

Preamble

This code of conduct is concerned with the adherence to the Compliance Policy at HA-BE. The Compliance Policy encompasses statutory provisions, regulatory standards and the fulfilment of other ethical standards and requirements which have been stipulated by the company itself as a rule.

1. Definition "Compliance" at HA-BE

- Compliance rules extend to all those external, legal and internal standards whose observance may prevent negative consequences such as claims for damages by customers and competitors, penalties, bad reputation of the company or a possible close-down of operations and thus enable the company to increase its efficiency and effectiveness. Therefore, compliance may be viewed as an internal instrument that wards off risks and encourages employees to behave consistently with the code. In this respect, the Compliance System promotes our sustainable growth and is used as a competitive advantage.
- The code of conduct applies to all HA-BE locations and each employee.

2. Legal principles

- We support the basic principle of strict legality and comply with the laws of the relevant applicable legal systems. We approve of the principle of acting solely in compliance with the law, irrespective of whether benefits for HA-BE ensue thereof or not. Each employee is personally responsible for the compliance with laws in his or her area of work. It is strictly prohibited to encourage third parties to commit unlawful acts or knowingly participate in such acts.

3. Responsibility for the social fundamental rights and principles

- We promote equal opportunities and equal treatment of our employees irrespective of their skin colour, ethnic origin, nationality, social origin, possible disability, sexual orientation, political or religious beliefs as well as gender or age.
- We respect the personal dignity, privacy and personal rights of each individual person.
- We do not employ persons against their will or force them to carry out work.
- We do not employ children under the minimum age of 15 years. In countries which, in the ILO Convention 138, fall under the exception for developing countries, the minimum age may be lowered to 14 years.
- We do not tolerate unacceptable treatment of staff members such as mental cruelty, sexual and personal harassment or discrimination.
- We do not tolerate behaviour (including gestures, way of speaking or physical contacts) which is sexual, coercive, threatening, abusive or exploiting.
- We ensure appropriate remuneration and guarantee to pay the statutory national minimum wages.
- We observe the statutory maximum working hours as required by law in the respective country.
- To the extent permitted by law, we recognise the employees' freedom of association and guarantee neither to privilege nor discriminate against members of employees' representative bodies or trade unions.

4. Fair competition

- No market or industry-specific agreements shall be made with competitors (prices, offers, general terms and conditions,...).
- We support fair and unadulterated competition in compliance with competition and antitrust law.
- The selection of business partners is not to be subjected to undue restrictions. The same applies to negotiations on business terms and conditions.
- Each employee undertakes to comply with the regulations governing competition and antitrust law.
- Our employees are not permitted to exchange confidential company information if opportunities for meetings arise.
- Violations against applicable antitrust and/or competition laws may have far-reaching consequences. In case of doubt, our employees undertake to obtain advice or help from the management.

5. Avoiding conflicts of interest and corruption

- No employee may exploit the business connections of the company for his own or the advantage of others, or to the detriment of the company.
- No employee may exploit private favours unlawfully in his business dealings (e.g. money, vouchers, discounts, any type of financing, material assets).
- We demand from our employees that they avoid situations that could lead to personal conflicts of interest. Each employee undertakes to obtain advice or help from the management if he has any grounds for suspicion regarding conflicts of interest or corruption.
- Our employees will always observe the limits that are appropriate and customary with regard to accepting and granting donations, as well as complying with tax provisions. This applies to gifts of any kind as well as business meals or other benefits that are likely to call independence of decision-making into question.
- Donations with a value of more than EUR 30.00 require the approval of the management at all times.
- We do not grant unjustified advantages to anyone and always avoid dishonest influence.
- The granting of donations to public officials such as judges, civil servants or politicians is generally forbidden.

6. Occupational safety

- We are committed to our responsibility for the health and safety of our employees.
- We keep risks to a minimum and take the best possible precautionary measures against accidents and occupational diseases.
- We offer training courses and make sure that all employees are proficient in occupational safety issues.

7. Environmental protection

- Our efforts to protect the environment are a commitment towards today's generation and those to come.
- We coordinate our actions with the environmental guidelines and thus contribute to the sustainable development of the environment.
- We observe environmental protection in accordance with the applicable statutory and international standards.
- We minimise environmental pollution and make continuous improvements in environmental protection.
- We maintain a certified Environmental Management System in accordance with ISO 14001.

8. Data protection and security

- We protect our data, which means our (confidential) company data as well as personal data, against access by unauthorised persons and manipulation. Personal data are only collected, processed or used to the extent permitted by law or if the person concerned expressly agrees to the collection, processing and use thereof.
- We comply with the applicable statutory regulations with respect to the safeguarding and protection of data.
- Our employees are trained on a regular basis with regard to data protection issues.

9. Company values

- Innovations, knowledge and experience ensure the ongoing existence of our company. This establishes the commitment of each HA-BE employee to adhere to a careful approach in any event.
- We safeguard industrial property rights deriving from our know-how through relevant statutory and contractual provisions.
- In addition, we obligate our employees as well as our business partners to maintain secrecy and confidentiality within the scope of cooperation. Information and trade secrets are thus safeguarded and remain undisclosed.
- The careful and respectful dealing with company property and other company values is a matter of course. Dealing with the same is only permitted for business purposes.
- Likewise, with the proper handling of the information technologies at our disposal, we avert damage to HA-BE. Our employees and business partners undertake to comply with the respective safety regulations.
- Confidential information of the company must be kept secret. This obligation remains in effect even after the termination of employment.

10. Dealing with authorities

- HA-BE values mutual and partnership-based cooperation with public authorities and administrative 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.

11. Implementing the code of conduct

- All employees comply with applicable laws.
- All employees have the duty to inform themselves about these rules and any updates thereof and to comply with this code of conduct.
- All executives bear responsibility for ensuring that this code of conduct becomes known in their area of responsibility and that employees are sensitised to conduct in conformity with the code.
- Violations of these rules by employees will not be tolerated and may result in consequences pursuant to labour law that may extend to termination of the employment relationship. Employees are held personally liable for possible damage incurred as the case may be.
- Evidence of misconduct or violations against this code of conduct will be assessed in a timely manner and are subject to investigation.
- These rules will be suitably reviewed on a regular basis as to their appropriateness, effectiveness and observance. If we identify weaknesses or violations during the review, improvements will be initiated.

*Gender-neutral differentiation has been dispensed with for reasons of convenient readability.
Relevant terms generally apply to both genders within the meaning of equal treatment principles.*