

Code of Conduct

Our legal and ethical principles



DyStar operates worldwide so we need to respect a wide range of different legal requirements and cultural backgrounds. To be successful as a company, we have to incorporate this diversity into our daily work. The conduct of our employees is also extremely important for our internal and external reputation: Ultimately, they determine whether we are regarded as a reliable partner and an attractive employer.

DyStar's Code of Conduct sets out our legal and ethical principles. It is designed to be a guide for our daily work and to help us uphold DyStar's reputation. The Code of Conduct is binding on us all and we will deal systematically but fairly with all infringements. I expect all employees to continue to comply with the law in all countries in which we operate and to respect this Code of Conduct. We are aware that setting these high standards imposes an obligation on us as a company to give our employees the necessary support and information.

This Code of Conduct provides examples of the standards of conduct we expect all employees to observe in their dealings with business partners and state authorities in all areas in which we operate. In addition, employees may be required to comply with other laws and regulations applicable to their job. This Code of Conduct will be reviewed at regular intervals and extended if necessary.

I am convinced that it will help our company remain successful.

Eric Hopmann
Chief Executive Officer / President

This Code of Conduct applies to all employees of the worldwide DyStar Group. As an internationally active enterprise we must comply with many different legal systems and be sensitive to a wide diversity of cultural circumstances

1 Introduction

This Code of Conduct is binding upon all employees of the worldwide DyStar Group.

2

2 Compliance with laws

We comply with the prevailing law in all countries.

3

3 Intellectual property protection

We treat the data entrusted to us and our intellectual property responsibly, while also respecting the intellectual property of others.

4

4 Fair competition

DyStar is unreservedly committed to fair competition, even-handed contracts and compliance with antitrust legislation, and we expect the same of our suppliers and customers

6

5 Separation of private and company affairs

Employees must not let personal interests influence decisions impacting the company and must avoid conflicts of interest.

7

6 Safety, health and environmental protection

We are committed to the highest possible levels of safety and to sustained environmental protection. To this end we not only ensure the implementation of prevailing national standards but also compliance with the DyStar guidelines at all our worldwide locations.

8

7 Product and service quality

The quality of our products and services is a vital differentiating factor. Systematic quality management ensures compliance with our quality guidelines.

10

8 Relationships with employees

We regard our international diversity as a strength and will not tolerate any form of discrimination, forced labor or child labor.

11

9 Cooperation with authorities

We make every effort to maintain cooperative relationships with all competent authorities while defending our rights and those of our employees.

12

1. Introduction

- **Sphere of application**
- **Contacts**
- **Sanctions**
- **Communication**

sites' CO can be found on the Intranet. The CO is a neutral port of call for all complaints, recommendations and reports of suspected or actual breaches of law.

Sphere of application

This Code of Conduct applies to all employees of the worldwide DyStar Group. As an internationally active enterprise we must comply with many different legal systems and be sensitive to a wide diversity of cultural circumstances. Accordingly we expect our employees to take personal responsibility for understanding and respecting both the law and the lawful, generally accepted customs of the countries in which we are active.

Managerial staff in particular must live up to their function as role models and demonstrate a high degree of social and ethical awareness. We understand that the high expectations we have of our employees must be matched by the company's obligation to provide all our employees with corresponding information and support. Each employee must realize that breaches of the law by individual employees can significantly affect the reputation of our company and cause it serious damage and financial loss.

Communication

The DyStar Code of Conduct will actively be made available to all employees and can be accessed at any time on our Intranet. It will be signed by all managerial staff, each employee's awareness of it will be placed on record, and the same will apply to all new appointments. Events will be held to raise employees' awareness of the Code of Conduct's content and to provide them with any necessary training on specific issues. In addition, to help employees avoid breaches of law, the company will make available to them all necessary information sources as well as the advisory services of the legal department.

Contact persons

DyStar has appointed Compliance Officers (CO) worldwide who are available for employees to consult and to support management personnel in the various departments. The contact details of the respective

In addition, a Global CO* is also available for contact by employees in general. The Global CO has direct access to the Board of Directors and Group CEO/President and will support the Board of Directors and Group CEO/President in the resolution of all breaches of this Code of Conduct, as appropriate.

Sanctions

DyStar expects this Code of Conduct to be followed and will not tolerate any breaches. The company will not exempt persons responsible from state sanctions. Breaches may be punished via warnings, by asserting claims for damages or dismissal. To these may be added state punishments including consequences under criminal law. In case of doubt every employee should seek advice from the above-mentioned competent parties within the company.

All employees are required to consult the Code of Conduct regularly to ensure that their conduct is in compliance with it and must ensure that any discovered breaches of the Code of Conduct are ceased immediately. All management personnel must strive to organize their part of the company in a way that ensures that breaches of law are reported and all breaches of the Code of Conduct are actively addressed. Furthermore, management staff must perform regular checks on their own initiative and seek to maintain dialogue with employees. Thus, employees are required to furnish relevant information and superiors are obliged to seek it out.

Global Compliance Officer

Isaac Soong Wee Siong

Tel +65-6671 2873

Mobile +65-8181-0095

Email: compliance@dystar.com



2. Compliance with laws

- Basis: prevailing law
- Compliance with international public law and international trade law

Basis: prevailing law

The company respects the prevailing law and expects its employees and business partners to do the same. Legal circumstances cannot be ignored on the grounds that they are unfavorable to either an individual or the company. DyStar is committed to complying with prevailing law irrespective of whether it is international or local. Illegal conduct can cause far-reaching damage: apart from the economic damage involved there is the risk of harm to our reputation and consequent damage to our market position. A company's reputation is an important factor determining its value, and even the appearance of infringement of the law can affect public opinion, leading to a detrimental change in the behavior of our customers and stakeholders.

DyStar is subject to many different jurisdictions. As a global enterprise with a worldwide presence we often have to comply with the law of a foreign state even with respect to matters lying outside that state. For instance, the appropriateness of co-supplier agreements between competitors has to be evaluated in light of the laws of countries in which the consequences of the agreement may be felt as well as those of the country in which the agreements are made. The sanctions applied and damages awarded by foreign jurisdictions for certain breaches of the law are often significantly more severe. In addition to sanctions, assets located in the country in question may in some cases be seized as soon as there is a mere suspicion of wrongdoing. In extreme cases conduct that is legal in one country may be strictly forbidden in another. In these cases it is vital to be aware of and strictly observe the prevailing legal situation.

Compliance with international public law and international trade law

No employees, and in particular no employees working in research and development, may either on their own or together with others conduct research into or manufacture substances in contravention of the provisions of the Chemical Weapons Convention. No employee of our company may knowingly participate in the development of substances or systems where he or she should reasonably assume that they are subject to export control law and have been conveyed to third-party countries without the permission of the competent authorities. Furthermore, no employee may use know-how which he or she has acquired while working for DyStar for this purpose or offer said know-how to third parties.



3. Intellectual property protection

- Handling documents and records
- Media information
- Personal information to the public
- Respecting the rights of others
- Passing on know-how
- External data storage

Handling documents and records

Confidential documents and data storage media used in the workplace must not be allowed to fall into unauthorized hands and must generally be kept under lock and key. Computers must be protected by assigning and frequently changing passwords. Steps must be taken to ensure that no third parties gain access to data even during lengthy absences from the workplace.

Employees may only make copies of the company's business documents or files for work-related purposes, and this also applies to all electronic processes. There is no right of access to information not concerning the person's own duties or areas of managerial responsibility. Accordingly, any deliberate attempt to gain or use knowledge for a non-work-related purpose is prohibited. Furthermore, the principle of privacy of correspondence must be observed with respect to all personally addressed mail. All documents and records must be kept in such a way as to facilitate retrieval by approved company representatives. Among other things this calls for full, clear and transparent record keeping. Whenever preparing documents, including emails and text messages, it should be borne in mind that hard copies of documents or data storage media may conceivably fall into the hands of unauthorized parties and be used to the company's detriment.

Media information

In our press work we aim to establish close and constructive working relationships with media representatives and make every effort to meet reasonable informational needs.

However, written and verbal information to the press and other electronic media may only be released after prior consultation with International Communications. This includes verbal replies to media queries. All media inquiries should be directed to the Corporate

Communications. If prior consultation is impossible on grounds of time, Corporate Communications must be notified of the nature of the information given as-

soon as possible thereafter.

Personal information to the public

Personal information in the public domain can affect the company and could represent the danger of losing know-how. In today's cross-linked information society general statements dealing with the professional activities of individuals at DyStar (functional descriptions) are basically accepted. However, in web forums (e. g. xing / facebook / linkedin / myspace), networks and other information sources open to the public no detailed information in relation to dedicated projects and tasks may be given without permission. Such information may only contain general descriptions of activities and general information of the professional environment of the individual(s) concerned.

Respecting the rights of others

When developing new products and processes, the legal situation regarding existing proprietary rights must be carefully researched. Every employee must respect valid third-party proprietary rights and refrain from their unauthorized use. Violating any such rights can have negative consequences both for us and our customers: Apart from claims for damages, which in the case of wilful patent violations may amount to many times the amount otherwise owed, there is the threat of sanctions such as the confiscation of company goods.

As a rule, the legal situation must be subjected in advance to expert appraisal by the Global Intellectual Property (Patents, Licences, Trade-marks) department.

Obtaining unauthorized information on the development work of other employees or outsiders is forbidden. No employee may obtain and use a third party's secrets without due authorization, and information concerning third parties should only be obtained from sources which are in the public domain.

Passing on know-how

Know-how is an important part of our intellectual



property and a major company asset and as such must be handled responsibly. The executive management is responsible for authorizing the transmission of know-how in any form both internally to other units and externally to third parties. In general, documents of any kind which contain know-how are confidential and should only be made available, on the need-to-know principle, to persons who require them for the fulfillment of their duties. This also applies to the internal transmission of documents within DyStar.

Decisions on the transmission of documents or files containing know-how within the DyStar Group must be made by the relevant department heads. Decisions on the transmission to third parties outside the DyStar Group of documents containing know-how must be made by the relevant Business Team.

Before such transmission, and after consultation with the Global Intellectual Property Department, a confidentiality agreement must be entered into with the recipient. No know-how may be passed on to third parties before receipt of said signed confidentiality agreement. Application technology advice and comparable subjects such as the environment or product safety are allowed within the course of normal customer support.

When passing on manufacturing and laboratory regulations to third parties in any kind or form, including between DyStar companies, written confirmation of receipt must be obtained. However, this does not apply to the transmission of information within a single company. Quality control instructions may only be submitted to a third party after consultation with the Quality Management International department and after obtaining a corresponding confidentiality declaration.

When transmitting any documents other than those mentioned above to third parties, the relevant department head will decide whether or not confirmation of receipts should be obtained.

Documents containing know-how may not be sent by email to third-party recipients outside the global DyStar network. Within the DyStar Group such documents should preferably be sent by post, fax or encrypted email. To recipients outside the DyStar Group they should generally be sent by registered mail, making reference to the confidentiality agreement and requesting confirmation of receipt.

The departments involved must keep records of the transmission of know-how, confidential documents and formulae along with the signed confirmations of receipt, and must ensure that the information is updated as and when necessary.

Documents containing know-how and other confidential documents must be handled by all users, i.e. all those who have access to them, in such a way as to prevent their unauthorized inspection or copying or their loss.

External data storage

The external storage of company data of any kind bears the risk of loss of data, data abuse or other kinds of losses for the company. The storage of internal company data on servers, data media etc., that is not controlled by DyStar, requires the permission of the IT department and the General Management beforehand.

In addition to protecting our own know-how, we must also protect the company from unnecessary restrictions or sanctions from the acceptance of confidential know-how from third parties. No employee is authorized to receive any files or information from third parties which could reasonably be assumed to be confidential. Discussions with the management and legal department should be held to determine if acceptance of this information is required for business purposes and, if so, under what conditions the company will accept it.

4. Fair competition

- No antitrust violations
- Compliance with merger control law

No antitrust violations

DyStar is unreservedly committed to fair competition, even-handed contracts and compliance with anti-trust legislation, and we expect the same of our suppliers and customers. The main areas of concern under antitrust law are price-fixing agreements, market share agreements, capacity agreements, the apportioning of regional markets, apportioning of customers, resale price controls, and boycott agreements. However, other restrictions also exist. Any concerted action, including informal discussions or gentlemen's agreements, intended to or having the effect of limiting competition is prohibited, and the mere appearance of being involved in any such activity should be avoided.

There is no justification for anticompetitive behavior. Care is of the essence in handling market information. At their meetings, trade associations offer opportunities to meet competitors and discuss issues of common interest, and this can be entirely legitimate provided the boundaries of antitrust law are not crossed. Market research is an indispensable tool and is of course also permitted. However, not all means of procuring information, such as certain organized market information processes, are suitable for this purpose.

Benchmarking with competitors is also in principle possible, but in all these cases certain ground rules exist which are directed at rendering competitively sensitive information anonymous so that its origin cannot be identified, thus ruling out any influence on actual market circumstances.

In general, no information may be exchanged with competitors concerning customer relationships, prices, impending price changes, costs or the like, and a company's calculations, capacities and planning may not be disclosed to competitors.

Under certain circumstances, information may be exchanged if a company purchases or sells a business or enters into a joint venture, though a pre-condition

for this is the existence of a confidentiality agreement which sets out the purpose of the transaction and rules for information exchange in unambiguous terms. Here too, however, any exchange of information must be restricted to what is necessary in order to be able to judge the advisability of the transaction.

When bidding for a contract any collusion with possible fellow bidders is strictly prohibited. If DyStar itself issues a call for bids, passing on to another bidder any information about a bidder or the details of their bid is also prohibited.

Compliance with merger control law

Business divestitures, corporate acquisitions and joint ventures are often subject to the review and approval of various antitrust authorities both domestically and abroad. During these approval procedures comprehensive information has to be submitted to the authorities, and this information must always be truthful and complete.

Problems of interpretation often crop up in anti-trust law because legislative texts cannot embrace every conceivable set of circumstances. This applies, for instance, to legitimate and legal co-producer agreements, contract manufacturing agreements and licensing agreements with competitors. In these cases legal advice must be sought to avoid unintentional violations of law and if necessary find legal alternatives.

Dominant market positions are not illegal provided they derive from our own achievements, from our own industrial property rights or, subject to scrutiny under merger control law, from licenses granted by third parties. Patents establish legally permissible monopolies for limited periods.

However, dominant market positions must not be abused and the laws that define such abuses must be followed.



5. Separation of private and company affairs

- No personal benefits
- No private use of company property
- Outside employment and any potential conflicts of interest must be disclosed

No personal benefits

Business decisions may not be influenced by personal interests or relationships, and any possible conflicts of interest must be disclosed immediately.

No employee may, either directly or indirectly, seek, accept, offer or grant any personal advantage in connection with their professional activities, and in particular when negotiating, awarding or executing a contract, irrespective of whether the other party is a private individual, a company or a government body.

No personal benefits of any kind may be offered to any customer, supplier, official or government representative. This prohibition applies to any kind of benefit, with the exception of generally accepted business meals and entertainment and token gifts of a reasonable value that would not affect the outcome of business transactions. Here too, even the impression of any non-objective considerations must be strictly avoided. If an employee is confronted with any such offer he or she must notify his or her supervisor thereof without delay.

No employee may use internal knowledge of the company's intentions, for instance to sell part of the business, acquire a company or establish a joint venture, for purposes of personal enrichment, either directly or via a third party. Furthermore, no employee may impart such knowledge either to an employee who is directly involved in the specific project or to third parties.

Business relationships with third parties must be governed solely by objective criteria. Suppliers must be selected purely on the basis of quality, reliability, price and responsibility for society and the environment.

Under no circumstances may personal relationships or interests influence the award of contracts. Advice or recommendations made by DyStar employees to

others must not be motivated by the prospect of material or non-material gain.

No private use of company property

No employee may use company property (such as appliances, goods, vehicles, office supplies, documents, records or data storage media) or company personnel for private purposes without the express written permission of his or her supervisor. Furthermore, company property may not be removed from company premises unless permission has been granted by a supervisor.

Confidential data, programs or documents may neither be copied nor brought onto or removed from company premises without permission.

Outside employment and any potential conflicts of interest must be disclosed

In accordance with the provisions of his or her employment contract, every employee must notify the personnel department in writing if intending either to accept outside employment, including on a freelance basis, or to set up a business. This applies in particular if taking up a position in a company with which DyStar either does business or is in competition. However, all employees are free to acquire shares in companies, provided their ownership remains at a nominal level, does not impair his/her ability to perform their tasks at DyStar, and does not create a conflict of interest.

In the event that an employee finds himself / herself in a potential conflict-of-interest situation, it is his / her responsibility to notify his / her supervisor of the situation. Employees' private involvement in clubs, political parties and other social or political institutions may not be detrimental to the performance of their duties under their employment contracts. Employees must not invoke their roles in the company when expressing their personal opinions in public.

6. Safety, health and environmental protection

- Corporate goals
- Dialogue
- Product
- Environmental protection
- Health and safety at work
- Plant safety and prevention of
- Technology transfer

Corporate goals

DyStar is a chemical industry enterprise and is committed to the principles of sustainability and Responsible Care®. When using DyStar products, customers should feel that they are being offered environmentally sustainable solutions. Although we handle hazardous materials, we will strive to ensure that our products are made, handled, transported and disposed of safely. Accordingly DyStar is committed to the corporate principles and goals of maximum possible safety and wide-ranging environmental protection. This embraces the thoughtful development of new products and processes, the safe handling of products, the safe operation of plants, a responsible attitude towards the environment and the responsible use of resources.

Conformance with our safety and environmental policies is a condition of employment. Employees are obliged to observe the environmental protection and safety rules and apply them wherever necessary within the company, and will be given appropriate training to that end. They should use their knowledge and commitment to contribute to the on-going development and improvement of environmental protection and safety procedures.

Dialogue

Responsible action creates trust, and to this end an open and transparent dialogue on safety, health, and environmental matters should be maintained between all stakeholders, i.e. customers, suppliers, employees, neighbors and society generally.

The concerns of customers, employees and the general public should be incorporated into the dialogue and taken into account when making decisions on environmental protection and safety activities and goals. Customers, employees and the general public will be informed about current events, changes and developments affecting environmental protection



and safety at DyStar.

Product liability

Our products are continuously tested for potential hazards, and preventive measures are taken to limit or avoid risk. DyStar is committed to informing customers, sales partners and distributors on the safe handling, storage, transport, use, and disposal of DyStar products. The evaluation of hazards to health and the environment begins during the product planning and development stages and continues through commercialization.

Environmental protection

Environmental protection imposes an obligation on both the company and all our employees to take positive action. Employees are required to promote environmental protection through their own commitment and on their own initiative.

Among other things, this means complying with statutory and official regulations and DyStar guidelines, operating production plants in such a way as to optimize the safe handling of products and waste, recycling or dispose of waste products in an environmentally responsible way, continuously monitoring production processes and improving them wherever possible, reducing consumption of raw materials and energy, reducing emissions and reducing the production of waste products or recycling them if possible.



Health and safety at work

DyStar is committed to providing a safe work-place for its employees and seeks to provide a safe and healthy working environment on the basis of the current state of knowledge within the industry and taking due account of the specific hazards associated with chemical industry operations. All employees have a common mutual responsibility and obligation to ensure occupational safety in their part of the company. Instructions and regulations must be understood and followed. The company has a duty to protect its employees from both immediate and long-term health hazards by identifying such hazards, providing information and training and taking suitable protective measures. In consultation with employees, an occupational safety system will be developed which addresses issues such as work organization, occupational safety management, health protection, safety technology, hazardous substances and production processes, viewing all these factors from a holistic perspective. Every employee must also take personal responsibility for further improving safety procedures.

Plant safety and prevention of accidents

Plants must be designed in such a way that they can be operated safely. Potential hazards and process risks must be identified, evaluated and minimized. When selecting contractual partners to operate on plant sites, safety, health and environmentally relevant criteria must be taken into account.

Contractors are expected to follow our rules. Systematic methods must be applied to the development of safety systems for technical installations. This should involve the continuous development of plant safety, updating the technical standards of existing plants as necessary to reflect technological progress and the regular, systematic monitoring and maintenance of technical plant and equipment. Furthermore, effective methods must be put in place for combating malfunctions and limiting their consequences.

Detailed accident prevention plans must be drawn up for all plants in consultation, if necessary, with the relevant global DyStar departments and local authorities. Employees must be given suitable instructions and training in the operation of plants and equipment, and the procedures to follow in the event of emergencies and danger must be practiced.

Technology transfer

DyStar applies the same environmental protection and safety principles worldwide. The transfer of technologies and knowledge within the Group ensures that all DyStar companies are in a position to implement the same environmental protection and safety principles and standards.



7. Product and service quality

- Foundations of our quality standards
- Product quality
- Quality management organization
- Communication and knowledge are the preconditions for quality
- Research and development

Foundations of our quality standards

The quality of our products and services is a key factor in our company's success and underpins the fulfillment of our corporate goals. The core thinking behind our quality standards is that we stand for reliable quality and environmentally sustainable products. Our manufacturing processes, products and application methods follow high, globally uniform standards and are sustainable for customers, processors, end-consumers and the environment alike.

Product quality

Quality-conscious thinking and action form the foundations of our attitude towards our products and services, and our customers' needs are paramount. Customers worldwide must be able to depend on the high quality and reliability of DyStar products.

The quality of our products is laid down in specifications, compliance with which is a fundamental goal of our production operations. The processes used are based on demanding performance specifications. It is the duty of every employee to comply with these requirements. Their continual improvement is measured against the yardstick provided by our various service and process quality indicators.

In the quality management audits performed internally by the Quality Management International Department, we inspect and safeguard our own quality management. Every person involved in these audits is responsible for the practical implementation of the findings. This is the only way to further develop and improve our quality assurance.

Quality management organization

The basis of our quality assurance system is certification under the ISO 9001 standard. The company's centrally established quality management standards are vitally important. Through documentation we make our activities transparent and comprehensible. The quality management guide-lines are laid down in both the

general and department-specific management manuals and are binding on every employee. Furthermore, all employees are required to participate actively in the design of the management system, particularly in their immediate working environments.

Communication and knowledge are the preconditions for quality

Quality assurance is an important factor in our in-house communications, which are frank and open both within and between departments. This is the only way to continually improve value-added processes and clearly regulate responsibility for quality. Every employee has the duty within his or her sphere of responsibility for continuing vocational training with a view to improving his or her performance, and the company must give employees every opportunity to do this within the framework of the prevailing circumstances.

Research and development

Technology leadership is a key to our success. We invest in research and development to ensure that our products embody the very latest technology. Together with our customers, we develop innovative solutions and deliver enhanced customer benefits. We are where our customers want us to be and seek to establish long-term partnerships through frank and open collaboration and exchanges of information. We continuously improve our business processes and increase our efficiency in order to offer our customers outstanding value.





8. Relationships with employees

- No discrimination or harassment
- No child labor or forced labor
- Other employee rights

No discrimination or harassment

Every employee must be aware that their conduct reflects upon the company and will affect its reputation both externally and internally. Accordingly, the company expects all its employees to adopt a professional, respectful, and fair-minded approach in all their dealings with colleagues and third parties. No employee may be disadvantaged on grounds of race, ethnic origin, gender, religion, philosophy, political or union membership, disability, age, marital, pregnancy or sexual orientation. Any form of harassment is prohibited. DyStar respects the 6 ILO principles.

The company will take appropriate measures to ensure a discrimination-free workplace. Every employee has the right to be protected from harassment.

The principles of equal treatment apply in employees' daily dealings with each other and to all processes relating to the working relationship, including the hiring and promotion of personnel. Accordingly, there will be no potentially discriminatory questions posed in job advertisements, at job interviews or when making decisions on new appointments. The same applies to career prospects, promotions, vocational training, remuneration and dismissal.

No child labor or forced labor

DyStar does not permit child labor within its sphere of responsibility nor does it support child labor.

DyStar does not employ or support forced labor. DyStar does not use physical punishments or psychological or physical coercion or insults towards its employees and does not support any such action.

Other employee rights

DyStar respects the rights of employees to set up and support labor unions and also the right to collective bargaining. The company ensures that labor union representatives are not discriminated against and that their members have access to the workplace. When fixing working hours, DyStar adheres to prevailing laws and standards, and also ensures that the wages paid are always at least as high as the minimum wages specified in law. The company guarantees that no employment contracts are entered into with illegal workers and that, to avoid working and social law commitment, no false apprenticeship/vocational training arrangements are entered into.



9. Cooperation with authorities

DyStar makes every effort to maintain a cooperative relationship with all competent legal authorities while safeguarding our rights and those of our employees.

It is the role of some government agencies to punish infringements of prevailing law. The sheer number of legal provisions is ever growing, and with it the danger that employees will break the law. Even where there is good knowledge of the legal situation, and despite all reasonable precautions, the possibility of a company's employees eventually becoming involved in a court case cannot be ruled out. All that is necessary for the criminal prosecution authorities to instigate a judicial enquiry is an initial suspicion, i.e. the mere suspicion that a criminal act has taken place. This could be triggered by the initiation of legal proceedings by a competitor, by citizens' initiatives or by allegedly injured parties or indeed employees who left the company with a grievance.

However, such criminal proceedings must be taken seriously. They affect both the persons concerned and the company, for instance by damaging the company's image, reduced credit ratings, lower sales, etc.

This makes it all the more important that the right action is taken at the earliest possible stage. Official proceedings follow certain rules, and in the case of criminal proceedings, these rules include the right to legal counsel. Claiming this right and asserting the right to remain silent is not an admission of guilt. The provision of information and submission of records may only take place after consultation with the legal department. The legal department will defend, as appropriate, the rights of the parties involved at hearings or examinations by the criminal prosecution authorities



