Compliance Policy



Introduction

The behavior of FLÖTER employees is driven by integrity. This notably means that we respect laws and regulations, encourage fair competition and are reliable partners. The management board, the employees and the owners of MetPro fully accept their social responsibility for the past, the present and the future. The main focus of attention here is given to the next generation. We fully adhere to statutory regulations pertaining to the minimum wage at all production sites. We voluntarily go beyond the legally-required minimum wage and even surpass it by enabling employees to participate in the company's success. We pay particular attention to the selection of suppliers to ensure they share the same or similar ethical, moral and social values as we do.

Our most important standards of conduct are defined in the following Code of Conduct. The Code of Conduct contains principles and minimum standards for our business conduct and dealings with one another. It gives us direction and is mandatory for everyone who acts on behalf of FLÖTER Verpackungs-Service GmbH.

Code of Conduct

In the context of our business activities, FLÖTER Verpackungs-Service GmbH commits itself to

- 1. Protect human rights, the elimination of discrimination before and during employment and the rejection of forced labour and child labour; We, therefore, do not discriminate against anyone and we treat all people equally regardless of:
 - a. Ethnic descent, origin or nationality
 - b. Religion or ideology
 - c. Political or union affiliation
 - d. Gender or sexual orientation
 - e. Age
 - f. Disability
 - g. Medical condition
- 2. Sustained environmental protection. The steps we take to improve the environmental impact of our production and our products are published as part of the ISO 14001 certified environmental management system, and we exchange information with those who follow our business.
- **3.** Fight against corruption. We do not tolerate corrupt behavior by employees or business partners and will take action against it. We do not waiver, even when benefits are expected or "common" for official duties. We also do not try to influence specific business dealings with private enterprises by making illegal payments. We refuse gifts, benefits or invitations from business partners and customers whenever their value may influence or appear to influence our decisions.
- **4.** Fair competition. We are committed to ensuring fair competition in our markets and to obeying applicable anti-trust and competition laws. We prohibit illegal agreements and coordinated behavior that seeks to, or may limit, competition. We are also required to obey further laws and regulations. These include
 - a. Foreign trade legislation, including export control regulations
 - b. Tax and customs duty laws
 - c. Money laundering laws
 - d. Anti-terrorism laws

Conclusion

The significant objective of the Compliance Management System of FLÖTER Verpackungs-Service GmbH is to raise awareness of compliance issues and to protect the company and its employees from financial and reputation damage.

Violations of legal requirements or internal regulations can be reported to the Head of Human Resources or the Executive Board. Requests for confidentiality submitted by reporting parties are guaranteed in every case.

Schwieberdingen, 30.04.2015

The document with original signature can be provided upon request

Marc Rapp

FLÖTER Verpackungs-Service GmbH

Robert-Bosch-Straße 17 D-71701 Schwieberdingen Phone: +49 - 7150-92 48 3 - 0 Fax: +49 - 7150-92 48 3 - 80

www.floeter.com