

This guideline amends and specifies the principles set in the Code of Conduct towards business partners and third parties in connection with the issues of corruption and unfair business practices.

It applies to all employees of Petrofer Chemie and Petrofer GmbH.

1. Offering and granting of benefits and invitations

The offering or giving of **monetary donations** (cash, loans, etc.) is not permitted independent of the amount or reason, with the exception of small charitable donations by prior approval.

Donations of all kinds to business partners and customers to obtain orders or unfair advantages are not allowed. Grants to employees of business partners and customers, which can influence their business decisions' or may suggest the impression of influence, may not be offered or granted.

Advertising and occasional gifts to employees of customers or business partners may be granted without prior authorisation up to a value of **50 Euros** (per year and per receiver), where this is permitted by the internal regulations of the business partner or customer (appropriate enquiries with the business partners / customers must be documented).

Invitations to meals given to employees of business partners and customers, which normally follows the nature and extent of local customs and events, as well as complying with the status of the parties (social standing level), may be offered if there exists a business relationship. It must not be suggested that the meal is to win business, or influence decisions.

Invitations to events (sports events, etc.) require prior approval by a supervisor, providing the cost of the invitation exceeds **50 Euros**. Any invitation must meet the internal regulations of the business partner or customer to be permitted (appropriate enquiries with the business partners / clients must be documented).

In all cases of doubt, the appropriateness of a gift or invitation requires prior approval by the Executive.

2. Accepting gifts and invitations

Employees may **NOT** ask or demand for **benefits of any kind**, of any business partner or customer, for themselves or for others.

Donations from business partners and customers, which can influence the business decisions of employees or may suggest the impression of influence may not be accepted.

Voluntarily given advertising and occasional gifts from business partners and customers may be accepted up to a reasonable value and context. A value of up to **50 Euros** is still to be regarded as reasonable. The amounts quoted are per annum and per business partner or customer. The acceptance of monetary grants (cash, loans, etc.) is not permitted independent of the amount.

Invitations to meals from business partners and customers, which normally follow the nature and extent of local customs and events, as well as complying with the status of the parties (social standing level), may be accepted if there exists a business relationship. It must not be suggested that the meal is to influence business or decisions.

Accepting **invitations to events** (e.g. sporting events etc.) requires prior approval by the Executive, where the value of the invitation exceeds **50 Euros**.

In all cases of doubt, the appropriateness of a gift or invitation requires prior approval by the Executive.

3. General note

In critical or difficult situations please refer any business partner or customer to our Code of Conduct.

Refrain from accepting or offering any gift, grant, donation or entertainment if you have doubts about the legal and policy compliance of the action.