



Industrial Solutions GmbH

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# CODE OF CONDUCT

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of

Heitkamp Industrial Solutions GmbH

Essen, 25.01.2021


Die Geschäftsführung

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		<b>HEITKAMP Industrial Solutions</b>			Document No.: <b>HIS-POL 002</b>		
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Title: <b>Code of Conduct for suppliers and contractual partners</b>							

## Preamble

Heitkamp Industrial Solutions GmbH (HIS) expects its suppliers and its contractual partners to commit to the principles set out in this Code of Conduct for Suppliers and Contractual Partners.

If suppliers or contractual partners engage third parties in the course of their business relations with HIS, HIS expects that these third parties will also commit to the principles set out in this Code of Conduct.

HIS reserves the right to inspect the supplier's or contracting partner's compliance with the requirements set out in the Subsequent, upon prior notice and in the presence of representatives of the business partner, during regular business hours and in accordance with the applicable law on site.

A prerequisite for all contractual agreements between HIS and its business partners is that the business partners recognise this Code of Conduct for Suppliers and Contractual Partners.

Not only our suppliers and contractual partners are obliged to comply with this Code of Conduct. All employees of Heitkamp Industrial Solution GmbH are also fully committed to this Code of Conduct. Any deviation from our code, however demanded by superiors, is not acceptable. The responsibility for behaviour in accordance with the code always lies with each individual.

You can talk to us about it at any time. If you do not feel heard, please contact our Compliance Officer.

This can also be done anonymously at [Compliance@heitkamp-solutions.com](mailto:Compliance@heitkamp-solutions.com).

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Code of Conduct

Our Code of Conduct is binding for all bodies and employees of Heitkamp Industrial Solutions GmbH and its affiliated companies (collectively referred to as HIS). It reflects our demand that we comply with the law and ethical rules of conduct. It is a requirement for the bodies and employees of HIS as well as being their promise to the outside world. It requires each individual to assume responsibility for the company in the knowledge that the success of HIS, and the reputation it has acquired, can be damaged by even a single act of misconduct.

The Code of Conduct thus contains rules of conduct that must be observed. Violations of the Code of Conduct will not be tolerated.

The HIS Code of Conduct is dynamic. Binding legal standards can change and in this case behavioural requirements can be firmed up through instructions and guidelines.

## **1. Prohibition of bribery, corruption and improper business conduct**

HIS condemns and prohibits any kind of bribery and any other form of improper or corrupt business behaviour. Anyone acting on behalf of HIS must not offer or grant any unfair advantage, either directly or indirectly, to any individual, group or company, for example in order to conclude business transactions.

Anti-corruption policy, Annex A

## **2. Gifts and invitations**

HIS expects relationships with customers, suppliers and other business partners to be based on a clear commitment to fair dealing and sound business decisions.

Specifications on gifts and invitations, Annex B

### **3. Prohibition of offering gifts, invitations or granting other favours to civil servants or other persons in the public sector**

HIS employees are strictly prohibited from offering money or other items of value as gifts to public officials or other members of the public service, whether this is done directly or indirectly. This is to avoid the impression of trying to influence decisions and actions of public officials. Most countries around the world have laws that make corruption punishable, including imprisonment, with substantial fines, costly enforcement proceedings and claims for damages. The sanctions are directed both against the agent and/or the employee guilty of corruption and against his or her employer. No less serious is the viewpoint that corruption and similar prohibited activities can significantly and adversely damage the good reputation of HIS and the reputation of its bodies and employees. Even employees, not directly involved, may find themselves in the position of being answerable in these matters. The prohibitions on corruption are not limited to dealings with all civil servants and employees of the public service, but also with persons and members of organisations that have been entrusted with sovereign tasks in the broadest sense.

**Prohibition of offering gifts, invitations or granting other benefits to public officials or other persons in the public sector, Annex C**


### **4. Conflicts of interest**

HIS expects unreserved loyalty from its bodies and employees. Decisions must remain uninfluenced by personal interests and by considerations outside the company in order to avoid conflicts of interest.

**Conflicts of interest, Annex D**

### **5. Donations and sponsorship**

As a responsible member of society, HIS promotes education, science, culture, social concerns, but also sport and the environment. All this, however, is within the framework of legal and economic possibilities. HIS does not make donations for commercial gain. All donations must be in accordance with the applicable legal system and internal guidelines. All donations must also document the addressee and the purpose of the donation. Donations from individuals, to private accounts and to persons or organisations that could damage the interests or reputation of HIS will not be granted.

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Sponsorship is also a communication tool used by HIS. However, all sponsoring activities require appropriate and verifiable communication and marketing services from the sponsoring partner and are handled transparently like donations.

Both donations and sponsoring are subject to prior approval by the management in all cases.

## 6. Integrity and loyalty

Integrity and loyalty means above all honesty, sincerity and openness in everyday work and in business dealings. It is our goal to always carefully check whether our behaviour towards each other and in our business dealings is in line with the expectations and guidelines of HIS regarding integrity and loyalty. It is our goal to be sincere and honest even when it is difficult for us personally. For example, if we have made a mistake, we should admit it openly. But openness also means sharing information fully so that others can assess our actions and know where they stand.

Our goal must also be to act as a reliable partner ourselves in all situations, both internally and externally.

## 7. Data protection and confidentiality

HIS with its bodies and employees is subject to the legal obligations regarding data protection and has adopted its own principles (I:\40 Info\Data Protection\Guidelines), which must be consistently observed for every type of data processing within HIS and in interaction with third parties. The aim is to ensure that data is processed with care and that appropriate preventive measures are chosen to prevent any misuse of personal data and commercial information.

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Confidential information of HIS, its employees and business partners can cause great damage in the wrong hands, e.g. with the media, with competitors or business partners.

Under certain circumstances, employment with another company or non-profit and/or similar organisation may also create a conflict of interest with your employment with HIS. If this possibility exists, then the other activity would have to be approved by your supervisor or the Compliance Officer before you take it up.

HIS therefore aims to ensure that sensitive information, whether in paper form, data form or verbally transmitted, is treated confidentially. In case of doubt, it is better to check once more, whether information is confidential, than once too little.

## 8. Appreciation and fair working conditions

A great motivation for each individual employee is that their own performance is recognised. Everyone can appreciate the special contribution of an individual by recognising him or her for a good result or individual effort. The knowledge and skills of the employees are the most important capital of HIS. However, it can only be fully developed if HIS and its employees see themselves as a genuine community in which each employee is willing to share his or her knowledge and experience with colleagues.

Every employee has the right to be protected against discrimination and harassment. In the event of conflicts, the supervisor, the HR department and/or the HR Director, or the employee representatives must be consulted.

The aim of HIS is thus to comply with labour law and the resulting agreements.

Unacceptable behaviour, Annex E

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## 9. Safety, health and environmental protection

HIS aims to provide a safe and healthy working environment in its activities, Also, to minimise or, wherever possible, prevent the ecological impact on soil, water, air and biodiversity and to protect cultural assets. HIS shall make sustained efforts to develop and use methods and procedures that are safe and protective of health and the environment. It shall ensure that its business activities comply with applicable health, safety and environmental standards, as well as recognised corporate standards and accepted best practice standards. All HIS employees are personally responsible for ensuring safety, health and environmental protection in their workplace to the best of their knowledge, skills and experience within the scope of their activities.

All employees are obliged to report violations of these principles immediately to their supervisor and to the HSE department. Any deviations that occur must be remedied immediately. Any environmental pollution caused must be reported to the authorities without delay, with the involvement of the HSE Director.


## 10 Implementation of the Code of Conduct

With the rules of conduct described above, HIS intends to prevent violations of the HIS Code of Conduct as far as possible. Should violations nevertheless occur, HIS will not tolerate this and will take appropriate measures. Employees and bodies who violate the Code of Conduct will be held accountable and will be subject to appropriate sanctions, which may include termination of employment.

All bodies and staff are therefore expected to,

- to avoid violations of the Code of Conduct,
- take action when violations of the Code of Conduct occur,
- to inform the Compliance Officer of any violations.

In the event that you are unsure whether you could be in breach of the Code of Conduct in a particular case, please contact the Compliance Officer/Director Contract Management as a preventive measure.

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## Annex A

### Anti-corruption policy

In most countries, not only corruption of public officials but also bribery among business people is illegal and subject to criminal prosecution. Bribery in business transactions can result in significant reputational damage for the companies involved, high claims for damages and substantial penalties (including imprisonment). Moreover, bribery in business transactions undermines fair competition in production and trade in goods. HIS aims to convince customers through the quality and excellent value of its products and services, but not through illegal and unfair plays. HIS bodies and employees are therefore strictly prohibited from accepting or offering personal payments in the form of bribes, kickbacks or similar from customers, suppliers or other third parties who have a business relationship with HIS. This prohibition on offering or accepting personal improper payments also applies in locations where the payments prohibited elsewhere may be tacitly condoned or where applicable law applies different ethical standards to such payments. If an HIS officer or employee is offered a prohibited payment, he or she should immediately contact his or her supervisor (at least the head of department) or the Compliance Officer. This is the only way HIS can take appropriate measures to deal with the situation and ensure fair competition.

For the avoidance of doubt, prohibited payments for the purposes of this clause shall include any conceivable undue favour, including but not limited to cash, any other form of pecuniary benefit, any benefit of monetary value or any other benefit of value to the relevant body or employee, their family or relatives.



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## Annex B

### Gifts and invitations

In working for HIS, bodies and employees come into contact with suppliers, customers and other business partners who play an important role in the business operations of HIS. It is therefore essential that relationships with suppliers, customers and other business partners are based on a clear commitment to fair dealing and business decisions. Excessive gifts and entertainment can impair the ability to make business decisions free from conflicts of interest. In contrast, low-value gifts and smaller invitations are less likely to be perceived as inappropriate and to trigger conflicts of interest. However, this always presupposes that the locally applicable business customs permit the exchange of such gifts and smaller invitations in the first place. This must not be assumed under any circumstances in the case of extravagant gifts and invitations. Should the case arise that a legitimate business purpose and local customs do not permit the rejection of a high-value gift, the gift may be accepted, but must then be transferred to HIS and left for further use, such as for exhibition purposes or the like. HIS may comply with the employee's wish to acquire the gift.

#### What does HIS mean by gifts and invitations?

The terms gifts and invitations basically cover anything of value. A list of possible relevant gifts and invitations would be endless, so the following are only examples for clarification:

#### - *Gifts*

Cash, wire transfers, cheques or other cash substitutes, discounts or specially favourable conditions of purchase of products or services (except where these are for the benefit of all HIS employees), loans, raffle prizes, means of transport, provision of vehicles for use, use of holiday facilities, gift vouchers, shares, watches, calendars, pens or other promotional items and accessories, etc.

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- *Invitations*

Business meals, sporting events, theatre visits, hotel accommodation, etc.

- *Appropriate (allowed) and inappropriate (rejected) gifts and invitations*

HIS distinguishes between appropriate and inappropriate gifts and invitations.

**Gifts and invitations, the acceptance of which is usually permitted without or, in individual cases, after prior approval by the superior (at least Head of Department) or the Compliance Officer:**

The acceptance of gifts and invitations is permitted without prior approval if they are of low value (guideline size up to **EUR 30.00**) and can be considered as an expression of local common, moderate business practice. The acceptance of invitations must also be made for a business reason. As a rule, the following low-value promotional items may be considered a sufficiently moderate expression of goodwill, unless local law provides otherwise: Low-value promotional items, i.e. pens with advertising imprints, calendars and the like, bouquets of flowers, fruit gift baskets, books or the like, small bundles of product samples, occasional dinner invitations, simple sporting events, theatre visits or other cultural events of similar value (invitations should, however, generally only be accepted if the business partner also attends).

However, the prior approval of your superior or the Compliance Officer is required if you receive an invitation whose value recognisably exceeds EUR 100.00 in an individual case. The same applies if you are regularly invited by a business partner and the value of all invitations clearly exceeds the sum of EUR 200.00 per year. Invitations to travel or other events lasting longer than one day or to events for which only limited ticket contingents are available (e.g. to European or World Cup football matches) are also subject to approval.

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**Even if you accept an invitation that is within the permitted range, you should always bear the following in mind:**

- *Could the gift or invitation possibly affect objectivity or judgement?*
- *Is there a business reason for the gift or invitation?*
- *Could the acceptance of a gift or invitation (or the authorisation you give as a supervisor) set an undesirable precedent for other similar cases?*
- *Would you have to fear negative reactions if the acceptance of the gift or invitation became known to other HIS employees, the public, your friends or your family?*
- *Gifts and invitations that you must not accept*

**In certain cases, acceptance of gifts or invitations is always inappropriate and should therefore be refused without exception:**

- *If the gift is cash, cash equivalent or other means exchangeable for cash, e.g. money transfers, cheques, loans, etc. or*
- *if- the gift or invitation itself or its receipt would be illegal; or*
- *if the acceptance of a gift or invitation promotes the expectation of "performance and consideration" or it is to be feared that such an impression could be created; or*
- *if, in the view of individuals involved, the gift or invitation might be something morally objectionable or might be seen as expressing a lack of respect for other people, religions and cultures (e.g. applies to events where sex is offered); or*
- *if the gift or invitation violates company rules of the recipient or the invitee.*

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## How do you behave when you are offered a gift that you are not allowed to accept?


A gift that does not comply with the principles described above must be returned immediately. In addition, you should inform your superior (at least the head of department) or the Compliance Officer of such an event. In certain cases, especially if it is to avoid repetition, it may be useful to write to the provider of the gift explaining the principles that apply at HIS for the acceptance of gifts.

### The reverse case:

#### Granting of gifts and invitations

The rules applicable at HIS for the acceptance of gifts and invitations apply in reverse also to gifts and invitations that HIS bodies and employees wish to offer to third parties. Particular restraint must be exercised when dealing with suppliers or customers or third parties with an ongoing business relationship with HIS. For HIS bodies and employees, this means observing the following principles:

- *HIS bodies and employees may not offer gifts that exceed the value and other limits described above; and*
- *no invitations should be issued whose **value** exceeds **EUR 100.00** in an individual case (depending on local customs, this amount may also have to be set considerably lower). The value limit must also be observed if several invitations to certain persons follow one another and the total value of these invitations reaches the value limit of EUR 200.00 per year. There can only be exceptions to these limits if the prior written consent of your superior (at least Head of Department) or the Compliance Officer has been obtained.*

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## Annex C


### **Prohibition of offering gifts, invitations or granting other advantages to civil servants or other persons in the public sector**

#### General principles of conduct

- HIS bodies and employees are prohibited from offering or giving gifts, other benefits or advantages of any kind whatsoever to civil servants or other members of the public service in the sense described above. This prohibition expressly also applies to indirect transmission of gifts etc. via third parties, consultants or similar, as well as to family members, relatives, etc.
- HIS bodies and employees may not invite civil servants or other members of the public service as described above to business meals, trips or other events, and likewise neither directly nor indirectly. Exceptionally and in rare individual cases, it may be permissible to extend a meal invitation or other invitation and to offer a means of transport for use, provided,
  - that this is done in "good faith" and for a business reason that has involved the civil servant or other public official in his or her official duties,
  - that the invitation has a reasonably low value and
  - that the invitation is only issued after a thorough examination of the measure for its compatibility with applicable law and local customs.

In any case, however, such an invitation is only permissible if the superior (at least head of department) or the compliance officer has approved it in writing beforehand.

- As a matter of principle, HIS bodies and employees do not make any gifts or donations, directly or indirectly, of any kind whatsoever to politicians, political parties, other political organisations or trade unions and their representatives. Furthermore, they do not extend individual invitations to this group for events, trips or business meals, except in those cases and to the extent that this is expressly permitted by the applicable law and only after prior written approval by the Compliance Officer. It is the policy of HIS to properly document and account for any gratuity. These rules are not intended to restrict the commitment of HIS, its bodies and employees in the cultural, social and scientific fields, insofar as it is based on decisions by the management of HIS.

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## Annex D

### Conflict of interest

The danger of a conflict of interest exists whenever such personal, social, financial or political interests of an employee overlap or collide with company interests. The requirements for correct and ethical conduct by the executive bodies and employees to avoid conflicts of interest are high. A threatened or actual conflict of interest should always be disclosed to the superior (at least head of department) or the compliance officer.

#### Typical cases of conflicts of interest

##### - *Secondary occupations and other activities*


Secondary employment in the form of services or consultancy for third parties who have a business relationship with or are in competition with HIS may trigger a conflict of interest and must therefore be approved by the aforementioned superior. As a rule, approval for secondary employment cannot be granted if the executive body or the employee simultaneously maintains a business relationship with the third party as part of the duties he or she performs for HIS.

##### - *Employment of close relatives*

If a close relative works for a customer, competitor or supplier of HIS, the body or employee should inform his or her supervisor or the Compliance Officer. The same applies if a relative has a business relationship with you as an officer or employee in the course of your duties for HIS. The rule is that the body or employee should not have a business relationship with relatives outside HIS on behalf of HIS. It should also be avoided that a close relative is among the employees in the reporting line or is otherwise responsible to the body or employee within HIS. If the possibility cannot be ruled out that family or other close relationships with a body or an employee of HIS could result in a conflict of loyalty or interest, the aforementioned superior or the Compliance Officer should be approached about this. HIS will then work together with the executive body or employee to find a solution appropriate to the situation for the persons concerned in the company.

##### - *Competition*

A conflict of interest may also exist if executive bodies or employees acquire shareholdings in competitors, customers or suppliers of HIS. This is the case, for example, if the intended

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investment is substantial and capable of influencing decisions that the body or the employee has to make at HIS. In this case, approval must be obtained from the aforementioned superior or from the Compliance Officer before the acquisition of the shareholding. As a general rule, however, a shareholding of less than 1% of the share capital in a corporation, for example, is not considered "material" within the meaning of this paragraph. Likewise, shareholdings in listed companies, investment funds or similar are not "material" if it can be assumed that your shareholding does not influence the interests of the company.

All the rules of conduct described above are, of course, also applicable mutatis mutandis to potential business contacts that are in the process of being established.

#### How should you behave in the event of a conflict of interest?

Any open or threatened conflict of interest can be mitigated by disclosing it to the supervisor (at least head of department) or the compliance officer and authorising the institution's or employee's action. Should the body or employee be unsure whether he or she can personally correctly identify a conflict between interests, or should he or she be unsure of the correct priorities in assessing interests, he or she should conduct the "three-question test" on himself or herself and, if necessary, seek advice from the compliance officer if one of the answers to the following questions is "yes":

- Can my actions influence me in any way in the freedom of the decisions I make for HIS?
- Could colleagues at HIS or uninvolved third parties develop the idea that what I am about to do somehow affects my judgement or actions at HIS?
- Would I object to my actions being reported publicly in the media or otherwise coming to the attention of HIS clients, suppliers, my friends or family?

## **Annex E**

### **Unacceptable behaviour**

#### **Introduction**

HIS wants to provide its employees with a pleasant and safe working environment. This means an environment where unacceptable behaviour is not tolerated.

#### **What is unacceptable behaviour?**

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Unacceptable behaviour is behaviour that makes people feel uncomfortable and/or unsafe, especially bullying, sexual harassment, discrimination and aggression. When this happens, action must be taken to stop it.

## **Bullying**

Bullying at work means that an employee is systematically harassed, disadvantaged, insulted or excluded by superiors or colleagues over a long period of time. Bullying can originate from individual colleagues or groups. Bullying can take place at the work level, at the social level or at both levels, or through physical behaviour. Bullying is methodical and systemic, and which takes place occurs over a prolonged period of time and without just cause.

Those who engage in workplace bullying, doubt the abilities of the person being bullied, make unobjective criticisms of their work, order meaningless or offending activities, conceal important information or even manipulate work results.

Those who bully on the social level treat the bullied person like as if he/she does not exist, and insult, harass or slander him/her. Or the bully offends him/her by making insinuations, conspicuously avoids being in the same room with him/her, or hides and/or damages personal belongings.

Sometimes it is difficult to objectively determine whether certain behaviour is bullying. In the workplace, there are always conflicts and differences of opinion. Sometimes someone takes the wrong tone or slams the door. That's not nice, but it's human and not bullying. In such cases, a compromise can be found and people treat each other with respect again.

The bottom line is that action must be taken if someone feels they are being bullied. Everyone should feel comfortable at work. If unacceptable behaviour is discussed between colleagues, this will create awareness among everyone. In most cases, this will be enough to stop the behaviour.

## **Sexual harassment**

Sexual harassment in the workplace is unwanted sexually directed conduct, including unwanted sexual acts and requests for such acts, sexually directed physical touching, remarks of a sexual nature and unwanted display and visible placement of pornographic images, which has the purpose or effect of violating the dignity of the person concerned, in particular when an intimidating, hostile, degrading, humiliating or offensive environment is created.



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Sexual harassment is defined by violation of dignity and unwanted attention. .

Any sexual harassment is prohibited in the workplace, regardless of whether the person causing the harassment intended it and the harassment was discernibly rejected.

## Discrimination

Discrimination means treating people differently without any justification, excluding or disadvantaging people on the basis of the following (personal) characteristics:

- Ancestry
- Gender
- Age
- Nationality
- Religion/Faith
- Sexual orientation
- Disability or chronic illness
- Marital status

Often discrimination is done for fun and people are not aware of the harm such behaviour causes. Unfortunately, it also happens regularly that people deliberately discriminate because they are convinced that they are better than others. Both forms of discrimination are unacceptable and must therefore be prevented.

## Aggression

Aggression is a form of unacceptable behaviour where a person displays violent behaviour towards another person. The previously mentioned issues of bullying, sexual harassment and discrimination can also fall under the scope of aggression. Often aggression involves physical violence, but also the use of bad language, blackmail or threats.

## Measures in case of unacceptable behaviour

HIS does not tolerate unacceptable behaviour and ensures that direct action is taken in this case. HIS creates awareness within the organisation through training and by making this sub-code available.

In the case of unacceptable behaviour, there are direct consequences for the person acting in this way. Depending on the degree of unacceptable behaviour, appropriate measures based

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on reasonableness and fairness will be taken. These measures range from a serious discussion to termination of the employment contract.

