



HEITKAMP & THUMANN GROUP



SUPPLIER CODE OF CONDUCT

July 2021



“INTEGRITY WILL NEVER BE COMPROMISED”

The Heitkamp & Thumann Group (H&T or the Group) places the highest value on business integrity of its companies, executives and employees. Moreover, H&T as a global market player recognizes its responsibility for the integrity of the Group’s supply chain and business partners. This Supplier Code of Conduct summarizes H&T’s core integrity standards. It is expected from the Group’s suppliers and business partners to use their best efforts to comply with this Code.

HUMAN & LABOR RIGHTS

H&T understands basic human and labour rights as fundamental pillars of modern economies and societies. The Group firmly adheres to the 30 articles of the United Nation Universal Declaration of Human Rights (<https://www.un.org/en/about-us/universal-declaration-of-human-rights>) and the ILO Declaration on Fundamental Principles and Rights at Work (<https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>). H&T requires that its business partners are compliant with human and labour rights worldwide which shall always include:

- abstaining of any form of forced or child labour
- condemning any discrimination because of race, gender, nationality, ethnic origin, religion or belief, sexual orientation, political opinion, etc.
- maintaining a workplace which is free of any bullying and other mistreatments
- assuring fair working conditions including most of all fair remuneration, adequate working time, the right to leisure, and the freedom of association and collective bargaining
- providing safe and healthy workplaces for all its employees worldwide

ENVIRONMENTAL PROTECTION & SUSTAINABILITY

H&T strongly believes that environmental and climate protection is the responsibility of every individual and organisation. The Group expects from its business partners to take the responsibility for protecting the environment seriously by:

- having an integrated sustainability policy in place
- complying with all applicable environmental regulations on local, national and international level
- striving to minimize the impact on the environment by continually reducing waste and emissions and thus actively contributing to the preservation of clean air and water
- ensuring the environmentally safe development, manufacturing, transport, use and disposal of its products
- using both resources and energy efficiently
- protecting its employees, neighbours, business partners and the general public against potential hazards resulting from its business processes
- maintaining a responsible management of chemicals
- having appropriate environmental management systems in place



BUSINESS ETHICS & GOVERNANCE

H&T's business partners shall always do business fairly. This involves:

- complying with all applicable laws at local, national and international level
- condemning any form of bribery and corruption worldwide
- donating and sponsoring only voluntarily and without intention to achieve unlawful business advantages by doing so
- disclosing and solving potential or actual conflicts of interest related to business with H&T
- adhering to all trade regulations, export controls, and export sanctions worldwide
- committing to fair competition by complying with antitrust and competition regulations
- protecting sensitive and personal data, e.g. in accordance with the GDPR, as well as respecting intellectual property (patents, designs, trademarks, etc.)
- having control mechanisms in place to rule out the risk of money laundering and terrorism financing in its business
- avoiding the introduction of counterfeit products into its supply chain
- having an appropriate compliance management system in place to ensure coherence with international standards of business ethics and governance

CONTACT H&T COMPLIANCE

In case of any concerns about potentially unethical or even illegal conduct at H&T companies or of H&T executives or employees or H&T's business partners please do not hesitate to get in touch directly with H&T Compliance via its "compliance reporting line".

Send us a secure message

- via the online template: <https://www.ht-group.com/en/about-us.html#c10697>
or
- by sending an e-mail directly to compliance@ht-group.com

H&T Compliance will take your message seriously. We accept anonymous messages. Feel free to write us in any of the Group's languages.

Any individual who in good faith raises an issue regarding a possible violation of law or Group policy will not be subject to retaliation, and their confidentiality will be protected to the extent possible, consistent with law and corporate policy and the requirements necessary to conduct an effective investigation.

Anyone who retaliates against an individual as a result of such individual's report of an alleged violation of law or Group policy will be the subject of disciplinary action.