



HÄRTHA GROUP CODE OF CONDUCT

PREFACE	3
SCOPE AND APPLICABILITY	3
COMPLIANCE WITH LAWS AND REGULATIONS	3
PREVENTION OF CORRUPTION	3
GIFTS AND BRIBES	3
OTHER FORMS OF CONSIDERATION	4
CLEAR SEPARATION OF BUSINESS AND PRIVATE MATTERS	4
KICKBACKS/ “FACILITATION PAYMENTS”	4
DONATIONS AND SPONSORING	4
BUSINESS RELATIONS WITH SUPPLIERS	4
COMPLIANCE WITH FUNDAMENTAL LABOUR RIGHTS	4
HEALTH AND SAFETY OF STAFF MEMBERS	5
EQUAL PAY FOR ALL EMPLOYEES	5
BAN OF CHILD LABOUR	5
ENVIRONMENT	5
USE OF COMPANY FACILITIES	5
DATA PRIVACY AND PROTECTION	6
DISCLOSURE OF CONFLICTS OF INTEREST	6
WE RESPECT ONE ANOTHER	6
WE INSPIRE CONFIDENCE	7
WE PROTECT OUR COMPANY	7
VIOLATIONS	7

PREFACE

We, the executive management of the HÄRTHA GROUP, have prepared this code of conduct in an effort to specify uniform principles of conduct that apply to everyone - management, senior executives, and employees. We are aware of the responsibility we carry towards our customers, business partners, staff members and authorities and are convinced that the observance of stringent ethical standards - along with the compliance with applicable laws and regulations - meets our moral requirements and promotes both our competitiveness and our long-term growth.

The objective behind this code of conduct is to lay down guidelines for the core principles of our ethical conduct, thus encouraging our employees to assume full responsibility for their own actions.

We call on every employee of the HÄRTHA GROUP to make the principles spelled out in this code of conduct an integral part of their daily work routine.

To provide for easier understanding, this document will refer to "employees". This designation includes employees of all genders (M/F/D).

SCOPE AND APPLICABILITY

This code of conduct applies to all employees of the HÄRTHA GROUP, including its executive management. All supervisors and senior managers are required to ensure that the employees they have assigned are



familiar with the contents of this code of conduct.

COMPLIANCE WITH LAWS AND REGULATIONS

The compliance with laws and regulation is an essential principle of the HÄRTHA GROUP. Acting in a lawful way is a natural requirement for our company as well as a crucial necessity for our success over the long term. Every employee is required to comply with all laws, regulations and provisions applicable in the relevant country.

Aside from national laws, there are international laws and rules we need to observe in the context of our global activities and our effort to tap new markets.

These are, in particular:

- foreign trade legislation including export control provisions
- tax and customs laws



- money laundering acts

PREVENTION OF CORRUPTION

Efforts to prevent corruption are intended to avoid conflicts and, thereby, make a contribution to fighting corruption. Attaining this goal requires that all employees act in an irreproachable manner. This requirement is rooted in the policy that no staff member in the employ of the HÄRTHA GROUP shall be allowed to mix - or even give the impression of mixing - their personal interest with the interests of the Group.

Incidents of corruption and fraud are a clear and present problem in today's world of business. The resulting losses suffered by the national economies are considerable. The damage individual companies may sustain - especially in terms of legal consequences and loss of reputation - can be of enormous proportions.

The employees of the HÄRTHA GROUP are barred from accepting benefits for themselves or other parties if these considerations are inappropriate or detrimental to the interests of the HÄRTHA GROUP in any way. If in doubt, employees are obligated to notify their supervisors



without delay about any potential conflicts of interest.

GIFTS AND BRIBES

Bribery can be defined as the offering, giving, promising, soliciting, or receiving of any inappropriate advantage to and from other parties. Such other parties may include customers, suppliers or authorities.

Every employee working for the HÄRTHA GROUP is strictly prohibited from becoming involved in any type of bribery.

By contrast, gifts that do not go beyond an appropriate scope are deemed a common part of day-to-day business life. The employees of the HÄRTHA GROUP are only allowed to grant or accept gifts and other benefits if they are reasonable with regard to their value and frequency and only insofar as they are in line with common and appropriate business practices.

Monetary gifts and other benefits which are or may be detrimental to the integrity or independence of the HÄRTHA GROUP must not be accepted under any circumstances. Gifts to government authorities or organisations are not permitted.

OTHER FORMS OF CONSIDERATION

Other considerations granted to or received from third parties such as business lunches, entertainment or any associated expenses for overnight accommodation are only permissible if they are justified by and serve purposes that are related to company business. They must be reasonably proportionate to the business-related occasion in every respect. Considerations must not result in obligatory dependence / the impression that the receiver / giver of the consideration was engaged in dishonest or improper activities. Impermissible considerations must be declined right away. If in doubt, notify your supervisor and seek approval from executive management for the final decision.

CLEAR SEPARATION OF BUSINESS AND PRIVATE MATTERS

If non-cash gifts or considerations are made/accepted in an environment where business and private matters mix in a way that does not allow for a clear separation, the costs of these gifts and considerations must entirely be borne privately.

KICKBACKS/ "FACILITATION PAYMENTS"

So-called "facilitation payments" are distinguished from bribery by the fact that the former are intended to precipitate or improve national or public actions (such as customs clearing or the granting of operating licenses). While customary in certain countries, these types of payments are illegal nonetheless. Employees of the HÄRTHA GROUP are not allowed to make such payments.



DONATIONS AND SPONSORING

Donations and sponsoring activities are managed exclusively by the corporate management of the HÄRTHA GROUP. Both donations and sponsoring activities must be designed such that they avoid conflicts of interest, thus making a contribution to the fight against prejudice and corruption. Donations



to political parties are banned as a general rule.

BUSINESS RELATIONS WITH SUPPLIERS

We as a company expect our suppliers to share our value principles and abide by all legal provisions. We also expect our suppliers to apply the principles listed below, which we have established for ourselves with regard to our responsibilities towards our stakeholders and the environment:

- compliance with all applicable laws
- renunciation of corruption
- respect of the human rights of their employees,
- compliance with all laws governing child labour,
- assumption of responsibility for the health and safety of their employees
- compliance with all relevant national laws and international standards pertaining to environmental protection, and
- requirement for the supplier to implement/enforce these value principles in their own supply chain.

COMPLIANCE WITH FUNDAMENTAL LABOUR RIGHTS

We commit to respecting all fundamental rights of our workforce. All employer-employee relationships are governed by voluntarily concluded employment contracts. Forced labour is not permitted under any circumstances.

Compensation is paid at least in the amount of the minimum wages applicable in the respective location plus any additional minimum benefits required by law. Regular as well as additional work hours must correspond to all applicable national and statutory provisions.



HEALTH AND SAFETY OF STAFF MEMBERS

We are aware of our responsibility for the protection of the health and safety of human beings. Executive management in collaboration with their senior executives commit to ensuring protection by implementing the necessary occupational health and safety measures.



EQUAL PAY FOR ALL EMPLOYEES

We pay employees working in comparable positions and possessing the same amount of experience performance-based compensation that is not tied to their gender or age.



BAN OF CHILD LABOUR

Child labour is not permitted under any circumstances. Considered to be a child is any person under the age of 15 unless applicable legislation mandates an older age for work or for the completion of compulsory education. In this case, the older age shall apply.



ENVIRONMENT

As a modern corporation, we are expected to use our resources and the material we employ in a responsible and gentle manner. Only if we treat our resources with the necessary sensibility can we use them efficiently and preserve their usefulness for as long as economically reasonable. Our employees commit to treating all resources in a gentle and sensible manner and in accordance with all environmental protection requirements.



USE OF COMPANY FACILITIES

Our offices and production locations are furnished with a large number of systems and equipment such as telephones, copying machines, computers, software,

Internet equipment, production machinery, company vehicles and other work equipment including email systems and answering machines. These systems may only be employed for company purposes and never for personal use. Exceptions to this rule - including any payment for private use - can be arranged on site, provided the use of company facilities

- is not linked to any illegal activities
- does not lead to a conflict of interest or does not appear to lead to such a conflict
- does not cause significant added cost, disruptions of business or other types of negative impact for the company, e.g. on account of a conflict of interest arising from the professional duties of the employee in question or of other employees.

Under no circumstances may information be accessed or shared that incites or promotes racial hatred, the glorification of violence or other criminal offences or whose content is sexually offensive against the cultural background in which it is disclosed.

Unless directly necessitated by their professional assignment, no employee is permitted to use company equipment to create records, files, image and sound documents, or copies



without the approval of their supervisor.

DATA PRIVACY AND PROTECTION

Access to the Internet, the electronic exchange of information and communication and the electronic processing of business transactions are essential prerequisites for the efficiency of each and everyone of us and for the overall success of our business. However, the benefits of electronic communication involve certain risks to the protection of personal rights and data safety. Taking effective precautions to counteract these risks is a crucial part of information technology management, of the managerial function and of the conduct of every individual.

Personal data must not be collected, processed or used unless for lawful and clearly defined purposes. Moreover, personal data must be stored safely and not be transmitted unless the necessary precautions are in place. The quality of the data and the technical measures to protect it against unauthorised access must satisfy a high standard. The use of the data must be transparent to the affected individual,

and their rights with regard to access and, if necessary, objection, blocking and erasure must be maintained. Some jurisdictions (such as the EU) impose strict laws and provisions on the storage and use of personal workforce data and the data of third parties, e.g. customers or business partners. All employees are bound to abide by all applicable laws to ensure the protection of personal rights.

DISCLOSURE OF CONFLICTS OF INTEREST

Executive management commits all of their employees to promptly report conflicts of interest to their supervisor. This also applies to conflicts in which employees become involved involuntarily as a result of their professional or personal relations



with customers or external service providers.

WE RESPECT ONE ANOTHER

We respect the personal dignity, the privacy and the personal rights of each and every individual. We regard diversity as an enrichment and work together regardless of our ethnic background, culture, religion, age, disability, skin colour, gender, sexual identity and orientation and ideology.

We do not tolerate discrimination, sexual harassment or other types of personal attack on individuals or groups.

This rule applies with regard to our co-workers and the dealings we have with such third parties as suppliers, customers, and business partners.

How does this translate to our daily work? Which types of behaviour are unacceptable? Here are some examples:

- Racial animosity
- Innuendos or utterances during work that show hostility towards the disabled
- Acts of harassment or violence towards a specific sex or gender. These also include unsolicited advances or assaults of a physical or verbal nature
- The sharing of unsolicited images and objects displaying sexual content



company reserves the right to also seek prosecution of those who committed the violations. Violations of the code of conduct are supposed to be reported to the supervisor.

PUBLISHER HÄRTHA GROUP GmbH

Industriestraße 9, 52457 Aldenhoven, Germany

E-Mail info@haertha.de | www.haertha.de | **V20220307**

WE INSPIRE CONFIDENCE

We are upfront and honest. We stand by our responsibility, are reliable and do not make promises we cannot keep.

We act with sincerity and lend our assistance to efforts intended to bring to light and eliminate any grievances.

We do everything to fulfil the trust others place in us.

What happens if we make a mistake? While some mistakes are of minor consequence, there are others which might have major ramifications for the company and others. This is why we report our mistakes.

Many cases require that the reports be made immediately in order to avert or minimise any damage that the company may incur. We do not look away when spotting violations against company



guidelines even if these violations do not concern us.

WE PROTECT OUR COMPANY

We protect and promote the reputation and values of the HÄRTHA GROUP. They are paramount to the success of our business and secure the future of our company for the long term. If acting in a way that is unlawful or improper, we might cause significant damage to the entire company.

VIOLATIONS

Violations against the provisions of this code of conduct may have consequences under labour law ranging from a written warning to an extraordinary notice of dismissal. The company's right to claim damages in accordance with applicable laws and regulations remains unaffected. The