

TKM-Group

Code of Conduct

Internal Corporate Guidelines

Preamble

TKM-Group is an international group of companies focusing on the business segments paper, wood, metal, machine elements and plastic/rubber/recycling. TKM-Group's employees, the quality of its products as well as the satisfaction of its customers form the quintessential basis for TKM-Group's long-term success. TKM-Group strives for market leadership in each segment it is operating in, by diligently and timely serving its customers and by employing a quality-oriented, goal-oriented and efficient work approach.

The success of TKM-Group depends on the commitment and the individual talent of its workforce. Therefore, TKM-Group supports and develops the strengths of its employees and continuously invests in training and employee qualification programs. Quality improvement is the responsibility of each and every employee.

TKM-Group considers it to be of utmost importance that employees treat each other with respect, honesty and trust. TKM-Group will make every reasonable effort to resolve any workplace conflict as promptly as possible. Clear work arrangements will be made and each employee is responsible for his/her activity.

Within the framework of these principles, the following internal corporate guidelines are agreed upon (the *Code of Conduct*).

A. Scope

This Code of Conduct applies to management employees as well as all other employees of TKM-Group. This Code of Conduct serves as the basis for internal collaboration as well as for external business relations.

B. Internal Corporate Guidelines

TKM Group will adhere to the Code of Conduct, which includes minimum standards, which apply to all employees.

I. Compliance with Laws

TKM-Group will comply with all applicable national and international laws and regulations.

II. Prohibition of Corruption and Bribery

TKM-Group opposes all forms of corruption and bribery.

No employee shall give gifts or other benefits to customers, distribution partners, or authorities for the purpose of gaining unfair advantages. The same applies for such benefits offered to, or received by, TKM employees. This does not apply to courtesy gifts of low-value commonly made in the context of business relations. Employees shall not abuse their respective positions within TKM-Group in order to demand, accept, or grant improper benefits.

III. Data Protection / Confidentiality

The compliance with, and enforcement of, data protection regulations is of particular importance for all business relations with customers and distribution partners. All employees shall make efforts to ensure the protection of data from or belonging to customers, distribution partners, and employees according to applicable data protection requirements.

Confidential information concerning any member of TKM Group, its customers, or suppliers are subject to confidentiality obligations and may not be disclosed vis-a-vis third parties without consent or due authorization.

IV. Environmental Standards / Environment Protection

All producing entities in TKM-Group strive to act in a sustainable and environmentally friendly manner. Avoiding and reducing pollution by taking precautions and reducing the usage of raw materials as well as developing recycling strategies are important goals of TKM Group. TKM Group aspires to ensure environmental protection beyond the minimum requirements and improve it on an ongoing basis.

Mindful of its ecological responsibility, TKM-Group complies with all applicable environmental protection laws and regulations.

V. Social Standards

1. Prohibition of Child Labor and Forced Labor

It is understood that the prohibition of child labor as well as the prohibition of forced labor in accordance with legal regulations are fundamental principles of TKM-Group's corporate policy.

2. Equality of Treatment / Antidiscrimination

No employee may be discriminated against, harassed, or treated preferentially on the basis of sex, age, national origin, racial status, ethnic status, creed, religious or political opinions, disability, sexual orientation or any other characteristic or class protected by law.

3. Health and Safety of Employees

Providing a safe work environment is a core objective of TKM Group. Each member of TKM Group will comply with all applicable laws and regulations relating to occupational safety and health and aspires to prevent workplace accidents and injuries. Each member of TKM Group will implement policies, programs, and procedures designed to evaluate and, where possible, improve workplace safety.

C. Compliance with Code of Conduct

1. Information

The Code of Conduct will be made available and brought to the attention of all employees of TKM Group. The Code of Conduct shall be freely accessible at any time.

2. Review

TKM-Group will put in place appropriate monitoring procedures to ensure compliance with the Code of Conduct. Any violation of the Code of Conduct must be reported to the management without undue delay.

3. Violations

Employees found to have violated the Code of Conduct will be subject to discipline, up to and including termination of employment.

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