



BUHLMANN
TUBE SOLUTIONS

General Declaration

Shared values form the foundation of our behaviour and actions in our company. They are the expression of our corporate culture affected by tradition, creating a positive work environment for our employees.

The following values are the guidelines for our actions:

- We are customer driven.
- We supply excellent quality.
- We are successful due to team orientated work style.
- We act with responsibility.
- We perform our work in the tradition of a successful family company.

Our Code of Conduct sets down mandatory guidelines for the professional conduct of all staff members towards customers, suppliers and colleagues. We are committed to the values of the UN initiative “Global Compact”, in particular to the principles of fair competition and acting in partnership as well as to the fight against corruption.

For preservation and development of these rules, investigation of infringements and as a contact partner for the staff in these topics BUHLMANN GROUP appointed Dr. Axel Willauschus as Compliance Officer.

Bernhard Buhlmann
President/C.E.O.

Jan-Oliver Buhlmann
Managing Director

Jörg Klüver
Managing Director

Reinhard Scheller
Managing Director



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TARGETS

Our Code of Conduct contains indispensable guidelines for the professional conduct in our daily business, enabling us to run our business in an ethically and legally appropriate manner.

All employees of Buhlmann are expected to respect all applicable legal requirements besides these internal rules and take account of traditions and social values of the countries in which we are conducting business.

1. Observing laws and social rules

Buhlmann is active in many countries and regions of the world and therefore has to take into consideration different legal systems. To us responsible action means complying with all applicable local, national and international legal requirements. Additionally we respectfully take national traditions and social norms of our partner countries into consideration.

2. Individual responsibility

The reputation of Buhlmann is substantially determined by the professional conduct and demeanour of each individual employee. Improper behaviour can significantly damage Buhlmann's interests. Personal integrity and acting with a sense of responsibility are benchmarks for all staff members. The following items are to be taken into consideration in all cases of decisions:

- Complying with all relevant laws and norms.
- Avoidance of personal conflicts of interests.
- Responsible decision making.



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3. Promotion of our employees

Buhlmann's success also depends on the skills of our employees. We promote a workplace environment characterized by mutual support, teamwork and open communication, in which talented and motivated staff members can utilize and develop their abilities. Buhlmann offers internal and external training courses for the promotion of our employees.

4. Safety, health and Environment

The protection of mankind and the environment as well as the conservation of resources are core targets of our company. Buhlmann and all of its employees are responsible for creating and preserving safe and healthy working conditions at all Buhlmann sites. We observe the environment, healthcare and security standards of the countries we are doing business in.

It is a fundamental duty of each employee

- to conduct his work in a safe manner so that neither others nor the environment are endangered.
- to immediately report accidents, operational malfunctions or other dangerous conditions to the relevant internal departments.

5. Conflicts of interests

We expect our employees to avoid any situations that may lead to a conflict between personal interests and company interests. Caution is necessary in cases of

- Business connections with companies in which an employee, a relative or a personal friend is an owner or a direct or indirect shareholder.



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- Transactions in which a relative, friend or former employee of Buhlmann is involved or acting for the other company or may take influence on the other company.
- Private secondary activities. All employees must ensure that any secondary or sideline activities, which relate to the business objective of Buhlmann have been previously approved by the company management. Private secondary activities which may affect the integrity of or loyalty to the company will not be approved.

6. Treatment of business partners, public officials and other representatives

We expect our suppliers and service providers to also share the aforementioned ethical standards. Buhlmann is honest in its dealings with others, observes all applicable legal requirements and corresponding regulations and fights corruption and bribery.

Acceptance and granting of incentives

Employees of Buhlmann are not allowed, either directly or indirectly, to demand, accept, offer or grant personal benefits or incentives. In particular no benefits may be offered or granted to any domestic or foreign public officer.

The only recognized exception is that of generally accepted customary, occasional or promotional gifts of small value in keeping with local mores and customs.

Approval by supervisors

If employees intend to offer a gift or benefit, and in case of doubt whether this could influence a decision, they must obtain approval by their supervisor prior to granting the benefit and ask the



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recipient to have acceptance approved by his responsible supervisor. Employees of Buhlmann are likewise required to obtain approval from their supervisors for the acceptance of gifts or benefits in case of doubt.

Money laundering laws

No employee is allowed, either alone or in concert with others, to perform any activities that contravene domestic or foreign regulations governing money laundering. In case of any doubts as to the propriety of transactions that involve transfer of cash, the prior consent of the company management shall be obtained.

7. Market and competitive behaviour

Buhlmann and its employees are unconditionally committed to the principles of fair competition and must comply with applicable anti-trust and fair competition legal requirements.

Relationship to competitors

Agreements with competitors and coordinated behaviour causing a restraint or limitation on competition are forbidden. In particular, agreements on prices, quotations, sales quotas as well as the apportionment of customers, markets and programmes are to be named. Not only formal agreements are forbidden, but also coordinated behaviour arising from informal talks.

Association meetings

Buhlmann employees are only allowed to attend meetings of associations, conducted for proper business purposes. If participants of competitors in these meetings should address legally critical approaches related to competition Buhlmann employees are obliged to leave this meeting immediately and to inform the company management.



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8. Corporate Citizenship

As a responsible corporate citizen Buhlmann and its owners engage themselves in national and international projects. Support is given to projects of social institutions, environmental initiatives, education, health care, sports, art and culture.

9. Protection of assets and competitively sensitive information

Within their sphere of activities all employees are responsible for protection of tangible (sites, facilities, products, vehicles, documents) and intangible (know-how, proprietary rights, business secrets) assets of the Buhlmann-Group. In this context IT-security plays an important part. The same applies with regard to protecting assets of the customer.

All employees are obliged to treat all internal information confidentially. The communication of confidential internal information to unauthorized persons is not permitted. If company interests require the handing over of internal information to third parties, a specific supervisor approval is required.

10. Implementation, sanctions

The provisions of this Code of Conduct represent fundamental components of our corporate culture. Employees who violate laws or this Code of Conduct may be disciplined by legal measures of employment law. Supervisors may also be disciplined for failing to detect violation in their area of responsibility.



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With this Code of Conduct Buhlmann provides its employees with documents, containing basic information for correct behaviour and actions which are not tolerated. In any cases of doubt employees may consult with their supervisors or the Compliance Officer.

Violations of laws or this Code of Conduct can be reported to the supervisor or to the Compliance Officer. Buhlmann will not execute reprisals or tolerate the execution of reprisals against any employee reporting violations.

Dr. Axel Willauschus
Compliance Officer