

## **Code of Conduct HUEHOCO Group**

### **Compliance with laws**

We abide by the laws of the countries in which we operate. This applies regardless of any economic disadvantages that may arise as a result. We expect the same from our business partners.

In cases of doubt, we would prefer not to achieve an objective than to be in violation of the law. In the event that national laws or other relevant regulations deviate from the rules contained in this code of conduct, applicable international guidelines or supplementary regulations, the stricter regulation takes precedence in each case.

### **Compliance is the responsibility of each individual employee**

Every employee is personally responsible for ensuring that laws are complied with in their area of responsibility. The way that employees present themselves, act and behave contributes greatly to the reputation that the HUEHOCO Group enjoys.

Managers are role models for all employees. They exemplify what this code of conduct stands for and ensure that the employees are familiar with and comply with its contents.

### **Reporting violations**

Every employee is responsible for reporting infringements of laws, the code of conduct or other applicable guidelines.

It goes without saying that legal reporting obligations must be obeyed.

No employee shall suffer any disadvantage as a result of a report they have made in good faith. We proceed with absolute confidentiality when investigating reported incidents. Information concerning details of the person who made the report is only disclosed if they agree to this or if disclosure is absolutely essential in order to clarify the matter.

### **Responsibility**

Infringements of the code of conduct may have serious consequences for both the individual personally and for the entire HUEHOCO group of companies. If an employee commits an infringement, they must therefore expect to face the consequences associated with this. In addition to disciplinary consequences arising from breaches of duty, consequences can also include claims for damages or the filing of criminal charges.

### **Business partners and competitors**

No personal business relationships must be entered into with business partners or competitors if this would result in a professional conflict of interest.

Employees must not enter into any commercial relationship with a business partner on whom they could exert influence either directly or indirectly.

### **Personal gain arising from business relationships**

Any use of a professional activity for personal gain is forbidden. To this effect, no benefits whatsoever arising from a business relationship or the initiation of a business relationship must be accepted which could influence commercial decisions under normal circumstances. A business partner with whom an employee has direct or indirect professional contact may only be engaged on a personal basis in line with the applicable company guidelines.

### **Bribery**

Bribery is not tolerated by the HUEHOCO Group under any circumstances.

All relationships with officials, companies and private individuals must be established in such a way as to prevent any allegations of corruption from being made. We therefore refrain from offering or granting any benefits which could be interpreted as an attempt to exert influence.

### **Occupational health and safety**

The health and safety of our employees is one of our most precious assets. We therefore establish safe working conditions and incorporate occupational health and safety into our operational procedures. All employees are equally responsible for complying with our safety regulations unconditionally and for reporting any shortcomings promptly and/or remedying these shortcomings within their own area of responsibility. Every manager is obligated to support their employees in their understanding of this responsibility.

### **Right of association and right to collective bargaining**

We respect the right of employees – in accordance with applicable national law – to establish company-level organisations, join external organisations and to carry out collective bargaining.

### **Equal treatment**

Based on the Charter of the United Nations and 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.

We reject any form of unlawful discrimination and unfair treatment. Such practices are illegal and are at odds with our code of conduct.

### **Protection of business and trade secrets**

Business and trade secrets must be treated with absolute confidentiality.

No sensitive information of any kind must be used to pursue one's own interests or made available to third parties. The safe custody of company information must be ensured at all times through the use of technical aids, for example.

As a matter of course, this commitment to confidentiality applies to the same extent to information which we receive from business partners. By the same token, we also impose a contractual commitment on our suppliers and other business partners to maintain confidentiality.

Public communication and responses to media enquiries may only be issued by the employees responsible for such matters.

### **Data protection**

The protection of personal data pertaining to our employees, customers and business partners is of great importance to us. We therefore only collect, store or process personal data if this is necessary for defined, clear and legally permitted purposes.

We support the security of data and processing procedures by putting in place appropriate technical and organisational measures. Every employee must pay the necessary care and attention to the data protection rules relevant for their field of activity.

### **Company property**

As a fundamental principle, all employees must ensure that they handle property belonging to our company with care. We treat resources and equipment sparingly, carefully and in accordance with their intended purpose. Company property must not be used personally in an improper manner.