

**Code of Ethics  
Code of Conduct**

**Matrium Group**



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## 1 Introduction

The company's foundation rests on strong pillars. Our corporate thinking and actions are based on the virtues of a medium-sized enterprise. Convinced that the key to quality is good service, we work every day towards ensuring our customers are satisfied.

In our business activity, we champion integrity and compliance with all applicable laws, regulations and internal guidelines. This Code of Ethics contains fundamental principles and rules that we apply within the Matrium Group and to our collaborative relationships with our business partners.

Violations of this Code of Ethics will be punished. Measures will be undertaken to ensure that the matter is promptly clarified. Violations may also lead to employment law sanctions and disciplinary action. The management will perform frequent checks to ensure compliance with the Code of Ethics. The management of the Matrium Group also undertakes to review and update this Code of Ethics on a regular basis.

To improve readability, the text in this Code of Ethics contains only the masculine form. No discrimination is intended. The wording encompasses all the individuals employed in the Matrium Group.

The management of the Matrium Group expects all employees to respect and comply with the Code of Ethics. Managers will support their employees in this, and they are also required to act as role models who demonstrate the requisite standard of conduct, and they are responsible for monitoring compliance therewith.

Olching, January 2021

The Management

Michael Niederführ

## **2 Requirements**

We consider meeting internal and external requirements a core element for achieving our goals. To ensure consistent compliance in the context of goal achievement, each and every individual has to work towards creating a positive working atmosphere. This intrinsic motivation and positive fundamental attitude among one another and towards our individual workloads, make it much easier to satisfy these internal and external requirements. So the organisation functions much more efficiently and the content of the Code of Ethics becomes internalised both consciously and sub-consciously.

### **2.1 Legal and regulatory requirements**

We comply with and adhere to all legal and official provisions as a matter of course. Obligations, responsibilities and remits are regulated and checked for compliance on a regular basis. All managers have a duty to make their employees aware of all the relevant provisions and ensure compliance with them.

### **2.2 Business system standards**

Our business system incorporates the stipulations derived from our quality and environmental management systems, our customer's requirements and our own aspirations. This business system provides all employees with transparent guidelines and rules, without restricting their creativity, initiative or capacity for work. By complying with these rules, we can offer our customers an efficient service that meets their requirements.

### **2.3 Stakeholders' requirements**

The requirements of stakeholders are analysed and defined. We can ensure compliance through a regular review of requirements and integrating these requirements into our corporate actions.

### **3 Compliance / codes of conduct**

#### **3.1 Conflicts of interest**

Each and every employee is duty bound to prevent conflicts of interest. A conflict of interest occurs when the interests of an employee collide with the corporate interests of the Matrium Group. Conflicts of interest can be avoided in many instances through ethical and moral behaviour. It is very important that objectivity is allowed to prevail when dealing with conflicts of interest. Personal and private relationships, both in-house and externally, may not be allowed to influence business matters. Any knowledge of internal or external conflicts of interest must be reported to the management. It is prohibited to hold an interest in competitor, customer or supplier companies, or to enter into personal business relationships with them, if this could result in a conflict of interest.

#### **3.2 Donations and sponsoring**

The Matrium Group does not donate to political parties, individuals, for-profit organisations or organisations with aims that are contrary to the principles contained in our policies, or which damage our reputation. As a responsible member of society, in certain instances the Matrium Group will make donations and donations in-kind to education and science, sport, art and culture and for social and humanitarian projects. The nature and amount of the donations are decided according to objective criteria and are in keeping with our economic resources.

#### **3.3 Gifts and gratuities**

All employees are forbidden from offering, granting, demanding or accepting gifts and gratuities or any other unfair advantages, either directly or indirectly, in connection with our business activities . This does not apply to occasional gifts or invitations with an insignificant financial value, which are extended in accordance with normal business practice. However, this applies subject to the condition that no statutory or legal provisions are infringed and the possibility of any influence over the decisions taken by a business partner or a public authority can be ruled out from the outset.

#### **3.4 Corruption, bribery and anti-trust law**

We respect the principles and rules of fair competition forbidding anti-competitive behaviour and the abuse of a dominant market position. The responsible employees must therefore comply with the applicable legal regulations set out by competition and anti-trust law.

The use of company resources for any unlawful or improper purpose is strictly forbidden. Employees are forbidden from engaging in bribery or corrupt practices when conducting business. Likewise, no employee is allowed – either directly or indirectly – to offer, provide or accept financial or other such benefits with a view to attaining, attracting or securing an improper business advantage.

### **3.5 Handling company property**

We expect all employees to whom assets - regardless of their nature, whether material or immaterial assets - are entrusted, to handle such assets diligently. Financial resources must be used frugally. Moreover, we expect all employees to avoid unnecessary costs and other such disadvantages, and to refrain from misusing company property. We reserve the right to punish violations.

## **4 Man and the environment**

Matrium takes its responsibilities to the environment, its employees and stakeholders seriously. We ensure that all natural resources are handled with care. We systematically monitor all relevant environmental aspects in order to minimise the potential environmental impacts. We regard compliance with the obligations imposed by environmental laws and regulations, as a self-evident necessity. Through their activities, each employee plays their part in helping to preserve the existing resources (energy, waste, water, etc.).

We value our employees. By maintaining a safe and healthy working environment, implementing training measures and complying with the defined rules, we offer all employees a positive and satisfying working environment. Our employees are duty bound to comply with the stipulated rules in order to protect themselves and their fellow workers from accidents and harm. We encourage an open, constructive dialogue with all employees at every level.

Discrimination, unfairness and violence are prohibited. This includes any discrimination based on personal origins, gender, religion, ideology, disability, age or sexual identity. We respect tolerance and human dignity. All employees are duty bound to treat one another with respect.

## **5 Communication, non-disclosure and data privacy**

All employees are subject to a duty of confidentiality in accordance with their contract of employment. All company data must be treated as confidential and may not be communicated to third parties. Such data includes company data, client information, financial data, internal documents and intellectual property. Personal data concerning employees, business partners, customers and suppliers must likewise be treated as confidential. Within Matrium, data is processed according to our IT Security policy, which is based on internal and external regulations. The internal guidelines on using IT systems must be observed. Compliance with the relevant rules and laws on data privacy is mandatory.

## **6 Implementation and monitoring**

Compliance with the Code of Ethics is a mandatory requirement for all employees. All internal regulations and processes of communication must be adhered to independently of the hierarchy. The four-eyes principle is to be followed without exception. Employees will be regularly updated on current topics connected with this Code of Ethics. Violations will be reported to the management and the appropriate response will be taken. The management shall review and update the Code of Ethics on a regular basis.