

Code of Conduct - The Code of Conduct of PLASTON Group

Dear Employees,

It is of utmost importance for us to protect and preserve the reputation of PLASTON Group. There has been a long tradition of combining business activities with ethical principles in the company, and this is one of the fundamental pillars of our success. Our conduct in keeping with these principles ensures that PLASTON Group enjoys an outstanding reputation and is economically successful.

The legal regulations under which PLASTON Group operates as a global enterprise differ from country to country. Furthermore, it is mandatory that we comply with international conventions such as the protection of human rights, the anti-corruption campaign and sustainability. We have derived our conduct rules from them and summarized them as a whole in the PLASTON Group Code of Conduct.

Each of us, managers and employees, is responsible for conducting ourselves according to the principles set forth in the Code of Conduct. As a precept and guideline, it gives us information about how to act during the day-to-day business. The key principle states: no business transaction justifies undermining confidence in PLASTON Group and jeopardising our good reputation.

We assume that the employees of all PLASTON companies will also observe the laws, follow the rules and act according to our principles in the future. We cannot and will not tolerate violations of our PLASTON Group Code of Conduct.

Our Code of Conduct states: "We are convinced that ethical and economic values depend on one another and that the business world will make every effort to conduct business in a spirit of fairness within the framework of existing standards." We want to bring this sentence to life. We rely on each employee justifying the trust placed in him or her and would like every one of you to fulfil our self-imposed requirements for fair, ethical and legally correct conduct.

08/2018

Jörg Frei
VRP PLASTON Group

Alexander Gapp
CEO PLASTON AG

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CFO PLASTON Group

Principles

Business ethics and integrity are the basis of our credibility. It is a matter of course that all employees in the various Group companies follow the laws and regulations of the countries in which they work and fulfil their obligations in a reliable manner. They must demonstrate honesty and fairness in all aspects of their business activities. We expect the same from our partners. If practices, statutory provisions or other rules in a country in which PLASTON Group is active differ from the provisions of the Code of Conduct, the more restrictive provisions shall apply.

We are convinced that ethical and economic values depend on one another and that the business world will make every effort to conduct business in a spirit of fairness within the framework of existing standards.

Our principles:

- Local and international laws and regulations are strictly observed. We treat business partners, suppliers, customers, employees and colleagues fairly at all times.
- Management and the HR manager of the PLASTON Group are always available to the employees in a preventive and advisory capacity.

Employees are required to report any violations of these ethical guidelines or principles. The direct superior is basically the initial contact for this.

If employees in a specific case must assume that a criminal offence has been committed, that particular employee is obligated to notify the CFO, CEO or COB without delay, if he/she has not reported the information already to his superior. All information is treated with strict confidentiality, unless for legal reasons another approach is required.

No employee shall suffer any disadvantage as a result of acting in accordance with the laws and legislation and the requirements of this Code of Conduct

Conflicts of interest and bribery

PLASTON Group expects all its employees to show loyalty to the company.

All employees must avoid situations where their own personal or financial interests conflict with those of the PLASTON Group. In particular, the acquisition of a participating interest or the entry into business relations with competitors, suppliers or customers in a private sphere is prohibited if this could result in a conflict of interest. A conflict of interest exists whenever the nature or scope of a participating interest could influence how employees perform their work for PLASTON Group in any way.

No employee may accept advantages in any form whatsoever — especially personal gifts or advantages arising from PLASTON Group business relationships — that could reasonably be assumed to have a possible impact on business decisions or transactions. If this principle is taken into account, then gifts up to a limit of CHF 50.00 maximum are possible. Invitations must be within the limits of normal business hospitality in accordance with industry standards.

Bribery and corruption

No employee may obtain or attempt to obtain undue advantages for business partners, their employees or other third parties in connection with business activities. Such a situation could be presumed to exist, particularly if the nature or scope of an advantage might have an unacceptable impact on the recipient's actions and decisions. The same rules that apply to employees also apply here. Gifts up to a limit of CHF 50.00 maximum are possible, and invitations must be within the limits of normal business hospitality. If the amount for understandable reasons is above the upper limit, the consent of a member of management is required.

Third parties (for example, consultants, brokers, sponsors, representatives or other agents) must not be used to circumvent this rule. Violations will be penalised by the termination of the employment relationship.

Donations and sponsoring

PLASTON organisational units and companies do not make any direct or indirect donations to political organizations, parties or individual politicians. Any exception to this rule must be clarified in advance with the COB of the PLASTON Group.

Sponsoring and donations for other, non-political recipients must not be used to circumvent the rules of this Code of Conduct.

Insider rules

All employees are obliged to observe the insider rules of the Securities Trading Act, for example, the prohibition on insider trading or the insider rules laid down in any other applicable national laws. In particular, the utilization or unauthorised disclosure of non-public, price-related information is prohibited.

Furthermore, it is prohibited to reveal non-public information about other companies and persons. This is especially the case if the corresponding information could have a significant influence on the investment decisions of third parties.

Dealing with internal knowledge

All employees are required to ensure a swift, smooth exchange of information within the company. Knowledge that is relevant for the work must not be wrongfully withheld, falsified or selectively communicated. Information must be forwarded correctly and completely to other business units, unless, in cases of exception, other interests (for example, confidentiality) take priority.

Confidentiality

Business and trade secrets must be treated confidentially. This also applies to any other information when PLASTON Group, its contractual partners or its customers have an interest in secrecy. Such information must not be disclosed to unauthorised persons without permission. This obligation continues to exist after the termination of a person's employment.

Data protection

PLASTON Group attaches great importance to ensure the privacy of its employees, customers and investors and to protect their personal data against violation or misuse. Any employee processing personal data must, therefore, maintain the highest degree of confidentiality and comply with the applicable data protection laws. Personal data may, in particular, only be procured, stored, used or transferred with the consent of the individual concerned or if the processing of the personal data is permitted by law. Any violation of personal data must be promptly reported to the employee's superior or to the responsible data protection officer.

Documentation of business transactions

All business transactions must be fully and properly documented in accordance with statutory regulations and with the applicable requirements at PLASTON Group as well.

Handling of company property and assets

All employees are obliged to handle company property and assets appropriately, economically and responsibly in every way. No employee may use the company's assets, goods or services for personal use in an impermissible manner.

Respecting human dignity

PLASTON Group respects human dignity and is committed to the adherence to and protection of human rights. Every employee is obliged to ensure that these universally applicable basic rights are observed.

Rejection of child labour and forced labour

PLASTON Group does not tolerate child labour or any form of exploitation of children or young people. The minimum age for the admission to employment must not be below the age at which compulsory education ends, and in no case may it be below the age of 16. An exception is the apprenticeship program as long as it is within the legal boundaries.

PLASTON Group rejects all forms of forced labour. No employee may directly or indirectly through force and/or intimidation be compelled to work. Employees may only be recruited if they have voluntarily made themselves available for work.

Equality of opportunity and the prohibition of discrimination

Employee diversity is a source of great potential. This is why PLASTON Group is committed to employing people of different origins and levels of experience. All employees are called upon to create an atmosphere of mutual respect and to resolutely oppose any discrimination on the grounds of race, ethnic origin, gender, religion or beliefs, disability, age or sexual identity.

Environmental protection

PLASTON Group is aware of the ecological effects of its business activities and undertakes to protect the soil, the water, the air, biological diversity and the cultural heritage. During the performance of their work, all employees in the different companies in the Group shall avoid the development of harmful effects on the environment through prevention and reduction measures in terms of sustainable economic activity and treat natural resources with due care. All relevant legal and official requirements must be strictly complied with. If any environmental damage is caused, the responsible offices in the company must be notified without delay.

Responsibilities

The ethical principles and behavioral rules set forth in this Code of Conduct form the core of our corporate culture.

Group-wide adherence to these principles is imperative – every employee shares the responsibility for this. Managers have a particular responsibility. They are required to communicate the significance and the contents of this Code of Conduct to their employees, to serve as a role model and to support the employees during its implementation. This should not restrict the leeway of the employees to act on their own responsibility within acceptable limits.

Superiors are responsible for ensuring that their employees follow the Code of Conduct. Therefore, they also supervise and check on their compliance. In addition, reviews are carried out independent of any process.

Guidelines and other internal requirements

The Code of Conduct forms the basis for all guidelines and other internal rules at PLASTON Group that express it in concrete terms and thus are to be observed in addition. Superiors are responsible for informing themselves and their employees about all relevant guidelines and other internal rules.

Taking specific issues into account, regional guidelines can provide supplementary rules which, however, must not conflict with this Code of Conduct.