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1 Preamble

All employees (as well as members of company management) of HA-BE are bound to the rules of this code of conduct. It sets forth the values, principles and behaviour which determine HA-BE'S entrepreneurial activity. The goal of corporate management is to comply with the ethical norms and create a working environment that encourages integrity, respect and fair play. A strict business policy compliant with laws and principles is conducive to long-term company interests. In this code of conduct, the essential principles and basic rules have been summarised for one's own behaviour as well as for one's conduct towards business partners, customers and the public.

It is important to take into account here that personal integrity and sound judgment of each individual cannot be substituted. In order to meet the demands of increased social responsibility, each person must act in accordance with the applicable rules and assume personal responsibility for compliance with such rules in their own working environment.

Consistency and permanent further development are primarily dependent on the common commitment to social responsibility and the reputation as a trustworthy business partner.

The code of conduct applies worldwide to all locations and for all companies of HA-BE, even if contradictory types of behaviour or business practices should be demanded, expected or tolerated by the authorities or the public in countries where HA-BE is active. If stricter rules or principles of conduct apply in a country than are laid down in this code of conduct, such stricter rules shall be applied in these cases.

2 Conduct in the business environment

2.1 Compliance with legal rules and regulations

Complying with laws and regulations is a basic principle of responsible economic behaviour. We observe the applicable legal prohibitions and obligations at all times, even though short-term economic disadvantages or difficulties may arise for the company or individual persons therefrom. To the extent national laws have more restrictive regulations than those prevailing at HA-BE, national law shall take precedence.

2.2 Avoiding conflicts of interest

At HA-BE, business decisions are taken exclusively in the best interests of the company. Conflicts of interest in a private context or otherwise economic and further activities, also those of relatives or otherwise close persons are to be avoided right from the outset. If they arise despite this, they are to be solved while observing the legal laws and regulations of the applicable company guidelines. The prerequisite for this is the transparent disclosure of the conflict.

2.3 Fair competition

The compliance commitment given by company management governs our actions in terms of competition: HA-BE stands for technological competence, innovation, customer orientation, and motivated employees who act responsibly. Our company's highly respected reputation and sustainable economic success in global competition are based on this. Corruption and cartel infringements jeopardise these guarantees for success and will not be tolerated (zero tolerance). We do not condone bribes or (collusive) arrangements as a means of securing orders. We would rather forego a contract and achieving our internal goals than to violate laws. HA-BE has taken measures to ensure compliance with the corruption and antitrust laws, as well as the company guidelines based on such laws. Violations will not be tolerated and may give rise to penalties against the persons concerned. All managing directors, all executive employees and all other employees have to be aware of the extraordinary risks involved, which a corruption or cartel-related case may imply for HA-BE, but also for such individuals personally.

2.4 Money laundering prevention

HA-BE fulfils its legal obligations to prevent money laundering and does not partake in any money laundering activities. If in doubt, each employee is requested to have unusual financial transactions checked by the relevant financial / legal or compliance department, in particular, those involving cash funds which may constitute suspected money laundering.

3 Conduct towards colleagues and employees

3.1 Equal treatment and non-discrimination

A culture of equal opportunities, mutual trust and respect is of prime importance to us. We promote equal opportunities and prevent discrimination when recruiting employees, as well

as when promoting or granting instruction and advanced training measures. We treat all employees equally, irrespective of gender, age, skin colour, culture, ethnic background, sexual identity, disability, religious confession, or ideology. We do not tolerate unacceptable treatment of staff members such as mental cruelty, sexual and personal harassment or discrimination, behaviour (including gestures, language and physical contact) which is sexually motivated, coercive, threatening, abusive, or exploiting.

3.2 Human and employee rights

We respect internationally recognised human rights and support the observance thereof. We reject any and all forms of compulsory and child labour. We recognise the right of all employees to form unions and employee representative bodies democratically within the context of national legislation. The right to appropriate remuneration for all employees shall be respected. Payment of wages and other services are in keeping with the minimum national and local legal standards respectively.

3.3 Cooperation with the employee representatives

A trusting and close relationship with the employee representatives is an integral part of HA-BE and a proven mainstay of corporate policy. The basis for mutual trust and good cooperation is an open and constructive dialogue, characterised by mutual respect.

3.4 Industrial safety and health protection

The safety and health of our employees are an equally important company goal in addition to the quality of our products and economic success.

Working safety and health protection are essential parts of all business operations and are already included in our technical, economic and social considerations right from the outset of the planning phase.

Each of our employees shall promote safety and health protection in his working environment and comply with the work safety and health protection regulations. All executive officers undertake to instruct and support their employees in shouldering this responsibility. Employees of subcontractors commissioned by HA-BE are subject to the same safety standards that apply for our employees. This is taken into account with respect to the selection and cooperation.

4 Conduct within society

4.1 Sustainable environmental and climate protection

Our efforts to protect the environment are a commitment towards today's generation and those to come. Sustainable environmental and climate protection as well as resource efficiency are important company goals. When developing new products and services and in the operation of the production facilities, we ensure that all impacts on the environment and climate arising therefrom are kept to a minimum and that our products contribute positively to environmental and climate protection at our customers. Each employee bears

responsibility in treating the natural resources with care and thus contributing to the protection of the environment and climate through his own individual behaviour.

4.2 Donations

We consider ourselves as active members of society and therefore get involved in different ways. We render donations and other types of social commitment solely in the interest of the company.

4.3 Appearance and communication in public

We respect the right to freedom of expression and the protection of rights relating to personality and privacy. Each employee should be aware that he can also be perceived as a part and representative of HA-BE in the private sphere. We therefore request our employees to safeguard our reputation through their behaviour and appearance in public, particularly towards the media. When expressing private opinions, we make sure not to bring these private statements into connection with the relevant function or activity at HA-BE.

4.4 Dealing with authorities

We value collegial and fair cooperation with public authorities and offices. In the case of discussions in the course of investigations or other activities on the part of public authorities, our employees are required to inform the management without delay and coordinate further action. We will assert the procedural rights to which we are entitled.

5 Dealing with information

5.1 Reporting

HA-BE builds on strong values: reliability and honesty, credibility and integrity. We thus attach great importance to open and truthful reporting and communication of business matters of the company towards employees, customers, business partners, the public in general, and state institutions. Each employee takes responsibility to ensure that both internal as well as external reports, records and other documents of the company comply with the applicable statutory regulations and standards and that they are complete and accurate, up to date and system-compatible at all times.

5.2 Confidential company information

We undertake the necessary steps to protect confidential information and business documents appropriately from access and disclosure to unauthorised colleagues and third parties.

5.3 Data protection and information security

The protection of personal data, in particular, those of employees, customers and suppliers is of crucial importance to HA-BE. Throughout the world, we observe the high standards of European data protection with respect to collecting, processing, using and storing personal

data. All components of the information processing are secured in such a way that confidentiality, integrity, availability, traceability, and capacity of the sensitive information is guaranteed and protected from unauthorised internal and external use.

6 Protection of company property

We make careful and appropriate use of the property and the resources of the company and protect it against loss, theft and misuse. The intellectual property of our company constitutes a competitive advantage for HA-BE and is thus an asset worthy of protection that we defend against any unauthorised access of third parties.

We use tangible and intangible property of the company exclusively for company purposes and not for personal use, insofar as it was not expressly permitted. Our employees together with their superiors bear responsibility for ensuring that the type and extent of business trips are always proportionate to the relevant objective of the trip, and that such trips are planned and carried out economically taking time and cost factors into consideration.

7 Closing remarks

HA-BE and its subsidiaries actively promote the communication of the company guidelines and agreements on which the code of conduct is based. The subsidiaries ensure their implementation and make sure that no employee suffers a disadvantage stemming from compliance with the guidelines and agreements.

Our executive staff exercise a particular role model function and are especially judged in their actions in terms of the code of conduct. They are the first contact persons when it comes to questions about the regulations and shall ensure that all employees are familiar with and understand the code of conduct. Within the context of their executive duties, they shall prevent conduct that is not acceptable and take measures to guard against violations in their area of responsibility. Trustworthy and good cooperation between employees and executive members of staff shows itself in honest and open information and mutual support and esteem.

For more simplified readability, no gender-neutral differentiation has been made. Within the meaning of equal treatment, relevant terms generally apply to both genders.