



Hako Code of Conduct

August 2023

Trust is essential for the success of an internationally active company. Good cooperation is built on the trust of customers and business partners, employees and the respective local business environment.

A prerequisite for this is the consistent adherence to high standards of social conduct such as integrity, loyalty and honesty. It is our responsibility to create and maintain universally applicable basic values for our conduct – over and above the relevant laws – that should form the basis for all our entrepreneurial activities.

This Code of Conduct contains two essential elements: the principles for the entrepreneurial activities of the Hako Group based on Hanseatic virtues such as reliability and down-to-earthness, and the support for the personal responsibility of every single employee.

Every one of us contributes to creating the basis for a trusting cooperation built on the responsibility of each individual.

This Code of Conduct pursues the goal of ensuring a high level of social and ethical competence through the best possible transparency.

1. Compliance with the Law

Even seemingly minor violations of the law in business activities can cause great damage to business partners and customers, but can also be detrimental to the Hako Group. A violation of laws and other binding regulations can furthermore have far-reaching consequences for the employee under labour and criminal law.

Employees are therefore expected to know and comply with the respective laws and internal guidelines. Particular importance is also given to the protection and observance of internationally recognised human rights.

In the event of doubts regarding their own legal conduct and in relation to the working environment, employees can therefore contact their direct supervisor, the relevant specialist departments, the HR department and the management for information at any time.

Customers and business partners trust laws and Guidelines.

2. Health and Safety at Work

Hako is committed to providing its employees with a safe workplace environment and fair working conditions. No employee shall be exposed to unnecessary risks. The occurrence of occupational risks must be prevented through proper monitoring of operations and appropriate measures. Every employee is relevant to and shares responsibility for effective safety and health protection at the place of work.

Compliance with safety regulations is essential. Hako ensures that potential safety risks are addressed and eliminated immediately.

Responsibility means making the highest demands on health protection and safety standards.

3. Responsibility for the Environment

The basis of our actions in the Hako Group is the responsible attitude towards the environment. One of our main duties is to respond carefully to ecological challenges and conserve limited natural resources. The aim is to continuously and sustainably reduce our consumption of energy and raw materials and minimise the negative impact on the environment.

Our company is committed to complying with the applicable legal environmental regulations and corporate standards. Furthermore, the companies of the Hako Group participate actively in environmental protection by recognising their responsibility for the conservation of natural resources and working towards the development and dissemination of environmentally friendly technologies based on high standards of quality and safety.

A responsible attitude towards the environment must be taken into account at all times.

4. Social Responsibility

4.1. Human rights

The observance of human rights, respect and appreciation towards fellow human beings are prerequisites for responsible interaction with one another.

Hako and every employee shares the responsibility for ensuring that fundamental social standards are observed and that these rights are not violated. They are indispensable for good human coexistence and interaction and thus apply equally to interactions within the company as well as to the dealings with business partners.

4.2. Child labour and young workers

We reject all forms of child labour and observe the minimum age for employment in accordance with ILO Convention No. 138. The dignity of children must be respected and their safety, health and personal development protected.

Young employees under the age of 18 shall not work night shifts or overtime.

4.3. Forced labour

We reject all forms of forced labour and unlawful compulsory labour.

4.4. Working hours

Hako complies with the applicable national laws on working hours and holiday entitlement. This also means that our employees are given sufficient time for rest and leisure and have one day off at least every seven days. The daily working time must not exceed 10 hours, and the working week may extend up to 60 hours only in exceptional cases.

The working of overtime is voluntary; these additional hours are compensated or remunerated in a timely manner, depending on the contractual agreement.

4.5. Remuneration

Our employees are remunerated with competitive and performance-related pay that is in accordance with national laws.

Hako pays its employees fairly on the basis of uniform assessment principles.

The basis for our cooperation is the protection of the internationally applicable human rights.

5. Interaction with One Another

5.1. Discrimination

All employees have the right to be treated with respect. Mutual respect and dignified treatment are prerequisites for successful cooperation.

No employee may be discriminated against, i.e. disadvantaged without objective reason, because of ethnic or territorial origin or affiliation, gender, age, skin colour, political opinion, sexual identity and orientation, religious conviction, social origin, physical constitution, disability or other personal characteristics.

5.2. Harassment, intimidation, bullying

Hako has a zero tolerance policy towards harassment, intimidation and bullying of any kind. We value respect in the workplace and will fully investigate and punish any incidents.

5.3. Diversity and inclusion

We value the diversity of people and the way of thinking. Different cultures and perspectives break down barriers and help build stronger teams.

A basic condition for a successful company is the satisfaction of all its employees.

6. Freedom of Association

Hako recognises the right of all employees to form or join employee representative bodies. In dialogue with our employees, our aim is to maintain sustainable cooperation for the benefit of both our company and our employees.

Promote dialogue between management, the employees and the employee representatives.

7. Avoidance of Conflicts of Interest

7.1. Personal or private interests

Business and personnel decisions in our company are based on fair and objectively comprehensible criteria, such as the reliability and integrity of customers, suppliers and other business partners, their product

and service quality, as well as the achievement and granting of prices in line with the market conditions. The Hako Group ensures that business decisions are not influenced by offering or granting personal or financial benefits to individuals. Business duties and private interests are strictly separated from one another. The Hako Group endeavours to actively and preventively counteract conflicts of interest in its business activities.

Conflicts of interest between business duties and personal interests are to be avoided.

7.2. Accepting and giving gifts and invitations

As a general rule, no gifts or gratuities may be accepted or distributed that influence or interfere with independent decision-making. The only exceptions are occasional and promotional gifts as well as invitations that are related to a business purpose. These regulations also apply in particular to business relationships with authorities and public officials.

**All business decisions must be taken independently
and in the best interests of our company.**

7.3. Export controls and economic sanctions

We comply with all applicable import and export control laws, trade sanctions and embargoes, and restrictions on the export or re-export of assets and goods to countries, companies or individuals.

**We support free trade by complying with existing
regulations and restrictions.**

8. Fair Competition

Applicable competition and antitrust laws govern dealings with competitors, suppliers and customers. Agreements with competitors and other activities that illegally impede free and open competition, improperly influence prices or conditions, allocate business territories or customers are not permitted. Legally protected and competition-relevant information must not be passed on, and suppliers or other business partners must not be inadmissibly excluded from competition. A dominant market position must not be abused. Only permissible means shall be used in competition and its monitoring. Violations must be reported to the Compliance Officer.

**The competition and antitrust laws apply to all
business activities of the companies in the Hako Group,
both at home and abroad.**

9. Bribery, Corruption and Tax Evasion

Management and all employees in the Hako Group set the highest standards for avoiding and combating corruption. Corruption and frequently associated offences such as tax evasion, fraud and falsification of documents are not tolerated in our companies. Hako companies comply unreservedly with the applicable anti-corruption laws in all countries in which they do business.

The granting of advantages that are otherwise contrary to the legitimate interests of the company is prohibited. Any suspicion of bribery or corruption must be avoided. Direct or indirect payments or financial benefits of this kind may neither be accepted nor offered. The use of any irregular payment channels or other forms of concealment of payment flows is also prohibited. Unusual monetary transactions are subject to mandatory reporting (see European Money Laundering Directive).

We also do not tolerate extortionate behaviour.

**No personal advantages may be granted, offered,
demanded or promised that imply illegal or unfair**

preferential treatment.

10. Quality

Ensuring the highest quality and its continuous optimisation form the basis for the success of the Hako Group. Our domestic and foreign customers expect conscientiousness in the execution of our duties. Unavoidable diversions from approved procedures, rules, guidelines and specifications are made only after thorough examination by the respective responsible employees and are only carried out with the express consent of the customer on the basis of the applicable law.

Products, methods and procedures within the Hako Group are subject to constant optimisation.

11. Internal Monitoring Systems

11.1. Compliance procedures

Analyses are carried out at regular intervals to ensure the continuous improvement of company procedures and processes. One aspect of these analyses is compliance with laws and guidelines. Surveys are always conducted on the basis of existing trust.

Processes and documentation must comply with applicable standards and legal requirements.

11.2. Complete and honest accounting

The accounts must accurately reflect the financial situation of the Hako companies. Business transactions are documented with the utmost care. All entries in books and records must be complete, accurate and correct and in accordance with applicable law and accounting principles. Operating expenses are subject to careful and prompt accounting. Business documents are the sole property of the Hako companies and are prepared and kept in accordance with internal regulations.

All business transactions must be properly accounted for and documented.

12. Protection of Company Property and Trade Secrets

12.1. Company property and plagiarism

The property of Hako GmbH must be protected against loss, theft or misuse.

Material assets such as materials, goods, office supplies, customer and advertising gifts or equipment shall be treated with care and used only for business purposes. Equipment or objects belonging to the Hako companies may be used for private purposes or removed from the company only with the express consent of the supervisor or in accordance with operational regulations. The handling and regulation of private telephone, e-mail and internet use is the responsibility of the local managers.

The intellectual property of Hako GmbH must be protected in exactly the same way as the material property. This applies in particular to patents, copyrights or trademarks. We also respect the intellectual

property of third parties.

Plagiarism and counterfeit products endanger the success of Hako as well as that of our customers. We minimise the likelihood of introducing counterfeit products by sourcing our raw materials or sub-materials from official suppliers and through regular quality assurance checks. If counterfeit or plagiarised materials are nevertheless found, they must be isolated and reported to the original parts manufacturer and, if necessary, to law enforcement authorities. Sales to non-OEM customers are in accordance with national laws; as far as possible for us, we ensure that the products sold are used in accordance with the law.

Company property may only be used for business purposes.

12.2. Protection of all data

Everyone is responsible for protecting the personal data entrusted to them by employees, customers or suppliers.

Information technology entails a risk of data misuse. In the Hako Group, all measures are taken to protect data received by the companies from employees, business partners and customers. Local laws (e.g. the General Data Protection Regulation “GDPR” of the European Union), regulations and standards governing the handling of confidential data are strictly observed.

In order to protect the data of Hako companies against malware or external attacks, the instructions of the IT managers of the respective divisions and companies must be strictly followed.

The Hako Group attaches particular importance to the technical protection of all data against unauthorised access.

12.3. Confidentiality

Both during the term of an employment relationship and after its termination, company and business secrets must be protected against disclosure to unauthorised persons. This includes internal company interests as well as any information concerning customers of the Hako companies and their business secrets. Internal and external information must be protected through absolute confidentiality. The only exceptions to this are information that is already in the public domain or accessible to third parties, or that is requested by the authorities.

Hako ensures that internal conflicts of interest are avoided and that existing conflicts of interest do not under any circumstances negatively impact the employees' public image. Absolute confidentiality must be observed vis-à-vis third parties and an internal company solution must be found. The company's interests and the trusting interaction within the framework of business relations with customers must not be impaired in any way.

Internal and external information must be treated with absolute confidentiality

12.4. Procedure and whistleblowing system

As part of our compliance management system, we have set up a whistleblowing system in the form of an internal reporting office for receiving information. Employees of the Hako Group and external parties have the opportunity to submit information on compliance-relevant matters in which Hako has a legitimate interest. The law firm Heuking Kühn Lüer Wojtek has been commissioned as an outsourced internal whistleblower reporting office (hereinafter: “whistleblower reporting office”) to receive and review

such information. The whistleblower reporting office can be used to report violations of legal regulations, of the Code of Conduct, of correspondingly specified codes of conduct of the divisions or companies as well as of other internal guidelines of the Hako Group and to have them examined. Reports to the whistleblower reporting office can be submitted electronically via a web form on our website www.hako.com, by telephone, by e-mail, by fax, by post or in person.

A compliance officer has also been appointed as a contact person for all compliance-relevant issues.

12.5. Communication with the media

The management is primarily authorised to disclose information about the Hako companies, such as financial data, information on accidents and crises, labour and environmental protection measures, acquisitions, company sales or personnel changes in the management structure, to the media. In doing so, we adhere to general principles such as ethical and truthful reporting and disclose information in accordance with applicable regulations and standard industry practice.

We respect the right to freedom of expression and the protection of personal rights and privacy.

Statements to media representatives must be authorised.

13. Adaptation

This Code of Conduct applies as a framework and minimum standard for all divisions and companies of the Hako Group. As soon as there are separate, more specific guidelines for individual divisions and/or areas of activity, these must be observed without reservation in addition to this Code of Conduct. The Code of Conduct is not a static document. It is regularly updated in line with the changing legal and economic framework.

Every employee is obliged to protect and communicate the company's principles and ethical values