

# CODE OF ETHICS

### **Ethical conduct and sustainability in terms of ecological and social responsibility are crucial components of the HEUNISCH company policy.**

We undertake to comply with any and all laws and rules within the context of our entrepreneurial actions without any exemption and acknowledge respect for human rights as well as the implementation of environmentally friendly business practices.

#### **Guided by Values and Principles**

In all its actions, HEUNISCH takes generally valid ethical values and principles, in particular integ-

rity, trust, fairness, righteousness, respect for human dignity, and environmental protection as guidelines. It is our stated aim to establish a vivid corporate culture that is based on mutual respect, understanding, and the willingness to cooperate. These corporate values characterise our company policies, all our decisions and activities.

### **Area of Application**

This Code of Conduct shall serve as a guideline for implementing our values and principles all over the HEUNISCH Group and for anchoring them in our daily actions. It builds the basis for the HEUNISCH Group's responsibility when it comes to human rights and the environment. The

principles of this Code of Conduct are binding guidelines and serve as orientation for our daily work. They apply for all of us equally – for the members of the management as well as for all employees within the HEUNISCH Group.

## B. Social Responsibility: Human Rights and Working Conditions

### 1. Compliance with Internationally Accepted Human Rights

We undertake to comply with internationally accepted human rights and, in particular, take the following international human rights standards as guidelines:

- United Nations' Universal Declaration of Human Rights
- core labour standards of the International Labour Organization (ILO)

### 2. Prohibition of Forced Labour and Slavery

The HEUNISCH Group does not tolerate any kind of forced labour or slavery. Any and all activities are carried out voluntarily and without any threat of penalty by our employees.

### 3. Prohibition of Child Labour

Both within the HEUNISCH Group and in the supply chain, no kind of child labour is tolerated. The legally defined age limitations shall apply.

### 4. Adequate Remuneration

The HEUNISCH Group offers its employees adequate payment as well as the same remuneration for equivalent work.

### 5. Working Hours

The HEUNISCH Group the working hours and holidays of its employees on the basis of legal provisions as well as in line with collective regulations. We make sure that work and life are appropriately balanced.

### 6. Freedom of Association

HEUNISCH acknowledges the right of all employees to establish a trade union or a similar workers' representation, to join them or to be represented by them. Employees must not experience any disadvantages because of their membership in a union.

## **7. Prohibition of any Form of Discrimination**

We do not tolerate any form of discrimination in the working environment. Any kind of unequal treatment, such as because of sex, marital status, skin colour, social background, ethnic affiliation, nationality, religious affiliation, sexual orientation, disability, political beliefs or other personal characteristics shall be prohibited.

## **8. Industrial Safety and Health Protection**

We make sure that the working environment is safe and healthy for our employees. By means of compliance with guidelines and procedures for industrial safety and health protection, we take precautions against accidents and health damages that might occur in connection with work.

## **9. Protection against Assaults**

All employees shall be treated with respect. Our workplaces are free from harassment, abuse, mental/physical penalties or any other inhumane treatment. The commissioning or use of security staff for protection of corporate projects shall be refrained from, if individuals are treated inhumanely or humiliatingly or if persons are injured or the freedom of association is impaired in this context.

## **10. Preservation of Natural Resources**

The HEUNISCH Group does not engage in violations of legitimate rights to use land, forests or waters, the use of which secures the sources of life of people. Harmful soil alterations, aquatic and air pollution, harmful noise emissions as well as any excessive use of water shall be refrained from, if they cause damages to the health of persons, significantly impairs the natural resources for the production of food or prevents personal access to impeccable tap water or sanitary installations.

## C. Ecological Responsibility: Protection of the Environment

### 1. Compliance with Environmental Laws

The HEUNISCH Group undertakes to comply with national environmental laws and any other relevant national and international regulations pertaining to the protection of the natural environment.

### 2. Environmental Management

The companies of the HEUNISCH Group shall observe the environmental concerns by including all relevant environmental concerns in the environmental strategy in a standardised and systematic manner by means of established environmental management systems. Environmental services are purposefully improved on a continuous basis.

### 3. Avoidance and Reduction of Environmental Pollution

In the HEUNISCH Group, the processes and products have been designed in such a manner that materials, energy, and natural resources are used efficiently and that environmental effects are reduced to a minimum. Emissions from the production process have to be reduced, harmful emissions have to be monitored and protected against their release into the environment as much as possible. Greenhouse gas emissi-

ons shall be continuously reduced. Waste shall be reduced as much as possible or recycled. HEUNISCH uses processes for the environmentally friendly use of water. We avoid the use of hazardous substances which, if released, pose a danger to humans and the environment. In our business premises, we maintain a hazardous substances management system which ensures safe use and transport, as well as the safe storage, recycling, reuse and disposal of hazardous substances.

In the HEUNISCH Group, all relevant regulations such as the REACH regulation or the RoHS directive are observed.

### 4. Development of Environmentally Friendly and Recyclable Products

In the development of products, it is ensured that their use is sparing in terms of the consumption of energy and natural resources. To the extent possible, the products should be suitable for reuse, recycling or harmless disposal.

## 5. Compliance with International Agreements

The HEUNISCH Group observes the regulations of international agreements for protection of the environment, such as the

- Minamata Convention on Mercury for containment of emissions and of mercury release
- Stockholm Convention on Persistent Organic Pollutants (measures to eliminate or restrict the production and use of persistent organic pollutants)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

## D. Ethical Business Conduct

### 1. Law-abidance

Employees shall comply with the laws applicable in every country where the HEUNISCH Group operates. In situations where no legal regulations exist, each and every one of us shall take our corporate values and our corporate culture as guidelines for their behaviour. In case of conflict between applicable law and the principles of this Code of Conduct, the respective applicable law shall prevail.

### 2. Prohibition of Corruption, Bribery, and Fraud

HEUNISCH will not tolerate any form of corruption, bribery, and fraud. The applicable anti-corruption laws shall be complied with. Our employees shall not offer or accept any gifts, payments or other remunerations that are made with the aim of gaining business or private advantages or that might result in the objectivity of decisions to be questioned.

### **3. Fair Competition**

With our business activities, we support fair competition. HEUNISCH complies with the international and national laws on safeguarding fair competition. Arrangements that are inadmissible according to antitrust regulations and concerted practices are strictly prohibited.

### **4. Data Protection**

The legal data protection regulations are at any time observed by the HEUNISCH Group. The management and employees shall be obliged to comply with the relevant provisions and actively contribute to the reliable protection of personal data against unauthorised access.

### **5. Intellectual Property Protection**

We protect the intellectual property of HEUNISCH such as patents, trademarks, copyright laws, designs, trade secrets, prototypes, models and expertise, and respect the intellectual property of third parties.

### **6. Avoidance of Conflicts of Interest**

The employees and members of the management of the HEUNISCH Group shall be obliged to pursue their private and any other external activities and financial interest in such a manner that they do not get in conflict or might cause conflicts with the interest of the HEUNISCH Group. If such a conflict occurs, the relevant person shall immediately notify this to their manager.

### **7. Fight against Money Laundering**

Any and all financial transactions shall be monitored by the internal HEUNISCH Controlling to make sure that any irregularities will be detected. Transactions that are indicative of money laundering are rejected by HEUNISCH. In case of such a suspicion, we undertake to inform the competent authorities and provide information promptly.

### **8. Product Safety**

HEUNISCH products and services shall not endanger humans or the environment and fulfil the agreed and legally prescribed product safety standards. We communicate information regarding the safe use of our products clearly.

## **9. Sustainable Procurement**

In the HEUNISCH Group, with our principles for sustainable procurement of products and services, we want to maintain human rights and environmental protection at our production sites and in the supply chain to the largest extent possible. This also includes the responsible procurement of raw materials. The procurement and use of raw materials which were obtained unlawfully or through ethically objectionable or unconscionable measures must be avoided. The use of raw materials such as conflict minerals which are affected by embargoes or other import restrictions must be ruled out.

## **10. Sustainable Supply Chains**

HEUNISCH wants to create sustainable supply chains and expects its suppliers to also comply with the principles of this Code of Conduct. Therefore, we defined principles for social, ecological and ethical business conduct in a separate code for suppliers which our suppliers have to accept.

## **11. Management Systems**

In order to systematically and permanently ensure compliance with due diligence with regard to human rights and the environment, both in the HEUNISCH Group and in the supply chain, we apply human rights and environment strategies and use approved management systems.

## **12. Proper Invoicing and Reporting**

The HEUNISCH Group complies with any and all legal provisions and regulations in order to ensure proper invoicing and financial reporting. Business cases shall always be documented in line with the generally applicable accounting principles. The HEUNISCH Group undertakes to provide information honestly, pertinently, and promptly.

## **13. Continuous Improvement**

We strive for continuous improvement in all our business units and all processes. This shall be to the benefit of our employees, our customers, and the company itself.



## E. Implementation

### **Responsibilities**

The management and executives of the HEUNISCH Group are in charge of setting an example of and communicating the content and purpose of this document to their employees. They shall be obliged to encourage the employees to conduct in line with these principles.

Reports about infringements of the rules of conduct defined in this Code can be addressed to the management anonymously and confidentially. The persons reporting infringements in good faith shall not have to expect any disadvantages.

This Code of Conduct shall enter into effect immediately and for an unlimited period of time. Non-consent to these regulations might result in disciplinary consequences.

This Code of Conduct has been passed by the management and can only be cancelled or modified by the management. Any cancellation or modification shall be announced.

  
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