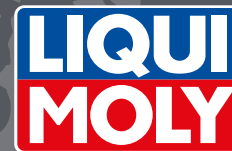


CODE OF COMPLIANCE

LIQUI MOLY GROUP



THE LIQUI MOLY GROUP

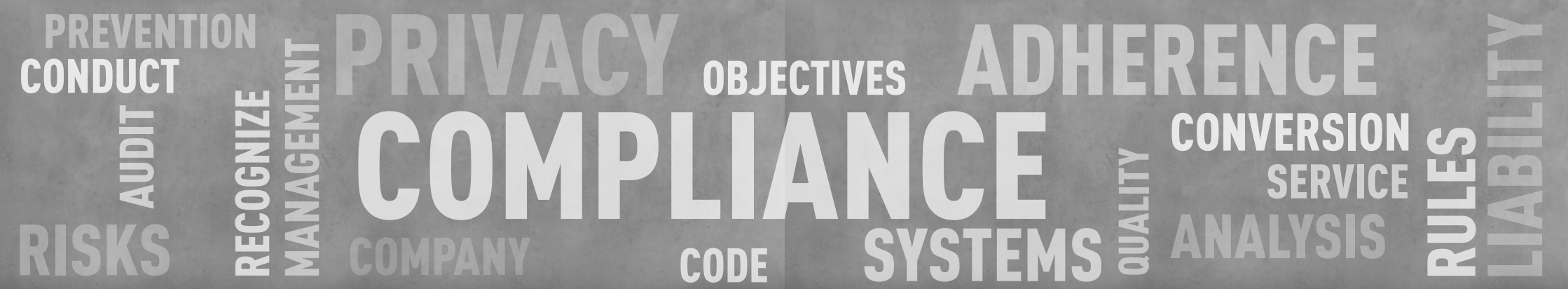


Two brands, one world - that's the LIQUI MOLY Group, composed of LIQUI MOLY GmbH in Ulm and Mineral Oil Factory Meguin GmbH and Co. KG in Saarlouis. The group develops and produces in Germany while the portfolio of products is marketed and distributed throughout the automotive sector in more than 150 countries. With a portfolio of around 4,000 items, the group offers a product range that is unique in its variety, including motor oils, additives, greases, pastes, sprays, vehicle care products, adhesives and sealants as well as an extensive range of accompanying services.

LIQUI MOLY was founded in 1957 in Ulm on the Danube. It all started with an additive. LIQUI MOLY later recorded an immense growth spurt after the decision to include engine oils in its product portfolio. Through this decision the connection with Saarlouis was established. Saarlouis is home to the Meguin mineral oil Factory, founded in 1847. This cooperation led to the creation of the LIQUI MOLY Group in 2006. As the product portfolio continues to grow, so does our distribution network through companies located in the USA, South Africa, the Iberian Peninsula, France, and Italy. In a marketplace with strong competition through large global corporations, the LIQUI MOLY Group persisted and has grown to be the most popular motor oil brand in Germany.

People are our center of attention

LIQUI MOLY and Meguin, behind the "Made in Germany" mantra, stand for excellent product quality and outstanding customer service. The success of the group is based on its philosophy: focus on the people, and more precisely, on the co-entrepreneur. They are the source of our success and to use a car analogy, the engine that moves the group. Sales figures are important in every balance sheet; however, the key figure is one that cannot be found in any balance sheet—the co-entrepreneur. We developed a system of values: thereof due diligence, respect, decency, tolerance, justice, honesty and gratitude are the most important values.



INTRODUCTION

The Code of Compliance represents an “orientation guide” and expresses LIQUI MOLY Group’s values. The guide sets forth the responsibilities, ethics, and behavior that we expect not only from our co-entrepreneurs, but also from our business partners - rules of conduct that define us together!

We are committed to comply with all applicable laws, standards, and regulations as well as all legal and official responsibilities. The principles for sustainable economic activity can be found in the Code of Compliance.

The Code of Compliance defines minimum requirements for all co-entrepreneurs of the LIQUI MOLY Group and are to be observed worldwide.

Therefore you must be familiar with the Code of Compliance and follow the principles and rules contained therein. The management and the executives of the LIQUI MOLY Group have a role model function and therefore a special responsibility.

Guenther Hiermaier and Dr. Uli Weller
Management LIQUI MOLY Group

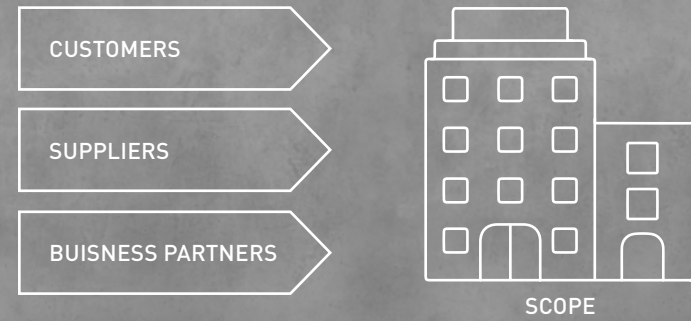


GUENTER HIERMAIER
Managing Director LIQUI MOLY Group



DR. ULI WELLER
Managing Director LIQUI MOLY Group





CONTENT

SCOPE

Scope

1.	General principles	8
2.	Dealing with business partners	15
3.	Avoiding conflicts of interest	20
4.	Handling of information	23
5.	Implementation of the Code of Compliance	27
	Contact person of the LIQUI MOLY Group	31

This Code of Compliance applies to all co-entrepreneurs of the LIQUI MOLY Group and describes principles of behavior for all co-entrepreneurs.

It is a guideline that is meant to support everyone in their work, support their decision making in accordance with the law and the values of the LIQUI MOLY Group. It serves the protection of the LIQUI MOLY Group and their co-entrepreneurs. The rules in this Code of Compliance are binding. If country-specific conditions of the LIQUI MOLY Group require further rules, then this Code of Compliance may be supplemented at respective level. The Code of Compliance also applies when dealing with customers, suppliers, and other business partners.



I. GENERAL PRINCIPLES



We adhere to our values

Mutual trust, predictability, honesty, and straightforwardness guide our actions internally and externally. We protect the image of the LIQUI MOLY Group and avoid conflicts of interest. We act straightforward and predictably.

The corporate culture of the LIQUI MOLY Group is characterized by mutual respect and responsible interaction. This applies both in the dealing with business partners as well as in cooperation with each other throughout the LIQUI MOLY Group.

Gratitude Trust Fairness
 Welfare Decency and
 Loyalty Friendship
 Modesty Effort Diligence Help Love Openness
Honesty Respect
 Tolerance Work Peace Teamwork
 Reliability Goodness
Humility Service



We act in compliance with the law and observe internal regulations

Applicable laws and internal regulations must be observed strictly. Executives are required to stay informed about local laws and changing regulations and to assure compliance with the same.

It is part of our self-image that we as co-entrepreneurs of the LIQUI MOLY Group strictly adhere to applicable laws and regulations.





We respect human rights and the human dignity

We respect personal and human rights, ostracize child and forced labor, and only make fact-based decisions.

We do not allow any discrimination based on race, origin, religion, age, disability, or sexual identity. We do not tolerate violence, intimidation, bullying, or sexual harassment at work.



HUMANITY BONDS US

Especially in uncertain times one truth applies: As long as humanity bonds us with one another, it doesn't matter what separates us. LIQUI MOLY stands for the living together and the cooperation of people of different cultures and religions. We produce high quality motor oils and additives made in Germany and export to more than 150 countries. The LIQUI MOLY worldwide family gives every member support and a feeling of security.

This is because together we are a global brand.

DR. ULI WELLER
Managing Director LIQUI MOLY Group

GÜNTER HIERMAIER
Managing Director LIQUI MOLY Group



We handle company property respectfully

We handle the material and intangible property of the LIQUI MOLY-Group carefully and do not use it for private purposes. We do not tolerate negligent or deliberate acts against company property.



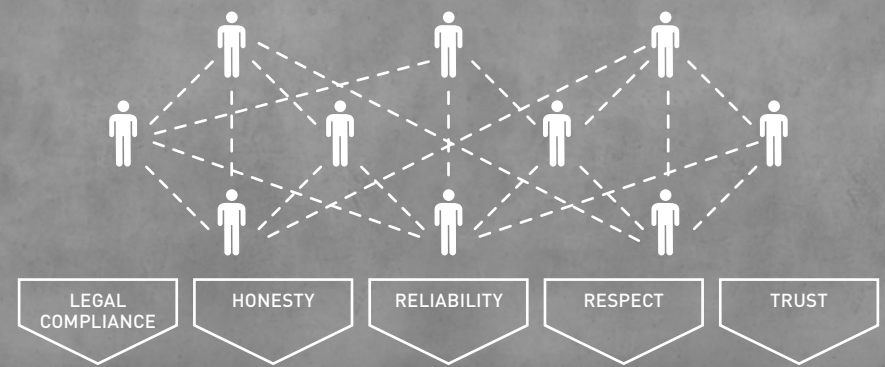
We are committed to safety in the workplace

We provide jobs that meet local and federal regulations.

The health of our co-entrepreneurs is very important to us; protecting the same is our top priority.

We offer our co-entrepreneurs a safe working environment and ensure that all provisions, laws, and standards are met.





2. DEALING WITH BUSINESS PARTNERS



We stand for sustainability

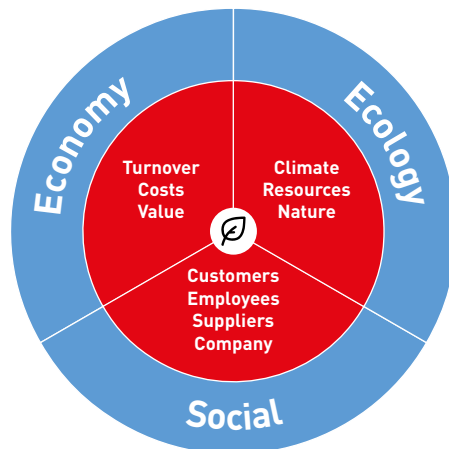
We design our products, services, and processes in an environmentally friendly manner. Wherever we operate, we follow environmental requirements and handle natural resources responsibly.

As a company, we pay attention to the efficient use of energy and resources.

As part of our comprehensive environmental management, we continuously analyze, improve and review our use of energy and resources.

The Code of Compliance also applies when dealing with customers, suppliers, and other business partners.

We expect from our business partners that they adhere to our principles. Compliance, honesty, reliability, respect and trust present a universal foundation for any good business relationship.





We reject all forms of corruption and bribery

We reject corruption and bribery in all their forms. We comply with all relevant laws and regulations and provide clear internal rules of conduct.

The LIQUI MOLY Group does not tolerate corruption or bribery in any form, neither offering and granting, nor demanding and accepting inappropriate benefits.



We advocate fair competition

We are committed to fair, performance-oriented competition and do not participate in anti-competitive agreements.

This means that we are not interested in cartels or participate in other restrictive or unfair practices. It is the responsibility of executives to ensure this.

We only conduct arrangements with other market participants within the applicable legal limits.



We do not allow ourselves to be used for illegal purposes

We do not participate in money laundering or terrorist financing activities and immediately report suspected cases.

We only want business relationships with reputable partners who act lawfully and draw their funds from legitimate sources. We therefore abide by the money laundering ban and do not participate in the financing of illegal activities.



We follow all applicable export control and customs laws

In international trade, we observe export bans, sanctions and embargoes. If we have any questions or face uncertainties, we contact the right authority. We created an authority for cross-border traffic. Our co-entrepreneurs always follow our export control processes.

We are aware that not only physical goods are affected, but also information and technologies. All co-entrepreneurs are required to act prudently and not to disclose any information without permission. Co-entrepreneurs can and should direct questions to their manager or to responsible departments in the company (at any time).



3. AVOIDANCE OF CONFLICTS OF INTEREST

Conflicts of interest can affect integrity, professionalism and negatively impact the success of the LIQUI MOLY Group. The interests of the LIQUI MOLY Group are to be prioritized over private interests by all co-entrepreneurs – this applies to non-competition and ancillary activities.



Non-competition

We do not compete within the LIQUI MOLY Group. A co-entrepreneur of the LIQUI MOLY Group shall not work for or have any stake or own a company that competes with the LIQUI MOLY Group.



RESPONSIBILITY

HANDLING

DATA PROTECTION



4. DEALING WITH INFORMATION



Side ventures

Side ventures must not harm the LIQUI MOLY Group and must be approved in advance.

The LIQUI MOLY Group practices an open information policy. We entrust our co-entrepreneurs with information for their work.



We handle company data responsibly

We keep information confidential. The exchange of information with external agencies may only take place through appointed individuals and approved departments such as the executive team, the press department, and the legal or finance department.

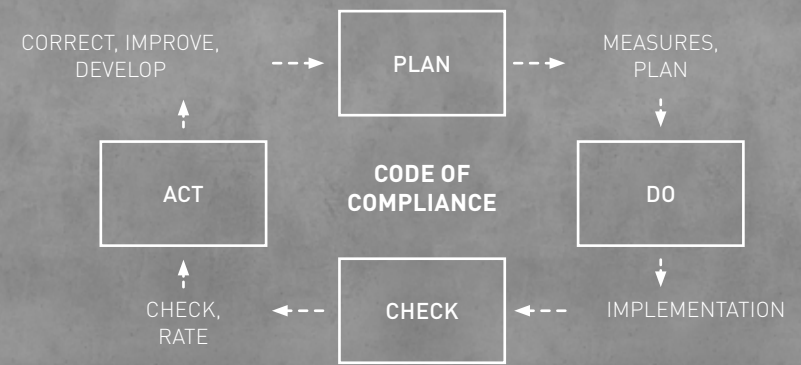
The obligation to maintain confidentiality also applies after the employment has ceased.



We do not take advantage of internal knowledge

We are not allowed to use insider information for our own, or the benefit of a third party.

We often have knowledge of the LIQUI MOLY Group or its business partners which is not known to third parties and therefore not public.



5. IMPLEMENTATION OF THE CODE OF COMPLIANCE



We adhere to data protection and data security

We treat personal and other data carefully and ensure that personal rights are not violated.

We exercise caution when collecting and processing personal data. We adhere to applicable data protection laws and have designated a department, which is responsible for compliance.

1. Plan

The current state is analyzed, processes are planned, goals set, and measures are initiated.

2. Do

Measures are implemented and the processes are applied in practice.

3. Check

The processes and results are evaluated.

4. Act

Processes are evaluated and, if necessary, corrected or further developed.



How do we make decisions?

The regulations in this Code of Compliance provide guidelines for the behavior of the co-entrepreneurs of the LIQUI MOLY Group. In concrete everyday situations, we often have to make decisions that are not clearly defined by the Code of Compliance or other guidelines of the LIQUI MOLY Group.

In such cases, we can always contact our managers or the responsible department in the company. However, we often can apply common sense and our sense of decency and integrity.



Obligations of our managers

The executives of the LIQUI MOLY Group act as role models. They are available for questions and help co-entrepreneurs perform their tasks and duties.

The LIQUI MOLY Group follows a decentralized and liberal management approach. As such, the responsibility for results is delegated far down the hierarchy.

We follow the motto, "The greater the success, the higher the degrees of freedom."

The managers are available for you to answer any of your questions or concerns. However, the responsibility of the managers does not discharge the co-entrepreneurs from their own responsibility.



CONTACT PERSON LIQUI MOLY GROUP



What to do if something illegal or a violation is noticed?

All co-entrepreneurs are encouraged to report any violations of the Code of Compliance or applicable law or other binding rules. Reports are treated confidentially.

The first point of contact for reports is the line manager. Co-entrepreneurs may also contact the Compliance Officer responsible, the management team, or the external reporting office at any time.



In addition, the Group-wide **SpeakUp** whistleblowing system is available for reports.

Violations of the Code of Compliance will not be tolerated and can have serious consequences.



For questions or reports that cannot be resolved with your immediate manager or executive team, specialized contact persons and the Group-wide SpeakUp whistleblower system are available for this disposal.



LIQUI MOLY Group
Rainer Maass
Company Compliance Officer
Phone: 0731/14 20 630
Mail: rainer.maass@liqui-moly.de



Reporting Office for Compliance Violations
external
www.bkms-system.net/wuerth



LIQUI MOLY GmbH
Jerg-Wieland-Straße 4
89081 Ulm
GERMANY

Phone: +49 731 1420-0
Fax: +49 731 1420-311
E-Mail: info@liqui-moly.de
www.liqui-moly.com