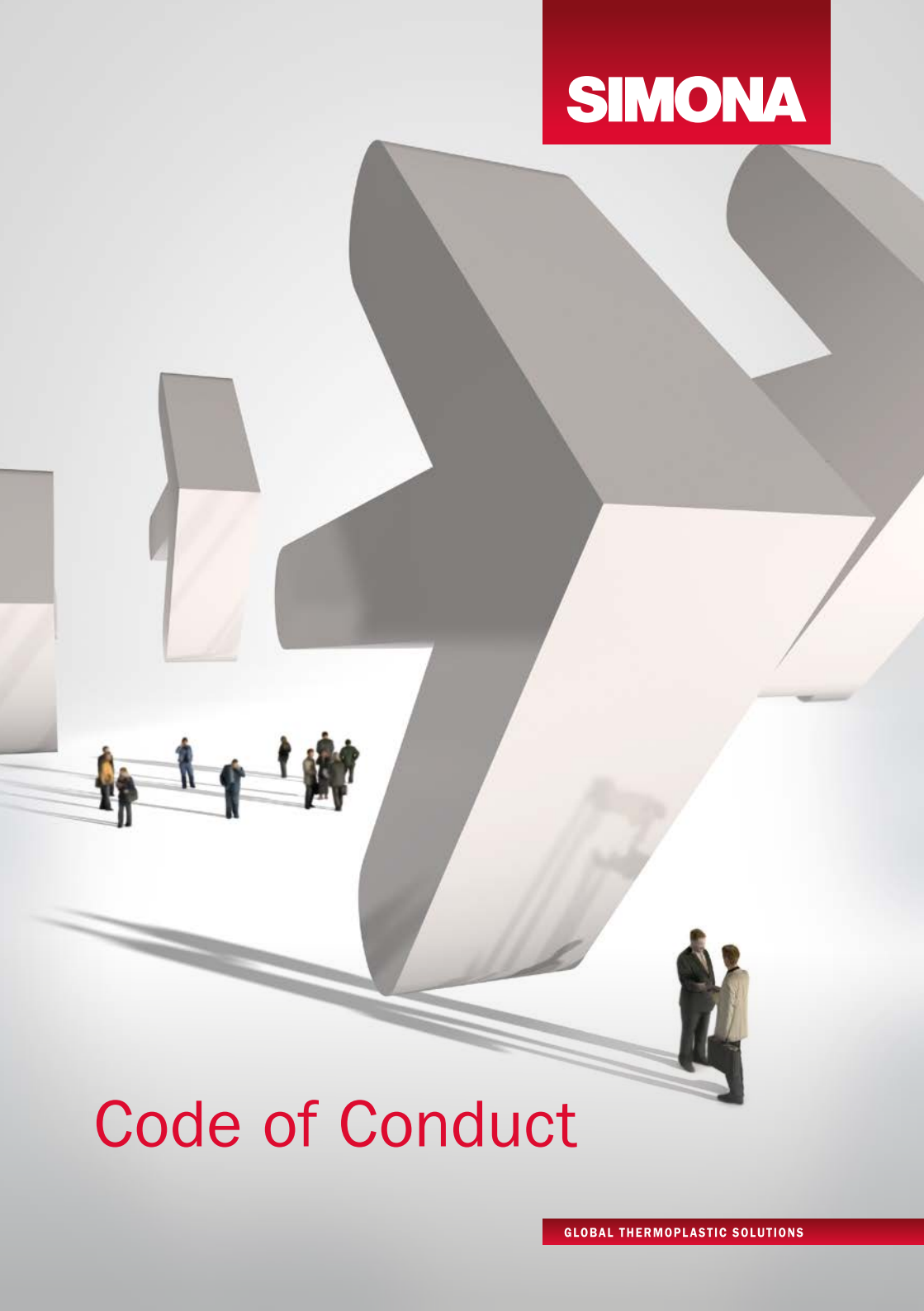


SIMONA




Code of Conduct

GLOBAL THERMOPLASTIC SOLUTIONS

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 The masculine form is used in this report regardless of gender.



The SIMONA Code of Conduct is a self-imposed commitment to ethically sound conduct. It is binding on all SIMONA Group employees worldwide.

Foreword

Dear Members of Staff,

As a global company with a tradition stretching back more than 150 years, SIMONA bears a social responsibility towards its customers, employees, investors and the general public. This responsibility requires us to adhere to applicable laws at all times and in all places, respecting fundamental ethical values and doing business in an exemplary manner. It is incumbent on all of us – from the Management Board and senior managers to individual employees – to assume this responsibility.

This Code of Conduct is designed to help us meet our responsibility. It incorporates important legal provisions and internal company policies that define the conduct required of all SIMONA employees in their dealings with business partners, public officials, other staff members and the company. At the same time, it will help us to make the right decisions. The Code of Conduct cannot, however, address all legal and ethical requirements that you may encounter. All employees are personally responsible for acquainting themselves and complying with applicable laws and major international standards as well as our internal guidelines and regulations.

Every SIMONA employee is an ambassador of the company. In your actions and conduct, you are regarded as SIMONA representatives. In the way we work and act, we can all contribute to a positive perception of SIMONA and underpin the economic success of our company. To this end, managerial staff must set an example to employees, addressing their questions and concerns on observing legal provisions and helping them behave in an ethically sound manner at all times.

We would ask you to familiarise yourself with the content of this Code of Conduct and use it, as we do, as a source of guidance in your day-to-day activities.

Best regards,
Your Global Management Team at SIMONA AG



A handwritten signature in blue ink, appearing to read 'Michael Schmitz'.

Michael Schmitz
Member of the
Management Board
(CFO)



A handwritten signature in blue ink, appearing to read 'Jochen Hauck'.

Dr. Jochen Hauck
Member of the
Management Board
(COO)



A handwritten signature in blue ink, appearing to read 'Matthias Schönberg'.

Matthias Schönberg
Chairman of the
Management Board
(CEO)



A handwritten signature in blue ink, appearing to read 'Adam Mellen'.

Adam Mellen
SIMONA AMERICA
(CEO)



A handwritten signature in blue ink, appearing to read 'Shaobin Wang'.

Shaobin Wang
SIMONA ASIA
(CEO)

About this Code of Conduct

The SIMONA Code of Conduct (hereafter referred to as the 'Code of Conduct') sets forth a commitment to ethically sound conduct. It is binding on all SIMONA Group employees worldwide. The Code of Conduct sets out fundamental, globally applicable standards of behaviour that form the basis of our actions and decision-making. It aims to help employees, senior managers and Management Board members alike understand our corporate principles and do business accordingly. The Code of Conduct defines the behaviour that is expected of you.

Within their day-to-day working routines, individual staff members may be faced with situations that present legal and ethical challenges. In such instances, the following questions may help you take the right decision:

- Is the decision compatible with the company's principles?
- Am I sure that the decision is legal and does not violate statutory provisions?
- Am I convinced that in taking this decision, I am acting properly from a legal and ethical standpoint?
- Does my decision stand up to public scrutiny? How would my decision look in a newspaper report?

The misconduct of a single employee can seriously impair the reputation of our company and impose considerable damage – financial and otherwise – on SIMONA. Our company does not tolerate breaches of the law; nor does it shield anyone responsible for such infringements from official sanctions. Violations of laws, international standards and internal policies may result in disciplinary measures (including the termination of working relationships) as well as civil or criminal prosecutions.

Misconduct is avoidable, provided advice is sought at an early stage. If you are unsure what is required or whether your course of conduct is legally and ethically correct, you are expected to consult your immediate superior, responsible department (e.g. the Legal, Human Resources or Finance department) or the Compliance Officer. In addition, any presumed or actual infringement of laws or company guidelines must be reported to your superior or, if necessary, one of the aforementioned departments, or if appropriate, through the whistleblower system.



01

Legally sound conduct

For SIMONA, compliance with laws and legislation is of the utmost importance. All employees must observe the legal requirements applicable to their job; this applies to all legal systems under which they perform their tasks.

The Code of Conduct cannot encompass all of the legal provisions that SIMONA Group staff members around the world are required to observe; it can only formulate some of the key principles underpinning the responsible conduct of SIMONA and its employees. All employees are therefore personally responsible for acquainting themselves with the legal requirements that apply to their field of activity. Where national laws set down provisions that are stricter than SIMONA's own policies, the national laws shall of course take precedence.

In case of doubt, employees are required to seek guidance from the responsible SIMONA departments. SIMONA will do everything necessary to enable its employees to act in a legally and ethically sound manner.

02

Product safety and product quality

For more than 150 years, SIMONA has been synonymous with quality, diligence and dependability. Ensuring the quality and reliability of our products is the foundation of our success, and thus a centrally important corporate principle.

To attain the highest standards of quality, we are continually working on improvements to our structures and processes to the benefit of our customers. This applies not only to our products and services but also to our internal processes and the manner in which we engage with one another. Our management and staff are committed to acting in line with this process of improvement at all times.

03

Fair competition and antitrust law

SIMONA observes the rules of free and fair competition. Our approach to competition is to rely on performance, customer focus, innovation and the quality of our products and services.

SIMONA observes applicable domestic, foreign and international competition and antitrust laws. All anti-competitive practices are strictly forbidden. It must be clear to all staff members that breaches of provisions of competition law are under no circumstances in the interests of SIMONA. Employees must, without exception, refrain from such violations.

The main anti-competitive actions, which are accordingly strictly prohibited, include the following:

- Overstate or misrepresent the qualities of our products.
- Improper coordination or agreement with competitors on prices, terms and conditions, the allocating of markets, customer groups or regions and limitations on capacity or production.
- Impermissible exchanges of such sensitive information as prices, price changes, margins and discounts with competitors.
- Placing improper influence on dealers in the determination of retail prices. Abuse of a dominant market position.

Infringements attract high penalties and fines for the company and persons committing such acts. In addition, infringements of competition law may inflict serious and lasting damage on the assets and reputation of SIMONA. This damage may take the form of compensation claims by clients, the revocation of agreements with customers and the exclusion from future business.

In all cases of doubt, without exception, early consultation must be made with the Legal department.

04

Prohibition of corruption including bribery and kickbacks

SIMONA does not tolerate corruption in any form in our business dealings. Bribery, the offering or accepting of anything of value to improperly obtain an unfair business advantage, is strictly prohibited without exception and limitation, notwithstanding to whom, by whom, where in the world and for what reason such unlawful advantages would be offered or granted. We would rather forgo a transaction and fail to reach internal goals than act against the law.

Laws aimed at combating corruption are in place worldwide and must be observed by all SIMONA companies and employees. Infringements of these laws can constitute serious offences and give rise to significant damage to both individuals and the company. For this reason, no SIMONA employee shall be entitled to offer, pledge, demand or accept personal advantages (including cash, gifts, offers of entertainment or other material benefits) where this could be construed as an attempt to influence business decisions. This applies to our representatives and agents (including sales representatives, advisors, brokers, agents and similar third parties). SIMONA could be liable for the misconduct of such persons.

Experience has shown that the issue of gifts and courtesies in connection with day-to-day business activity gives rise to many questions from employees. You can avoid unintentionally committing an offence by consulting your superior or the Compliance Officer in case of doubt.



05

Conflicts of interest, gifts and invitations

The SIMONA Group's governing bodies, senior managers and staff are obliged to avoid any conflict of interest or the appearance of a conflict between personal interests and the interests of SIMONA. Business-related decisions on behalf of SIMONA must not be influenced by private interests or personal relationships.

The proper way to deal with potential conflicts of interest is to disclose all relevant facts in full. Also with regard to gifts and invitations only absolute transparency can protect SIMONA and affected employees from damage. Gifts and invitations might leave the appearance that the person giving or receiving the gift or invitation will expect a benefit in return, and even this appearance has the potential to impair the reputation of individuals and SIMONA itself.

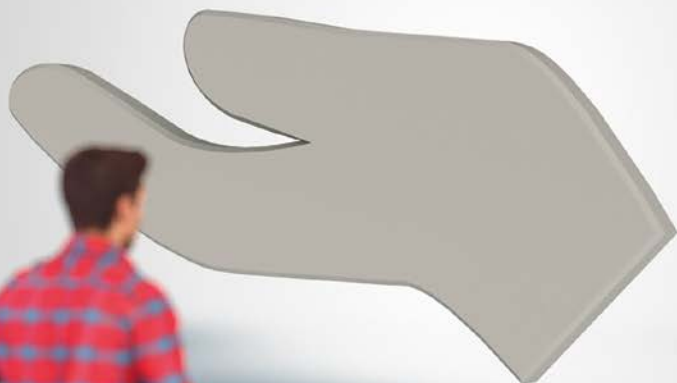
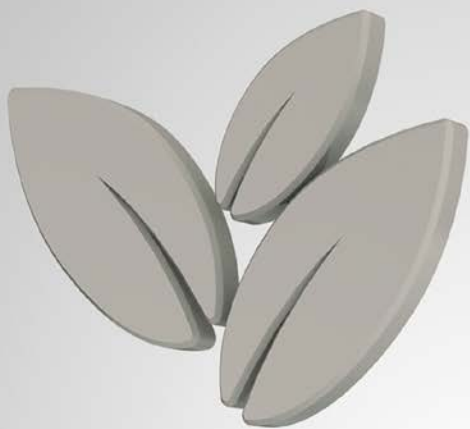
Therefore, employees must always refrain from accepting gifts or inappropriate invitations from business partners. The only exceptions to this are low-value gifts such as promotional items or gifts of a suitably representative nature. Gifts (value limit 50) and invitations sent to private addresses may not be extended or accepted.

The giving of high-quality gifts, monetary donations and financial benefits to employees and representatives of other companies is expressly forbidden. Gifts may only be given where appropriate (value limit €25) and no consideration is expected in return. Please give priority to promotional gifts.

Expenses for food and drink are not covered by the above value limits, but must be reasonable. Gifts to and invitations of public officials are highly sensitive in virtually all jurisdictions, and are therefore prohibited as a rule.

To avoid even the appearance of unlawful conduct, you should always discuss cases of doubt with your immediate superior or the Compliance Officer.





06

Health and safety in the workplace

SIMONA is obliged to provide safe and healthy working conditions for all of its employees and is committed to improving the working environment for staff continuously. Observance of high standards in the area of workplace safety is regularly monitored; training courses in occupational safety are also held.

Each and every employee can help to keep the working environment at SIMONA safe. The following rules of conduct should be self-evident:

- Comply with guidelines on health and safety in the workplace.
- Carry out your duties with the caution necessary to ensure nobody is put at risk.
- Act with the requisite care and consideration to avoid hazardous situations. In the event that a dangerous situation is unavoidable, take steps to ensure the problem is solved immediately and your colleagues are informed accordingly.
- Report all incidents that jeopardise safety to your superior and those responsible for workplace safety.

07

Use of company resources

SIMONA makes company resources available to all staff members with a view to achieving our shared objectives. The efficient utilisation of all resources at every level is critical to the longterm success of the company.

The wastage or misuse of company resources (including working time) adversely affects the operational and financial performance of SIMONA, which in turn affects us all. Every employee can play their part by remembering the following:

- Act in a cost-conscious manner and think carefully about whether an expenditure is necessary and proportionate.
- Act in an energy-conscious manner and play an active part in energy conservation.
- Handle company property with care. Protect company property from damage, destruction and theft.

08

Confidentiality, protection of intellectual property and data protection

Intellectual property is a valuable asset and basis of the company's success. This property must therefore be protected. Intellectual property includes inventions, production processes, formulations, product ideas, customers, supplier information and business secrets.

All employees must contribute to the safeguarding of this property confidential corporate information must be kept secret and may only be used for business-related purposes. In particular, confidential information must not be passed on to unauthorised persons, which includes friends and family.

SIMONA takes steps to ensure modern information and communications technology is used properly. Personal data relating to our customers, contracting partners and employees is accorded maximum protection and may only be collected and used within the framework of applicable law.

09

International trade and the prevention of money laundering

Legal requirements that pertain to international commerce that apply to our products and services are binding. We comply with all applicable import and export bans imposed by national and international law as well as all government prescribed approval requirements.

SIMONA meets its legal obligations to prevent money laundering and takes no part in money laundering activity. In cases of doubt, employees are encouraged to ask the competent Finance and Legal departments to review unusual financial transactions that could give rise to suspicions of money laundering (and especially those involving cash).

10

Insider trading law

As a listed company, SIMONA AG is subject to strict securities law provisions, which amongst other things, preclude insider trading by employees of the SIMONA Group. For this reason, confidential information regarding internal activities and other affairs may only be used for operational purposes, shared internally only on a need-to-know basis, and must not be passed on to third parties. In this context, 'third parties' include family members. Therefore, please ensure confidentiality, especially in times of mobile or remote work. Personal utilisation and/or unauthorised disclosure to other persons of details of confidential information that if made public, could have an effect on the market price of securities, and in particular the share price of SIMONA AG, ('insider information'), are prohibited by law and punishable as a criminal offence. Recommendations to other persons to acquire or sell securities on the basis of insider information is also prohibited.

Examples of insider information include unpublished financial information and information concerning the planned acquisition or sale of substantial businesses or shareholdings. The insider trading guidelines of SIMONA AG provide further regulatory guidance.

11

Diversity, Equity and Inclusion

As an international company, SIMONA stands for diversity, tolerance and equal opportunity. We believe in a diverse, equitable, and inclusive workplace. The diversity of our staff members promotes creativity and enables us better to understand our custom-ers around the world.

Therefore, discrimination cannot be allowed to influence decision-making in any part of the company. There can be no discrimination on the basis of gender, age, race, ethnic/national origins, religion, ideology, sexual orientation, gender identity, disability status and other factors.

All employees can contribute to the success of SIMONA by respecting the diversity of the company. Needless to say, staff members are required to deal with each other in a professional, friendly and fair manner and work together constructively on the basis of trust. Furthermore, all employees are expected to recognise the dignity, privacy and personal rights of the individual. Discrimination, harassment and insults are unacceptable.



12

Human rights and employee rights

SIMONA and all employees respect and help to uphold internationally accepted human rights. We completely reject all forms of forced labour and child labour. We recognise the right of our employees to establish trade unions and representative bodies on a democratic basis in accordance with national regulations. These principles apply to any interaction within the SIMONA Group as well as the conduct towards our suppliers and business partners. We also must ensure that the principles are upheld by our business partners.

13

Responsibility to the environment

Long-term protection of the environment and the climate, which goes hand in hand with the efficient use of resources, is an important corporate goal for SIMONA. In the development of new products and services and the operation of production facilities, we are fully committed to minimising the associated impact on the environment and the climate, and to ensuring our products deliver a positive contribution to environmental and climate protection on the part of customers. To achieve this, all employees are responsible for utilising natural resources sparingly and contributing to environmental and climate protection through their personal conduct.

Implementation and observance of the Code of Conduct

All SIMONA Group employees have been provided with a copy of this Code of Conduct in German and English. The obligation to comply with the principles set out in the Code of Conduct arises either directly from legislation, company policies and guidelines or through an employment contract (if applicable). Material breaches of the Code of Conduct may result in consequences under employment law, civil law or criminal law.

Given that our executives fulfil an important role in terms of leading by example, their actions are subject to the Code of Conduct. Managers are the first point of contact for staff seeking clarification of the principles contained in the Code of Conduct and applicable regulations. Their task is to ensure all employees are familiar with and understand the Code of Conduct. Within the scope of their managerial duties, they must preclude unacceptable behaviour and take suitable measures to prevent infringements of the applicable laws in their fields of responsibility. An open and honest flow of information and mutual support are signs of the positive cooperation that exists between employees and their managers on the basis of trust. The SIMONA guidelines for managers also apply.

All staff members are encouraged to report violations of the Code of Conduct to their immediate superior, responsible department (e.g. the Legal, Human Resources or Finance department) or the Compliance Officer. No employee who reports presumed or actual infringements has to fear any sanction or discrimination.

Questions on the Code of Conduct should be addressed to the Compliance Officer at SIMONA AG.

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