

BUSINESS BUSINESS ETHICS POLICY

The continued trust and confidence of Schoeller-Bleckmann customers, employees and suppliers are required for the success of our group of companies. Trust and confidence take time and care to develop, but can be easily destroyed by improper or thoughtless actions. Schoeller-Bleckmann is committed to, and demands, the highest standard of conduct from its employees with regard to business ethics.

Following its basic values, we compete strongly but fairly in the marketplace. It obtains business through well-trained and motivated people who are dedicated to customer service worldwide in a safe and clean environment, and through the provision of highly efficient solutions and products and advanced manufacturing services. We do not obtain or maintain business through illegal conduct or practices of unfair competition such as price fixing, bribery, collusion with competitors and deceptive trade practices. Similar, all of our dealings with governments and governmental agencies are based on honest presentations and discussions; bribery in any form, and other improper conduct are prohibited.

Schoeller-Bleckmann employees shall neither accept, nor seek to accept, or offer gifts of more than token value from / to any company or individual maintaining business with us, including, in the forms of loans, excessive entertainment or other substantial favors.

Individual policy statements of Schoeller-Bleckmann subsidiary companies deal with various other aspects of business ethics. However, these basic policy statements do not attempt to cover all situations involving questions of business ethics. Maintenance of the highest level of business ethics in Schoeller-Bleckmann depends on the honesty, judgment and common sense of everyone on our group of companies in assuring that all people are treated fairly. In most cases, your basic instincts will tell right from wrong. If it "feels" wrong or questionable, it probably is. If you have any doubt about doing something, the rule is "don't". If you want further guidance, or become aware of potential violations of this policy, you are encouraged to consult your supervisor. Violations of this policy will subject the employee to disciplinary action, including possible termination.

Gerald Grohmann
CEO