

# New Code of Conduct

Information for supervisors

March 2017, Antitrust & Compliance

# Foreword

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“

*A Group-wide uniform and state-of-the-art Code of Conduct is key to a trustful cooperation within the Group and with our stakeholders.*

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**KLAUS ENGEL**

Chairman of the Executive Board of Evonik Industries AG

# Overview

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## CODE OF CONDUCT

We always play by the rules—wherever we are.

# 1. Rationale

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1. The current Evonik Code of Conduct **dates back to 2007**.
2. In recent years **new** (money laundering) or **modified laws and other regulatory requirements** (with regard to human rights, labor and social standards) were enacted.
3. In practice additional **necessity for regulation** arose with regard to four-eyes principle and dealing with conflicts of interest.



Also refer to  
**Main Changes**

## 2. Revision

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- In the context of a benchmark the **Codes of Conduct of other German big corporations were reasonably considered.**
- The Code of Conduct was revised in **close cooperation and in consensus with all relevant functions within the Group.**
- The **responsibility** for the content of the relevant chapter **follows the responsibility of the topic**, meaning the department who attends to the topic is also responsible.
- The **Corporate Division Legal & Compliance** has **overall responsibility.**

Also refer to  
**Contact and  
additional information**

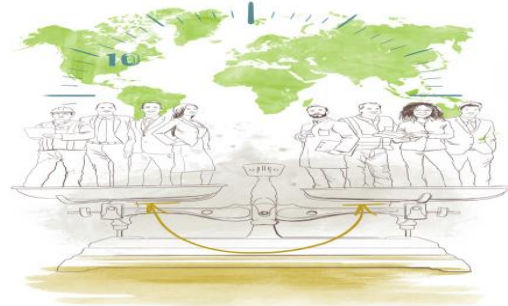
### 3. Main Changes

#### Four-eyes principle (New)



- When making decisions with a significant legal, economic or substantive impact it is important to avoid taking incorrect decisions and to exclude all possibility for abuse. Therefore, Evonik has a large number of internal regulations which stipulate that at least two authorized employees must be involved in decisions ("four-eyes principle").
- In addition to this, all employees must consider carefully on a case-by-case basis whether they are authorized to take a decision on their own, or whether it is appropriate to involve other employees.

#### Human Rights, Labor and Social Standards



- Due to local laws and its increasing importance the topic human rights, labor and social standards was comprehensively incorporated in the new Code of Conduct and in addition to the Global Social Policy.

#### Prevention of Money Laundering (New)



- Due to tightened laws any company doing business has the duty of care to prevent money laundering.

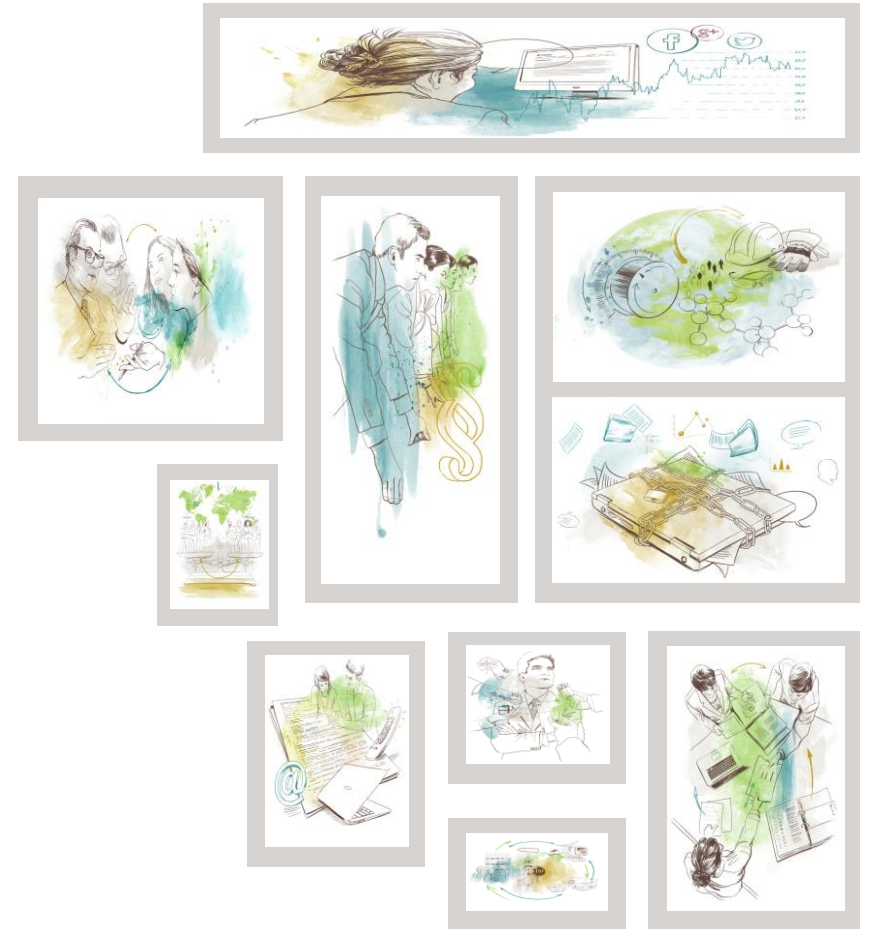
#### Conflict of Interest



- The Code of Conduct differentiates three cases of conflict of interest:
  - Secondary employment
  - Financial interest in certain companies
  - Transactions and decisions involving relatives and other related parties
- In all three cases employees are required to notify their supervisor and Human Resources. Notification is not necessary where applicable local law conflicts with this obligation.

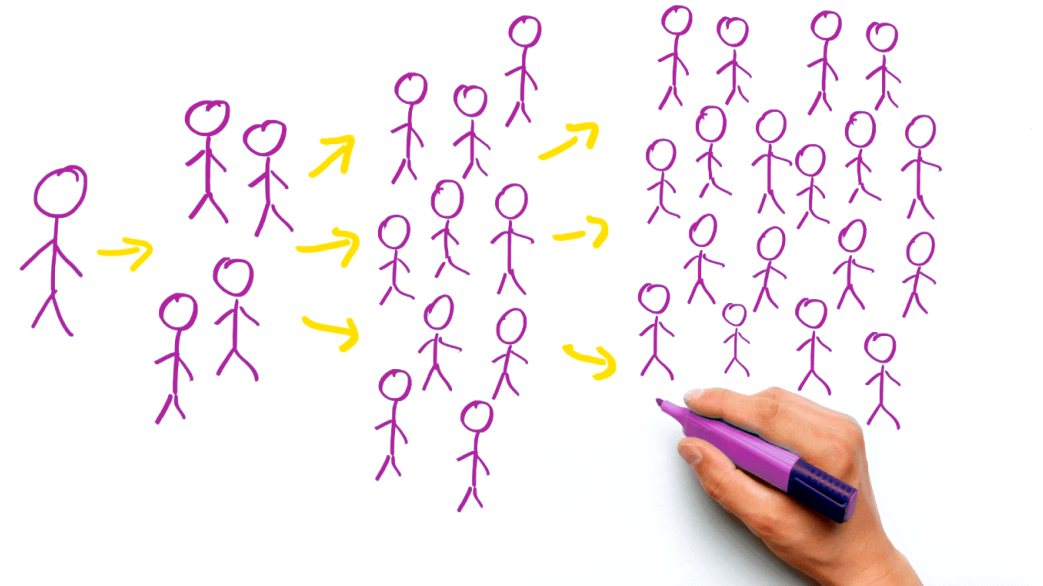
## 4. Obligations

- Employees
  - All employees must **observe** the rules set out in this Code of Conduct.
  - They are required to **familiarize** themselves with the Code of Conduct and **take part** in the related **training sessions**.
- Supervisors
  - All supervisors act as **role model**. They therefore have a special responsibility and must ensure that employees under their supervision observe the rules of the Code of Conduct.



## 5. Implementation

- The new Code of Conduct **was adopted by the Executive Board** of Evonik Industries AG and **applies to the entire Evonik Group**.
- When implementing the Code of Conduct it will be ensured that the Code of Conduct **becomes effective and enforceable** in the relevant countries.





## 6. Communication

- In close consultation with the Corporate Communication division the new Code of Conduct has been and is communicated in connection with a comprehensive **Group communication**.
- Besides a printed brochure in German and English and an **electronic version for Intra- and Internet**, the Code of Conduct will be available on a **Microsite**, a site modified for mobile devices.
- In addition, **articles on the Intranet and Folio** will be published
- The Code of Conduct will be available electronically **in 27 languages**.

Also refer to  
Contact and  
additional  
information



## 7. Distribution

- The Code of Conduct will be distributed according to the local labor law requirements:

Distribution via...	Distribution in ...		
	Germany*	UK, Hongkong, Taiwan, Region Japan, Region Korea, Region North America, Region SEANZ, Region Sub-Sahara Africa	Not explicitly mentioned Regions or countries
Electronic Letter of Commitment (FutureZone)	+	+	—
Written Letter of Commitment or Addendum to the Employment Contract	—	—	+
Human Resources (employees without email address)	—	+	—

\*Employees without email address will receive the Code of Conduct by mail.

## 8. Contact and additional information

- In case of questions you may contact the experts as follows:

### Intranet\*

- The Code of Conduct page includes the list “Code of Conduct – topics and responsibility” showing the contact for the relevant Code of Conduct topic.

### Compliance-Hotline\*

- In case of questions or to report breaches you may also use the Compliance-Hotline. The hotline is manned by the Compliance Team from the Legal & Compliance division.

### E-Mail\*

- You may also write an email to [compliance-officer@evonik.com](mailto:compliance-officer@evonik.com)  
This email address is also manned by the Compliance Team.

\*Please note that Regions may have local Compliance pages with additional contact information.





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