

## **Code of Conduct**

The respectful and cooperative Collaboration and the conscious exercise of social responsibility are the basis for our long-term business success.

This understanding already has a long tradition at Hauhinco. Equal opportunities and a fair compensation aligned with locals standards are a matter of course for us. Wages and other benefits shall at least comply with the respective national or local legal standards or the standards in the national economic sectors.

The essential principles and basic rules governing our behavior in our actions with business partners and the general public are brought together in the Hauhinco Code of Conduct. It is an orientation framework for employees, executive managers and general management on the following topics:

### **1. Compliance with the law**

Compliance with law, rules and regulations is an essential basic principle of responsible business conduct for us. We adhere to legal prohibitions and requirements at all times, including approval regulations in terms of trade- and export control.

### **2. Avoiding conflicts of interest**

Hauhinco avoids conflicts of interest. A conflict of interest exists whenever personal, private interests do not coincide with business interests. So, for example, if carrying on a secondary occupation, a conflict of interest can arise. Therefore, any secondary employment must be declared. Benefits provided by the business must not be used for private purposes without the prior agreement of the Company. If in doubt, consult with the Compliance Manager on how to deal with the situation.

### **3. Fair competition**

Hauhinco is committed to fair dealing in a manner fully compliant with applicable competition and antitrust legislation. Corruption and antitrust will not be tolerated (zero tolerance) and will result in sanctions against the persons concerned. Hauhinco employees may only accept, or offer a benefit, provided it doesn't create even the merest impression of having any influence on any proposed or actual decision. When in doubt, such benefits must be reported and discussed with an independent third party, or with the Compliance Manager on how to deal with them.

### **4. Preventing money laundering**

Hauhinco fulfills its legal obligations to prevent money laundering and does not participate in money laundering activities. All employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the central service department for review.

### **5. Equal treatment and non-discrimination**

A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. Hauhinco respects and attaches importance to the dignity of each person. We also expect this behavior from our employees including respect towards each other.

### **6. Human and labor rights**

We respect internationally recognized human rights and support their observance. We reject all forms of forced and child labor. We recognize the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation.

## **7. Cooperation with labor representatives**

For Hauhinco a trusting and close cooperation with employee representatives is a key component and established cornerstone of our corporate policy. Mutual trust and cooperative relations are based on an open and constructive dialogue characterized by mutual respect.

## **8. Occupational health and safety**

The health and safety of our employees are a corporate objective of equal standing with the quality of our products and our commercial success. Occupational safety and health protection are an integral part of all business processes and are included from the outset considerations. All employees shall promote safety and health in their work environment and comply with the health and safety regulations.

## **9. Sustainability and protection of environment and climate**

For us, sustainability, environmental and climate protection and resource efficiency are key corporate objectives. When developing new products and services and when operating production equipment, we ensure that all environmental and climate impacts are kept to a minimum and our products make a positive contribution to environmental and climate protection for our customers. Every employee bears responsibility for conserving natural resources and helping protect the environment.

## **10. Behavior in public and communications**

We respect the right to freedom of speech and the protection of personal rights and privacy. All employees should be aware that in their private lives they can also be seen as a part and as a representative of Hauhinco and are therefore called upon to safeguard the Company's image and reputation in the way they act and conduct themselves in public, above all towards the media. When expressing a personal opinion we pay attention not to link our personal opinion with the function and our work at Hauhinco.

## **11. Data protection and information security**

Hauhinco respects data protection and information security. It is not allowed to share or reveal any confidential Company information and trade secrets with unauthorized, non-company related persons, either during or after the employment with the Company. At the same time, we respect the confidentiality of any information from our customers and suppliers. When customers and suppliers share information with Hauhinco, it is treated with the same level of confidentiality with which we protect our own information.

## **12. Protection of company property**

We use the Company's property and resources correctly and carefully protect them against loss, theft and misuse. This is particularly the case for the intellectual property of our company, which is an asset deserving special protection. Our employees bear joint responsibility with their supervisors to ensure that business travels are always appropriate in nature and scale to the purpose of the trip and are efficiently planned and carried out taking time and cost aspects into account.