



Code of Conduct of Spielkartenfabrik Altenburg GmbH

Preamble

All employees of Spielkartenfabrik Altenburg GmbH are bound by the ruling of this Code of Conduct. It sets out the values, principles and methods of action that determine the entrepreneurial behaviour of Spielkartenfabrik Altenburg GmbH. The aim of the company's management is to comply with ethical standards and to create a working environment that promotes integrity, respect and fair conduct. A strict legal and fundamental business policy serves long-term company interests. This Code of Conduct has been approved by the management of Spielkartenfabrik Altenburg GmbH and is binding.

1. Behavior in the business environment

Compliance with law and regulations

Compliance with laws and regulations is, for us, a fundamental principle of economic responsibility. We always observe the applicable legal regulations and obligations, even if they involve short-term economic disadvantages or challenges for the company or individual persons. If national laws have more restrictive regulations than the regulations valid at Spielkartenfabrik Altenburg GmbH, national law prevails.

Avoidance of conflicts of interest

At Spielkartenfabrik Altenburg GmbH, business decisions are made solely in the best interests of the company. Conflicts of interests should be avoided at the first onset with regards to private issues, economic or other activities, including those of relatives or otherwise related parties or organisations.

Fair competition - Commitment of company management

Spielkartenfabrik Altenburg GmbH sees itself obliged to act economically, socially and environmentally conscious. Spielkartenfabrik Altenburg GmbH therefore strives to conduct its business competently and ethically and to protect fair competition in all markets in which it operates, complying with applicable antitrust laws, competition and competition restrictions. Unfair advantages against customers, suppliers and competitors shall be avoided.

Prohibition of corruption (Zero Tolerance)

Spielkartenfabrik Altenburg GmbH is against corruption and bribery. Procedures dealing with unfair means are not tolerated. Employees of Spielkartenfabrik Altenburg GmbH are not allowed to offer, or accept, any benefit from business partners, which could lead to an impairment of an objective and fair business decision or even to create such an impression.

2. Behavior towards colleagues and employees

Equal treatment and non-discrimination

A culture of equal opportunities, mutual trust and respect is of great importance to us. We promote equality of opportunity and prevent discrimination in the recruitment of employees, as well as in the promotion or granting of training and education. We treat all employees equally, irrespective of gender, age, color, culture, ethnic origin, sexual identity, disability, religious affiliation or worldview.

Human and employment rights

We respect the internationally recognised human rights and support their compliance. We strictly reject all forms of forced and child labour. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to reasonable remuneration is recognized for all employees. The remuneration and other benefits correspond to at least the respective national and local legal norms or the level of the national economic sectors and regions.

Cooperation with employee representatives

For Spielkartenfabrik Altenburg GmbH a trustworthy and close cooperation with the employees' representatives is a key component and a proven foundation for corporate policy. The basis for mutual trust and a cooperative relationship is an open and constructive dialogue characterized by mutual respect.

Health and safety at work

The health and safety of our employees is an equally high company goal as the quality of our products or the economic success. Health and safety at work is an integral part of all business processes and is an integral part of technical, economic and social considerations from the very beginning of the planning phase. Each employee promotes health and safety protection in their work environment and adheres to the regulations on occupational health and safety. Each supervisor is obliged to instruct and assist their employees in exercising this responsibility. The same safety standards apply for employees of subcontractors of Spielkartenfabrik Altenburg GmbH. This is already taken into account during the selection process and remains part of our business cooperation.

3. Behaviour within society

Sustainable environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important company goals for us. We always make sure that all environmental and climate impacts are kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers, being it in the development of new products or in the operation of production plants.

Each employee is responsible for handling natural resources carefully and contributing to the protection of the environment and the climate through his individual behaviour.

Donations

We see ourselves as an active member of society and therefore engage in a variety of ways. We provide donations and other forms of social engagement solely in the company's interest. We do not make financial contributions, in particular donations and sponsorship to political parties, domestic and abroad, parties or similar organisations, individual mandate holders or political offices.

Political representation of interests

We conduct political representation of interests centrally, openly and transparently. We follow the legal requirements for lobbying and avoid unfair influence on politics and legislation in all circumstances.

Behaviour and communication in public

We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that he could be seen in the private sector as a part and representative of Spielkartenfabrik Altenburg GmbH and is therefore encouraged to uphold, through his behaviour and presence in public, the prestige and reputation of the company, especially towards media.

4. Data protection and information security

The protection of personal data, especially of the employees, customers and suppliers, is particularly important for Spielkartenfabrik Altenburg GmbH. We collect or process personal data only if it is strictly necessary or legally required to fulfill the respective task. No personal data may be collected or processed without the consent of the person concerned or if it is a legal admissibility.

5. Protection of the company's property

We use the property and the resources of the company appropriately and gently and protect it from loss, theft or misuse. The intellectual property of our company represents a competitive advantage for Spielkartenfabrik Altenburg GmbH and is a protective asset, which we defend against any unauthorised access by third parties. We use material and immaterial property of the company exclusively for business purposes and not for personal purposes, unless expressly permitted. Our employees, together with their superiors, are responsible for the fact that the type and extend of business travel is always adequate to the respective travel purpose, is economically planned as well as conducted, taking into account time and cost aspects.

6. Compliance and responsibility

The rule outlined in this Code of Conduct form a core element of the corporate culture of Spielkartenfabrik Altenburg GmbH. Strict obedience is indispensable to these principles. Every employee is accountable.

If a staff member has any concerns or complaints about the above mentioned points in this Code of Conduct, or if he has knowledge of a possible breach of the rules contained therein, he should immediately forward this to his supervisor for clarification. This may also be done anonymously or in a confidential manner. If an employee is not satisfied with the clarification, he or she can submit the request or complaint not only to the supervisor, but also to the management or the Human Resource department. Spielkartenfabrik Altenburg GmbH does not allow reprisals due to complaints submitted in good faith within the scope of this Code of Conduct.

All employees as well as the members of the management are bound by the rules of this Code of Conduct. Violations of this Code of Conduct lead to consequences.

Spielkartenfabrik Altenburg GmbH, Altenburg, April 2017