

CODE OF CONDUCT

HUEHOCO Group

1. Preamble

The HUEHOCO Group is committed to responsible, sustainable, and lawful conduct throughout the value chain.

Our business conduct is guided by our core corporate values:

Respect – Courage – Dedication

These values shape our corporate culture and guide our day-to-day decisions and actions. They are firmly embedded in our value book, which is provided to all employees when they join the company. The value book complements this Code of Conduct and sets out our expectations for responsible behavior.

This Code of Conduct is based on the following international standards and principles:

- the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG),
- the ILO Fundamental Conventions,
- the Universal Declaration of Human Rights,
- the UN Guiding Principles on Business and Human Rights, and
- the OECD Guidelines for Multinational Enterprises.

The principles set out in this Code apply to all employees of the HUEHOCO Group. To the extent that we are able to influence them, they also apply to our suppliers and other business partners throughout the supply chain.

2. Compliance with Laws and Corporate Responsibility

We comply with all applicable national and international laws and regulations. Where legal requirements differ from this Code, the more stringent requirement shall apply.

Managers have particular responsibility for implementing and ensuring compliance with this Code. However, compliance is the responsibility of every employee.

3. Respect for Human Rights

We are committed to respecting and upholding internationally recognized human rights.

3.1 Prohibition of Child Labor

We do not employ children as defined in ILO Conventions No. 138 and No. 182.

- The minimum age for employment shall be at least the statutory minimum age in the country concerned.
- Persons under the age of 18 must not perform hazardous work.
- The health, safety, development, and education of young workers must not be compromised.

We expect the same standards from our direct and indirect suppliers.

3.2 Prohibition of Forced Labor and Modern Slavery

We do not tolerate any form of:

- forced labor,
- involuntary labor,
- debt bondage,
- human trafficking, or
- modern slavery.

All employment relationships must be entered into voluntarily.

The following practices are prohibited:

- withholding identity documents,
- requiring deposits or charging recruitment fees, or
- compelling employees to work through threats, violence, or intimidation.

Employees are free to terminate their employment in accordance with applicable statutory notice periods.

3.3 Fair Working Conditions

Working Hours

We comply with all applicable legal requirements concerning:

- maximum working hours,
- rest periods,
- breaks, and
- holiday entitlements.

Overtime may only be performed within the limits permitted by law and will be compensated in accordance with applicable statutory, collective bargaining, company, or employment-contract provisions.

Wages and Social Benefits

We provide appropriate remuneration that complies with all applicable legal requirements, including:

- payment of at least the statutory minimum wage,
- compliance with applicable collective bargaining agreements,
- transparent and understandable pay statements,
- no unauthorized deductions from wages, and
- provision of all legally required social benefits.

Remuneration is paid regularly and on time.

3.4 Freedom of Association and Collective Bargaining

We respect employees' right to:

- form or join trade unions,
- establish employee representative bodies, and
- engage in collective bargaining.

No person may be disadvantaged because of trade union membership or activity.

3.5 Equal Treatment and Non-Discrimination

We do not tolerate discrimination on the grounds of:

- gender,
- age,
- ethnic or social origin,
- nationality,
- skin colour,
- religion or belief,
- disability,
- sexual orientation or gender identity,
- political opinion or belief, or
- social background, or
- any other status or characteristic protected by applicable law.

Harassment, bullying and any form of degrading treatment will not be tolerated.

4. Occupational Health and Safety

The safety and health of our employees is our highest priority.

We provide:

- safe working conditions,
- appropriate protective measures,
- regular training, and
- the continuous improvement of our occupational health and safety management system.

Hazards are systematically identified, assessed, and minimized.

5. Environmental Responsibility

We are committed to environmentally responsible business conduct and to compliance with all applicable environmental laws and regulations.

This includes, in particular:

- the responsible use of resources,
- the prevention and reduction of emissions,
- proper waste management and disposal,
- the safe handling of hazardous substances, and
- the continuous improvement of our environmental performance.

6. Integrity in Business Dealings

6.1 Anti-Corruption

Bribery, the acceptance of bribes and any other form of improper advantage are prohibited.

Business decisions must be made solely on objective business grounds.

6.2 Conflicts of Interest

Personal interests must not improperly influence business decisions. Any actual or potential conflict of interest must be disclosed promptly.

6.3 Fair Competition

We are committed to fair competition and comply with all applicable antitrust and competition laws.

7. Protection of Information and Assets

7.1 Confidentiality

Trade secrets and confidential business information must be protected and treated confidentially.

7.2 Data Protection

Personal data is processed only in accordance with applicable data protection laws.

7.3 Company Property

Company property must be handled with care and used only for its intended business purpose.

8. Responsibility in the Supply Chain

We expect our suppliers to comply with the principles set out in this Code.

In particular, suppliers are expected to:

- apply these principles throughout their own supply chains,
- cooperate openly in the assessment and investigation of risks and violations,
- provide all required information and supporting evidence, and
- implement agreed remedial measures.

9. Reporting Concerns

We maintain a confidential whistleblowing system.

Concerns regarding potential violations of this Code, including human rights or environmental risks, may be submitted through internal or external reporting channels. All reports will be treated confidentially.

Whistleblowers must not suffer any form of retaliation or disadvantage. The reporting procedure is available to employees and affected external stakeholders.

10. Implementation and Monitoring

This Code of Conduct is implemented through appropriate organizational measures, including:

- publication on our website,
- communication across all Group companies,
- training for employees, and
- regular review and further development of this Code.

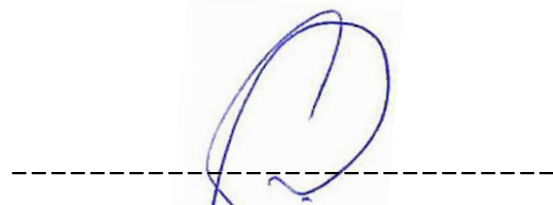
11. Handling Violations

Any identified violation of this Code of Conduct will be reviewed. Depending on its nature and severity, appropriate measures may be taken in accordance with applicable legal, company and contractual requirements. Such measures may include:

- disciplinary or other employment-related measures involving employees, and
- contractual measures involving suppliers, service providers, and business partners, up to and including termination of the business relationship.



Iris Bovenkamp



André Bovenkamp