



CODE OF CONDUCT

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Dieter Siegel, CEO

Born 1964

Joined Rosenbauer: 2009

Date of first appointment: 2011

End of current period of tenure: 2015

BUSINESS UNITS	Specialty vehicles, Fire & safety equipment and USA
FUNCTIONS WITHIN THE GROUP	Corporate strategy, marketing and advertising, personal and social management, corporate communications, international sales



Gottfried Brunbauer, CTO

Born 1960

Joined Rosenbauer: 1995

Date of first appointment: 2000

End of current period of tenure: 2014

BUSINESS UNITS	Municipal vehicles, Aerials and Fire fighting components
FUNCTIONS WITHIN THE GROUP	Technical Group coordination, logistics, innovation management, quality management, environmental management



Robert Kastil, CFO

Born 1949

Joined Rosenbauer: 1983

First appointment: 1993

End of current period of tenure: 2013

BUSINESS UNIT	Business Development
FUNCTIONS WITHIN THE GROUP	Financial accounting and controlling, Group finance, IT, risk management, internal audit and control system, investor relations

Dear colleagues,

Conscientious, responsible and lawful conduct is a fundamental cornerstone of our success, and it has a critical influence upon our company's reputation.

We at Rosenbauer strive to achieve exemplary quality not only in terms of our products and processes, but also in the way we conduct ourselves towards third parties. This is why we set very high standards for ourselves and for every single employee, based on the principles and values outlined in our mission statement.

We on the Rosenbauer Executive Board have thus decided to draw up this Code of Conduct as a summary of the "ground rules" for proper behavior that we expect all our employees – all over the world – to uphold in the course of their business dealings.

If any local regulations are even more strictly worded than this Code, then it is these local regulations that must be observed.

We expect you to make this Code of Conduct the binding standard for your behavior, and to be well aware of the responsibility you have in this regard.

In doing so, you will be making an indispensable contribution towards the development of our company – both today and in the future.

Leonding, November 2011



Dieter Siegel



Gottfried Brunbauer



Robert Kastil

(1) We abide by the law.

We observe the legal norms and official regulations in the countries in which we operate. This is in line with the fundamental values of the Group and shall apply unconditionally, regardless of any consequences.

Unlawful acts are not only unethical but also lead to serious reputational damage. They may incur sanctions and indemnity claims, and lead to the loss of orders.

Employees who break the law must expect to be individually prosecuted. In several countries in which Rosenbauer operates, companies can also be called to account under criminal law if decision-makers or employees commit an offence for the benefit of the company or in contravention of corporate duties.

Grounded on the foundations of the Charter of the United Nations and of the European Convention for the Protection of Human Rights and Fundamental Freedoms, human rights are regarded as fundamental values which must be respected and observed by all employees.

No individual is to be disadvantaged or harassed on account of his or her race, ethnic origin, skin color, religion, gender or other legally protected attributes. Discriminatory practices are against the law; they are contrary to basic human rights and to the principle (as enshrined in our mission statement) of dealing with other people in a spirit of mutual confidence and esteem, both inside and outside the company.

Every employee is obliged to inform him/herself on the legal regulations applying in his or her area of responsibility, and is expected to comply with these regulations. In case of doubt, the respective line manager must be asked to issue a written instruction and/or to provide clarification by obtaining definitive legal advice, in writing.

(2) We attach great importance to fair competition.

Transparent, fair conduct on the market is in the best long-term interests of both the company and its employees. For this reason, we do not come to any arrangements with market competitors regarding our competitive behavior, and we comply strictly with any laws protecting competition.

To ensure fair competition, certain business practices, such as misleading the consumer, belittling or disparaging another company, or advertising with inadmissible “extras”, are forbidden.

In particular, it is also forbidden to collude with a view to fixing prices and terms, to apportion markets and regions, to allocate customers, and to co-ordinate bidding as well as development or production strategies. It is not only explicit understandings that are prohibited, but also co-ordinated, harmonized behaviors.



Even the act of communicating with competitors to exchange information which could be the basis for co-ordinated behavior (i.e. especially regarding prices, costs, margins, terms, customers, bids, product developments, production capacity) is inadmissible.

Breaches of competition law are resolutely pursued by both national and international competition authorities, and may have existentially threatening consequences for the company and for the persons concerned.

(3) We reject bribery.

Corruption endangers the rule of law and, by disregarding the principle of equal treatment, also jeopardizes normal free competition.

Bribery is unethical, immoral and fraught with very great risk, both for the employees concerned and for the company. This being the case, bribery is by no means in Rosenbauer's interest and must be avoided.

In compliance with the statutory provisions, all employees are forbidden to either offer or accept favors, either directly or indirectly, if these are intended to (or might only appear to be intended to) influence business transactions in an inadmissible manner.

Offering money or other favors is not permitted under any circumstances, especially where this goes beyond merely minor gratuities to office holders. We exercise caution when it comes to accepting and giving gifts and other gratuities (including e.g. invitations to meals or to events). On no account may these be such that the recipient has to conceal the fact that he/she has accepted them, or that accepting them places the recipient under any moral obligation. Any doubtful cases must be discussed and agreed with the Compliance Officer or the employee's line manager; the course of action taken must be in strict compliance with the relevant national rules and regulations.

Commissions and remunerations received by dealers, intermediaries or consultants may only be paid for allowable services that have actually been performed, and must thus be commensurate with these services.

(4) We do not commit tax evasion or subsidy fraud, nor do we aid and abet any such course of action.

Due to the regular inspections carried out by the authorities, the risk of detection is particularly high in the case of tax and subsidy offences. Any grounds for suspicion regularly lead to the investigating authorities being called in. All employees are required to co-operate with the responsible authorities in establishing the facts of the case.

Assessing the relevant factual issues from the point of view of taxation or subsidy law is often difficult. In cases of doubt it is necessary to engage a tax consultant or certified public accountant to provide clarification.

(5) We abide by the regulations governing cross-border trade.

Import or export restrictions must all be observed, without exception, and any required (special) permits must be obtained.

Compliance with the applicable regulations is monitored by regular inspections carried out by the responsible authorities. Full co-operation must be given to the authorities, and the customs duties and taxes levied are to be paid within the time prescribed. There is a threat of serious sanctions in the event of non-compliance.

(6) We avoid hazards to both persons and the environment.

We set very high standards for the quality and safety of our products. We offer our customers assistance in using our products for their stipulated purpose, notably by providing appropriate training to help them prevent and avoid hazards.

We ensure that our employees have a safe working environment. Accident prevention rules must be strictly observed and continually monitored for efficacy. Any shortcomings must be identified and eliminated immediately. The managers in charge bear a particular responsibility here.

Rosenbauer guarantees compliance with the regulations and environmental protection standards applying to each of its plants, and acts in an environmentally conscious manner at all of its facilities. We avoid having a damaging impact upon the environment. We are sparing in our use of natural resources, and strive to ensure that this is also true for the products themselves.

(7) We avoid conflicts of interest and protect Rosenbauer's physical and intellectual property.

Company employees are required to steer clear of situations in which their personal or business interests come into conflict, or risk coming into conflict, with those of the company.

Sideline business activities require the prior consent of the employee's line manager. This is particularly important with regard to secondary activity on behalf of competitors, customers or suppliers, and to equity interests held in these.

Using one's professional activities for private advantage is forbidden and is utterly contrary to the Rosenbauer corporate ethos. At no time may business partners be given preferential treatment for reasons of private interest.

We treat our operating resources carefully, using them only for their intended purpose. It is only allowed to use operating resources for private purposes in cases where this is expressly permitted.

We are responsible and cost-efficient in the way we make use of Rosenbauer's assets. Materially unjustified and unnecessary expenses must always be avoided, without exception. We take our business decisions within the legal bounds and on the basis of a commercially transparent evaluation of the opportunities and risks involved.

As a technology company, Rosenbauer is especially concerned to protect its intellectual property and is dependent upon its know-how. Confidential information of any kind which an employee obtains in the course of his/her professional activities (including information from outside his/her immediate sphere of work) may not be used for pursuing the employee's own interests, nor may it be made accessible to third parties.

This also applies to information that we receive from our business partners. If special circumstances (as is the case with e.g. sensitive project or order information) necessitate a particularly high degree of confidentiality, then we maintain such confidentiality vis-à-vis Rosenbauer colleagues as well.

It must be ensured – especially by employing suitable technical means – that company information, of whatever kind, is kept secure at all times.



(8) We strictly comply with the governing capital-market regulations.

Information with potential to substantially influence the price of the Rosenbauer share if it became public knowledge (insider information) must not be divulged to third parties. Such information would include e.g. unpublished revenue or results figures, major pending order intakes and information on planned acquisitions or important product innovations that have not yet been communicated to the general public.

Exceptions to this rule may only be made where Rosenbauer colleagues need this information in order to carry out their work for the company. On no account, however, may this knowledge be used for share trades, either directly or indirectly by way of third parties.

The lock-up periods stipulated by Executive Management and required by stock corporation law (applying in particular to executive personnel and to staff in “high-confidentiality areas”, meaning areas which regularly, or in certain special cases, receive confidential information) must be strictly complied with.

(9) We deal responsibly with personal data.

We treat the privacy (including person-related data) of our employees and contractual partners in strict confidence. The legal norms that are in force for the protection of personal data must be strictly upheld.



(10) This Code of Conduct is binding upon all Rosenbauer Group employees, worldwide.

Particular responsibility is borne by all managerial personnel. They are called upon to actively live out the values and rules of conduct that are set out in this Code, and are the first points of contact when the employees placed under them have any questions about what is the correct conduct in any individual case. It is also incumbent upon them to ensure that this Code is adhered to in their particular area of responsibility.

Breaches of this Code will not be tolerated and will always result in disciplinary measures and (where appropriate) in legal action under tort law. All tip-offs about such breaches will be followed up. Where tip-offs are given in good faith, the whistleblower is assured of confidential treatment, i.e. that his or her anonymity will be guaranteed.

Instructions from superiors which obviously go against the rules of this Code of Conduct are not binding, and so cannot be cited as justification for any misconduct.

Tip-offs about breaches of the Code of Conduct may be given to the Compliance Officer, to the respective line manager, the Management of the company concerned, the central Personnel Department in Leonding, or to any member of the Rosenbauer Executive Board.

Acting on its own initiative, Rosenbauer shall take all appropriate measures to continually apply the rules set out in this Code of Conduct.



