

Customer Value through Innovation



CODE OF CONDUCT



Valid from April 1, 2016

For NORMA Group SE and its direct and indirect subsidiaries

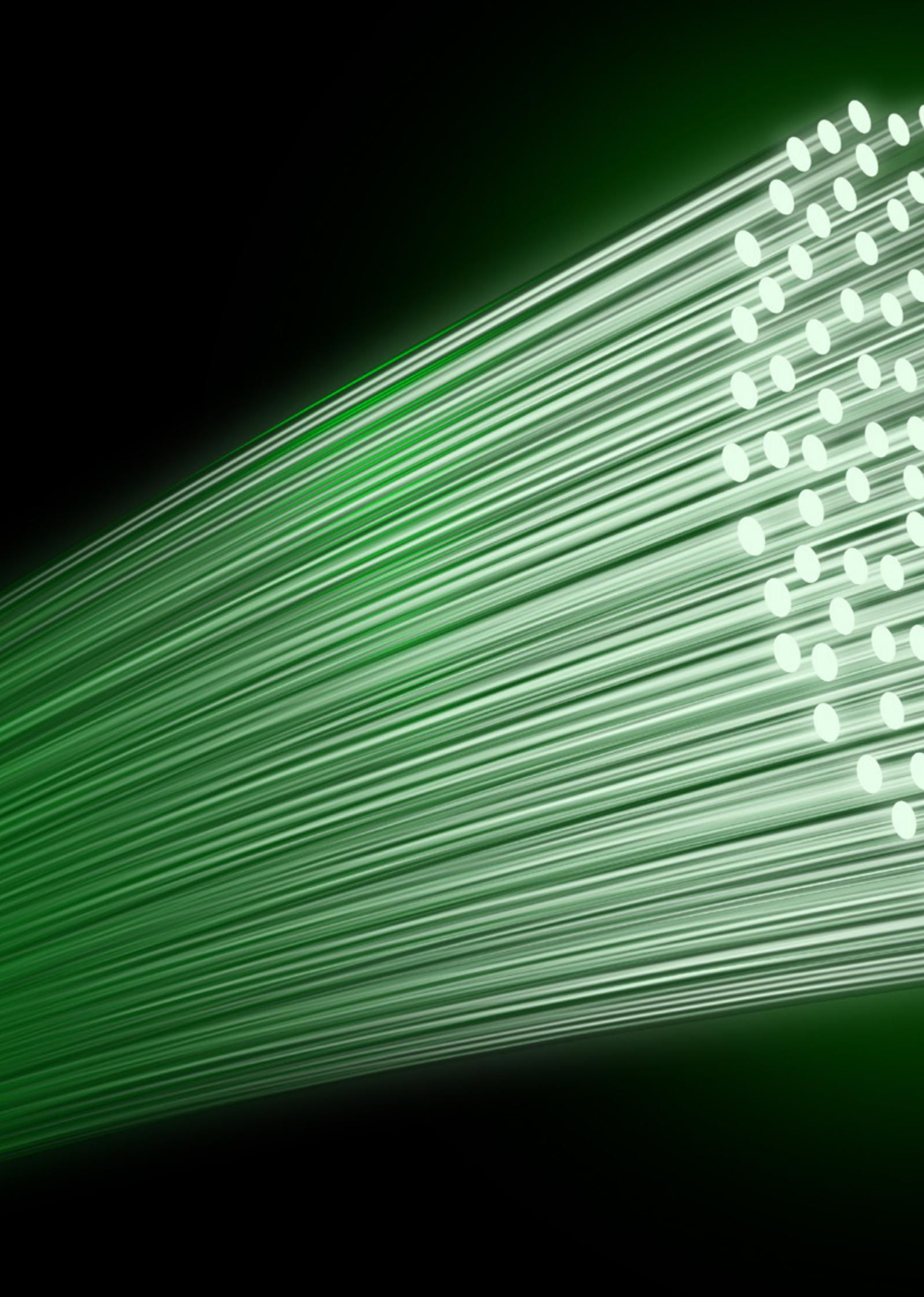
NORMA – a NORMA Group brand

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1. INTRODUCTION

The reputation and integrity of NORMA Group SE and its direct and indirect subsidiaries ("NORMA Group") is a valuable asset that is vital to NORMA Group's success. You and each other director, officer, manager and employee of NORMA Group (collectively referred to as "employees"), are responsible for conducting NORMA Group's business in a manner that demonstrates a commitment to the highest standards of integrity. This Code of Conduct, which applies to all employees, has been created to help meet these standards. Specifically, the purpose of this Code of Conduct is:

- **to encourage among our employees a culture of honesty, accountability and mutual respect;**
- **provide guidance to help you to recognize and deal with ethical issues; and**
- **to provide mechanisms to report unethical or inappropriate conduct.**

While this Code of Conduct is designed to provide helpful guidelines, it is not intended to address every specific situation. Nevertheless, in every instance, we require that you act honestly, fairly and with a view towards "doing the right thing". Therefore, dishonest

or unethical conduct or conduct that is illegal violates this Code of Conduct, regardless of whether such conduct is specifically referenced in this Code of Conduct. Such violations may result in disciplinary sanction up to and including dismissal.

NORMA Group has designated a Chief Compliance Officer who is responsible for implementing and administering the Code of Conduct, and implementing the guidelines and policies required by the Code of Conduct. The Chief Compliance Officer is supported by Regional and Local Compliance Officers. They monitor if the Code of Conduct and its sub-policies have been implemented effectively and report to the Chief Compliance Officer. The Chief Compliance Officer reports accordingly to the Chief Executive Officer of NORMA Group.

If you have any questions regarding this Code of Conduct, our guidelines or policies, feel free to direct your questions to the Regional and Local Compliance Officers and the Chief Compliance Officer. A current list of NORMA Group's Compliance Officers and their contact information can be found in the appendix.

2. OVERVIEW

We as NORMA Group:

- expect and require you at all times to act honestly and ethically when you are performing your responsibilities for NORMA Group;
- expect and require you to comply with all applicable governmental laws, rules and regulations;
- expect you to treat others, including other employees, stockholders, customers and vendors, in a professional manner; and
- encourage and support internal disclosure of any violation of this Code of Conduct for appropriate action.



3. RAISING CONCERNS AND REPORTING IMPROPRIETY

NORMA Group encourages you to openly discuss compliance issues. Often, asking a question is the best way to determine whether an action is proper and to ensure that we comply with applicable laws. Any question concerning this Code of Conduct, our guidelines and policies can be addressed to your Compliance Officers.

We expect that all our employees conduct themselves in a manner consistent with our values and commitment to ethical conduct. To this end, if you become aware of, or reasonably suspect that there will be or has been a violation of any laws, rules, regulations applicable to NORMA Group's business, NORMA Group's policy or this Code of Conduct, – as a first step – promptly consult your immediate supervisor. He or she is responsible for taking necessary steps to resolve the issue. In case your immediate supervisor does not take the necessary measures or in case he or she may be involved

in the alleged misconduct, please contact a more senior manager, your Compliance Officer or

compliance@normagroup.com

You may also contact the Chief Compliance Officer directly. A current list of NORMA Group's Compliance Officers and their contact information is attached for your convenience in the appendix.

Where permitted by local law, you, any other NORMA Group employee, as well as any third party can anonymously report any kind of actual or alleged misconduct relating to NORMA Group using the BKMS® Whistleblower System. The BKMS® Whistleblower System can be accessed via

<https://www.bkms-system.net/normagroup>



4. PERSONAL INTEGRITY

4.1. CONFLICTS OF INTEREST

You are expected to put the interests of NORMA Group ahead of your personal interests or those of any other person or company. You must avoid Conflicts of Interest. A conflict of interest exists when your private interests interfere or could reasonably potentially interfere with the business interests of NORMA Group.

Examples of Conflicts of Interest include:

- **Having outside employment or business or civic affiliations or ventures (including board memberships) that interfere with your ability to perform your duties for NORMA Group in an objective, effective and timely manner.**
- **Having a direct or indirect financial interest in a customer, vendor or supplier.**
- **Engaging in personal investment or business ventures that compromise or give the appearance of compromising your ability to make decisions in the best interests of NORMA Group.**
- **Selecting suppliers, contractors or vendors based on a close personal relationship.**

Detailed guidance on handling of Conflicts of Interest is included in NORMA Group's Conflicts of Interest-Policy.

4.2. INSIDER TRADING

NORMA Group SE and some of the companies we do business with are a publicly traded company. This places you in a position to potentially obtain material non-public information regarding NORMA Group or NORMA Group customers and business partners. Trading on the basis of material non-public information can result in insider trading liability and accordingly, is taken very seriously. Regardless of whether you are listed in an insider list or not, you must refrain from using any non-public information (whether or not you view it as material) you have learned about NORMA Group SE or any publicly traded company for purposes of making investment decisions. Consistent with NORMA Group's confidentiality and proprietary information policy as described in this Code of Conduct (see section 7.2), you may not disclose such information to any other party, for any purpose, including, but not limited to, for the purpose of that third party engaging in investment activities.

Non-public information includes, but is not limited to:

- **development of new products or services;**
- **unannounced mergers and acquisitions;**
- **advance notice of changes in senior management;**
- **non public financial results; and**
- **pending or threatened litigation.**

The consequences of violating insider trading laws can be severe. In the event that you may have inadvertently disclosed insider information or have questions about whether your actions or the actions of another person may violate the Code of Conduct or insider-trading laws, please contact your Compliance Officer.

5. CORPORATE INTEGRITY

5.1. COMPLIANCE WITH LAWS

As a multinational company, we are subject to the laws of the many jurisdictions in which we operate. We are committed to conduct our affairs in a manner consistent with all applicable laws. Being a NORMA Group employee, you are expected at all times to conduct NORMA Group business in accordance with all applicable national, regional, local and foreign laws, and applicable NORMA Group policies. NORMA Group condemns all acts that violate any applicable law, rule or regulation, even when such action appears to be in NORMA Group's best interest and is motivated by your best intentions.

In most cases, simply doing the right thing will avoid any violations of law. However, some legal concepts and areas of regulation are a challenge for all of us. If you are uncertain of whether or not a particular action or transaction violates applicable laws, rules or regulations, please do not hesitate to contact your Compliance Officer.

5.2. ANTI-CORRUPTION LAW COMPLIANCE

Any action you perform and all decisions you make for NORMA Group are subject to a wide range of applicable anti-corruption laws. This is simply a reflection of our international work environment. As a matter of example, anti-corruption legislation such as the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and the German Criminal Code has an impact on our daily work-flows and actions taken by NORMA Group employees. These laws share a common denominator which you need to bear in mind at all times: In the broadest sense, these laws prohibit NORMA Group and its officers, directors, employees, agents, affiliates or any other partners from directly, or indirectly through third parties as may arise from time to time, offering, promising, authorizing or giving anything of value (e.g. money, gifts, rewards, hospitality or other inducements) to any government official or private party (i.e. vendor, supplier, contractor, customer or representative), anywhere in the world, for purposes of improperly obtaining or retaining business, gaining influence, favorable treatment or any other advantage for the Company or another party (active corruption). Under many of these laws, it is equally prohibited to request, agree to receive or accept such an improper advantage personally or for any other per-

son or entity (passive corruption). Anywhere in the world you are expected never to engage in any kind of corrupt conduct. Never let your actions be driven by the goal to improperly obtain or retain business, to gain influence, favorable treatment or any other advantage for NORMA Group or another party. You are furthermore expected never to request, never to agree to receive, and never to accept any such improper advantage for you personally or for another person or entity.

All applicable anti-corruption laws as well as NORMA Group's Anti-Corruption Policy bind NORMA Group employees. To facilitate your decision-making to greatest extent possible, NORMA Group's Anti-Corruption Policy identifies the prohibited conduct and defines clearly which advantages to be given or received are subject to mandatory pre-approval. It also explains NORMA Group's expectations when you conduct affairs on behalf of NORMA Group. For your convenience, NORMA Group's Anti-Corruption Policy also provides forms to be used in connection with (i) giving or receiving advantages, (ii) donations and sponsoring as well as (iii) any third party matters.

5.3. WORKING AND INTERACTING WITH GOVERNMENT AGENCIES & GOVERNMENT OFFICIALS

In the course of conducting business affairs you may need to interact with government agencies, ministries or offices in order to obtain permits, licenses or other approvals. If conducted improperly, interacting with governments and government officials can result in significant legal risks to NORMA Group and even to you personally.

When engaging in such interactions, it is therefore important to obey the following simple rules:

- **Do not make any payments to a government official (including indirectly through third parties). Refrain from even creating the appearance that such a payment could be made for the purpose of improperly influencing their opinions or actions.**

- **Be attentive where gifts, hospitality or entertainment are/is being provided to a government official. In particular granting a donation or charitable or political contribution at the request or suggestion of a government official should capture your attention.**
- **Remind yourself that all interactions with or connected to government officials conducted by you as NORMA Group employee must be consistent with any applicable law, this Code of Conduct and all applicable NORMA Group policies such as the Anti-Corruption Policy.**

You must always receive pre-approval from your Compliance Officer before giving or accepting any advantage to or from a government official.

5.4. ANTI-MONEY LAUNDERING

NORMA Group is committed to complying with all applicable anti-money laundering laws, rules and regulations. Our values require that we take steps to ensure that we will only conduct business with reputable vendors, suppliers, contractors and customers involved in legitimate business activities with funds derived from legitimate sources. Money laundering is broadly defined as engaging in a transaction with criminally derived property, structuring a transaction in order to avoid detection of criminal conduct or engaging in a transaction in furtherance of criminal conduct. Be alert, in particular, to the following:

- **Requests for cash payments.**
- **Country where business partner is located deviates from country where its bank is located.**

- **Unreasonable splitting of transactions.**
- **A business partner uses multiple accounts or suddenly changes its accounts.**

NORMA Group's Compliance Officers can provide you with further guidance on red flags of money laundering and requirements to prevent NORMA Group from being involved in any money laundering conduct. If you have any questions about whether a vendor, supplier, contractor or customer may be involved in money laundering, please contact your Compliance Officer.

In case you recognize any suspicious facts, consult immediately with your Compliance Officer.

5.5. CUSTOMER AND SUPPLIER RELATIONS

Our success depends upon deep and trusting relationships with our customers and suppliers. When dealing with customers and suppliers, you must act ethically, fairly, courteously, competently and timely. In furtherance of these objectives:

- **You must act in a professional and courteous manner at all times and avoid misleading customers and suppliers.**
- **You must only make claims about our services that you know to be true or have adequate information to support.**
- **You must not misuse or disclose confidential or proprietary customer or supplier information.**
- **You must truthfully represent the nature and quality of our services, prices, contractual terms and other information.**
- **When dealing with suppliers, vendors or customers, you must ensure full compliance with our Anti-Corruption Policy.**

5.6. AGREEMENTS WITH AGENTS/CONSULTANTS

From time to time, our business may require us to hire agents, consultants, or other third parties to provide services on behalf of NORMA Group (“Third Party Representative”). Any Third Party Representative we hire must meet our ethical standards and be capable of sufficiently performing their assigned duties. All arrangements with a Third Party Representative must be in writing. Contracts with agents and similar distribution agreements should be aligned with a Compliance Officer.

You may not retain any Third Party Representative or make any payments to a Third Party Representative unless authorized by the appropriate NORMA Group manager in a manner consistent with NORMA Group’s Delegation of Authority and Four-Eyes-Principle. Additional guidance on the interaction with Third Party Representatives is included in NORMA Group’s Anti-Corruption Policy.



5.7. ACCURATE BOOKS, RECORDS AND PUBLIC DISCLOSURES

The effective operation of NORMA Group's business, and the integrity of NORMA Group's public disclosures, is dependent on accurate business records. You must prepare and maintain all company records accurately and honestly. No false or misleading entries may be made in any books, records or accounts of NORMA Group and no NORMA Group funds may be used for any purpose other than as described in the documents supporting the disbursement.

NORMA Group personnel engaged in the preparation of these filings, submissions and communications must endeavor to ensure that NORMA Group's filings, submissions, and communications accurately and fairly reflect NORMA Group's transactions and provide full, fair, timely, accurate and understandable disclosure.

If you are responsible for any aspect of our internal accounting controls and financial and tax reporting systems, you must be vigilant in recording entries accurately and honestly and in a manner consistent with all legal requirements. If you are uncertain about proper recording of company transactions or accounting or tax matters, you should consult with a manager.

You must not take any action to fraudulently influence, coerce, manipulate or mislead any auditor engaged in the performance of an audit of NORMA Group financial statements. Complaints or concerns regarding accounting, internal accounting controls or auditing matters should be reported as indicated in section 3 of this Code of Conduct.

5.8. EMBARGO LAWS, TRADE SANCTIONS, EXPORT CONTROL

NORMA Group's international operations can trigger issues under applicable trade sanctions and trade embargo laws. Trade embargo laws and regulations generally prohibit companies located in a particular country from doing business in another specific country. On the other hand, sometimes a country makes it illegal for companies operating within their jurisdiction to recognize embargoes put in place by another country. You must act in accordance with all applicable laws, rules and regulations relating to embargo laws and trade sanctions. NORMA Group monitors these embargoes and sanctions and implements controls to make sure we follow them.

5.9. FAIR COMPETITION AND FAIR DEALING

NORMA Group's mission is to maintain its status as a global market and technology leader in Engineered Joining Technology solutions through ethical and legal conduct, and not resort to anti-competitive behavior. Although we recognize the importance of identifying NORMA Group's strengths and our competitors' weaknesses, you may not seek a competitive advantage for NORMA Group through fraud, concealment, misrepresentation of material facts, or illegal means. NORMA Group also does not condone theft of trade secrets and non-public information and you must avoid unauthorized use of any patented, copyrighted, privileged or confidential information.

5.10. ANTITRUST

Antitrust and competition laws seek to protect competition by prohibiting anti-competitive behavior that results in decreased competition, unjustified price discrimination or produces other artificial forces in the market. Antitrust laws exist in virtually all countries and apply to conduct at all levels of an organization. In general terms, antitrust laws require companies to compete on an individual basis rather than join with other companies in agreements to restrict individual competition. Any kind of concerted actions, informal talks or agreements that are intended to restrict competition or may have the effect of doing so, are prohibited. Even the appearance of anti-competitive behavior should be avoided. You should be particularly careful at association meetings and trade shows.

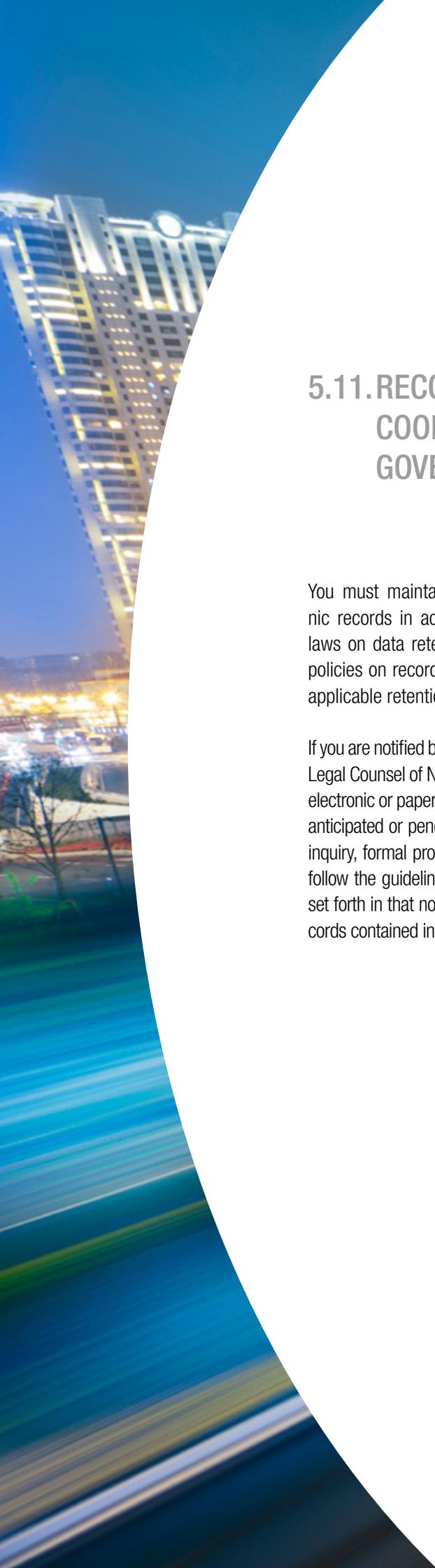
To avoid participating in prohibited anti-competitive behavior, you must not:

- **intentionally or unintentionally exchange competitively-sensitive information with competitors, for example by talking to competitors about prices, output, capacities, sales, bids, profits, profit margins, costs, methods of distribution or any other parameter that determines or influences NORMA Group's competitive behavior;**
- **undertake informal discussions and unwritten agreements in relation to behavior that could have an impact on competition;**
- **enter into any actual or inferred agreements with competitors to:**
 - **raise, lower or stabilize prices or other terms and conditions of sale;**
 - **influence the award of a tender;**
 - **boycott or refuse to deal with certain customers or suppliers;**
 - **reduce output of services;**
 - **allocate clients, services, market, production programs or geographic territories;**
 - **coordinate on employees' wages and benefits, except as permitted by specific labor laws;**
 - **submit offers when not intending to obtain a contract.**
- **fix the resale prices charged by our customer or set a minimum resale price;**
- **provide our services at predatory or below-cost pricing;**
- **enter into exclusive arrangements that deny a competitor access to an excessive proportion of the market;**
- **as a condition of receiving our services, require a customer or client to purchase another service from us or a product or service from a third party.**

The consequences of violating these laws are severe. You must not misuse or disclose confidential or proprietary customer or supplier information.

You must truthfully represent the nature and quality of our services, prices, contractual terms and other information.

When dealing with suppliers, vendors or customers, you must ensure full compliance with our Anti-Corruption Policy.



5.11. RECORD MANAGEMENT AND RETENTION AND COOPERATION WITH INVESTIGATIONS AND GOVERNMENT REPORTING

You must maintain all paper and electronic records in accordance with applicable laws on data retention and NORMA Group policies on records management, including applicable retention periods.

If you are notified by any Compliance Officer or Legal Counsel of NORMA Group that you have electronic or paper records that are relevant to anticipated or pending litigation, investigation, inquiry, formal proceeding or audit, you must follow the guidelines for retaining documents set forth in that notice. Do not destroy any records contained in the notice.

You must follow all requests made by NORMA Group management or the government for information or records related to any investigation or government report. Do not conceal, alter, falsify or destroy any records management or the government requests, as this could lead to criminal prosecution for you and NORMA Group.

If you believe documents are being concealed, altered, falsified or destroyed, you should immediately report this in accordance with section 3 above.

5.12. DATA PRIVACY

NORMA Group treats personal data of employees, customers, suppliers and other affected individuals confidential and protects their personal data. Personal data can be any information relating to an employee, customer, supplier and other affected individual making it possible to identify such individual in particular by an identification number or one or more factors specific to

his physical, physiological, mental, economic, cultural or social identity. NORMA Group only collects, processes or uses personal data if NORMA Group is required to do so by law or if necessary for business or employment purposes. NORMA Group treats such personal data as confidential and protects it.

5.13. ENVIRONMENTAL PROTECTION

NORMA Group complies with all applicable environmental laws, standards and requirements and takes a proactive and long-term view on environmental matters to prevent pollution and continuously improve environmental performance.

Environmental protection and product safety is of great importance, not only for NORMA Group's reputation but

also for our customer's safety and future generations. NORMA Group is conscious of the great importance of environmental protection in developing and manufacturing its products. We support national and international efforts to ensure the health of the environment. It is everyone's responsibility to take care that environmental laws are properly observed and resources are used efficiently.



6. EMPLOYMENT

6.1. HEALTH AND SAFETY

It is the policy of NORMA Group to comply with all applicable environmental health and safety laws and regulations. NORMA Group is committed to creating and maintaining a safe working environment and preventing workplace injuries. You are responsible for recognizing hazards, taking steps to correct them, making certain that safe working conditions exist and that safe operating practices are observed. If you observe an unsafe condition, you should warn others, if possible, and immediately report the condition to your manager or local workplace safety contact.



6.2. FAIR EMPLOYMENT PRACTICES

NORMA Group is committed to complying with all laws relating to freedom of association, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor, and employment discrimination. Beyond legal compliance, NORMA Group strives to create a positive environment that is free of improper

harassment and bullying and considerate of all employees wherever they may be located. All employment decisions should be based upon the qualifications and performance of the individual, the particular job requirements, and business needs.

6.3. NON-RETALIATION POLICY

Do not harass or retaliate against an employee or other person who, in good faith, reports a violation or suspected violation of the law or NORMA Group policies. If you believe you have been retaliated against for reporting an actual or potential violation in good faith, report this matter to your Compliance Officer or the local Human Resources Department.

7. NORMA GROUP ASSETS

7.1. PROTECTION AND PROPER USE OF NORMA GROUP ASSETS

NORMA Group property and assets may only be used for legitimate NORMA Group-related business purposes. You are responsible for ensuring that NORMA Group's property is not misused, wasted or damaged. Unless authorized to do so, you are also prohibited from using or taking NORMA Group property for your personal benefit or gain. You may not provide third parties with any NORMA Group property, unless you are authorized to do so in a legitimate business transaction. NORMA Group property includes, but is not limited to:

- **Use of work equipment (i.e. laptops, internet, email, mobile phones), including approved personal use authorized in accordance with applicable NORMA Group policies.**
- **Office supplies, materials and services.**

7.2. CONFIDENTIAL AND PROPRIETARY INFORMATION

Confidential and proprietary information is one of a company's most valuable assets. Without prejudice to any obligation contained in your employment contract or any other document, you may not disclose NORMA Group's confidential and proprietary information without authorization. Similarly, you may not disclose the confidential information of NORMA Group's customers, vendors or suppliers without authorization. You must safeguard NORMA Group's and any competitor's, vendor's, supplier's, contractor's, customer's, representative's confidential and proprietary information. You may not use or allow anyone else to use any such confidential and proprietary information, except as required by your job responsibilities.

These obligations apply during working and nonworking hours, whether or not the information is specifically designated as "Confidential" or "Restricted", and extend beyond your employment with NORMA Group. Examples of confidential or proprietary information include inter alia

- **non-public sales, pricing and marketing strategies;**
- **accounting information and non-public financial data, customer lists and contacts;**
- **non-public information regarding NORMA Group products, processes, practices, methods, designs, developments, production manufacturing or services;**
- **development or experimental work in progress;**
- **trade secrets of customers and NORMA Group;**
- **possible acquisitions and divestitures; and**
- **non-public information relating to customer agreements.**



7.3. SOCIAL MEDIA

Social media forms an important part of today's business and is becoming more and more important. "Social media" refers to the means of interactions among people in which they create, share, exchange and comment on content among themselves in virtual communities and networks. Social media include social networks (e.g., Twitter, Facebook, LinkedIn), blogs, wikis and video streaming websites (e.g. Youtube). NORMA Group manages the contents of the official company pages on social media in a centralized manner. Therefore, do not create any NORMA Group pages on any social media platform.

Keep in mind that postings, both personal and professional, may ultimately be connected to NORMA Group, even if your affiliation with NORMA Group is not disclosed. Therefore, when you are active on social media, you must

- **be honest, accurate and respectful;**
- **be open about your affiliation with NORMA Group if it is relevant to the issue;**
- **make it explicitly clear that your opinions are personal and may not represent the position of NORMA Group.**

Please also consult NORMA Group's Social Media Guidelines.

7.4. COPYRIGHTS, PATENTS, AND TRADEMARKS

Intellectual property forms an important part of our economic success and the success of our business partners and customers. You are expected to protect our intellectual property, including any patents, trademarks, trade secrets, technical and scientific knowledge, and expertise developed in the course of our business. You are required to respect the intellectual property of others. Unauthorized duplication or misappropriation of another's intellectual property may subject you and NORMA Group to significant fines and criminal penalties.

7.5. IT SECURITY

Confidentiality of postal correspondence and telecommunications must be maintained at all times. Therefore, pay particular attention to IT aspects of confidentiality such as data protection and data security and protect your computer from unauthorized access by necessary appropriate measures (e.g. changes of password). Do not make any transcripts or copies of data for other than operational purposes and do not access information that is unrelated to your own activities. Do not save confidential business information in public clouds. Have a healthy distrust especially when it comes to business-related topics in social networks or other public portals. Please consult the ICT policies on IT Security and contact your IT Department in case of any question.

8. NORMA GROUP CODE OF CONDUCT CERTIFICATION

Although this Code of Conduct does not form part of individual contracts of employment, all employees should acknowledge this Code of Conduct and comply with it, unless local applicable laws provide otherwise.

9. DEFINITIONS

Anti-Corruption Policy:	NORMA Group's Anti-Corruption Policy in its most recent version.
Chief Compliance Officer:	The acting Chief Compliance Officer as stated in the appendix.
Code of Conduct:	The Code of Conduct of NORMA Group in its most recent version.
Compliance Officer:	Any Local or Regional Compliance Officer or the Chief Compliance Officer of NORMA Group (appendix).
Employee:	Each director, officer, manager and employee of NORMA Group (including interns and temporary employees).
FCPA:	U.S. Foreign Corrupt Practices Act.
NORMA Group:	NORMA Group SE and its direct and indirect subsidiaries.
Third Party:	Any person other than employees, and any legal entity other than NORMA Group.
Third Party Representative:	Persons or entities engaged by NORMA Group to sell, market or provide goods or services for NORMA Group, including distributors and sales agents, as well as persons and entities that otherwise act on behalf of or provide services to NORMA Group, including in certain cases business partners, suppliers and vendors. In particular customers of NORMA Group do not fall under the definition of "Third Party Representatives".

APPENDIX:

LIST OF COMPLIANCE OFFICERS

GROUP	CONTACT	
Chief Compliance Officer NORMA Group Worldwide	Matthias Lohmann +49 6181 61027 610	Matthias.Lohmann@normagroup.com
Local Compliance Officer NORMA Group SE & NORMA Group Holding GmbH	Dr. Gisa Ortwein +49 6181 61027 611	Gisa.Ortwein@normagroup.com
EUROPE, THE MIDDLE EAST AND AFRICA		
Regional Compliance Officer Europe, the Middle East and Africa	Caterina Crescente +49 6181 403 285	Caterina.Crescente@normagroup.com
Local Compliance Officer Czech Republic/Hustopec	Andrea Hillova +420 519 440 332	Andrea.Hillova@normagroup.com
Local Compliance Officer France/Courcouronnes Evry Cedex & Briey	Joel Lahir +33 3 82 47 13 00	Joel.Lahir@normagroup.com
Local Compliance Officer Germany/Gerbershausen	Eva-Maria Hots +49 36081 62981	Eva-Maria.Hots@normagroup.com
Local Compliance Officer Germany/Maintal	Harald Weigand +49 6181 403 227	Harald.Weigand@normagroup.com
Local Compliance Officer Germany/Marsberg	Michael Hafner +49 2992 907 188	Michael.Hafner@normagroup.com
Local Compliance Officer Italy/Gavardo	Laura Pasini +39 03651901036	Laura.Pasini@normagroup.com
Local Compliance Officer Netherlands/Purmerend	Manon Snoek +31 299 462062	Manon.Snoek@normagroup.com
Local Compliance Officer Poland/Pilica & Krakau	Marta Rachwal +48 32 67 36 733	Marta.Rachwal@normagroup.com
Local Compliance Officer Russia/Togliatti	Julia Mukhieva +7 8482 63 50 41	Julia.Mukhieva@normagroup.com
Local Compliance Officer Serbia/Subotica	Roland Hancik +381 24 644 595	Roland.Hancik@normagroup.com
Local Compliance Officer Spain/Barcelona	Xavier Carmona +34 93 432 99 55	Xavier.Carmona@normagroup.com
Local Compliance Officer Sweden/Anderstorp	Jenny Bergström +46 371 588 819	Jenny.Bergstrom@normagroup.com
Local Compliance Officer Switzerland/Tagelswangen	Mauro Pivetta +41 52 354 68 07	Mauro.Pivetta@normagroup.com
Local Compliance Officer Turkey/Istanbul	Ilke Demirkiran Adas +90 216 504 26 73	Ilke.Adas@normagroup.com
Local Compliance Officer UK/Newbury	Paul Kelly +44 1635 573013	Paul.Kelly@normagroup.com

AMERICAS

Regional Compliance Officer
Americas

CONTACT

Sarah Krüger
+1 248 758 6670 Sarah.Krueger@normagroup.com

Local Compliance Officer
Brazil/Atibaia and Santo André

Ieda Danoski
+55 11 4417 8255 Ieda.Danoski@normagroup.com

Local Compliance Officer
Mexico/Juarez

Alma Chaparro
+52 656 616 6264 Alma.Chaparro@normagroup.com

Local Compliance Officer
Mexico/Monterrey

Daniel Rodriguez
+52 81 1247 5770 Daniel.Rodriguez@normagroup.com

Local Compliance Officer
USA/Auburn Hills & DC/Lake Orion

Brandon Cummings
+1 248 292 55 78 Brandon.Cummings@normagroup.com

Local Compliance Officer
USA/Fresno

Yury Lopez
+1 559 431 3013 Yury.Lopez@normagroup.com

Local Compliance Officer
USA/Saltsburg

Sean Gillespie
+1 724 639 1018 Sean.Gillespie@normagroup.com

Local Compliance Officer
USA/St. Clair

Jennifer Woodruff
+1 810 637 8804 Jennifer.Woodruff@normagroup.com

Local Compliance Officer
USA/Woodland Hills

Bob Passaretti
+1 818 710 4012 Bob.Passaretti@normagroup.com

ASIA PACIFIC

Regional Compliance Officer
Asia Pacific

Kwee Hua Tan
+65 6727 5335 KweeHua.Tan@normagroup.com

Local Compliance Officer
Australia/Melbourne & Adelaide

Sylvia Went
+613 872 09 332 Sylvia.Went@normagroup.com

Local Compliance Officer
China/Qingdao

Yanqing Sun
+86 53 280 996 718 Yanqing.Sun@normagroup.com

Local Compliance Officer
China/Changzhou

Mandy Sun
+86 51 980 588 006 Mandy.Sun@normagroup.com

Local Compliance Officer
India/Pune

Kwee Hua Tan
+65 6727 5335 KweeHua.Tan@normagroup.com

Local Compliance Officer
Japan/Tokyo

Akiko Matsuyama
+81 35 2981 223 Akiko.Matsuyama@normagroup.com

Local Compliance Officer
Korea/Seoul

Kwee Hua Tan
+65 6727 5335 KweeHua.Tan@normagroup.com

Local Compliance Officer
Malaysia/Ipoh

Marcus Chan
+60 52 408 410 Marcus.Chan@normagroup.com

Local Compliance Officer
Singapore

Kwee Hua Tan
+65 6727 5335 KweeHua.Tan@normagroup.com

Local Compliance Officer
Thailand/Chonburi

Jirawan Asawinanondh
+66 38 0799046 Jirawan.Asawinanondh@normagroup.com



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