



Code of Business Conduct

The background of the lower half of the page is a photograph of a modern cityscape with several tall glass skyscrapers. A semi-transparent, light grey rectangular box is centered over the image, containing the text 'sealing the future.' in a dark grey sans-serif font.

sealing the future.

Sealing the future
with integrity

Index

Letter from the CEO	7	Reporting unethical or illegal behavior	53
Our ethical values	9	How do I report a concern?	56
Code of Business Conduct	10	What is SpeakUp®?	56
Compliance with laws	17	Can I file a report confidentially?	57
Bribes – payments to government officials / private sector	17	How does it work?	57
Anti-competitive practices	18	Enforcement	61
Anti-money laundering	18		
Environment	19		
Conflicts of interest	23		
Board membership and political activities	26		
Gifts and gratuities	27		
Workers' rights	31		
Working conditions	31		
Bullying and harassment	32		
Discrimination	32		
Sexual harassment	33		
Personal data	37		
Definition of personal data	38		
Examples of personal data	39		
Company's assets	43		
Information technology	46		
Confidentiality	48		
Financial reporting	48		



As a global company that is represented in over 12 countries, we are committed to conducting our business in keeping with the highest ethical standards. Our Code of Business Conduct ("Code") establishes the essential rules for our daily operations around the world.

Absolutely all staff of the Group, including non-permanent personnel, are required to take the time to read this Code carefully. Having a clear understanding of the values of this Code, exercising good judgment and adhering to them every day is your personal responsibility. If you have questions about the implementation of any aspect of this Code, please consult your manager, your local HR representative, or our General Counsel and Chief Compliance Officer.

SaarGummi's integrity and reputation are in your hands. The success of this Code and of our compliance program depends on you. We trust you to stick to the principles in this Code. Should you become aware of any wrongdoing, we encourage you to use the means available for reporting it in confidence. We would take your report seriously and start an internal investigation.

We count on your continuous commitment to respecting the fundamental values embodied by the following pages.

*Lawrence Johnson
CEO
CQLT SaarGummi Technologies*



Our ethical values





Code of Business Conduct

This Code of Business Conduct ("Code") of CQLT SaarGummi Technologies ("SaarGummi") sets out the essential principles and values to be upheld in our business practices and procedures every day.



This Code of Conduct applies to all SaarGummi employees without exception, including its directors, managers and the representatives of all subsidiaries around the world (hereafter referred to as the "Employees"). For the purposes of this Code, the term "Employees" also embraces staff who work on a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, agents, consultants, professional advisors, secondees and interns. SaarGummi expects all Employees to conduct the company's business and affairs in conformity with the principles set forth herein. Conduct not specifically addressed by these standards must be consistent with them.

If a policy in this Code is in conflict with the law, the latter must be complied with.

If this Code is in conflict with a local custom or policy, however, you need to comply with the Code. If you have any questions about these conflicts, please seek advice from your supervisor, Human Resources or the Legal Department.

This Code has been approved by SaarGummi's Executive Committee.



We are reliable.
We comply with laws.

Compliance with laws

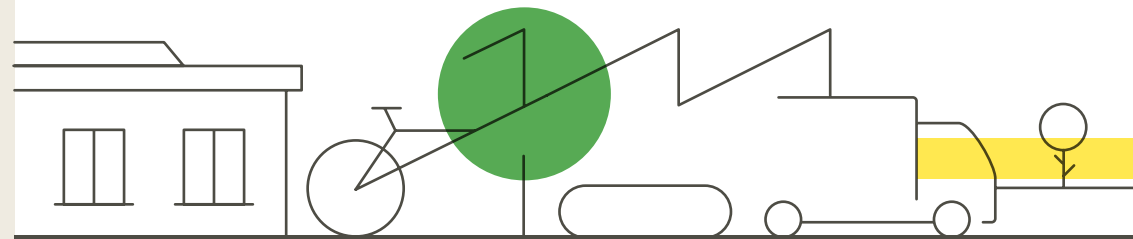
SaarGummi's Employees are required to ensure that all their activities for SaarGummi or on SaarGummi's behalf comply with all applicable local, regional, federal, national and international rules and regulations.

Employees with questions about the applicability or interpretation of any law, rule or regulation should contact the Legal Department. Ignorance of the law will generally not stand up as a legal defense in case of violations. Employees are required to ensure that all their activities on behalf of SaarGummi comply with the requirements of applicable rules, laws and regulations.

Bribes – payments to government officials or the private sector

SaarGummi is committed to compliance with the anti-corruption legislation of all countries it does business in. Employees must therefore not resort to bribes in their dealings with government officials or the private sector. Employees are prohibited from making illegal payments to government officials (including political candidates or employees of state-owned enterprises) in person or by way of third parties in order to acquire or retain business.

Promising, offering or delivering a gift, favor or other gratuity to government officials in violation of this Code



would not only contravene our policy but could also constitute a criminal offence.

Anti-competitive practices

SaarGummi's policy is to compete in keeping with the applicable anti-trust and competition laws of the countries it does business in. Employees are required to refrain from any practices that could be considered illegal. Employees are prohibited from entering into any (verbal or written) agreements with competitors and from attending any formal or informal meetings with competitors about price fixing, bidding conditions, division of markets, allocation of customers or any other activity with an anti-competitive effect.

Non-compliance with competition rules can lead to substantial fines for the company and legal consequences for the individuals involved under civil and criminal law.

If you have any questions about this, please contact the Legal Department.

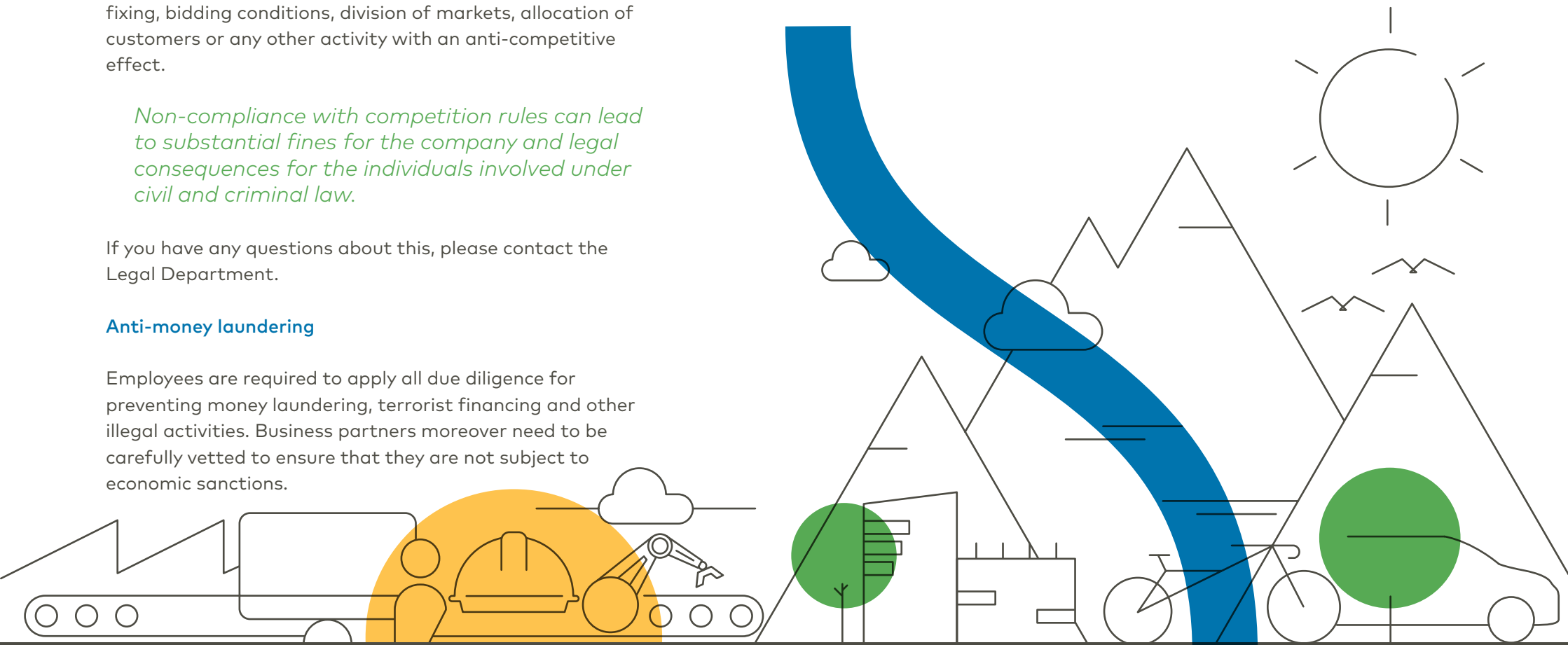
Anti-money laundering

Employees are required to apply all due diligence for preventing money laundering, terrorist financing and other illegal activities. Business partners moreover need to be carefully vetted to ensure that they are not subject to economic sanctions.

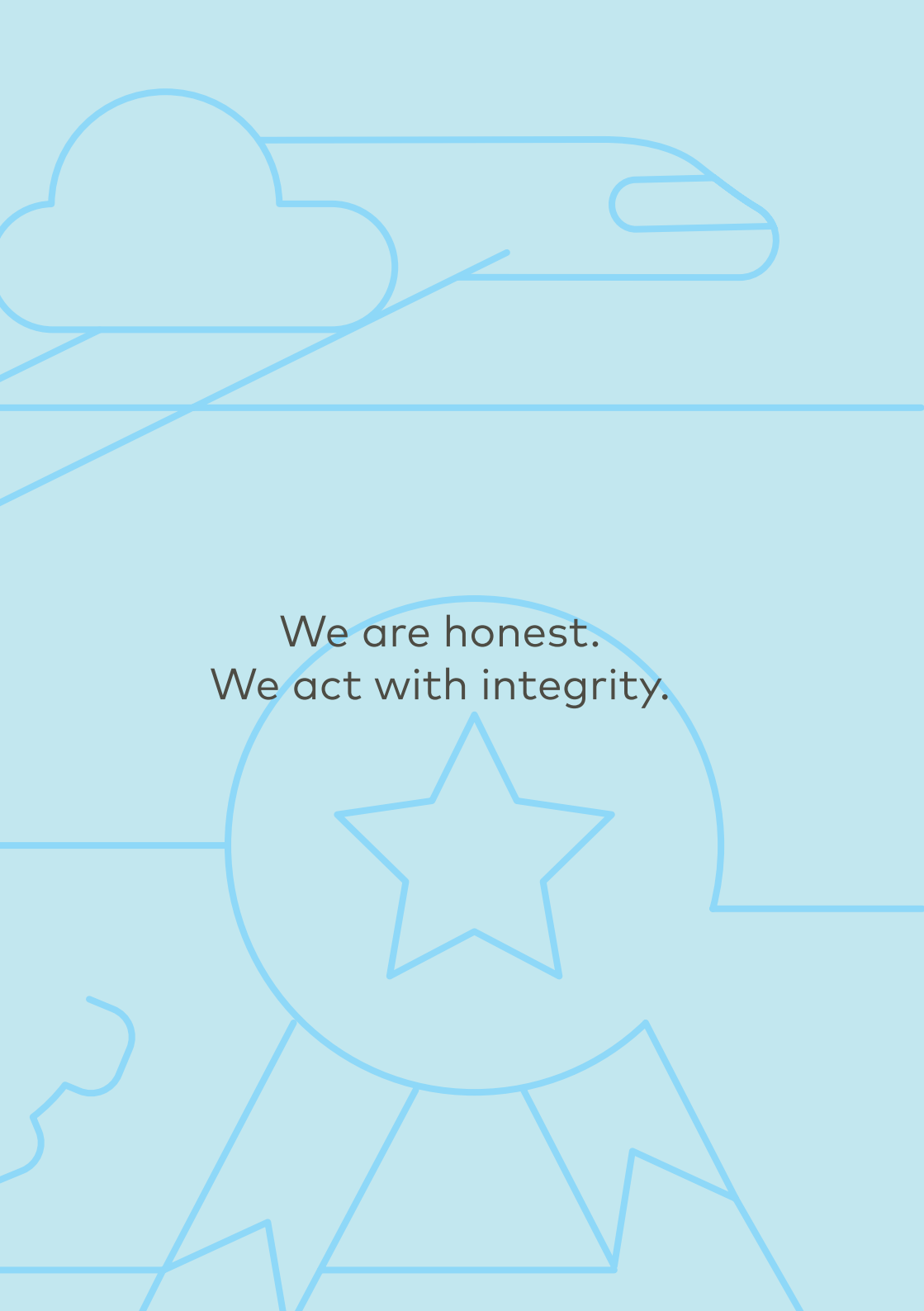
Environment

SaarGummi is committed to conducting its business in a sustainable manner, mindful of the environment and respectful of the resources in the communities we conduct it in.

Employees are required to comply with all applicable local and federal environmental rules and requirements at all times.





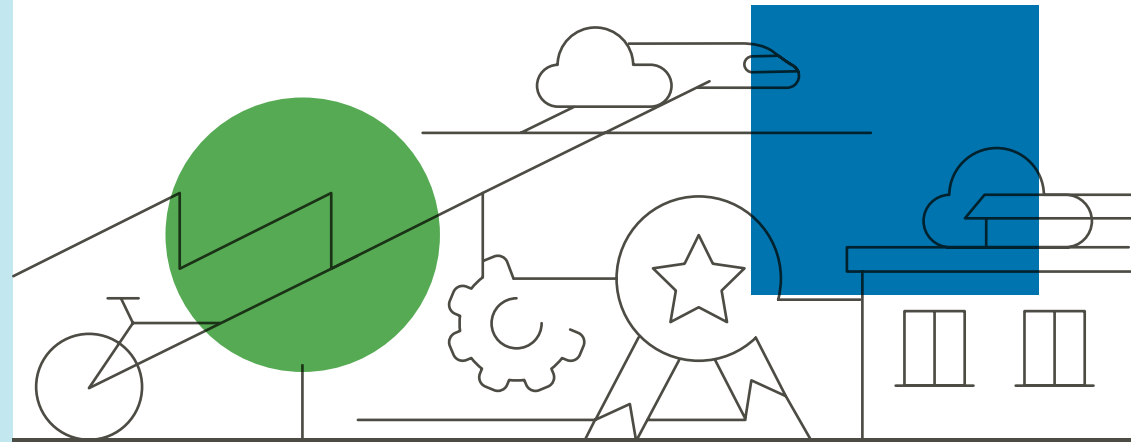


We are honest.
We act with integrity.

Conflicts of interest

Conflicts of interest are prohibited. Employees are always expected to act in SaarGummi's best interest in the performance of their duties. A conflict of interest arises whenever an Employee's private interests interfere or appear to interfere with the interests of the company in any manner.

A conflict of interest can also arise where Employees engage in activities or pursue interests that may interfere with the objective and efficient performance of their work.

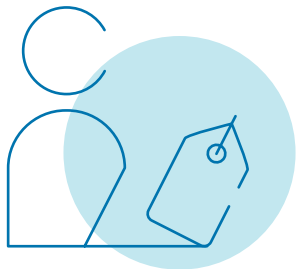


Examples of conflicts of interest:

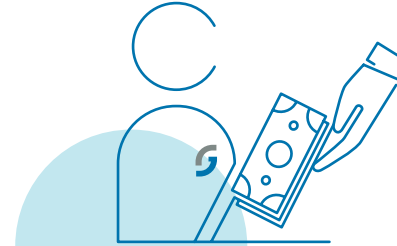


Accepting nominal gifts or favors in exchange for business referrals.

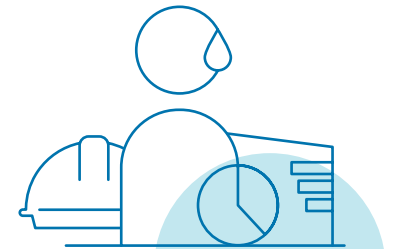
Employees being in a position to supervise, review or influence the performance evaluation, pay or benefits of an immediate relative or other Employee with substantial personal interests.



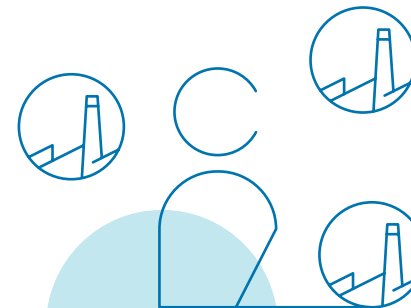
Employees selling anything to or buying anything from SaarGummi at other terms and conditions than other comparable employees.



Employees or their relatives receives improper personal benefits as a result of their position with the company.



External business activities distracting Employees from devoting due time and attention to their duties with SaarGummi.



Employees simultaneously working for or having any direct or indirect links with a competitor, customer or supplier, including service as a consultant or board member.

The above are just a few examples of where conflicts of interest may arise.

Any Employee who knows of a conflict or potential conflict of interests should bring this to the attention of a supervisor, Human Resources or the Legal Department, or use the anonymous reporting tool SpeakUp®.

Board membership and political activities

Employees are required to obtain the Executive Committee's approval before serving as a board member of any organization whose interests may be in conflict with those of SaarGummi. Organizations whose interests will not interfere with SaarGummi's by definition (charitable, civic, benevolent organizations) require no approval, but Human Resources must be notified. SaarGummi reserves the right to prohibit any board membership that is in conflict with its best interests.

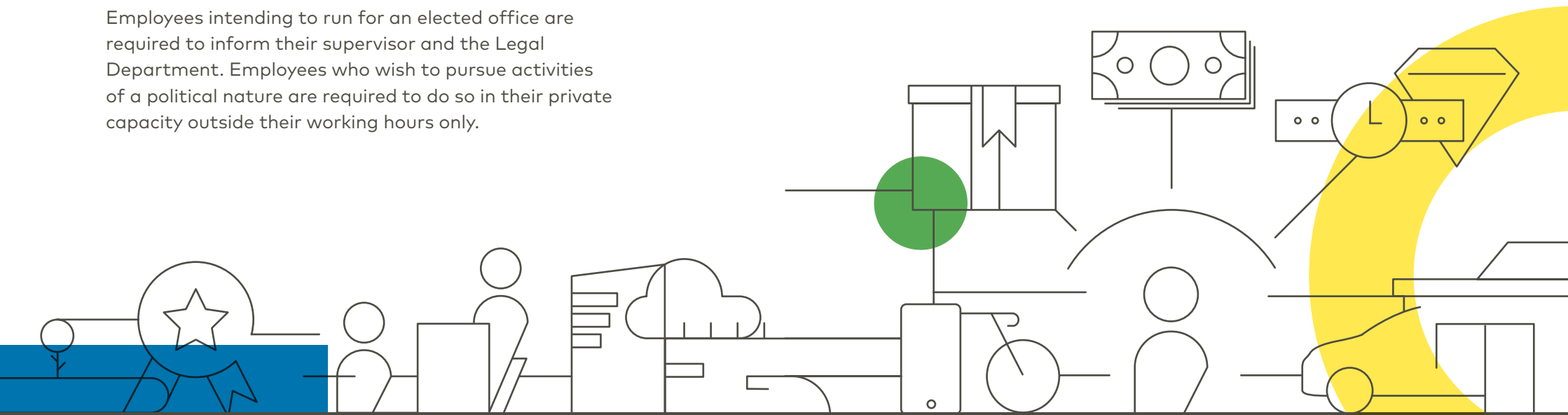
Employees intending to run for an elected office are required to inform their supervisor and the Legal Department. Employees who wish to pursue activities of a political nature are required to do so in their private capacity outside their working hours only.

Gifts and gratuities

No gift or entertainment should ever be offered, given, provided or accepted by any Employee or their relatives unless all the following conditions are met:

- The item received or offered is not a cash gift or cash equivalent (e.g. voucher, gift card);
- Accords with customary business practices;
- Is not of excessive value (50 EUR, 60 USD, 200 RMB);
- Cannot be construed as a bribe or payoff, and
- Does not contravene any laws, regulations or anti-bribery and anti-corruption policies of the company.

Employees shall discuss with their supervisor, Human Resources or Legal Department any gifts or proposed gifts not certain whether there are appropriate.





We are respectful.
We treat our colleagues with
courtesy.

Workers' rights

SaarGummi is committed to complying with all applicable labor laws in the countries it operates in, including international treaties on workers' rights. SaarGummi rejects child labor and forced labor.

Working conditions

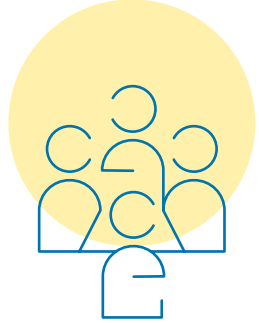
All SaarGummi plants are required to ensure strict compliance with all health and safety standards ensuring an appropriate work environment. Health and safety matters being a shared responsibility, SaarGummi expects every Employee to contribute to a safe and healthy workplace by complying with health and safety rules and practices, and by reporting accidents, injuries and unsafe equipment, practices or conditions.

Employees are prohibited from engaging in violent or threatening behavior.

Employees should be in a suitable condition for performing their duties and not be under the influence of illegal drugs or alcohol when reporting for work.

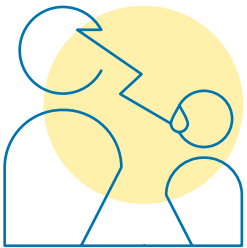
In case of contravention, SaarGummi will apply its policies on illegal drugs and alcohol, including drug and alcohol testing and rehabilitation alternatives.





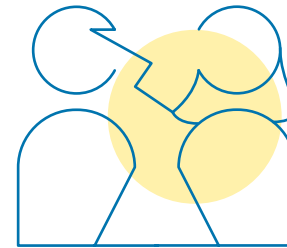
Discrimination

SaarGummi is highly committed to equal opportunities in all aspects of employment and will not tolerate discrimination of any kind. All allegations of discrimination will be immediately investigated in accordance with the internal policies and procedures.



Bullying and harassment

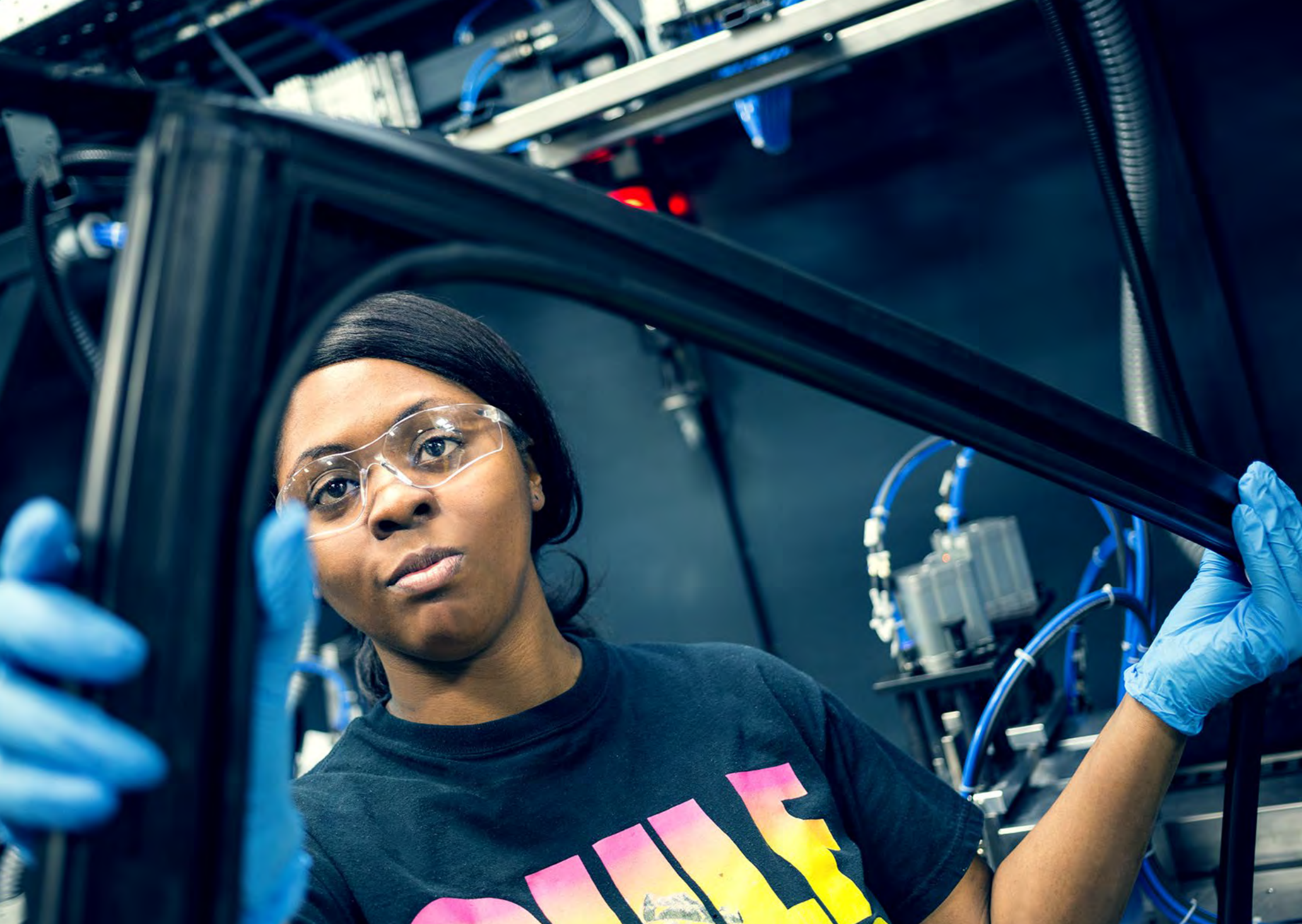
SaarGummi is committed to offering its Employees a working environment that is free from bullying, harassment or violence. All complaints in this respect will be taken seriously and promptly investigated. Individuals engaging in this kind of behavior will face disciplinary action.




Sexual harassment

SaarGummi has a zero-tolerance policy for any form of sexual harassment in the workplace.

Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal. All complaints about sexual harassment will be taken seriously, promptly investigated and treated with respect and in confidence.





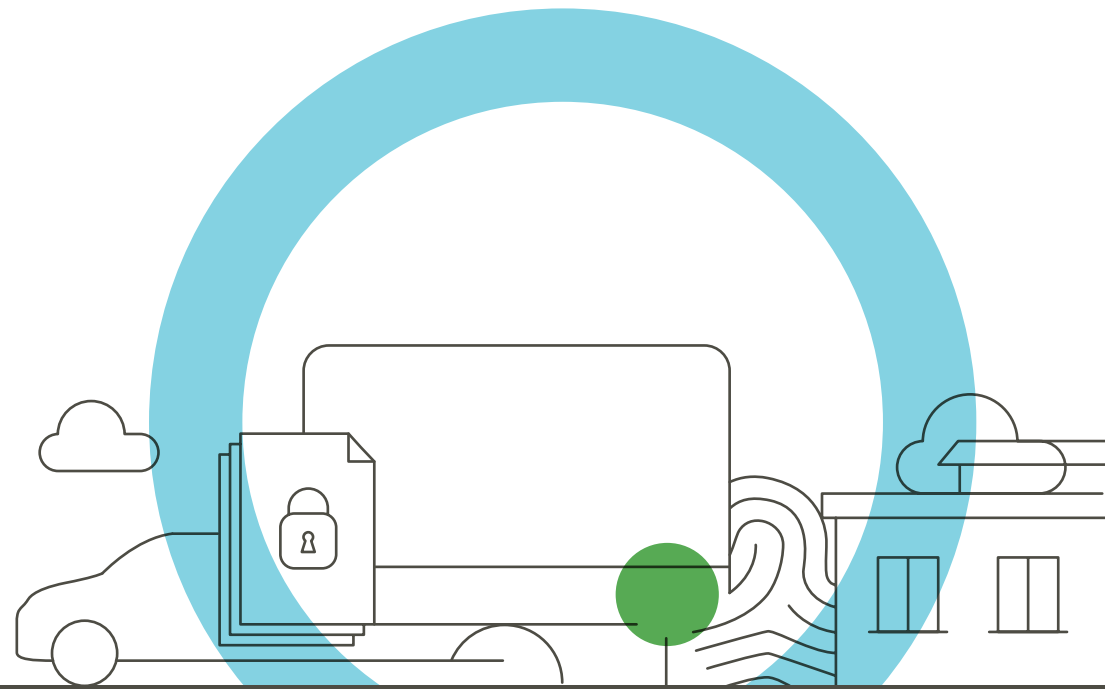
We are reliable.
We ensure data privacy.

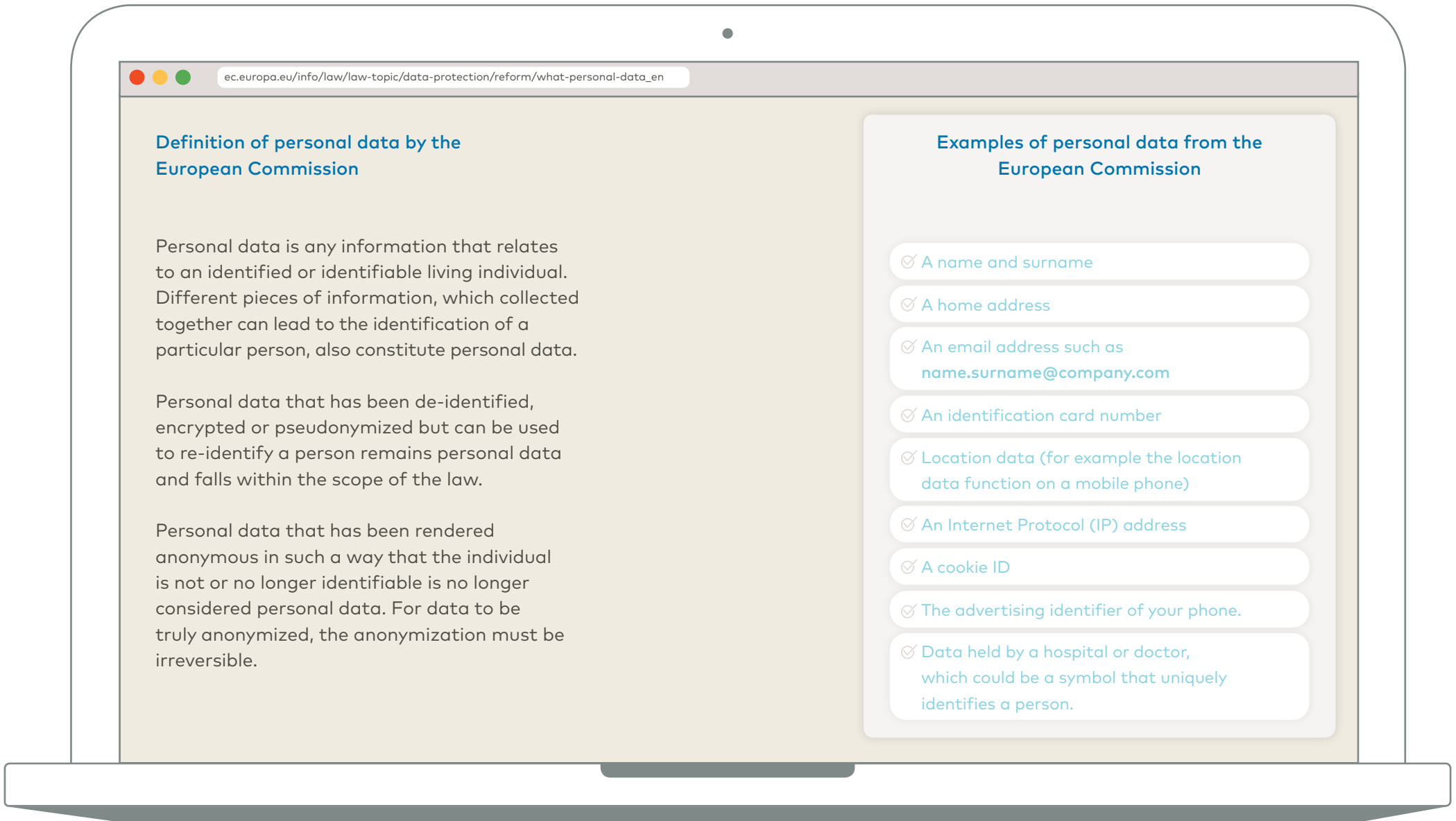
Personal data

SaarGummi is committed to treating the personal data of its Employees and business partners in keeping with the strictest standards and regulations.

Personal data are all information relating to an individual or enabling an individual to be identified.

All personal information is consistently collected, retained, used or disclosed in accordance with data privacy laws and the company's existing policies in this regard. If in doubt about the handling of personal data, Employees are required to consult the Legal Department.







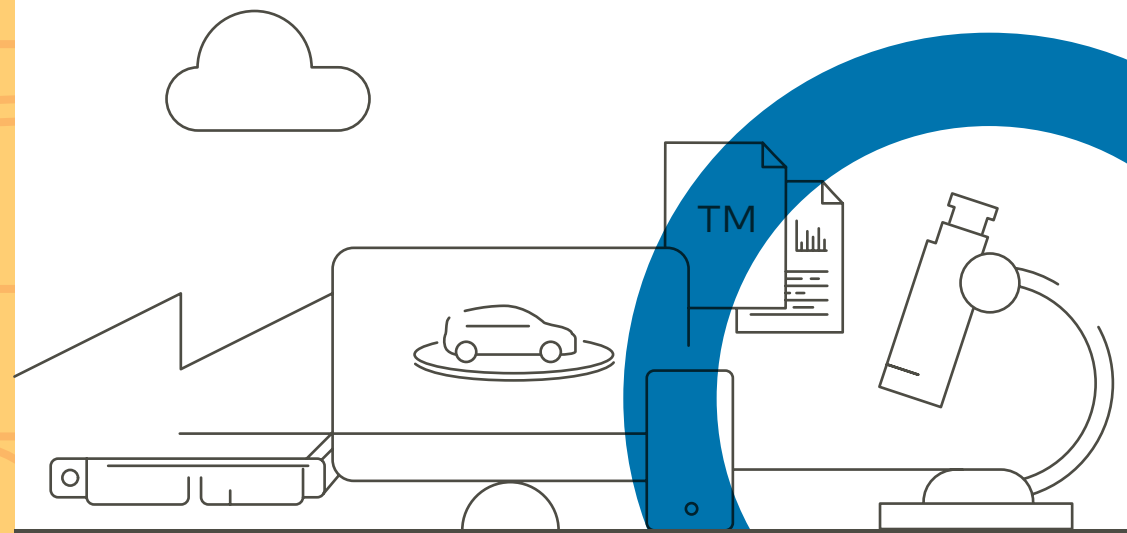
We are efficient.
We make respectful use of
company assets.

Company's assets



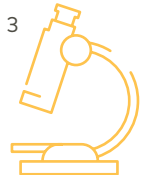









Employees are required to preserve and protect the company's assets by ensuring an efficient use of its resources and by preventing theft, damage and premature wear. Suspected fraud, theft or loss must be reported to the supervisor or Human Resources immediately.

Company assets must not be used for private purposes.

Employees are prohibited from using or taking the company's equipment, supplies, materials or services without permission. In their working hours, Employees are prohibited from engaging in any activity involving a remuneration for them or use of the company's equipment, supplies, materials, or services for private ends or purposes unrelated to their work without prior written approval by their supervisor and Human Resources.



The company assets also include SaarGummi's business sensitive and proprietary information, such as:

- | | | | |
|--|---|---|---|
| 1
 | 2
 | 3
 | 4
 |
| Trade secrets | Patents | Know-how | Trademarks |
| 5
 | 6
 | 7
 | 8
 |
| Copyrights | Business, marketing and service plans | Engineering and manufacturing ideas | Designs |
| 9
 | 10
 | 11
 | 12
 |
| Databases | Records | Salary information | Any unpublished financial data and reports |

The obligation to keep business sensitive and proprietary information confidential also continues to apply after the end of the employment. Unauthorized use or distribution of this information is illegal and may lead to civil or even criminal penalties.



Information technology

All information systems (including e-mail and internet) made available by SaarGummi must only be used for work-related purposes. Employees are required to use them in a responsible manner as required by the corporate policies on information security.

Abuse of information systems (including e-mail and internet) for improper or illegal (e.g. defamatory or discriminatory) purposes is strictly prohibited.

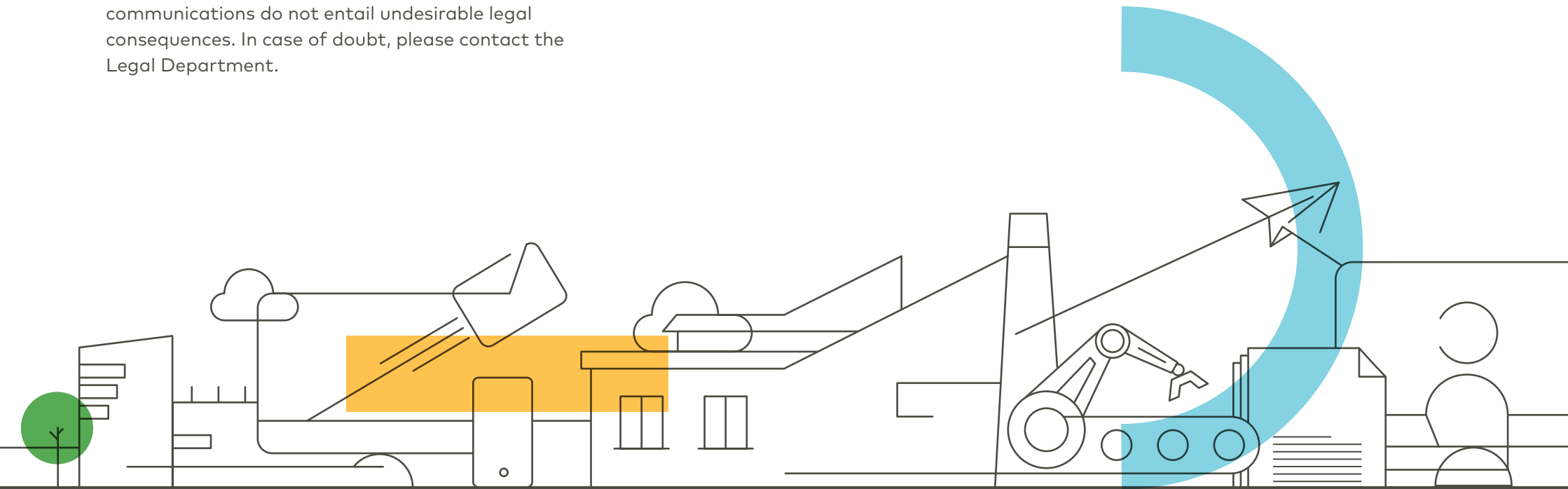
Employees should keep in mind that e-mail communications may have legal implications and could be taken for official statements by the company.

Employees should take care to ensure that their communications do not entail undesirable legal consequences. In case of doubt, please contact the Legal Department.

The installation of unauthorized or unlicensed software on SaarGummi's information systems is prohibited. All information generated and stored in our information systems is considered a company asset.

Employees leaving the company are prohibited from deleting, corrupting, extracting, downloading, printing or copying company information. Employees are required to store and retain information in keeping with the internal rules for information security.

SaarGummi reserves the right to audit and monitor the use of information systems within the bounds prescribed by law.

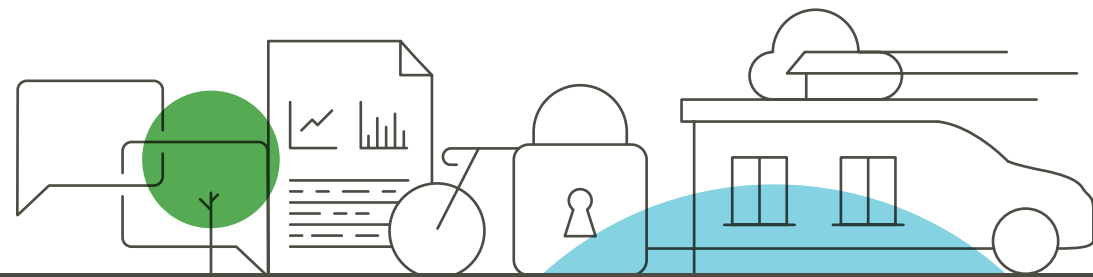


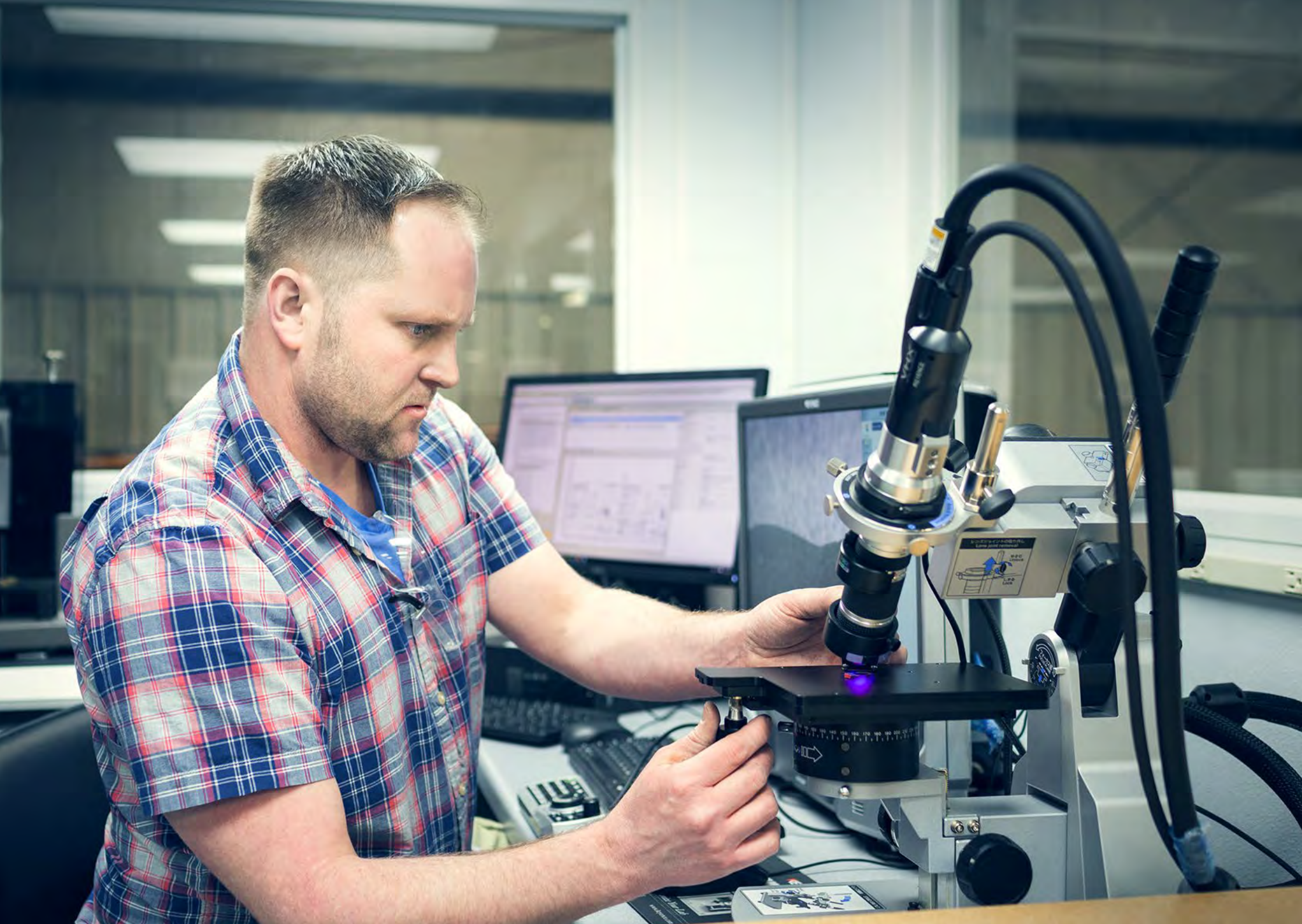
Confidentiality

Employees must not disclose any confidential information entrusted to them by SaarGummi or its business partners unless authorized to do so by the Legal Department or required to do so by laws or regulations. Confidential information is understood as all non-public information belonging to SaarGummi (including business sensitive and proprietary information as described above) and the information entrusted to us by our business partners.

Financial reporting

All financial reports, accounting records, reports, expense accounts and other documents must accurately and clearly reflect the relevant facts and true nature of the underlying transactions and conform with applicable legal requirements as well as the company's system of internal controls. Improper or fraudulent accounting, documentation, or financial reporting will not be permitted at SaarGummi and lead to disciplinary action, in addition to possible consequences under civil or criminal law.





Reporting unethical or illegal behavior

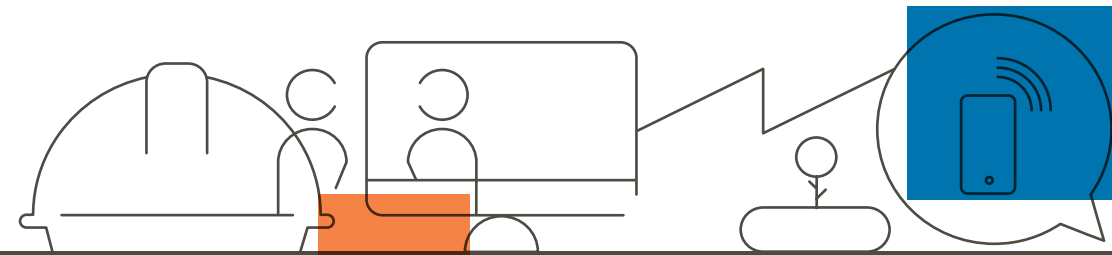
SaarGummi encourages its Employees to report all unethical or illegal behavior contravening the principles and values of this Code.

Employees are encouraged to talk to their supervisors, managers, Human Resources or the Legal Department about all unethical or improper behavior or, if in doubt, seek their advice for the best course of action.

Employees can report violations of this Code in confidence and without fear of retaliations.

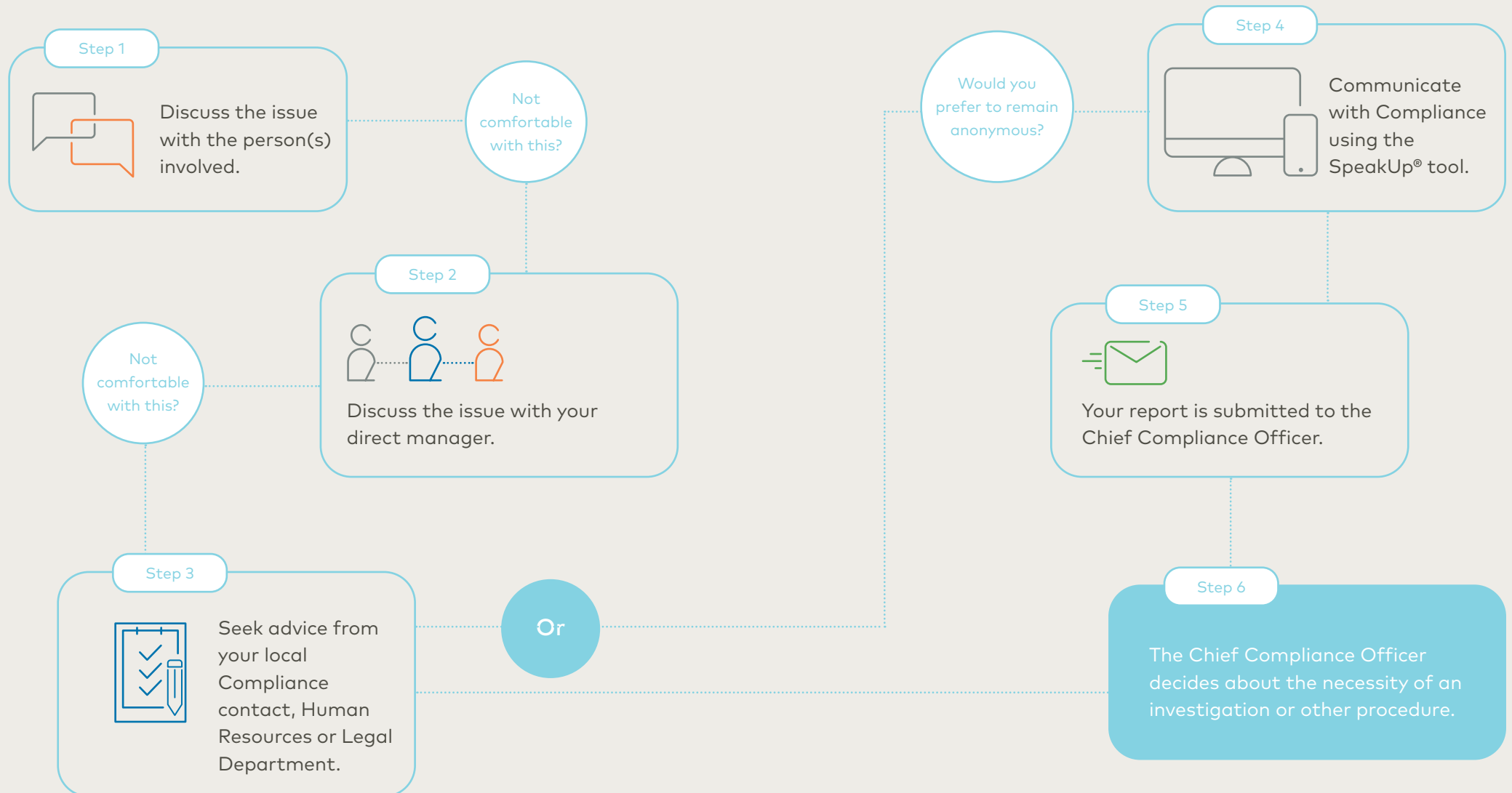
SaarGummi will not allow retaliations for reports of misconduct made in good faith. Employees can report misconduct by way of the anonymous SpeakUp® reporting tool, which is available in all local languages.

We speak up.
We report in confidence.



The SpeakUp® process

You need to raise a concern? Check these options.



How do I report a concern?

If you have a question, problem or concern, you can use any of the options below:

Your 1st point of contact should always be your direct manager.

He or she is in the best position to understand your concerns and take appropriate actions. If you do not feel comfortable, however, or if you already shared your concerns and feel that they are not being addressed, your 2nd point of contact should be your local HR representative, local Compliance Officer or the Legal and Compliance Department.

If none of the above are an option, you can also use the independent reporting tool: SpeakUp®

What is SpeakUp®?

This is an independent reporting service where you can communicate with the Compliance Department anonymously.

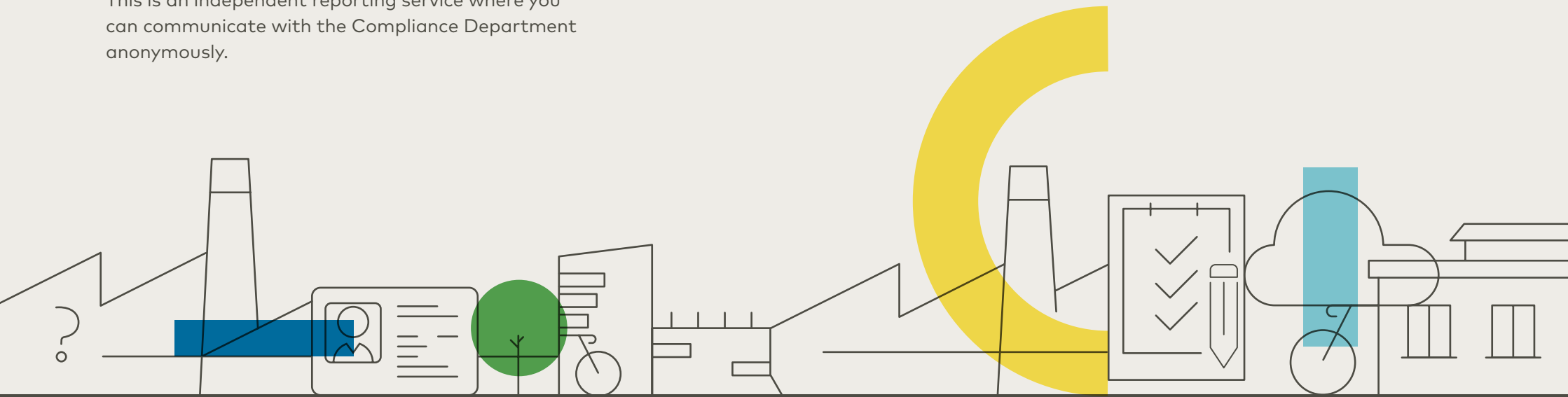
Can I file a report confidentially?

Yes, you can file your report on a confidential basis (without disclosing your name or contact details). Exceptions may apply as required by local laws.

How does it work?

You can use SpeakUp at any time on the phone or online to raise any questions, issues, concerns or allegations relating to violations of this Code of Conduct, our corporate policies or any local law. You can report in confidence in any of the official languages of your country.

After making your report online or on the phone, you will be provided with a case number as a personal reference. Write this down as you will need it to get status updates for your report later.





We are reliable.
We enforce our values.

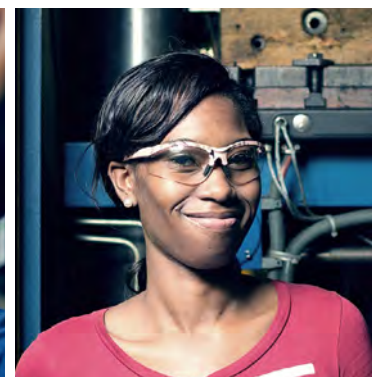
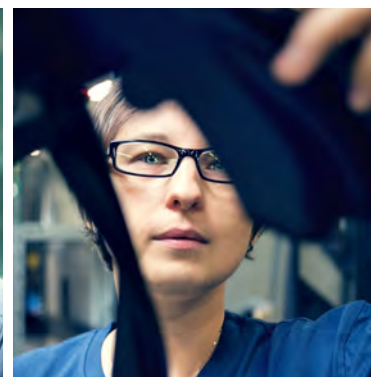
Enforcement

Employees are expected to cooperate in internal investigations of misconduct.

If an internal investigation comes to the conclusion that a violation of this Code has indeed taken place, SaarGummi will take the disciplinary and/or preventive actions it deems necessary, including dismissal or, in case of criminal offenses, reporting to law enforcement authorities.



The True Success Story.
You!



Editor

CQLT SaarGummi Technologies S.à r.l.
9, Op der Kopp
5544 Remich
Luxembourg

T +352 26 66 68 80
F +352 26 66 68 88
compliance@saargummi.com
group.saargummi.com

