



# CORPORATE COMPLIANCE STRUCTURE OF THE NEA GROUP

## FUNDAMENTAL GUIDELINES

- **Sustainable, profitable performance** Of all Group-Companies
- **Innovation in technology and service** Market-leadership and customer-connectivity
  - **Intercultural competence** Global business and cross-linkage of Group-Companies
- **Mutual respect and open dialogue** Human factor and commercial activity
  - **Health & safety** Responsibility for all Group-Employees
  - **Environmental protection** Postulate of responsibility for the future
  - **Integrity** Daily ambition

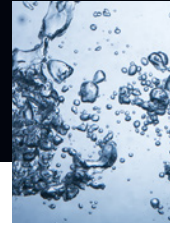
## Expertise and responsibility

This motto is the key to the success of the NEA GROUP. Fundamental to this is lawful and ethical conduct. Alongside high and specific technical expertise, the sense of our employees for responsibility is the substantial factor for the success of our international group of companies and representations.

Important key for this mutual understanding is probably the over 180-years of company history and the fact that the NEA GROUP is – up to today – a successful family-owned enterprise. This implies a flat command structure and fast decision-making processes.

Besides that the NEA GROUP is a reliable and long-term partner for our CUSTOMERS, SUPPLIERS, EMPLOYEES and AUTHORITIES.

All this leads in total to the definition of COMPLIANCE as we practise this idea in the NEA GROUP.



## **CORPORATE EXPERTISE – CORPORATE RESPONSIBILITY**

### **Progression of the „NEA COMPLIANCE GUIDELINE“**

#### **Laws and regulations**

The NEA GROUP respects applicable laws all over the world and requires its employees and business partners to do the same. This guideline lists some of the main points that are of particular practical relevance for the development of the NEA COMPLIANCE GUIDELINE.

## **THE NEA COMPLIANCE GUIDELINE**

#### **Fairness and respect in activities with one another**

Every employee is an ambassador of the NEA GROUP. The respective company expects its employees to be fair, objective and friendly in their activities with colleagues, customers, suppliers and third parties. There has to be no discrimination whatsoever.

#### **Separating corporate from private interests**

Every employee of the NEA GROUP must separate his or her private interests from those of the company. The same applies – for sure – in business relationships with third parties or also when making personnel decisions. Guideline for our employees is, that only impartial criteria have to be taken into account.

#### **Compliance with the national law and the international trade law**

The national laws and regulations of the respective countries of the GROUP companies and representations are absolutely binding. The same applies of course for the specific Export Control Regulations.

#### **No antitrust violations**

The NEA GROUP is committed to the principles of free competition and fair terms. In this regard the GROUP adheres antitrust laws all over the world strictly. Even the appearance of using anti-competitive practices in the NEA GROUP must be avoided to prevent the GROUP from any damage with regard to its reputation.



### **Working with authorities**

NEA GROUP endeavors to be cooperative and open in its activities with national authorities. This is much easier because most of our employees are local citizens. Safeguarding the rights of the company and its employees – in case of investigations by the authorities – is not in contradiction to this.

### **Intellectual property rights**

Inventions, patents and/or other intellectual property rights are outstandingly important for the future of the NEA GROUP. We are specially focussed on protecting our industrial property rights, as also our trade mark rights. Of course we respect the similar rights of our competitors with the same approach.

### **Product safety**

The principles of product safety are essential in our business - though we deliver our products almost exclusively in very sensitive industries (e.g. oil and gas sector, chemical industry). This demands for sure that NEA GROUP assumes responsibility for the entire product cycle – and we do. With our after market service organization we ensure a very safe and long term use of our products.

### **Occupational safety**

Careful planning and operation are the best way to avoid malfunctions, accidents or major incidents. That is why NEA GROUP modernizes its facilities steadily.

Additionally every single GROUP employee is responsible for occupational safety at his or her workplace. Beside that environmental protection, industrial hygiene and work legal safety regulations have to be applied strictly.

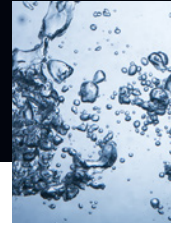
### **Data protection**

All documents and data used at a workplace in the NEA GROUP is effectively protected from access by unauthorized persons and/or third parties.

Computer data is secured through the use and frequent changing of passwords. This is described in detail in the NEA Quality Management System and defined in a GROUP wide data protection contract.

### **Environment**

In line with the entirety of environmental laws and regulations NEA GROUP implemented an environmental plan in its Quality Management System. On that basis NEA GROUP is able to improve its environmental performance steadily.



## **IMPLEMENTATION of the „NEA COMPLIANCE GUIDELINE“**

- 1.** The NEA GROUP offers its companies and employees the use of all necessary sources of information including the GROUP management, the local management, the IMS, the Counsel of its Legal Department, the help of colleagues all over the world via media and intranet and the assistance by third parties (e.g. externals).
- 2.** Violations against the „NEA COMPLIANCE GUIDELINE“ will not be tolerated by the group management. In case of any doubt, the employee must seek advice from the relevant departments in the company.  
Every local managing director must ensure, that his company conforms to the above-noted requirements of the guideline. If the existing management instructions do not apply to the local circumstances the local managing director is responsible to establish his local management instruction.
- 3.** The Integrated Management Representative will monitor the compliance with the corresponding management instructions underlying this guideline at regular intervals. As far as needed the IMS department will audit the GROUP Companies – if necessary under consultation of Third Party Services.