

CODE OF CONDUCT

A SET OF RULES EXPLAINING HOW TO CONDUCT OUR BUSINESS

2021



Visko
Teepak

VISKOTEPAK CODE OF CONDUCT

ViskoTeepak is committed to conduct its business with honesty and integrity, to follow the law and to make sure that each employee and business partner is treated respectfully. This is reflected in our values Trust, Ambition and Fun which form the basis for our company culture and for the behaviour we expect from our employees. ViskoTeepak is proud of its excellent reputation as a responsible and reliable partner. This code of conduct contains the seven main business standards as rules of ethical behaviour all ViskoTeepak employees must follow.

In some circumstances however it may be uncertain how a business standard should be explained and followed. This code of conduct therefore includes annexes providing further explanation, examples and a Q&A per business standard. In case of doubt, please consult your manager or local HR department.

1. BUSINESS INTEGRITY

1.1 Compliance with laws

ViskoTeepak must comply with all laws and regulations applicable to its business activities. ViskoTeepak trusts you to make yourself familiar with the applicable laws and regulations and ask your manager how to comply with them. When it comes to relations with competition, customers and suppliers, we refer to [Annex 1 "VT anti-trust policy"](#).

1.2 Prevention of fraud

ViskoTeepak expects you to conduct your work in a reliable and honest way, not to steal or misuse any company property or property of your colleagues nor to mislead anyone or set up a scheme with the intention that you benefit in a way that was never intended by ViskoTeepak. Further explanation and examples are set out in [Annex 2 "Prevention of fraud"](#).

1.3 No corruption or bribery

Do not in any way (try to) bribe another person, organisation or company. You shall not offer or accept anything of value from someone with the intention to obtain assistance in business matters. Should you reckon that declining or not offering will be against (local) business courtesies, please discuss with your manager.

Further explanation and examples are set out in [Annex 3 "No corruption or bribery"](#).

1.4 Avoid conflicts of interest

Avoid any situation where your judgement might be affected as a result of conflicting loyalties between ViskoTeepak and another person or business. Can your involvement in such situation be fully disclosed without embarrassing yourself or ViskoTeepak? If not, inform your manager so that neither your nor ViskoTeepak's integrity will be at stake as explained in [Annex 4 "Avoid conflicts of interest"](#).

1.5 Accurate accounting and reporting

All books, records, accounts and financial statements, time and expense reports should be recorded consistently and accurately, reflecting the true view and conforming to all applicable legal requirements and internal control policies. Further guidance is provided in the internal ["VT Accounting Manual"](#).

2. DISCLOSURE OF INFORMATION

Any commercial or financially sensitive information regarding ViskoTeepak may not be disclosed to the public nor communicated to the press without consulting ViskoTeepak first. Furthermore, every employee should refrain from disclosing information, by any means of communication, that may harm the image of ViskoTeepak or any of its employees. You may not disclose any confidential information regarding ViskoTeepak, its customers and suppliers. Always take appropriate measures to keep such information strictly confidential.

3. DEALING WITH SUPPLIERS

ViskoTeepak companies must select their suppliers on the basis of objective comparison criteria, including commercial conditions, reputation, sustainability and reliability. Suppliers that adhere to the standards as reflected in this Code of Conduct should be contracted by preference. ViskoTeepak requires suppliers to sign the confirmation page of [Annex 5 "ViskoTeepak Supplier Code of Conduct"](#)

4. RESPONSIBLE WORK CONDUCT

ViskoTeepak's IT and communication systems are built for business purposes. The capacity, software and security are not designed for private purposes and any use for private purposes should be limited as much as reasonably possible. During office hours it is therefore prohibited to regularly use private e-mail or social media, visit websites, download data or install software for private purposes as that can harm ViskoTeepak's systems or reputation. Reference is made to [Annex 6 "Responsible work conduct"](#).

5. RESPONSIBLE WORK ENVIRONMENT

ViskoTeepak strives continuously to improve health and safety aspects within your work environment while keeping a strong focus on product quality. The

management and each employee is responsible for creating and maintaining a workplace culture that is free of harassment and discrimination, respecting all colleagues. Alcohol is not permitted in ViskoTeepak facilities although exceptions can be made for special events. Any use of drugs is strictly prohibited. Reference is made to [Annex 7 "Responsible work environment"](#).

6. CORPORATE RESPONSIBILITY

ViskoTeepak is committed to take its responsibility in the field of energy, waste, purchasing, personnel, health and safety very seriously and each of you is expected to do the same. More about this can be found in our Sustainability report, which can be downloaded from our website www.viskoteepak.com.

7. PROPER AUTHORISATIONS AND APPROVALS

We expect you either to notify your manager or to obtain proper authorisation with respect to certain business matters. We consider such behaviour essential business practice. It is not the intention to restrict entrepreneurial spirit, but to mitigate the risk of inappropriate representation and binding of ViskoTeepak.



IMPORTANT

These business standards should be observed consistently by all ViskoTeepak employees. Working for and dealing with a group of companies with an excellent reputation is something to be proud of. Should you however become aware of any conduct that you believe violates this Code of Conduct, you are advised to contact your manager or the HR department.



ANNEX 1 – ANTI-TRUST POLICY

1. INTRODUCTION

ViskoTeepak has committed itself to comply with the antitrust regulations in all countries where the company markets its products. Any violations against the antitrust regulations can make all engaged people as well as the company subject to both civil and criminal law sanctions including, but not limited to, risk for fines, penalties, prison and substantial claims for damages. Therefore it is important that all employees of the company are aware of the existence of such laws and regulations and that they behave in accordance with the regulations.

The laws can be complex depending on what country they concern. In general, the laws are made in order to prevent anticompetitive behavior, for example agreement between competitors to set prices on products or to split customers between themselves. The general idea behind the antitrust regulations is that the companies are independent from each other and not in common acting in a way that prevents or restricts competition. Is there any uncertainty in a specific situation whether a certain procedure can be in violation with the antitrust regulations, the employee should contact the CEO that will retain and coordinate legal advice when needed.

2. PRICING

ViskoTeepak is independently making its decision on to what price the products will be sold. It is not illegal to investigate what the “market terms” are with regard to pricing and neither to follow the price adjustments a competitor might implement. The information about the competitors’ prices shall be gained from other sources like distributors or customers and not from the competitor. No employee at ViskoTeepak shall engage in any kind of behavior that could be seen as a commitment (written or not) with a competitor about the price ViskoTeepak will charge. Pricelists should not be sent to or received from competitors. Pricing policies or costs should not be discussed with the competitors.

It is allowed to be in contact with competitors at social or business events like conferences or trade shows but topics like prices shall not be discussed. If a competitor would address such a topic, just let him know that these topics are not to be discussed and any repeated attempt to continue the discussion should be reported to the CEO. General meetings between competitors are not permitted if not arranged by official trade or industry organization.

3. RELATIONS TO CUSTOMERS AND SUPPLIERS

ViskoTeepak independently makes decisions about whom to sell to or to buy from and to what geographical regions to sell the products to. No ViskoTeepak employee should discuss or agree with a competitor to sell or not to sell to a specific customer or a specific geographical region, or to buy from a specific supplier. Further, ViskoTeepak will independently agree its terms to its customers and suppliers and ViskoTeepak will not agree with competitors about the terms on which the company is doing business with its customers and suppliers.

All employees at ViskoTeepak that will attend a meeting where representatives of competitors of ViskoTeepak are present, should assure themselves that there are no topics on the agenda that will cover pricing, business terms to customers or suppliers etc. If such topics are raised the employee of ViskoTeepak should inform that they will not be involved in such discussions and leave the meeting if such discussions start and report the incident to the CEO.

4. GENERAL COMPLIANCE

If you in your duty ever have any doubts whether any act or other measure is not in conformity with these guidelines, do not hesitate to contact the CEO of the company that will consult external legal expertise when needed.

Examples

Example 1: A trade association meeting is taking place. The issues discussed there pertain to, among other things, the current certification procedures and legislative proposals. During a coffee break you get into a conversation with employees of two competitors.

What should you do when a competitor (even a former colleague, friend or relative) provides you with commercial information about his company?

As a rule of thumb you should keep in mind for any contact with competitors that you are not allowed to exchange information which, as a result, may prompt us or any competitor to adapt our/his business strategy, prices, product portfolio, production process etc.

Example 2: You participate in a trade fair and present our products. An employee of a competitor visits your stand and introduces himself as an employee of the competitor. He says that he would like to learn more about product developments and asks about specific products exhibited at the stand. He wants to know prices, productions and development costs as well as the materials used. How should you react?

Do not disclose any information to that person other than that contained in the product brochures, price sheets, or other information already available at the stand or your company website. Information relating to market launch, production and development costs as well as know-how is highly sensitive business information. An exchange of this information constitutes a violation of competition law.

Q&A

Question 1: I received confidential business information about a competitor. What should I do?

Answer 1: It is decisive where the information comes from. If, for instance, the wholesaler voluntarily provides you with information about the terms and conditions of your competitor, such information is legitimate and you can also use it in your own price negotiations. If such information is however received from a competitor, the principles explained in the examples above apply. Generally, you are not allowed to use

such information. Immediately speak to the sales management or your manager about the situation.

Question 2: I am participating in a working group in which representatives of competitors also participate. I sometimes pick up relevant information at these events. What can I do with this information?

Answer 2: The principles explained in the examples above apply. In personal conversations you must reject such an information exchange. You are not allowed to use such information. Immediately speak to the sales management or your manager about the situation.



ANNEX 2 – PREVENTION OF FRAUD

FURTHER EXPLANATION

Fraud is a deception that is deliberately practiced to secure unfair or unlawful gain and can include deceit, holding back, skimming, forgery or alteration of (electronic) documents. Fraud may be committed by one person or by two or more and may involve internal and/or external parties such as suppliers or customers. ViskoTeepak maintains a zero tolerance approach for its companies and employees with regard to fraud.

Managers are responsible for ensuring they have identified fraud risks, having appropriate controls in place, and tracking the effectiveness of controls on an on-going basis. Each manager must make him or herself familiar with the types of improprieties that might occur within his or her area of responsibility, and must orient their personnel to be alert to any indications of potential fraud. Employees that detect or suspect any fraud must immediately report the matter to their manager. In addition, ViskoTeepak may initiate random checks on group companies to verify compliance with this Code of Conduct.

Examples

Example 1: An employee is requiring a kick back in order for a certain supplier to be selected. This means that for each purchase, the employee receives 2% of the contracted purchase price from the supplier. This is considered to be theft because apparently the purchase price for ViskoTeepak could have been 2% lower than the contracted price. Such behaviour seriously harms ViskoTeepak and may result in instant dismissal of the employee concerned.

Example 2: An employee presents forged documents to ViskoTeepak in order to obtain financing for the purchase of material that he will sell for his own account. This is considered theft as well and may result in instant dismissal of the employee concerned.

Example 3: An employee reported illness to his manager but used this time to paint his house. Effectively, such situation results in painting at the expenses of ViskoTeepak and could therefore be considered fraud.

Q&A

Question 1: I suspect an employee of fraud and want to know what I must do.

Answer 1: Please report the situation directly to your manager. If you suspect fraud, do not discuss the matter with any of the individuals involved and do not attempt to investigate or determine facts on your own. Your manager will review the matter and take the appropriate steps.

Question 2: I suspect my manager to be involved in a fraud scheme and want to know what action to take.

Answer 2: Report the situation to your HR manager. The matter will then be reviewed without prejudice and investigated.

Question 3: Will there be consequences for me if I misjudged the situation?

Answer 3: ViskoTeepak appreciates its employees being committed to the company's interests and willing to raise concerns regarding suspicious situations. The ability to investigate and remediate fraud successfully depends on prompt and confidential reporting. You will of course not be affected for creating awareness for fraudulent conduct where in hindsight your judgement proved to be incorrect.

It is of course never allowed to impeach someone intentionally without a justifiable reason.

ANNEX 3 – NO CORRUPTION OR BRIBERY

FURTHER EXPLANATION

ViskoTeepak is doing business around the world and its employees are subject to anti-bribery laws of many countries. Some of these anti-bribery laws also apply to bribery committed outside the countries where the ViskoTeepak group companies and their employees are domiciled (for instance the so-called UK Bribery Act and some individual provisions of the National criminal law). ViskoTeepak, its group companies, its employees and business partners should comply with all applicable anti-bribery laws, also when doing business abroad. It is ViskoTeepak's policy that bribery of persons in both the public and the private sector is always forbidden in all countries it does business, even if in a certain country exceptions are legally allowed. This Annex provides general guidance and in case of doubt prior legal advice should be obtained. For questions you should contact your manager.

What conduct is considered bribery?

Anti-bribery laws prohibit persons or companies from offering, promising or paying a bribe to a public official or person in the private sector to influence this person in his (official) acts or function. Likewise it is prohibited to solicit or accept a bribe. A "bribe" may consist of any advantage or benefit that has a value. Small payments or benefits are therefore not per se excluded. The mere offering or promising of a bribe is prohibited. The bribe does not have to be actually paid or accepted. The person offering, promising or soliciting the bribe does also not necessarily have to be the recipient of the bribe (indirect payments are also prohibited).

Anti-bribery laws in the various countries are quite broad and may apply not only to the actual briber and the person being bribed but also to anyone knowingly cooperating in, approving, directing or covering up the bribe.

Most anti-bribery laws apply if a payment, offer or promise is made in exchange for some type of improper action or omission by the bribed person (or a contact of that person). An important factor is whether any influence is exerted to obtain or retain business or a business advantage such as (a) granting of a licence or permit or awarding an assignment in circumstances where it may not otherwise be granted, (b) taking the decision not to investigate or prosecute an alleged offence by a company, or (c) providing confidential

information to a company. It is not required that the intended recipient of the bribe is directly involved in awarding or directing the business advantage. The use of his influence to establish a certain result may be sufficient.

Corporate hospitality and promotional expenses, gifts and entertainment

Hospitality and promotional expenditure as well as offering and accepting gifts and entertainment are not considered bribery (a) if reasonable and proportionate as regards the value and timing, the impression conveyed to third parties and the type of gift or entertainment, and (b) there is no intention to induce a person to improperly perform his function, to secure a business advantage or not.

In case you have any doubts about the appropriateness of hospitality, entertainment or a gift that you intend to offer or accept, you must always contact your manager first.

Facilitation payments and lawful government payments

ViskoTeepak prohibits all facilitation payments. Facilitation payments are small payments that are not prescribed by the written regulations in a certain country and are made to secure or expedite the performance of a routine governmental action (e.g. customs clearance). Payments to public officials that are prescribed by written regulations of the official's country, such as fees and payments for various government services, are not prohibited. Payments on top of such legally required amounts are strictly forbidden.

Liability for and prevention of bribery by associated persons

ViskoTeepak could be held liable for bribery by associated persons acting on its behalf. ViskoTeepak therefore requires that business partners acting on its behalf, such as partners, agents and representatives, comply with all applicable anti-bribery laws. Any issues should be immediately notified to your manager.

Examples

Example 1: Your production plant is inspected by local officials every year. Local regulations require that the inspected company pays for the travel expenses, accommodation and meals of the inspection team. The payment is required by written regulation and therefore allowed. However, the travel expenses - if possible - must be approved in advance and only be reimbursed against receipts. The costs spent on accommodation and meals should be reasonable and proportionate. It is ViskoTeepak's policy that excessive hospitality spending are never permitted.

Example 2: You have received a Christmas gift from a local contractor. Although the gift is not exceptionally disproportionate you sense that he expects you to award him a contract in the future. You must inform your manager. You may consider the possibility to politely return the gift. If you keep the gift, you should not award the contractor a contract without prior approval of your manager.

Example 3: You have submitted an application to the local government for the renewal of a certain permit. When you receive the invoice for the administrative charges you notice that these are considerably higher than they used to be. You must check whether the rise of the charges is prescribed by law. If not, you may not pay the invoice. You must contact the local government and request a corrected invoice for the charges payable by law. Furthermore you must contact your manager.

Q&A

Question 1: We have applied for a permit to make adjustments to our plant. A local official has suggested that he may speed up the process against payment of a small amount. Such payments are not prohibited by local law. May we accept the local official's offer?

Answer 1: Such a payment qualifies as a facility payment. Although not covered by all anti-bribery laws, ViskoTeepak prohibits all facility payments. You are not allowed to accept the local official's offer and must report this to your manager.

Question 2: We recently have had some issues with the local government. A friend of one of our employees, who has good contacts within this local government, has helped us solve these issues. He has not requested any remuneration for this. May we give him a present as a reward?

Answer 2: It is allowed to give him a present to express thanks. However, note that a reward in arrears

may be considered a bribe too. You must avoid the impression of bribery and the present therefore should be reasonable.

ANNEX 4 – AVOID CONFLICTS OF INTEREST

FURTHER EXPLANATION

What is a conflict of interest? Employees are expected to avoid any actual or suspected conflict between the interests of ViskoTeepak and their own personal interests. ViskoTeepak recognises that you are part of a family, have friends, act in volunteering jobs, and have specific personal responsibilities and interests. A conflict of interest can arise when you take actions or have personal interests that can interfere with your performance for ViskoTeepak. You should always declare any direct relationship with someone who may be tendering on a contract for ViskoTeepak if you have a direct involvement or management responsibility in awarding such a contract.

Full disclosure

You are required to disclose to your manager each actual or suspected conflict of interest situation in which you are directly or indirectly involved. You need to make this disclosure as soon as you become aware of facts giving rise to the actual or apparent conflict of interest.

Guidelines

If you are unsure as to whether a given situation creates a conflict of interest, raise the issue with your manager. Whilst it is impossible to describe every circumstance where a conflict of interest may arise, the following guidelines will help you avoid conflicts of interest:

- never allow your personal or financial interests to interfere with your work for ViskoTeepak;
- always be able to satisfactorily explain your decisions to your manager and to your colleagues

Examples

Example 1: You or one of your family members owns a financial interest in an entity that wants to do business with ViskoTeepak and you are involved in the decision taking. This is a clear issue that should be raised with your manager. Your manager will decide on any measures to ensure that you are not involved on behalf of ViskoTeepak regarding the possible relationship with this entity.

Example 2: You work in a research and development department of a ViskoTeepak company. Your brother works at sales department of a competitor. He proposed to start up a new business combining your

and his knowledge. The knowledge that you have obtained during your work for ViskoTeepak is considered ViskoTeepak intellectual property and may not be used by you for your own benefit or the benefit of your family members.

Q&A

Question 1: A good friend of mine works for a company that could be an important customer for ViskoTeepak. He approaches you, as a sales manager, to see whether ViskoTeepak would be interested in selling to his company. What should I do?

Answer 1: Report the situation to your manager and keep him fully informed of the deal and each step in the process. However, since it can result in an important customer for ViskoTeepak, there is no need to say no to the (potential) customer beforehand, unless the dealing would be on non-commercial terms.

Question 2: I am asked by a good friend to provide advice to his company that is in direct competition with ViskoTeepak. Although he seeks only technical advice, which seems not to be commercially sensitive, I am not sure what to do.

Answer 2: When considering such request, always involve your manager. He will ensure that your question is considered objectively. In addition, be aware that information sharing between competing businesses is in many cases forbidden due to competition laws.

ANNEX 5 – SUPPLIER CODE OF CONDUCT

ViskoTeepak is committed to conduct its business with honesty and integrity, to follow the law and to make sure that each employee and business partner is treated respectfully. We expect our suppliers to do the same.

This supplier code of conduct (“Supplier Code”) explains the business standards and principles as rules of ethical behaviour of ViskoTeepak and specifies what ViskoTeepak expects from its suppliers.

ViskoTeepak is proud of its excellent reputation as a responsible and reliable business partner. Maintaining this reputation requires responsible management of our supply chain. For this reason, our suppliers are an integrated part of our responsible business strategy.

1. BUSINESS INTEGRITY

1.1 Compliance with laws

Our suppliers are expected to comply with all (local) laws and regulations applicable to their business activities.

1.2 Fair competition

Our suppliers must compete fairly and comply with applicable competition and anti-trust laws. Our suppliers are expected not to enter into agreements or practices that have a restrictive effect on competition, such as price-fixing, market allocation or abuse of dominant position.

1.3 Export control

We expect that our suppliers do not violate any national or international export controls or trade, economic or financial sanctions or embargoes applicable to them. Our suppliers identify and manage trade restrictions applicable to their business, including those of sanctioned countries and parties.

1.4 Prevention of fraud

Our suppliers are expected to conduct their work in a reliable and honest way. Our suppliers must have internal control systems in place to detect, prevent and respond to fraud and money laundering. Any potential fraud that may have an impact on ViskoTeepak must be reported to us immediately.

1.5 No corruption or bribery

We expect our suppliers to have zero-tolerance for corruption. Our suppliers will not make, offer or authorise bribes or conduct any form of unethical business practices and do not make facilitation payments. We expect our suppliers to refrain from offering or accepting gifts and entertainment that are not reasonable and proportionate or are offered with the intention to induce a person to improperly perform his function to secure a business advantage.

1.6 Avoid conflicts of interest

In the business dealings of our suppliers with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence the decisions of our suppliers due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties. If a suppliers’ employee is related to an employee of ViskoTeepak, and this may represent a potential conflict of interest in a transaction or business relationship, our supplier must disclose this fact to ViskoTeepak or ensure that the employee of ViskoTeepak does.

2. RESPONSIBLE WORK ENVIRONMENT

We expect that our suppliers are generally committed to apply the principles of the UN Global Compact and the OECD.

2.1 Health & Safety

ViskoTeepak strives for an accident free, secure and healthy work environment for all its employees and expects its suppliers to do the same. Our suppliers must apply all applicable safety rules and regulations and have a process in place to report and manage safety incidents.

2.2 No child labour or forced labour

We expect our suppliers to abide by applicable legislation and regulations on child and adolescent labour, and that they shall strictly refrain from employing children under the minimum years of age. Employees of our suppliers are not employees against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights.

2.3. Employment conditions

Our suppliers shall comply with all applicable legal and regulatory requirements and are generally committed to apply principles of the International Labour Organization (ILO). Working hours, wages, benefits will be fair and consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits. We expect our suppliers to respect individual rights of freedom of opinion and association, including the right to collective bargaining.

2.4 No harassment and discrimination

Our suppliers do not demonstrate or tolerate harassment of any kind, including on the grounds of race, colour, religion, gender, sexual orientation, national origin, age, disability or any other type of behaviour that is hostile, disrespectful, abusive and/or humiliating.

2.5 Equal opportunity

We expect our suppliers to strive for equal opportunities for its employees.

3. ENVIRONMENT

Our suppliers comply with all relevant environmental laws and ensure that the necessary permits are in place. Our suppliers are committed to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission and noise.

4. INTELLECTUAL PROPERTY AND COMMUNICATION

We expect our suppliers to respect intellectual property rights, including those of ViskoTeepak. There must be appropriate measures to prevent disclosure or unauthorized use of ViskoTeepak confidential information made available to them. Our suppliers will not

issue any external communication about their business relationship with ViskoTeepak including but not limited to press releases about ViskoTeepak without our prior written approval.

Our suppliers will protect the personal data of ViskoTeepak’ employees and customers and use this data for legitimate and authorized business purposes only. Our suppliers must be clear on when and how they collect, use or share personal data. All personal data is only processed in accordance with applicable data protection laws and regulations. Upon a breach of security our suppliers must immediately notify ViskoTeepak in accordance with applicable laws and regulations.

5. SUPPLIER RELATIONS

At ViskoTeepak, we expect our suppliers to communicate the business standards laid out herein to their subcontractors and sub-suppliers and to take these business standards into account when selecting sub-contractors and sub-suppliers. Our suppliers are expected to encourage their subcontractors and sub-suppliers to comply with the minimum standards of the Supplier Code regarding the protection of human rights, working conditions, anti-bribery and no corruption, export control and sanctions when fulfilling their contractual obligations.

6. COMPLIANCE WITH THE SUPPLIER CODE

Our supplier shall apply and monitor the observance of the principles described in the Supplier Code or equivalent principles. With prior notice, ViskoTeepak may conduct reasonable audits to verify compliance of our suppliers with the Supplier Code. Non-compliance with the Supplier Code may lead to measures, including termination of the relationship with the supplier.

CONFIRMATION

We confirm to comply with the business standards and principles provided for in this Supplier Code.

Company name: _____

Name & function: _____

Signature: _____

ANNEX 6 – RESPONSIBLE WORK CONDUCT

FURTHER EXPLANATION

Company assets and funds

All property of ViskoTeepak may only be used for the intended business purposes. This includes but is not limited to:

a. physical assets such as office equipment, plant facilities, tools and technical equipment

b. software, intellectual property rights and confidential information

c. company funds, bank accounts and other company resources

You must use company property only for the intended business purposes and guard it against misuse, loss or theft. Company funds may only be used for ViskoTeepak business purposes and may never be used for private purposes unless this has been approved by your manager. It is not permitted to combine business expenses such as lunches and travel trips with personal holidays with family members or friends without approval of your manager.

Use of IT and communication

ViskoTeepak's IT systems, software and all means of electronic communication, including the internet, shall be primarily used for business purposes and in the company's interest. The capacity for communications, antivirus software and licenses are implemented for business use and not for private use. Though some proportionate personal use of these systems may be inevitable, such use should be limited as much as possible and may never interfere with the intended business purposes. The IT systems may never be used in any way that can result in the storing or communicating of content that breaches applicable legislation, harassment of colleagues or third parties, or discrimination or other improper behaviour. Only if there are justifiable suspicions that you do not act in accordance with this Code of Conduct or applicable legislation, ViskoTeepak preserves the right to monitor your use of the IT systems and electronic communications in accordance with applicable laws.

Intellectual property

ViskoTeepak has developed or purchased licences for valuable intellectual property, including inventions, product names, software, engineering drawings, and confidential information for its business operation. You must strictly comply with the applicable intellectual property laws and licence conditions. Unauthorised use or disclosure of company intellectual property is forbidden and the intellectual property right of third parties must be fully respected.

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Examples

Example 1: You are the coach of the soccer team of your child and urgently need to send a mailing to various sponsors for the next soccer tournament. It is not allowed to use the company e-mail service for this. Your company e-mail address contains the trade name of your company and interferes with the business purposes of this name. This can damage the image or reputation of ViskoTeepak. These mailings should be done with your private e-mail address outside office hours.

Example 2: An employee uses office supplies to provide his children with the necessary pens and pencils to do their homework. This is not allowed and is considered to be theft.

Example 3: An employee downloads illegal software that he prefers for enhancing his business presentation. This endangers the safety of ViskoTeepak IT-systems and breaches third party intellectual property rights.

Q&A

Question 1: You receive an e-mail, apparently from a colleague, containing all kinds of confidential information. The e-mail turned out not to be intended for you but for another person within the company. What should you do?

Answer 1: Please make sure to (permanently) remove this email to make sure that the confidential information cannot be misused by someone and notify your colleague.

Question 2: I sometimes take my ViskoTeepak laptop or USB stick at home to be able to work during the evening. Of course, there might a possibility that my laptop could be stolen in case of a burglary?

Answer 2: Never leave the laptop or storage device unattended in your car or at public places. Ensure that the laptop or USB stick uses state of the art encryption and passwords to protect the company sensitive information. Ask your IT department for assistance before your store data on such devices. If the laptop has been stolen, report this immediately to your manager.

ANNEX 7 – RESPONSIBLE WORK ENVIRONMENT

FURTHER EXPLANATION

Health, Safety & Quality

ViskoTeepak strives for an accident free, secure and healthy working environment for all its employees and expects you to do your utmost best to ensure the same. Our customers expect us to deliver products according our quality standards and therefore we must ensure that we comply with all quality procedures in order to to create customer satisfaction.

Safety is especially important in our manufacturing locations, which are subject to workplace safety regulations. You must follow all applicable safety rules or instructions for the facility where you work and promptly report all accidents, near misses, potential hazards and environmental concerns to your manager. You may never put yourself or anyone else at risk of your health or safety, even if you think that such would make the work more efficient. Further, we will not tolerate any level of violence or the threat of violence in the workplace.

No child labour

ViskoTeepak abides by applicable legislation and regulations on child and adolescent labour, and shall strictly refrain from employing children under the minimum years of age.

No harassment and discrimination

ViskoTeepak does not tolerate harassment of any kind, including on the grounds of race, colour, religion, gender, sexual orientation, national origin, age, disability or any other type of behaviour that is hostile, disrespectful, abusive and/or humiliating. Harassment or discrimination can take many forms, such as verbal, visual or physical. Such conduct will not be tolerated. Employment with ViskoTeepak is based solely upon individual merit and qualifications directly related to your job. If you or a colleague are being harassed or discriminated, you should immediately report the incident to your manager.

Equal opportunity

To be a leader in our business, we must be flexible, innovative, and creative and have an ability to accommodate other people's points of view. ViskoTeepak strives to equal opportunities for its employees, including the recruitment, promotion, compensation,

training and development. We expect our managers to exercise leadership in this field by role modelling appropriate behaviour.

No drugs or alcohol

ViskoTeepak will not tolerate any use of alcohol or drugs during working hours or even outside working hours when such use has a negative influence on your performance.

Examples

Example 1: An employee displays a screen saver with a cartoon that contains a harsh statement about Muslims. Such display will be seen as discriminatory and will not be tolerated. Be aware to act respectfully against any religion practised by your colleagues.

Example 2: An employee notices that the breath of his colleague regularly smells of alcohol. The employee tries to discuss this with his colleague, but he is not successful. The employee should go to his manager, since drinking could severely influence the functioning of his colleague and could, as a consequence, damage himself and other employees.

Q&A

Question 1: I suspect that one of our machines has an inadequate button, which could potentially be very dangerous. My manager does not want to initiate a replacement procedure because such procedure might put our weekly targets at risk. What should I do?

Answer 1: If your manager does not take the appropriate actions, report this immediately to your Plant manager or the VP of Operations. Prevention of dangerous conditions will always prevail over meeting targets.

Question 2: My male colleague regularly makes sexual orientated comments on my appearance. I feel highly uncomfortable working with this colleague. What should I do?

Answer 2: First, discuss this situation with your manager. If your manager refuses to help you, report this situation to the HR department.



Always around



FOR MORE INFORMATION PLEASE CONTACT YOUR HR DEPARTMENT

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