



Code of Conduct Plansee Group



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Guiding Principles

We operate within the law

We respect human rights

We act in the Group's interests

We act responsibly

We ensure state-of-the-art
QSE management

We trust that our employees want to do the right thing, and to ensure they are able to do this, they should be familiar with the guiding principles of business conduct relevant to their work.

This Code of Conduct sums up our commitments to ethical business practices and compliance with the law, gives every employee a clear understanding of our expectations, and provides an explanation of our five guiding principles of business conduct.

Understanding this Code of Conduct and living by its principles is essential for the personal success of employees and their ability to contribute to the overall image and success of our company, its employees and their families, and our customers, suppliers and neighbors in the communities where we live and work.

Breitenwang/Reutte, August 2010

Dr. Michael Schwarzkopf

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Our commitments

- **Value creation:** We are committed to the sustainable and profitable development of the Group and its companies. This is a prerequisite for our long-term competitiveness, for safeguarding our future, and for creating value for the company.
- **Excellence:** We are committed to achieving market-leading positions in each of our business activities and to constantly improving products and processes. Excellence in powder metallurgy is the reason why we are our stakeholders' preferred supplier, customer, employer and partner.
- **Respect and trust:** We are committed to honest, direct and fair relations with our employees, suppliers, customers, partners and communities. Mutual trust and respect are essential prerequisites for successful long-term partnerships.

Our expectations

- Every employee is concerned with the good reputation of our company.
- All employees and business partners respect these guiding principles of business conduct.
- Management throughout the world is proactive in ensuring that the Code of Conduct is put into practice and appreciates employees who demonstrate exemplary business practices.
- Any employee who feels uncomfortable with a situation or becomes aware of behavior that does not comply with the Code of Conduct should speak to his or her supervisor, compliance officer (if applicable to the company), or a member of the human resources or legal department or he or she may submit an anonymous report according to the particular company-specified procedure.
- Any employee who violates the Code of Conduct or is involved in criminal activities will be subject to appropriate disciplinary measures.



1. We operate within the law

We comply with the applicable laws, rules and regulations in every country where we operate. We respect the rules of fair competition, antitrust laws, export and import restrictions and intellectual property rights, and we forbid any kind of bribery.

Rules of fair competition and antitrust laws

We respect the rules of fair competition and antitrust laws and avoid engaging in behavior that may violate them, such as:

- Unlawful arrangements with competitors or market partners on pricing, territories, customers or production volumes.
- Unlawful agreements not to compete with a competitor.
- Submission of false tenders or bid rigging.

Export or import restrictions

We comply with all applicable export control laws and import laws that limit or require government approval of commerce and trade with certain countries, regions, corporations or persons. This relates to the permissible use, sale or purchase of technical information, products and services.

Employees should follow the respective policies and procedures that have been established for their company to maintain compliance.

Intellectual property rights

We respect and do not infringe third parties' intellectual property rights (patents, utility models, trademarks and copyrights).

Bribery

Offering, soliciting, giving or receiving inducements or kickbacks that are intended to influence an individual, a company, a public official or a governmental institution is strictly forbidden.

Bribery may include money, goods, privileges or some other promise made to influence the action, vote, or decision of a person.

- Gifts given to business partners should be chosen carefully, so as to avoid any appearance of bad faith or impropriety in the mind of the recipient.
- Gifts must not be made to public officials or other civil servants, unless they are permitted under applicable local law.
- Employees should never accept any unjustified advantages of any kind from third parties, including from customers, suppliers, service providers, consultants or agents.

If questions or concerns arise regarding any of the above issues, employees should consult with their supervisor, the compliance officer (if applicable to the company), or a member of the legal department.

2. We respect human rights

We respect everyone's right to personal dignity and privacy. We recruit, select, train, promote and compensate employees solely on the basis of work-related criteria, such as experience and performance.

- We do not tolerate human rights abuses of any kind.
- We do not allow child labor or tolerate any form of forced labor.
- We exercise due diligence to ensure socially and environmentally responsible sourcing of raw materials in our supply chain.
- We do not tolerate any discrimination, harassment or offence based on race, color, national origin, gender, religion, age, disability, union or political affiliation, sexual orientation, marital or family status.
- We ensure that every employee receives a fair compensation for his/her work and that wages meet the applicable legal minimum levels.
- We ensure that international, national and local laws, conventions, regulations and agreements on working hours are adhered to.



3. We act in the Group's interests

Everything we do is aimed to benefit our global business. We avoid situations where the private interests of an employee conflict with the interests of the company.

Conflicts of interest may arise if an employee:

- Holds business interests in a company that is not part of the Group.
- Employs close relatives or purchases goods or services from relatives or from companies controlled by relatives.
- Is privately engaged in any organization whose activities may be considered to prejudice the interests of the company or its employees.



4. We act responsibly

We use our tangible and intangible assets effectively and responsibly, are careful to protect confidential information, intellectual property or information relevant to legal actions or administrative proceedings, and use electronic media in an appropriate manner.

Confidential information includes:

- All non-public information regarding our company that might be of use to competitors, or harmful to the company, its affiliates, its customers or business partners if disclosed.
- Product or business plans, specifications, non-published financial information, manufacturing methods and processes, customer and employee lists, and computer software.
- All information which is covered by intellectual property laws.

To protect our assets, every employee must handle information carefully:

- Employees should only have access to confidential information if they need it to do their job effectively.
- Employees must not make written records, database entries, or video or audio recordings or reproductions of confidential information, unless this is directly related to their jobs and/or they have the consent of their supervisor.
- The confidentiality of any information provided by our customers and business partners must be maintained, unless the disclosure of such information has been permitted.
- We respect the property of others. We do not copy or use such property without prior formal authorization.

- Upon receiving notice from their supervisor or a member of the legal department, employees should act as instructed to preserve relevant information and records.

All employees should be aware of the risks associated with the use of Internet and other electronic media. Employees must:

- Ensure all tokens and passwords remain confidential.
- Use the Internet and email appropriately.
- Adhere to the company's IT guidelines.

5. We ensure state-of-the-art QSE* management

Our management systems monitor performance in terms of product and service quality, occupational health & safety and environmental protection, establishing new guidelines and standards where appropriate.

We provide our customers with products and services that meet their needs.

- We are committed to the design, manufacture and marketing of products which meet our customers' requirements, both in terms of intended use and quality.
- We comply with universally accepted quality management standards.
- As we have customers in many different business fields, this requires certifying different products to different industry standards.
- We continuously develop our quality management systems to ensure that failures are kept to a minimum, and to improve our ability to serve our customers' requirements.

We are committed to providing a safe and healthy working environment for all our employees.

- We respect the applicable laws regarding occupational health & safety.
- We aim to minimize all risks and hazards at every workplace, in order to protect the health and well-being of our employees, contractors and visitors.

Environmental protection is a process of continual improvement.

- We comply with applicable laws regarding environment protection.
- We comply with universally accepted environmental management standards.
- We strive to keep the environmental impact of our activities down to an absolute minimum. In areas such as

resource use and waste management, there are obvious synergies between environmental responsibility and economic efficiency.

Behavioral standards are defined in the QSE rules.

- QSE procedures, which include the provision of adequate and regular training, are continually reviewed and improved.
- All employees must comply with the QSE rules, actively contribute to improving processes, and act in a conscientious manner.

*Quality, safety and environment



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