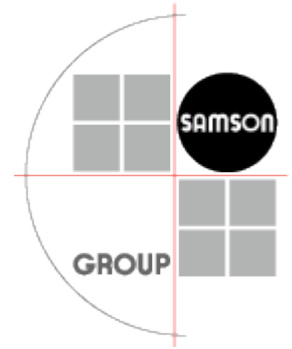


# Code of Conduct of the SAMSON GROUP



Principle:

The SAMSON GROUP is committed to tradition and conviction in the following values:

- a) All business activities of the SAMSON GROUP are characterized by fair, dependable and long-term relationships. We will only remain successful if we continue in this manner.
- b) The international presence of the SAMSON GROUP must not be put at risk intentionally or negligently by violations of the law.
- c) Employees, management and shareholders of the companies of the SAMSON GROUP do everything in their power to avert any damage to the SAMSON GROUP and to treat each other with mutual respect.

Following this tradition and conviction, we are committed to keeping the following guidelines:

1. We are committed to providing fair and civil working conditions for all employees in the SAMSON GROUP. This includes:
  - No discrimination, harassment, intimidation or invasion of privacy!
  - No illegal employment, child labor or other violations of employee rights!
  - No disclosure of personal data!
  - No tolerance, arrangement or cover-up of inhumane conduct!
2. We are committed to contributing towards preventing violations of the Code of Conduct and to report any suspected breach of the Code to superiors.  
Nobody is to be put at a disadvantage because of his or her observance of this Code.
3. We are committed to respecting the law applicable in the countries in which we operate. Any incitement to violate the law or hindrance to report legal violations to superiors is prohibited. We are committed to cooperating with the responsible authorities.
4. We are committed to the principle of business sustainability. This includes:
  - No breach of our social commitment or advantage gained from our suppliers' non-observance of this commitment!
  - No risk or lasting damage to the environment or advantage gained from our suppliers' non-observance of these regulations!
  - No breach of legal export control guidelines or advantage gained by evading any export regulations!
5. We are committed to fair and lawful competition. This includes:
  - No illegal cartel agreements with competitors or agreements to unlawfully exclude customers, suppliers or competitors!
  - No breach of legal regulations and rules to be applied during business transactions!
  - No tolerance of or involvement in money-laundering activities or financial support of terrorism!

6. We are committed to integrity in our business activities. This includes:
  - No gifts, whether they be of financial nature or any other nature, are to be granted or promised to customers, authorities or other business partners.
  - No personal financial advantage or any other kind of advantage is to be accepted or demanded.
  - No gifts that go beyond normal hospitality or occasional gifts of low value are to be exchanged.
  - No commission is to be paid to agents or consultants that unreasonably exceeds the commission common on the market.
  - No unreasonable payments are to be paid to third parties through agents or consultants.
  - All received gifts are to be disclosed and reported to superiors without exception.
  
7. During all business activities we are committed to ensuring that the SAMSON GROUP does not sustain any damage. This includes:
  - No negligent or careless handling of company property, no enrichment or theft, and no unlawful acquisition of property belonging to another person!
  - No unauthorized disclosure of business information or data! The disclosure of intellectual property and business secrets are not permitted without the explicit authorization by corporate management.
  - Conflicts of interests caused by any kind of personal agreements with our business partners, competitors or any other third party involved are not allowed.
  - No activities that could risk the health or life of employees of the companies of the SAMSON GROUP intentionally or through negligence are to be assigned.
  - No advantages are to be granted to employees for reasons other than justifiable business reasons.
  - Legally binding decisions must not be taken without a second authorized person.

All Board members, executives and managers of the SAMSON GROUP confirm their commitment to the Code of Conduct by signing it as part of their contract. The Code will be made known to all other employees as a documented procedure, binding them to observe the Code.

SAMSON AKTIENGESELLSCHAFT