

Our business principles Issued by the Board of Directors of DMP Rohstoffe AG

Our commitment to compliance, integrity and ethics

DMP Rohstoffe AG (DMP) is committed to reliability, sustainability and innovation. As employees and executives of the company, we are all responsible for embodying these values by acting with complete integrity, responsibility and transparency and behaving respectfully towards each other. We commit ourselves wholeheartedly to this pledge in all areas at all times and irrespective of what others might expect or demand.

Compliance (commitment to the law, integrity and ethics) is non-negotiable and cannot be delegated. Each employee and executive is a representative of DMP and as such is personally responsible for adhering to the law, fundamental ethical principles and our own internal rules. No commercial transaction must be allowed to endanger the reputation and existence of DMP by violating regulations.

This code of conduct defines and specifies the conduct we expect of you. In implementing the code of conduct, our management always leads by example and provides a clear model of conduct. By adhering to the code of conduct, you protect not only yourself but also DMP.

If you have any questions about the code of conduct or are not sure about the right path to follow in a specific situation, please do not hesitate to ask your line manager or the undersigned for advice.

Triesen, 4 April 2018

Arthur Beck
Chairman of the Board of Directors
DMP Rohstoffe AG

Roland Gstach Chief Executive Officer DMP Rohstoffe AG



Our business principles

The following 12 principles underline the commitment of DMP to compliance, integrity and ethics. The fundamental principles must be observed by all employees of DMP Rohstoffe AG in the context of their daily work and by our business partners.

Integrity

Our business activities are conducted in line with justice and the law — in all areas, at all times and irrespective of what others might expect or demand. Our management always leads by example in this regard.

Security

Safety and the protection of people and the environment is a priority for DMP. Adhere to security, occupational safety and environmental protection rules and report any infringements to us.

Protection of personal rights

Our conduct towards colleagues is respectful, tolerant and courteous at all times. Harassment, discrimination or any other violations of the personal rights of employees are prohibited. We respect the privacy and personal data of employees, clients and business partners.

Competition

We respect the principles of fair competition and do not engage in any anti-competitive collusion regarding prices, conditions, clients, markets, volumes or areas. In addition, we do not exchange such information with business rivals or competitors.

Corruption

We do not give or accept bribes. Our business is based on the quality of our products and services, and not on corrupt practices.

Gifts and invitations

Gifts, invitations and other gratuities or benefits shall not be accepted, promised or granted if this will or is intended to influence a person unlawfully.

Appropriate gifts, invitations and other gratuities or benefits of limited commercial value are permissible as tokens in the context of normal business and social appreciation or courtesy, for advertising purposes or for legitimate client care.

Conflicts of interest

Private interests and relationships must be kept separate from business interests and existing or potential conflicts of interest must be disclosed immediately.

Business partners

We work with business partners that share our values and recognize our business principles.

Confidentiality

Confidential and non-public information and business secrets of DMP that may be disclosed to you as an employee must remain confidential (even after termination of the employment or contractual relationship).



Communication

As an employee, always communicate in a considered and appropriate manner and always ensure that you are willing to stand by what you say or write.

Doubt

A single employee can permanently harm DMP through dishonest or illegal conduct. If you are uncertain about the right path to follow in a specific situation, always ask your line manager or the Management for advice.

Infringements of regulations

Infringements of regulations and punishable offences can harm us all and must therefore be reported to your line manager and the Management. No employee will be disadvantaged for reporting with honest intent any infringements of regulations by employees or third parties.

Contact Details

If you need clarification on any issues related to compliance or our business principles, please approach your line manager or directly the CEO of DMP Rohstoffe AG:

Roland Gstach, CEO DMP Rohstoffe AG Schliessa 6 FL-9495 Triesen

Telefon +423 392 17 16 Mobile +423 791 73 30 E-mail roland.gstach@dmp.li