advantage to domestic or foreign public officials for the performance or omission of an official act,
- to offer, promise or grant illegal personal benefits to employees or representatives of domestic or foreign companies,
- to allow bribery to be perpetrated with the help of others, for example relatives, friends, agents, consultants, planners and intermediaries,
- to support unlawful acts of other persons.

## **7. Cooperation with customers and suppliers**

We expect from employees, customers and suppliers:

- compliance with all applicable laws,
- abstention from corruption,
- respect for human rights,
- compliance with the laws against child labour,
- compliance with the laws of international trade,
- in particular, compliance with export and import bans and embargo regulations,
- the protection of the health and safety of all employees,
- compliance with the relevant national laws and international standards for occupational safety, environmental protection and data protection,
- that these points are also implemented and adhered to in our own supply chain.

## **8. Invitations, gifts and other personal benefits**

In principle, employees may not demand, be promised or accept personal benefits either for themselves or for persons close to them.

Employees may only accept personal benefits (e.g. invitations to restaurants or sporting events or gifts) if they do not give the impression that they are expected to give something in return. For the acceptance of gifts from a value of 75 € upwards or invitations involving an overnight stay, the approval of the management is required in each case.

## **9. Occupational safety, environmental protection and privacy**

In the interest of the health and safety of all employees and visitors, every employee must comply with the applicable laws, regulations and standards for occupational safety at his workplace.

Every employee is jointly responsible for environmental protection in his area of work and is required to comply with the laws, regulations and standards on environmental protection.

Personal data may only be collected, used and stored in accordance with the applicable privacy laws.

Company and business-related data must be treated confidentially and may only be used within the scope of the area of responsibility.

## **10. Behaviour towards competitors**

- Competition law and antitrust law must be observed.
- No prices, quantities and conditions may be agreed with competitors.
- Agreements with competitors on market sharing are not permitted.

## **11. Consequences of compliance breaches**

Compliance breaches can have the following consequences for employees:

- warning
- notice
- third-party claims for damages
- monetary penalty
- prison sentence.

Compliance breaches can have the following consequences for the APPL Group:

- third-party claims for damages
- costly court proceedings
- monetary penalty
- reputational damage.

Wemding, July 2014

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