

Energising
the north

December 2017



Code of Conduct

Raffinerie Heide GmbH



RAFFINERIE
HEIDE

Table of contents

	Message from the management board	03
	Explanatory comments on the Code of Conduct	04
1.	People, safety and security • Health, safety, personal and property protection, the environment (HSE) and social responsibility • Fair interpersonal relations	05–06
2.	Upholding our business integrity • Bribery, influence peddling and corruption • Gifts and invitations • Dealings with public authorities and government officials • Conflicts of interest	07–09
3.	Our trading relationships • Competition and antitrust law • Export and import controls and sanctions	10–11
4.	Protecting information and assets • Protecting assets • Document management • Protecting privacy and data	12–13
5.	Communications and information • Internal and business communications • Private use of IT infrastructure • External disclosure of information	14–15
	Glossary	15

Message from the management board

Many of us face legal and ethical conflicts when taking decisions in our everyday working lives and have to find a reasonable solution and take appropriate action. In essence, it is very simple: you have to comply with prevailing law, follow Raffinerie Heide GmbH's in-house rules and allow yourself to be guided by a mixture of sound common sense and high ethical standards. By adopting this stance, you contribute to ensuring that we, as a collective, do the right thing and that it never becomes a hardship for you to account for what we do to your family, your colleagues, the media and the general public.

Good relationships with our business partners, the authorities, neighbours and all other stakeholders are key to our success. You can contribute to the forging of sound relationships by treating other people in a straightforward and respectful fashion. Any other course of action leads to loss of trust and reputational damage for our enterprise.

Please do your part by carefully reading the Code of Conduct and acting in conformity with our values and guiding principles as set out over the following pages.

Raffinerie Heide GmbH



Jürgen Wollschläger
Managing Director



Explanatory comments on the Code of Conduct

The present Raffinerie Heide GmbH Code of Conduct (hereinafter referred to as 'the Code of Conduct') sets out the conduct that our company expects from you, and conversely what you are entitled to expect from Raffinerie Heide GmbH. The Code of Conduct is not drawn up in legal language, but it is more than a mere list of rules. It is intended to serve as an important guide to assist you in taking the right decisions in cases of doubt. In evaluating your professional conduct, your superiors will take into consideration the extent to which you have applied the values laid down here and implemented the guiding principles of the Code of Conduct.

Reporting duties

The Code of Conduct makes frequent reference to situations in which you are expected to file a report or seek advice regarding your concerns and worries. The persons to contact when filing such reports or seeking advice are:

- your direct superior,
- any other senior manager,
- members of the management board,
- staff of the Human Resources department,
- members of the works council or
- the company data protection officer.

The Code of Conduct specifically addresses areas in which unlawful conduct can be expected to have serious consequences. However, any illegal conduct could have serious consequences, particularly in relation to labour law, and may lead to the exacting of fines or even a term of imprisonment.

The management board will ensure that any matter that you report is treated as confidential and that reporting an issue does not entail any disadvantage for you. However, improper reports or false accusations will not be tolerated.

To WHOM does the Code of Conduct apply?

Every employee, apprentice, trainee and executive director of Raffinerie Heide GmbH is obliged to follow the rules of the Code of Conduct. If services, operational processes or commercial activities are outsourced to contractors or advisers who are representing our company or are acting on our behalf or in our name, they too are obliged to act for us in conformity with the Code of Conduct. Independent contractors or advisers are referred to the provisions in our Code of Conduct which are of relevance to their collaboration with our employees.

WHAT is the Code of Conduct and WHY do we need one?

The Code of Conduct sets out the prevailing rules and specifies standards for our daily dealings with colleagues, customers, business partners, the authorities and neighbours, whereby we ensure the integrity of our working practices. It lays down principles governing how to act in certain situations and provides a series of self-assessment questions. Both of these are intended to help you take legally and morally correct decisions during your everyday working life.

¹ The term 'employee' refers to both male and female personnel at Raffinerie Heide GmbH, as well as the contract employees and trainees working for the company.

1.

People, safety and security

1.1

Health, safety, personal and property protection, the environment (HSE) and social responsibility

We want to feel proud of our performance in the fields of employee safety, health care, environmental protection and social responsibility. Our aim is to harm nobody and to protect our planet's natural resources. We know that reconciling this aim with our corporate goals is a major challenge for us. At Raffinerie Heide GmbH, however, we have a firm commitment to this and our other objectives, and so we apply a systematic approach to the above-mentioned issues which guarantees compliance with the law as well as the continual improvement of our performance in these fields. Raffinerie Heide GmbH has formulated corresponding aims, and we ensure that our employees and contractors act in compliance with our commitment.

Raffinerie Heide GmbH wants to contribute to meeting growing worldwide energy needs in an economically, ecologically and socially responsible way. It is our aim to take economic, ecological, social, working safety and security considerations into account when making business decisions. Reconciling the three pillars of economic, ecological and social responsibility is a vital precondition for our success.

WHAT YOU SHOULD DO

You must know, understand and comply with our mission statement and our ten safety rules. Both can be viewed on our intranet at any time.

WHAT YOU SHOULD DO

You must comply with Raffinerie Heide GmbH's requirements in the fields of health and safety at work, security, environmental protection and social responsibility. The objective of all business activities must be the long-term common good, as well as the protection of health and safety of both our own and external employees and also local residents. Any nuisance for the local community must be kept to a minimum. Emissions and negative impacts on ecosystems and diversity of species must be minimised. Energy, water and other resources must be used efficiently. If you have any questions about corresponding legal provisions, your superiors will be glad to help.



1.2 Fair interpersonal relations

Raffinerie Heide GmbH ensures that recruiting decisions are made strictly on the basis of relevant qualifications, suitability, performance and other factors relating to the position in question. We do not tolerate any unlawful discrimination in our relations with employees.

WHAT YOU SHOULD DO

Treat everybody with consideration, respect and fairness. Appreciate how valuable diversity of personnel is for our company and do not discriminate against anybody.

Observe the provisions of the company agreement concerning harmonious workplace relations, which can be viewed on our intranet.

Guiding principles

- When making personnel decisions (appointments, performance assessment, promotion, training, development, disciplinary measures, remuneration, termination of employment, etc.), be guided solely by the qualifications, suitability and performance of the person in question, as well as other explicit business considerations.
- Do not discriminate against anybody on the grounds of their background, nationality, skin colour, religion, age, gender, sexual orientation, marital status or disability.
- Familiarise yourself with prevailing laws in this respect which could have consequences on personnel decisions.

Self-assessment

- Do you always conduct yourself in a fair and respectful manner?
- Have you taken the other person's viewpoint into account?
- Are your decisions influenced by personal feelings, prejudices or preferences?

Raffinerie Heide GmbH also has zero tolerance for bullying, and does not accept actions or behaviour of a humiliating, intimidating or hostile nature.

WHAT YOU SHOULD DO

Treat others with consideration and respect and try to prevent situations developing which could be regarded by others as inappropriate. If you find a person's behaviour hostile, intimidating or humiliating, talk to them about that behaviour. Bullying is behaviour which can lead to disciplinary measures and ultimately to dismissal.

Guiding principles

- Never try to intimidate or humiliate others, either physically or verbally.
- Do not make inappropriate jokes or comments. If you are unsure about the appropriateness of a comment, please refrain from making it.
- Do not distribute or display any offensive or defamatory material or images.
- If you encounter any negative actions or behaviour, raise your concerns with the person in question, explaining your reasons and asking that person to refrain. If this does not remedy the situation, please contact either your superior or one of the other people listed in the Explanatory comments section of this Code of Conduct.

Self-assessment

- Have you behaved appropriately?
- Have you been guilty of humiliating or intimidating behaviour?
- Have you made inappropriate jokes or comments?
- Have you distributed or displayed potentially offensive material?

2.

2.1 Bribery, influence peddling and corruption

A case of bribery exists as soon as you offer, promise or grant a payment, gift or favour to an employee or representative of a commercial undertaking in order to attain an unfair influence over the competitive process. Such conduct towards a holder of public office in order to induce that person to take unlawful action also constitutes bribery. Furthermore, you should not attempt to gain influence over holders of public office even if the intended decisions are not unlawful, as doing so could expose you to an accusation of influence peddling.

Conversely, during business dealings you may not demand, solicit a promise of or accept any advantage for yourself or third parties in return for a favour. In short, you must remain incorruptible.

A deliberate breach of these obligations normally constitutes a criminal act. Offences of corruption are punishable in law by fines or imprisonment. Please note that German criminal law may still apply if the acts in question take place outside Germany.

Alongside the penal consequences for the individual, accusations of corrupt and improper conduct by employees do incalculable damage to the image of the company concerned. Accordingly offenders can expect not only to lose their jobs but also to face a claim for damages.

WHAT YOU SHOULD DO

Under no circumstances may you offer, grant, demand or accept payments, gifts or favours in return for preferential treatment or to gain a business advantage. You must comply with the anti-corruption laws to which we are subject. Note that this also applies to laws which apply beyond national boundaries – for instance, those of Great Britain, Switzerland and the USA. Should you become involved in bribery or corruption, you must expect dismissal and criminal prosecution which may lead to a term of imprisonment.

Guiding principles

- Never offer or grant payments, gifts or favours in return for preferential treatment so as to influence a business transaction or to achieve a commercial advantage. Likewise you may never demand or accept such payments, gifts or favours.
- Make sure that the people with whom you work are aware that bribery and corruption are not tolerated at Raffinerie Heide GmbH.
- If you suspect or are aware of a case of corruption involving Raffinerie Heide GmbH or a party, whether a company or an individual, with whom Raffinerie Heide GmbH has business relations, you must report the matter.

Self-assessment

- Have you offered, granted or received money, gifts or favours in connection with the influencing of a business decision?
- Would there be uncomfortable consequences for you if your conduct became public knowledge?
- Do you feel obliged to conduct yourself in a certain way with regard to somebody from whom you have received payments or favours during the course of your business dealings?
- Are you planning or have you made a donation which could be viewed as an unlawful payment?

The same principles also apply to transactions made using money or assets of criminal origin (money laundering) or if legitimate financial resources are used to fund criminal activities.

WHAT YOU SHOULD DO

Criminals could attempt to use Raffinerie Heide GmbH for money-laundering purposes or to finance criminal activities. Your duty of care in dealings with potential business partners therefore includes finding out about the nature of their business activities and background as well as the origin and purpose of any money and assets involved. You must report any suspicious transactions or cases of money laundering.

2.2 Gifts and invitations

Under no circumstances may any gifts or invitations you receive influence your business decisions or subject you or Raffinerie Heide GmbH to any kind of obligation.

WHAT YOU SHOULD DO

You must not allow your business decisions to be influenced by gifts or invitations or give grounds for others to suspect any such influence. If you allow yourself to be influenced in this way or seek to influence others, you must expect consequences under both employment and criminal law.

Guiding principles

Raffinerie Heide GmbH advises its employees not to accept gifts or invitations from business partners. You must never offer, grant, demand or accept the following favours or payments for yourself or members of your family in connection with your activities for Raffinerie Heide GmbH:

- gifts and invitations of unacceptably high value as well as favours or payments of illegal origin,
- cash or cash equivalents (e.g. vouchers),
- personal services,
- loans,
- [invitations to] events or hospitality at which the business partner in question is not present or
- gifts or invitations at a time when important business decisions are impending.

Never offer, demand or accept gifts or invitations whose value exceeds the prescribed limit of 25 euros without first obtaining the consent both of your direct superior and the Human Resources department.

The following gifts and invitations must be documented and placed on record. The corresponding documentation must be submitted to the Human Resources department:

- all gifts and invitations which others could regard as inducing a conflict of interests,
- all gifts and invitations to or from third parties which exceed the permissible value limit and
- all refused gifts and invitations which would have exceeded the permissible value limit.

Inform your business partners about the principles applied by Raffinerie Heide GmbH regarding gifts and invitations. Discuss any planned business hospitality or sponsorship with your superior and comply with all relevant laws and regulations.

2.3 Dealings with public authorities and government officials

Any offers of gifts or invitations to holders of public office and government officials – for instance, in connection with travel – are a particularly sensitive matter. Gifts and invitations which are acceptable among private sector business partners may be unacceptable if offered to the representatives of public institutions. Accordingly, particular care must be taken in any dealings with such persons. Do not overlook actions which appear illegitimate to you, but rather report them to your superior or to the responsible authorities.

Guiding principles

- All gifts and invitations to holders of public office and government officials must be documented and recorded unless they are of only marginal value, as is the case with a cheap pen or cup of coffee, for instance.
- Before offering holders of public office or government officials gifts or invitations, you must obtain the permission of Raffinerie Heide GmbH. To this end, consult your superior and the Human Resources department.
- You must not cover the costs of non-business travel or hospitality for holders of public office or government officials.
- You must comply with prevailing laws and Raffinerie Heide GmbH's in-house regulations.

2.4 Conflicts of interest

A conflict of interest arises if somebody is confronted by divergent loyalties. Sometimes this may even involve a decision between two positive alternatives. Typical conflicts of interest arise when people's private interests differ from their professional obligations towards their employers.

Regardless of the nature of any conflict which you may be confronted with during your work, you must ensure that the necessary steps for a due and proper resolution of the conflict are taken.

WHAT YOU SHOULD DO

You must avoid conflicts of interest. The decisions you take during your activities on behalf of Raffinerie Heide GmbH must not be influenced by personal or private interests. A conflict of interest may either cause such an influence or give the appearance of doing so, thereby damaging both your personal reputation and that of Raffinerie Heide GmbH.

Guiding principles

- Notify your direct superior of all circumstances which could influence your decisions and activities at Raffinerie Heide GmbH or give the appearance of so doing.
- Furnish your direct superior with a written account of all relevant circumstances which you believe could constitute an actual or potential conflict of interest.
- Distance yourself from decisions which could give rise to a conflict of interest or give the appearance of so doing.
- Act in an impartial and professional manner in your dealings with contractors and suppliers, bearing in mind alternative competitors.
- Inform Raffinerie Heide GmbH if you intend to use your knowledge or your position to gain external material advantage.

Provided you comply with prevailing law, regulations and the guiding principles laid down by Raffinerie Heide GmbH, you are entitled outside your working hours to engage in community activities, take political office or become involved in the educational sphere or with other non-commercial organisations. You may acquire shares in other companies and pursue external professional activities outside your working hours – provided this does not lead to actual or potential conflicts of interest and the external professional activity has been approved in writing by the Human Resources department. In case of doubt, please consult your direct superior.

Violations of these principles may lead to disciplinary measures being taken against you and ultimately to your dismissal.

If you wish to undertake community work, Raffinerie Heide GmbH will give you the opportunity to do so within the framework of the prevailing legal provisions in this respect. However, your involvement in political activities must always be on your own initiative, at your own cost and during your leisure time.

WHAT YOU SHOULD DO

You are not entitled to use Raffinerie Heide GmbH funds or resources to support political campaigns, parties or candidates or associated persons. In any political activities you engage in, you must take care to ensure that you are not portrayed as a representative of Raffinerie Heide GmbH. Political activities and financial contributions in the political sphere can lead to conflicts of interest and may have harmful commercial or reputational consequences for Raffinerie Heide GmbH. Accordingly, breaches of the Code of Conduct or of laws and regulations may here, too, lead to disciplinary measures and ultimately to dismissal.

Self-assessment

- Have you appointed a person with whom you are related or acquainted, are you the superior of such a person or responsible for their evaluation or assessment?
- Do you use your position to gain personal advantage?
- Have you benefited personally from confidential information?
- Do your private relationships influence your business decisions?
- Do you use your position to support politicians or political parties?
- Are business decisions made in an illegitimate way in order to exercise political influence?
- Do you use Raffinerie Heide GmbH resources for party political work?



3.1 Competition and antitrust law

Competition and antitrust laws safeguard free competition and ban conduct which illegitimately hampers trade or fair competition. These laws apply to all business activities and are designed to combat illegal practices, such as price-fixing agreements, market sharing, coordinated action in relation to public invitations to tender and all conduct designed to achieve or defend a monopoly position. Raffinerie Heide GmbH will not tolerate any breaches of competition and antitrust law.

WHAT YOU SHOULD DO

You must not enter into any agreements with competitors of Raffinerie Heide GmbH regarding prices or elements thereof (such as discounts, rebates or surcharges). You may not make agreements with others to the effect that you will not compete with each other on certain markets or for certain customers or customer groups. You may not make agreements concerning invitations to tender or bids and may not arrange with others to boycott certain customers or suppliers, except in connection with internationally imposed sanctions. Agreements with competitors to reduce or freeze production volumes or capacities are prohibited, as are arrangements with independent dealers or retailers to fix minimum retail prices for a product. Anticompetitive conduct damages our business and our good reputation for fairness and honesty. Anticompetitive practices will not be tolerated. They are illegal in most countries and may be punished by heavy fines or terms of imprisonment.

Guiding principles

- Never enter into agreements with competitors, even of an informal or tacit nature, concerning prices, production volumes, customers or markets. After consulting with your direct superior on the matter, you should take legal advice as to whether a given course of action is lawful.
- Raffinerie Heide GmbH's decisions concerning pricing, production volumes, customers and markets must only be taken by Raffinerie Heide GmbH employees or by companies explicitly and officially contracted by Raffinerie Heide GmbH.
- The following must not be discussed with competitors of Raffinerie Heide GmbH:
 - the suppliers, customers and contractors with whom Raffinerie Heide GmbH has or will have business relationships or
 - the markets on which Raffinerie Heide GmbH will operate and the terms and conditions on which it will do so.
- Leave the room if, at an industry event, issues of relevance for competition law are raised for discussion and ensure that your departure is on record; report the incident to the Human Resources department.
- Inform Raffinerie Heide GmbH if you become aware of potential breaches of competition law or if you are unsure about the legality of a given course of action.

3.2 Export and import controls and sanctions

Export controls and sanctions are imposed by countries for the statutory control of the sale, supply, electronic transfer or distribution of information, software, goods and services across national borders. As well as conventional export methods, exports today may also take electronic form or the form of a discussion or visual examination.

Import controls and sanctions are imposed by countries as binding rules governing the purchase, supply, electronic transfer or distribution of information, software, goods and services within their sovereign territory.

Export and import controls apply equally to you personally and to Raffinerie Heide GmbH as a company.

WHAT YOU SHOULD DO

EXPORT:

Before transferring goods across national borders, please in all respects take into account the potential applicability of export controls and boycott regulations. Please bear in mind the fact that controls, sanctions and embargos against countries, organisations, individuals or in connection with specific goods may have been imposed. You must be aware which of these controls and sanctions may lead to restrictions or bans affecting your business activities.

IMPORT:

If you import goods or services into a country, you must comply with the import conditions and ensure that all duty, levies and taxes are paid. You must not import any restricted goods into a country without declaring them. Obtain legal advice if you have any doubts about an upcoming importation. You must not import prohibited goods. Non-compliance with import control provisions and boycott rules may lead to delays in our business operations and damage our business.

If you fail to comply with prevailing controls and sanctions, the possible consequences for Raffinerie Heide GmbH include criminal prosecution, fines or other legal action, while you may be subject to disciplinary measures and ultimately to dismissal, as well as to fines or terms of imprisonment.

Guiding principles

- Before exporting or importing goods, technologies, software or services across national borders, make sure that you have the necessary authorisation.
- Find out about your customers and suppliers and about the use to which the goods, technologies, software or services will be put.
- Comply with any internationally imposed import or export sanctions.
- Keep up to date with any prevailing regulations in this respect.
- Obtain legal advice if you are uncertain about the prevailing export and import controls and sanctions and before engaging in transactions with a country or individual where corresponding sanctions have been imposed.

Self-assessment

- Are you aware of the applicable export and import regulations?
- Do you know which countries, organisations, individuals and goods have had sanctions imposed on them?
- Have all duty, levies and taxes been paid?
- Have you obtained all necessary permissions?
- Do you import or export goods which are subject to restrictions or bans?

4.1 Protecting assets

Raffinerie Heide GmbH's assets may be financial, physical or intangible in nature. They include buildings, plant and equipment, financial resources, software, know-how, data, consumables, patents and other intellectual property.

WHAT YOU SHOULD DO

You must protect Raffinerie Heide GmbH assets from waste, loss, damage, misuse, theft and misappropriation. You use the assets in appropriate and suitable fashion and respect the physical and intangible assets of others. Violations of these principles or of prevailing laws and regulations may lead to disciplinary measures and ultimately to dismissal, as well as having penal consequences.

4.1.1 Intellectual property

Intellectual property and the corresponding rights, including patents, trademarks, know-how and business secrets which concern the business activities or technologies of Raffinerie Heide GmbH belong to our most valuable assets. Intellectual property is an important strategic tool for achieving business goals and must be looked after with corresponding care.

4.2 Document management

Documents, files and records (hereinafter referred to collectively as 'documentary records') are of high value to our company and must be handled correctly. Raffinerie Heide GmbH must be in a position to gain rapid and reliable access to said documentary records. Some documentary records are subject to prescribed storage periods and, once these periods have expired, the documentary records concerned must be destroyed in a suitable fashion.

Documents contain information which is needed as proof of business activities serving statutory, taxation-related, official or accounting purposes, or which is relevant for the corporate records of Raffinerie Heide GmbH.

What counts as a documentary record is determined by the content, not the format. Examples of documentary records include contracts, audit reports, financial data, product specifications, internal principles, guidelines, operating instructions and minutes of meetings.

WHAT YOU SHOULD DO

You must be aware what information should be regarded as constituting documentary records, manage them accordingly and destroy them on expiry of their storage periods. The erroneous management of documentary records constitutes a major business risk. Among the possible consequences are financial loss and competitive disadvantages, reputational damage and conformity problems, as well as the breach of tax and accountancy regulations.

Guiding principles

- Identify and catalogue documentary records in your sphere of responsibility and store them in accordance with the above-mentioned provisions.
- Protect the documentary records from unauthorised access or manipulation.
- In the event of a change in your responsibilities, give all relevant documentary records to the person responsible.

4.3 Protecting privacy and data

Laws designed to safeguard privacy and protect data regulate the handling of personal information. This information includes people's names and contact data, employment and financial details, age and nationality. Information about ethnic origin, religion, ideology, political opinions, health, sexual orientation and trade union membership constitute sensitive personal data and are subject to stringent safeguards. Raffinerie Heide GmbH respects the fundamental rights of individuals and the protection of privacy. This applies equally to employees, customers and suppliers.

WHAT YOU SHOULD DO

If you collect or process personal data, you must respect the right to privacy of the person concerned and also observe all prevailing laws, in particular the German Federal Data Protection Act (Bundesdatenschutzgesetz ~ BDSG), as well as Raffinerie Heide GmbH's corresponding in-house rules. An individual's personal data must be protected from abuse, so when collecting, using and divulging this data you must follow the correct procedure. If you fail to treat personal data as confidential or to protect it, you must expect disciplinary measures or ultimately dismissal, as well as possible penal consequences. You should also protect private and business documents containing personal data.

Guiding principles

- Learn Raffinerie Heide GmbH's in-house rules concerning privacy and data protection by reading the corresponding operating instructions on the protection of personal data. Take suitable security precautions for the protection of data. Inform Raffinerie Heide GmbH if you become aware of or suspect any negligence in this respect.
- Be aware that you are only entitled to collect, handle, store, use and divulge personal data if you definitely need that information and have the corresponding authorisation. Notify the persons concerned of the reasons for collecting their personal data.
- Check whether you need to obtain the permission of the person concerned before using or divulging their personal data.
- Comply with legal restrictions on the transfer of personal data.
- Do not store personal data any longer than necessary. Thereafter, it must be irreversibly deleted, destroyed or anonymised.

5.1 Internal and business communications

Internal and business communications include all kinds of notification, including emails, electronic documents, instant messages, Internet and intranet, social media contributions, hard copies of documentary records, fax messages, verbal messages and voicemail.

Guiding principles

Bear in mind the following points in your communications:

- Always conduct yourself with integrity and use polite expressions and forms of address.
- Do not deceive anybody.
- Avoid speculation.
- Do not exaggerate.
- Do not engage in an 'informal exchange' on sensitive or confidential matters.
- Do not joke about serious matters.
- Make sure that your communications with a competitor do not breach competition and antitrust laws.
- When you handle personal data, make sure that you comply with provisions for the protection of privacy and data.
- Before importing or exporting information into or out of another country, make sure that this is not prohibited and that you first obtain any licences which may be necessary for the purpose.

WHAT YOU SHOULD DO

Always choose a suitable communication form. Make sure that your communications are lawful and necessary. Before sending anything, consider whether you would have any concerns should the communications in question become public knowledge. Disregarding these rules could involve reputational damage for Raffinerie Heide GmbH. Accordingly, breaches of these binding rules may lead to disciplinary measures or criminal charges.

5.2 Private use of IT infrastructure

Raffinerie Heide GmbH does not generally allow its employees to use IT and communication systems for private purposes. However, the reasonable use of telephones for private conversations is permitted.

The rules regarding the use of IT infrastructure can be found in the corresponding company agreements, which can be viewed on our intranet.

WHAT YOU SHOULD DO

When using Raffinerie Heide GmbH's IT and communication systems, you must comply with the relevant Raffinerie Heide GmbH provisions concerning information security, as well as being guided by ethical rules and the relevant laws.

The private use of telephone systems must comply with the prevailing company agreement and must not entail any cost for Raffinerie Heide GmbH exceeding a marginal amount. Furthermore, said private use must not be to the detriment of your productivity. Excessive private use of these systems may contravene the law and could damage Raffinerie Heide GmbH. In this event, there could be consequences for you under labour law.

Guiding principles

- Do not use Raffinerie Heide GmbH's IT and communication systems for unlawful or immoral activities or purposes (including violations of intellectual property rights or Internet crime) to play games of chance or to conduct private business transactions.
- Do not use the Raffinerie Heide GmbH network or the storage space it contains for entertainment purposes or to store personal data.
- Maintain control of your personalised IT and communication equipment when others use it.
- Always give Raffinerie Heide GmbH's company name or trademark in your business communications. Do not use your business email address to send private emails.
- Comply with the communication rules laid down in the Code of Conduct.
- Obtain the necessary approval before installing software or connecting hardware.

5.3 External disclosure of information

Any written or verbal public communications made in the name of Raffinerie Heide GmbH count as the disclosure of information. The disclosed information must be true, correct, accurate and must not mislead.

Guiding principles

- Protect confidential information.
- Comply with all prevailing laws and regulations.
- Immediately report the loss or theft of Raffinerie Heide GmbH information to your direct superior.
- Do not communicate with external bodies, such as the media or potential investors, until you have obtained the necessary approval from Raffinerie Heide GmbH.

WHAT YOU SHOULD DO

Unless you have the corresponding authorisation, you are not entitled to disclose any information about Raffinerie Heide GmbH's business activities. If you are authorised to disclose information, you must take care to ensure that it is true, correct, accurate and does not mislead. You may only communicate with the media on business matters or contact potential investors after obtaining approval from Raffinerie Heide GmbH. Failure to comply with these requirements constitutes a breach of the obligations laid down in your employment contract and may also contravene legal provisions. Furthermore, the provision of erroneous information and delays in the provision of information may damage Raffinerie Heide GmbH's reputation. In this event, Raffinerie Heide GmbH and the responsible individual can also expect serious legal consequences.

Glossary

Competitor

A company operating in the same sector which offers a comparable product or service.

Customers

The buyers of and customers for the products and services of Raffinerie Heide GmbH.

Donations

Money or material assets given to charitable organisations, free support for charitable enterprises or money provided for development projects.

Holders of public office and government officials

Civil servants, judges and other employees holding offices under public law, as well as people who perform public administration tasks for a government department, agency or other body, members of a local or national government, employees of a company wholly or partially controlled by a government, representatives of a political party and employees of an international organisation.

Inappropriate gift

A gift either offered or given which is of inappropriately high value or nature or has been offered or given under inappropriate circumstances.

Intellectual property

This includes patent rights, utility models, trademarks and service brands, domain names, copyright and proprietary rights (including proprietary rights to software), design rights, database rights, know-how rights and other confidential information (sometimes referred to as 'business secrets' or 'in-house information'), as well as rights arising from intellectual property agreements.

Items of marginal value

Items of minimal value, such as an ordinary pen or a cup of coffee.

Partners

Raffinerie Heide GmbH's suppliers, customers and service providers.

Restrictions and prohibitions

Limits regulating what is permissible and what is not – for instance, what kinds of goods may be imported into a country.

Social responsibility

The manner in which Raffinerie Heide GmbH deals with the consequences of its activities for the community and society.

Stakeholders

People, groups, organisations or systems which have a direct interest in the activities of Raffinerie Heide GmbH.

Superior

A person who is entitled to give you instructions and orders.

Value limit

The maximum value that a gift, invitation or hospitality may have in order to be accepted, as laid down in Raffinerie Heide GmbH's in-house regulations.

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If you have any questions or comments concerning the Raffinerie Heide GmbH Code of Conduct, our executive management and Human Resources department will be glad to assist. Through your personal conduct, you can help to ensure that the Raffinerie Heide GmbH is regarded internally and externally as a reputable company. Please regard the Code of Conduct as an integral part of your daily work.

Hemmingstedt, December 2017

Raffinerie Heide GmbH

Meldorfer Straße 43
25770 Hemmingstedt, Germany
Tel. +49 481 6930
Email. info@heiderefinery.com
or personal@heiderefinery.com



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