

This Code of Conduct defines the principles we adhere to in all interactions with our employees, clients, suppliers, society and the environment as we engage in daily global commerce.

Our business model strives to integrate sustainable social, ecological and economic responsibility, exceeding statutory and legal requirements, in all of our endeavors.

It is our objective to create and preserve a corporate culture which supports adherence to the rules and ethical principles stated below in the best possible way.

VACUUBRAND GMBH + CO KG hereby commits to the following principles:

Respect for Human Rights and Legal Compliance

- We support and respect the protection of the UN Human Rights Charter and ensure that our entrepreneurial activity does not make us complicit in human rights abuses;
- We comply with all laws of the applicable jurisdictions in which we conduct business, especially with regard to fair trade, data protection, intellectual property rights, money laundering, and insider trading laws.

Prohibition of Corruption and Bribery

- We do not tolerate and will not engage in any form of corruption or bribery, including any unlawful payments or any other benefit conferred to any government official or policy-maker for the purpose of influencing decision making.

Prohibition of Child Labor

- We do not employ anyone below the applicable minimum legal working age.

Respect for the Basic Human Rights of Employees

- We promote equal opportunities and treatment of our employees irrespective of race, gender, ethnic heritage, political or religious conviction, disabilities, age or sexual orientation;
- We respect the personal dignity, privacy and rights of each individual;
- We refuse to make anyone work against their will;
- We do not tolerate any unacceptable treatment of employees, including discrimination, coercive, abusive or exploitative behavior, or sexual harassment;
- We provide fair remuneration of our employees and we guarantee the applicable statutory minimum wage;
- We comply with all applicable laws and regulations regarding working hours;
- We recognize employees' rights of free association and neither favor nor discriminate against members of employee organizations or trade unions.

Health and Safety of Employees

- We take responsibility for the health and safety in the work environment of our employees;
- We utilize the best reasonably applicable standards for precautionary measures to control hazards, prevent accidents and occupational diseases;
- We maintain an adequate occupational health & safety management system which includes regular safety training.

Suppliers and Business Partners

- We promote adherence of our suppliers and business partners to the principles and ethical standards of this Code of Conduct;
- We adhere to the same non-discrimination principles stated above in our relationship with our suppliers and business partners.

Environmental Protection

- We maintain and develop an adequate environmental management system;
- We make all reasonable technical and economic efforts to reduce pollution beyond applicable statutory and international standards.
- We continuously revise the effectiveness of our environmental protection measures.

Export Restrictions

- Our export control management system strictly complies with all of the European Union's and the Federal Republic of Germany's rules and regulations regarding export restrictions.
- We do not tolerate or engage in any form of circumvention of these regulations and will not conduct business with anyone we believe may be trying to circumvent such regulations.

This Code of Conduct is subject to revision in order to comply with applicable laws and regulations or should there be changes to the requirements of the compliance principles.

Wertheim, September 2011

VACUUBRAND GMBH + CO KG