

Suntrace Code of Conduct

This manifesto frames the principal values and code of conduct we at Suntrace commit ourselves to properly run our business. They are compulsory for working at Suntrace and should be applicable equally for our stakeholders. We at Suntrace herewith commit ourselves to the following principles:

§1 Legal compliance

We comply with the laws of the countries in which we operate.

§2 Respect for the basic human rights of employees

We promote equal opportunities for and treatment of our employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;

We refuse to employ or make anyone work against his or her will;

We respect the personal dignity, privacy and rights of each individual;

We do not tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;

We do not tolerate behavior including gestures, language and physical contact, that is sexual, intimidating, threatening, abusive or exploitative;

We strive to provide fair remuneration and to guarantee the applicable national statutory minimum wage;

We comply with the maximum number of working hours laid down in the applicable laws;

We recognize, as far as legally possible, the right of free association of employees and do not favor nor discriminate against members of employee organizations or trade unions.

§3 Prohibition of child labor

We do not employ workers under the age of 15.

§4 Health and safety of employees

We take responsibility for the health and safety of our employees;

We commit to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;

We make sure that employees are educated in health and safety issues;

We set up or use a reasonable occupational health and safety management system.

§5 Transparency, anti-corruption and anti-bribery

We conduct our business fairly, honestly and transparently;

We do not make or offer any bribes, whether directly or indirectly, to gain business advantages;

We do not accept bribes, whether directly or indirectly, to give business advantages;

We care to uphold and support these principles within Suntrace and its subsidiaries.

§6 Environmental protection

We act in accordance with the applicable statutory and international standards regarding environmental protection;

We promote awareness of the environmental impact of our activities and strive to reasonably minimize such impact;

§7 Supply chain

We apply reasonable efforts to promote among our suppliers compliance with the principles of this code of conduct.

The owners of Suntrace

Hamburg, March 28th, 2011

A handwritten signature in blue ink, appearing to read "Jörg Weyh".A handwritten signature in blue ink, appearing to read "Michael Selzer".A handwritten signature in blue ink, appearing to read "Niklas Meyer".