

Code of Ethics of the ADA Group

I. General principles

1. Honesty and integrity

The ADA Group (ADA) carries out its activities in accordance with applicable laws and professional ethics. Pursuing the interests of the Group can never justify behaviour contrary to the principles of honesty and integrity.

A stable business cooperation benefiting everyone can only exist with fair competition and strict compliance with laws. Corruption, deals between competitors, betrayal of confidence and fraud distort competition, result in higher costs, and can cause significant fines and image damages, eventually also endangering jobs in the company.

For this reason, ADA rejects all types of privileges and gifts, whether offered or received, if these are viewed as a means to influence the impartiality of the judgement and the behaviour of the affected parties.

2. Impartiality, equal opportunities and respect

ADA is of the strong opinion that the dignity of the individual is inviolable, and all should have the same opportunities. ADA employs its staff because of their skills and also trains them further based on their skills. In this, neither sex, age, disability, ethnicity, skin colours, religion, sexual orientation, gender identity or marital status play any role whatsoever.

At ADA, everybody has the right to fair treatment, politeness and respect. ADA does not tolerate any kind of mobbing or harassment of our employees, contractual partners, suppliers, customers or other persons with which it is in business. Violence, the threat of violence, insults and inappropriate language are forbidden.

3. Respect for human dignity

The ADA group is present in many countries of the world and is committed to respecting and promoting the international declared human rights, labour and social standards. Under no circumstances does ADA tolerate forced or involuntary labour or human trafficking.

Children in particular have the right to be protected from exploitation, abuse and neglect. ADA believes in protecting children. For the ADA group, child labour is unacceptable.

4. Professionalism and staff development

ADA guarantees a suitable degree of professionalism in the performance of tasks allocated to its employees. For this purpose, the ADA Group champions the promotion of employee competences and supports this with training sessions, professional further education and various development options.

5. Health and safety in the workplace

Personal health requires more than just following the rules. All those involved must, in addition to observing legal and trade association regulations, consider safety risks when performing their tasks and, if required, ensure that disproportionate hazards are avoided. Nothing can be so important that there is not enough time to do it safely. ADA provides the resources required for a safe workplace as well as technical support.

Our employees whose physical and mental integrity constitute basic values for ADA, are guaranteed work conditions, which respect the dignity of each individual in a safe and healthy work environment.

6. Environmental protection

ADA warrants to preserve the environment as a vital good. For this purpose, it makes its decisions in such a way that economic interests and environmental concerns are addressed equally, not only in accordance with applicable provisions but also in view of state-of-art technology and experience.

ADA and its employees pay particular focus to energy consumption, efficient transport, waste and recycling, water consumption, the disposal of liquid waste as well as the use and handling of hazardous goods.

ADA works continuously to avoid and reduce negative effects on the environment. All employees and all partners are obligated to actively participate in treating resources sparingly, avoiding waste and exploiting optimisation potential.

7. Protection of intellectual property

The ADA trademarks (such as logos, slogans etc.) guarantee customers that they are buying original ADA products. Trademarks and related laws protect the ADA brands against counterfeit goods and other attempts to derive unauthorised advantage from the good reputation of these brands.

8. Exemplary function of management

ADA company management is aware of its exemplary function and warrants not to tolerate corrupt or unethical behaviour under any circumstances.

Company management ensures that affected employees are aware of and observe the relevant laws and provisions. It is responsible for ensuring that framework conditions are created which unmistakably demonstrate to employees that unethical behaviour and corruption are not tolerated. For this purpose, employees are familiarised with and trained in the principles contained in this guideline and must warrant that they will comply with the ethical principles contained therein. They are also supported in questions of implementation.

II. Application areas

1. Relationships to business partners and authorities

1.1 Correct treatment of business partners and authorities

ADA can boast impressive prices, performance, quality and suitability of the products or services offered. Employees treat business partners fairly and deal with the authorities in Germany and abroad based on applicable laws and internal guidelines, which are in particular specified in the ADA Management Manual.

The company does not allow competition to be influenced or distorted by blackmail, fraud, industrial espionage, theft, coercion etc. We do not participate in agreements which are illegal under competition laws.

Employees attempting to influence business partners or public office-holders through corrupt behaviour, or who allow themselves to be unfairly influenced by business partners or public office-holders, are - irrespective of the consequences under criminal law - held responsible in a suitable manner. This includes disciplinary measures and measures under employment law.

1.2 Responsible treatment of gifts

Generally, gifts must not be handed out or accepted. This applies to gifts of money, monetary value securities, services and non-cash gifts. Gifts of money are amounts of any nature and in any currency. Non-cash gifts are any gifts of value.

Small courtesies of a low value (EUR 10.00) and flowers taking account of commensurability and typical promotional gifts with company imprints may be accepted.

ADA advertising gifts must be designed in terms of value in such a way that accepting them does not result in obligatory dependencies. They must be selected based on the principle that both the donor and the recipient can avoid any impression of dishonesty and impropriety.

Also trips, tickets for sports and cultural events, meal invitations, services, advertising premiums and discounts must be viewed as gifts.

Invitations to or acceptance of customary and appropriate entertainment during general events (e.g. customer and supplier visits or other general events), which the employee attends as a result of his/her position in the company on behalf of the company or in deference to the social obligations with which she/he has been entrusted as a result of his/her role, are acceptable.

In case of doubt, the employee is obligated to contact the management office for approval.

When dealing with the authorities, their special rules must be observed.

Abroad, gifts might be in accordance with customs and politeness. It must be noted here that neither the donor nor the recipient are bound by obligatory dependencies as a result and that national as well as international legal provisions apply.

1.3 Avoidance of conflicts of interest through ancillary activities and equity holdings

ADA contractually ensures that employee ancillary activities are not exploited to the detriment of the company. Employees must notify of ancillary activities and holdings at or in business partners and competitors in writing and, if applicable, obtain the company's approval.

This reporting duty does not apply if listed securities or insignificant, purely financial investments, are acquired.

1.4 Alternative suppliers

ADA actively seeks out and favours business partners who share its values and its ethical and social commitments.

For economic reasons alone, ADA makes sure to regularly obtain different offers and to transparently structure procurement. This means that one-sided dependencies can be effectively counteracted. Additional information is available in the ADA Procurement Guideline.

1.5 Donations

Donations must meet legal requirements and must be approved by management.

2. Employee relations

2.1 Protection of the private sphere

ADA has warranted to respect the private sphere and the confidentiality of personal information. ADA collects personal data to the extent that this is required for the effective operations of ADA or to meet applicable laws. ADA has agreed a data protection guideline with its employees to ensure that this is achieved.

2.2 Staff management

All employees are employed under sound employment contracts. The principles of the ILO (International Labour Organisation) and the relevant local laws are observed. This means in particular that no type of child labour, forced labour or exploitation is tolerated. ADA will never directly or indirectly become involved in violating human rights.

ADA refrains from any type of discrimination, be it in choosing employees, in staff management or in the career development of employees, and respects the right of employees to become involved in employee representation and/or trade unions.

ADA rejects any action that could represent an abuse of authority, a violation of dignity or a violation of the mental or physical integrity of a person.

2.3 Health and safety

By monitoring, managing and preventing the risks involved in exercising the profession, ADA ensures that the work environment meets applicable health and safety regulations.

Our employees play a key role in implementing the safety of work conditions. Each employee is obligated to ensure a safe work environment for themselves and others.

III. Implementation

1. Behaviour towards others and open address

All ADA employees must treat each other openly and fairly and live the ADA Code of Ethics. They must familiarise themselves and apply the legal provisions and the Company's regulations that are important for the relevant employee's occupation. In particular, these are set out in the Management Manual.

If an employee has concerns or questions regarding the Code of Ethics or has witnessed breaches, s/he can discuss these openly with their

- supervisor or
- the HR department or
- the Works Council

at any time.

If the employee desires this, any notifications can of course be treated confidentially. Anonymous tips are not consistent with the ADA system of values.

These approached contacts at ADA check information for potential breaches of the Code of Ethics and then pass on this information to the responsible company committees or company management with the whistleblower's approval.

ADA company management must generally follow up on all leads, check them, if required report them to the criminal authorities and draw consequences.

2. Breaches and consequences

If the ADA Codes of Conduct applicable in the company or the legal provisions are breached, the necessary organisational, disciplinary and legal measures must be consistently taken in order to - irrespective of prosecution under criminal law - appropriately respond to the identified violations and to counteract future violations. Depending on the severity of the breach, this can result in a loss of employment.

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