

„Compliance“ and „Corporate Social Responsibility“ in the DORNIER Group

Lindauer DORNIER GmbH

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DORNIER

Quality creates value

1. INTRODUCTION AND DECLARATION OF PRINCIPLES

The trust of our customers, owners, employees and the public placed in our company depends decisively on the behavior of each individual employee. This trust is based upon the respect towards rights and compliance with as well as with all internal rules of our company („Compliance“).

DORNIER is aware of its responsibility towards society and acts accordingly. We recognize the commitment of the company and our employees for the benefit of the community („Corporate Social Responsibility“). Therefore DORNIER summarizes with this Code of Conduct the most important mandatory standards, applying to all DORNIER employees worldwide, and thus continues the long tradition of compliance with reputable business principles practiced by DORNIER. At the same time DORNIER provides with this Code of Conduct a guideline for each employee that may foster a self-reliant conduct for the good of the company. This personal responsibility is both a privilege and a duty. Each and every employee is responsible in his or her area of responsibility that he/she always acts according to the rules stipulated in this Code of Conduct. Our executives, as role models, are invited not only to communicate these rules in due form, they must also lead by example and demand compliance from their staff. Our managers are the first contact persons for their employees in case of any questions related to this Code of Conduct.

The up to date DORNIER Group guidelines can be consulted and printed via the intranet site „Compliance“.

This code applies worldwide to all employees of the DORNIER Group. DORNIER also expects all other persons working for the company (trainees, consultants) to comply with it.

The regulations contained in this code are applicable to the relationship between each company of the DORNIER Group and its employees. It shall not constitute a basis of third-party rights.

The Compliance Committee shall have final authority for disputed issues.

2. COOPERATION WITH CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

Our customers, suppliers and other business partners expect, besides quality products and services, a high degree of professionalism and absolute reliability in our dealings with them. Therefore, our focus always lies on correctness, honesty and transparency in every communication and all contractual relationships.

2.1 Fair competition

DORNIER observes the rules of fair competition and supports all efforts to promote a free market and open competition, nationally and internationally. DORNIER therefore renounces to pursue any contract obtainable only by violation of legal laws.

2.1.1 Agreements, cartels and waivers of competition

Every employee is required to comply with the laws against restraint of trade. Therefore, making formal or informal agreements with competitors, with the purpose or effect of obstructing competition, are prohibited. The same applies to tacit, concerted practices. In particular, demarcation of sales areas or customer sharing between competitors are forbidden as well as any agreements and exchanges of information concerning prices, supply relationships, business terms, capacities, market shares, profit margins, costs, special customer data or quotation contents or bidding approaches.

If DORNIER enjoys a dominant market position, it will not be exploited in any unlawful way.

All intended agreements with competitors must be submitted in advance to the „Compliance Committee“ for approval.

2.1.2 Corruption and bribery

DORNIER will not tolerate corruption or bribery in any form. All of its business activities must be inspired by a spirit of honesty and responsibility, in thinking and acting.

2.1.2.1 Offering and granting of benefits

In the field of competition, we entirely rely on the quality and performance of our products and services. Any agreements or collateral agreements that involve granting benefits, either directly or indirectly, to individuals or organizations in connection with arranging, awarding, approving, implementing or paying for contracts are forbidden. This applies specifically to agreements with business partners, their employees or officeholders, but also to other third parties. The same applies for granting benefits in relation with public authority procedures. Such undue advantages can consist of financial benefits or material donations. The granting of benefits to an individual may also be unacceptable even if the individual only benefits indirectly, e.g. if payments are made to a family member or if payments (e.g. donations) are made to a third party who contributes to the improvement of the individual's social or political standing.

Gifts and invitations are permitted only if they do not incite in terms of value, financial scope or otherwise to improperly influence the recipient's actions or decisions or to create a binding dependence of the recipient.

When invitations to events are issued, it must be observed that the event complies with business practice and is appropriate in terms of type and scope or that it is clearly related to business activities. Especially strict standards must be applied for public officeholders. Monetary gifts are prohibited under all circumstances.

Commissions and other remunerations paid to third parties such as agents, brokers, consultants or other intermediaries must be adequate and comprehensible in relation to their services and the contracted business volume. All agreements with agents, brokers, consultants and other intermediaries, including all later amendments, must be completely recorded in writing.

2.1.2.2 Demanding and accepting benefits

Gifts from business partners are customary to a limited extent. They can, however, damage the reputation of our company and lead to conflicts of interest. For this reason, it is strictly prohibited that our employees demand or accept personal benefits such as services, inappropriate invitations for themselves or closely related persons or institutions. Exceptions are, for instance, occasional gifts of low value. Accepting monetary gifts of any kind is strictly forbidden. An offer of gifts and benefits exceeding the limits outlined above must be refused and reported to the superior. Furthermore, the rules specified in 2.1.2.1 apply.

2.1.2.3 Donations and sponsoring

DORNIER receives requests for donations from various organizations and institutions. Donations must be made in a transparent way, that is, the recipient and the intended use must be known. Payments to private bank accounts are not permitted. No donations are to be made to organizations that could damage DORNIER's reputation. When donations are granted, it has to be made sure that the rules specified in 2.1.2.1 and 2.1.2.2 are observed. This applies in particular to donations awarded close or related to orders.

In the case of sponsoring, an adequate balance between granted support and stipulated service in return must be respected.

2.1.3 Patents, intellectual property rights

The continuous development of our proprietary technology thanks to inventions and improvements of our know-how is crucial for the preservation of our competitiveness. Protection of our technology by means of intellectual property rights is therefore increasingly important.

No employee is allowed to disclose new knowledge or company secrets in any form to third parties. Every employee must respect valid intellectual property rights of third parties. No employee may acquire and utilize unauthorized secrets from a third party.

2.2 Selection of suppliers and service providers

DORNIER examines all offers submitted by its suppliers in a fair and unbiased way. The assessment, decision, awarding and handling of a contract must be based strictly upon professional criteria and be carried out in a transparent manner. It is strictly prohibited to give undue preference to a supplier or to impede its efforts to win a contract.

When selecting business partners, DORNIER demands that the partner also respects the values of this code. Infringement by a partner can lead to termination of the business relationship.

3. DORNIER MANAGEMENT AND EMPLOYEES

Productivity and humanity are indispensable in order to achieve sustainable corporate success. DORNIER's economic success can only be ensured by and with our employees worldwide.

3.1 Leadership and trust

Every employee is required to comply with this code especially, our executives specifically having a role model function. They are responsible within the atmosphere of trust cultivated by DORNIER that no violations of this code occur in their respective area that could have been prevented or impeded by appropriate supervision.

3.2 Tolerance and equal opportunities

DORNIER respects fundamental human rights worldwide. As a globally active group we work with employees and business partners of different nationalities, cultures and mentalities. We will not tolerate unlawful, unequal treatment (discrimination), harassment or degradation. In particular, we will not tolerate discrimination on account of race or due to ethnic origin, gender, religion or worldview, political opinions, disabilities, age or gender identity.

3.3 Fair working conditions

DORNIER offers its employees in all domestic and foreign locations an appropriate remuneration and fair working conditions in compliance with all legal standards of the respective country.

3.4 Avoidance of conflicts of interest

DORNIER attaches importance to the fact that its employees do not get into conflicts of interests or loyalties in the course of their work. Such conflicts may occur, for instance, in business transactions between DORNIER companies and employees or their close relatives. In any event, such transactions must be disclosed to the superior before conclusion.

3.4.1 Secondary employment

Secondary paid activities have to be approved in written form beforehand by the responsible Managing Director and the Human Resources Department. The approval has to be granted (with reservation of revocation) provided that the secondary activities do not counteract the legitimate interests of the employer.

3.4.2 Political activities

DORNIER as a company does not get involved in political activities. We welcome however our employees' commitment in civic and corporate as well as social and charitable work. Employees who engage in such activities do so as private persons. This has however, to be practiced in a way that conflicts of interests arise with their work.

3.5 Protection of assets

DORNIER requires its employees to protect the tangible and intangible assets of the company. These assets include real estates, operating equipment and stocks; security papers and cash; office equipment and supplies; information systems and software as well as patents, drawings, trademark rights and know-how. Infringements of the law such as fraud, theft, embezzlement and money laundering will be prosecuted.

All facilities and equipment may only be used for work-related purposes unless private use is explicitly permitted. When internet is used, attention must be paid that, by no way, information are retrieved or transmitted that could incite racial hatred, glorification of violence or other crimes or that have offensive content.

3.6 Use of information

We expect that appropriate care is taken when dealing with company information.

3.6.1 Confidentiality

Confidentiality must be maintained concerning in-house matters that are not disclosed to the public. This also applies to inventions and other know-how. These elements are the basis for sustaining success and guarantors for the future of the DORNIER Group. No employee is therefore allowed to disclose new knowledge or company secrets in any form to third parties. This also applies after the termination of employment.

3.6.2 Data protection and information security

The global electronic exchange of information is essential for the effectiveness of our employees and for the business success in general. The advantages of electronic communication are however tied to risks in terms of data protection and data security. Official documents and data carriers must therefore always be protected from being accessed by third parties. Effective foresight with regard to these risks is in the responsibility of the management but also of each individual employee and an important mission of the IT management.

3.6.3 Insider knowledge

It is not permitted to derive personal advantages or advantages for others by using company in-house knowledge. The same applies to unauthorized disclosure of such insider knowledge.

3.6.4 Correct reporting

When making oral or written reports for in-house or external use, employees are obliged to make truthful statements. Any manipulation of the contents is prohibited.

3.7 Occupational safety, health, environmental protection and sustainability

It is self-evident for DORNIER to protect the life and health of all employees and to assure a responsible handling of resources and pollutants. It is the task of all employees to avoid potential dangers for human health at the workplace, to minimize impacts on the environment and make economical use of resources. In development and production of our products we observe the principles of sustainability and environmental compatibility.

3.8 Quality

The market success of our products and services is inseparably linked to their quality. Our motto „Quality creates Value“ demands maximum creativity, skill and carefulness on the part of our employees and proves our high standards to customers and third parties.

We will not tolerate deliberate or negligent conduct that results in diminished quality.

4. IMPLEMENTATION OF THE CODE OF CONDUCT

4.1 Compliance organization

DORNIER has set up a „Compliance Committee“. It is responsible for the implementation and enforcement of the Code of Conduct.

The „Compliance Committee“ consists of Mr Dornier, Mr Kückelmann, Mr Schmidt, Mr Schöffl and Mr Appl.

4.2 Advice

DORNIER provides its employees with information to help them avoiding possible infringements of the law and of the Code of Conduct. This includes in particular trainings for special themes and selected hazardous fields. In case of remaining questions, every employee can submit them to the members of the „Compliance Committee“.

4.3 Complaints and reports of misconduct

Any employee has the possibility and right to report a violation or suspected violation of the Code of Conduct to DORNIER. The employee may choose to contact his/her direct superior, the responsible human resource employee or any member of the „Compliance Committee“.

An employee who, on the basis of tangible evidence, honestly believes that the Code of Conduct has been or might have been violated and who makes use of the right to report this to DORNIER will not suffer any kind of disadvantages. DORNIER will take the necessary actions, in each single case, in order to protect the reporting employee against retaliation. To this extent possible and permitted by law, DORNIER will keep confidential the identity of the employees that have reported, according to the rules, a violation of the Code of Conduct or a suspicion in this respect. The same applies to the identity of employees who cooperate in the investigation of violations or a suspected violation of the Code of Conduct.

As a rule, anonymous tips will not be followed up.

4.4 Implementing regulations

DORNIER might issue additional regulations concerning the implementation of selected items of this Code of Conduct.