

CODE OF CONDUCT ON ANTITRUST

Version 20170619 (June 19, 2017)

Sirris shall comply with the legislation and, in particular, shall ensure that the legislation on organization-internal economic competition is enforced by its members, customers, suppliers, and employees.

To this end, with regard to meetings held within Sirris and with third parties, employees shall:

- always send out a clear agenda for meetings, and do so in good time: where there are matters on the agenda that are of a sensitive nature in light of the legislation on economic competition, management shall be consulted in this regard;
Sensitive items include:
 - o market data (statistics);
 - o general contractual terms and conditions;
 - o pricing policy;
 - o certification marks and procedures.
- always be in attendance throughout a meeting and intervene where sensitive matters are broached that do not appear on the agenda;
- compile accurate minutes of meetings, clearly indicate the decisions taken, and submit the minutes to the meeting participants for approval.

Employees shall not tolerate the following during meetings at Sirris or during consultations outside of Sirris in which they are participating:

- data being shared between the participants regarding production costs, purchase or sale prices, price reductions, discounts, or profit margins;
- arrangements being made between the participants regarding the distribution of geographic areas, groups of customers, or markets;
- customer, competitor or supplier blacklists being drawn up.

Where the participants in a meeting, consultations or contacts continue discussing inadmissible matters despite the employee's intervention, the latter shall immediately leave the meeting or consultations such Page 2/2 that everybody notices this and shall ensure that his or her departure is recorded in the minutes or that the informal contacts are broken off.

During meetings or consultations at other organizations, Sirris employees shall comply with the codes of conduct of the organizations concerned insofar as these do not conflict with this Code of Conduct.

Where such organizations do not have such a code of conduct, Sirris employees shall apply the principles laid down in this Code of Conduct.

Employees shall not share any information which this Code of Conduct has led them to believe, or should have led them to believe, is in breach of the legislation on competition or other legislation.

