

Code of Conduct

Docter Optics Group

1	Introduction	2
2	General Rules	2
	2.1 Laws, Regulations and Ethical Conduct	2
	2.2 Business Partners, Governmental Authorities and Customers	2
	2.3 Trade Secrets.....	2
3	Anti-Trust and Competition Law.....	2
	3.1 Anti-Trust Legislation	2
	3.2 Bribery and Corrupt Practices.....	2
4	Global Guidelines.....	3
	4.1 Human Rights	3
	4.2 Forced Labor.....	3
	4.3 Remuneration.....	3
	4.4 Working Hours	3
	4.5 Occupational Health and Safety	3
	4.6 Protection of the Environment.....	3
5	Ethical and Social Principles	3
	5.1 Non-Discrimination.....	3
	5.2 Harassment.....	3
	5.3 Freedom of Opinion	3
	5.4 Private Sphere	3
6	Compliance with the Code	4
	6.1 Implementation.....	4
	6.2 Confirmation for Third-Party Organizations	4
7	References to Regulatory Requirements	4

1 Introduction

The companies of the Docter Optics Group, their employees and the organizations with which they partner expressly acknowledge the responsibility towards society associated with their activities (Corporate Social Responsibility).

The present Code represents a commitment to ethical and moral conduct and provides guidelines intended to ensure compliance with legislation governing competition.

Companies that recognize this Code of Conduct also provide their employees with information on the content, ethical goals and principles contained therein.

The Docter Optics Code of Conduct is a voluntary undertaking. Compliance is controlled by the Compliance Officer of Docter Optics SE in the context of regular ongoing assessment.

Neustadt an der Orla, 1 April 2015

Dr. Jan Hamkens
CEO Docter Optics SE

2 General Rules

2.1 Laws, Regulations and Ethical Conduct

The Company complies with applicable laws and regulations in effect in the various countries, in which it operates. It is guided by generally accepted ethical values and principles, including but not limited to integrity, fairness and human dignity.

2.2 Business Partners, Governmental Authorities and Customers

The Company conducts its operations on the basis of the generally accepted business practices of fairness and honesty. It conducts its business with governmental institutions on the basis of mutual respect and complies with regulations governing consumer rights.

2.3 Trade Secrets

The Company treats trade secrets of other companies confidentially. Disclosure of such information to third parties or the public is prohibited. This provision also survives agreements entered into by the Company.

3 Anti-Trust and Competition Law

3.1 Anti-Trust Legislation

The Company is committed to fair competition. The Company complies with legislation governing and controlling competition, including in particular anti-trust legislation. Collusive agreements to fix prices or other conditions, sales territories or customers as well as abusive exercise of market power are inconsistent with the principles of the Company.

3.2 Bribery and Corrupt Practices

The Company disapproves of bribery and corruption and does not tolerate such conduct. Employees make every effort to avoid dependence upon or obligations towards customers or suppliers. In particular, Group employees may not accept or give gifts or favors that a reasonable observer would have to assume have an effect upon business decisions. In the case of countries in which custom and courtesy call for gifts, every effort is made to avoid any binding obligations. Appropriate measures will be taken in the case of violation.

4 Global Guidelines

4.1 Human Rights

The Company firmly and expressly embraces internationally recognized human rights ⁽¹⁾. All Group employees must also be treated with dignity and respect in the case of disciplinary measures. Such measures may be taken only if consistent with applicable national and international standards and without violation of internationally accepted human rights.

4.2 Forced Labor

All forms of forced labor, bonded labor, serfdom and slave labor or slavery or similar circumstances are considered unacceptable. Violence and intimidation may not be used, directly or indirectly, to force employees to work⁽²⁾.

4.3 Remuneration

All employees must receive a fair wage that is at least sufficient to cover basic needs. Wages must be paid in the manner agreed and appropriate payroll advice provided ⁽³⁾.

4.4 Working Hours

Working hours must comply with applicable national law, industry standards or the relevant ILO Conventions. Extra work must always be voluntary⁽⁴⁾.

4.5 Occupational Health and Safety

National and international regulations governing occupational health and safety must be observed. Appropriate measures must be implemented to avoid risks to health and safety⁽⁵⁾.

4.6 Protection of the Environment

The Company is committed to the goal of a sustainable environmental protection. Efforts are made in this context to develop and introduce environmentally friendly production methods. The Company supports responsible use of natural resources in accordance with the principles of the Rio Declaration of the United Nations⁽⁶⁾.

5 Ethical and Social Principles

5.1 Non-Discrimination

The Company disapproves of discriminatory hiring or employment practices, in particular on the basis of race, ethnic or national origin, skin color, gender, mental or physical disability, age, creed, membership in a labor organization or other personal characteristics ⁽⁷⁾.

5.2 Harassment

The Company disapproves of physical, psychological or sexual violence.

5.3 Freedom of Opinion

The right to freedom of opinion and freedom of speech is respected.

5.4 Private Sphere

The private sphere is respected.

6 Compliance with the Code

6.1 Implementation

The Company makes this Code of Conduct known to all employees affected in a suitable manner. Compliance with applicable requirements is controlled and monitored internally.

6.2 Confirmation for Third-Party Organizations

Third-party organizations are evaluated by the Compliance Officer or procurement department of Docter Optics SE. Such organizations must meet the following requirements:

- Submission of completely filled out questionnaire bearing an authorized signature.
- Risk assessment carried out by Docter Optics SE for outsourced processes.
- Receipt of a statement of compliance from company management.

In the case of selected strategic partners and in the event greater risk is ascertained, confirmation of compliance with this Code will require a compliance audit.

The confirmation of compliance is an integral part of valuation for processes outsourced processes by Docter Optics SE and is as a rule valid for 2 years. It can, however, be derecognized at any time.

7 References to Regulatory Requirements

- (1) Universal Declaration of Human Rights, UN Doc. 217
- (2) ILO Conventions 29 and 105
- (3) ILO Conventions 26 and 131
- (4) ILO Conventions 1 and 14
- (5) ILO Convention 155
- (6) Twenty-seven principles of the Rio Declaration on Environment and Development, produced at the United Nations Conference Environment and Development (UNCED), Rio de Janeiro, 1992
- (7) ILO Conventions 100, 111, 158 and 159