

Code of Conduct Sickert & Hafner GmbH

# Transparency, Trust and Teamwork

Ladies and Gentlemen,

the quality culture of Sickert & Hafner GmbH reflects our corporate mission statement. Our job is to provide our customers with quality products and services. Our values such as mutual respect, transparency and personal responsibility play an important role here. As a family business, we have earned an excellent reputation among our customers, suppliers and the public through decades of excellent work, innovative technology and first-class quality. This is a great asset that we want to secure and expand. We want to continue to grow profitably. But not at any price. No business is so important that we can violate applicable rules and laws. Irresponsible action can lead to considerable damage. This Code of Conduct supports our commitment to ethical conduct. It describes the principles that underlie our decisions and actions. It applies equally to everyone – the management, the executives, each individual employee – and at the same time it represents an important promise to the outside world.

Dear Colleagues, we all want to help lead Sickert & Hafner GmbH into a sustainable, successful future. Please use the Code of Conduct and let us consistently align our daily behavior with each other as well as with business partners and the general public.

Thank you for your support.

Kind regards,



Michael Sickert | Geschäftsführer Sickert & Hafner GmbH

## PREAMBLE

Fairness, mutual respect and integrity are the cornerstones within the Sickert & Hafner GmbH upon which our actions are based. Sickert & Hafner GmbH assumes its corporate responsibility and thereby creates the prerequisites for the sustained success of the company.

This code sets out the principles and practices that must be observed in letter and spirit by all Sickert & Hafner GmbH employees, managers and the Executive Board, as Sickert & Hafner GmbH also expects from its business partners.

Approved by the entire Executive Board and fully supported by the Sickert & Hafner family, the following code demonstrates the importance Sickert & Hafner GmbH attaches to responsible corporate conduct.

The Executive Board of Sickert & Hafner GmbH expects of its employees to feel personally responsible for compliance with this Code of Conduct and to encourage colleagues to abide by it as well.

## Content

<b>1 BASIC BEHAVIORAL REQUIREMENTS.....</b>	<b>5</b>
1.1 Transparency, trust and teamwork .....	5
1.2 Compliance with applicable laws .....	5
1.3 Respect for human rights.....	5
1.4 Handling company assets with due care .....	5
1.5 Avoidance of conflict of interests .....	6
<b>2 BEHAVIOR TOWARDS BUSINESS PARTNERS AND THIRD PARTIES.....</b>	<b>6</b>
2.1 Integrity.....	6
2.2 Fair competition .....	6
2.3 Anti-corruption .....	6
2.4 Trade controls.....	7
<b>3 HANDLING OF INFORMATION .....</b>	<b>7</b>
3.1 Protection of confidential information.....	7
3.2 Compliance with data protection regulations .....	7
<b>4 TREATMENT OF EMPLOYEES AND COLLEAGUES .....</b>	<b>8</b>
4.1 Fair working conditions and employee development .....	8
4.2 Diversity and the principle of equal treatment.....	8
4.3 Compatibility of work and family .....	8
4.4 Rejection of forced and child labor .....	9
4.5 Dialogue with employees and employee representatives .....	9
<b>5 ENVIRONMENT, HEALTH AND SAFETY .....</b>	<b>9</b>
5.1 Acting sustainably.....	9
5.2 Safe working environment .....	9
<b>6 REPORTING AND CONTACT PERSONS .....</b>	<b>10</b>
6.1 Reporting of misconduct.....	10
6.2 Local contact persons.....	10
6.3 Compliance Officer .....	10
6.4 Whistleblower system .....	10



## **1 BASIC BEHAVIORAL REQUIREMENTS**

### **1.1 Transparency, trust and teamwork**

Sickert & Hafner GmbH wants to be a reliable partner. Sickert & Hafner GmbH and its employees therefore act transparently towards shareholders, customers, and suppliers and also towards each other because transparency is a decisive factor for trust and successful teamwork.

Responsible collaboration requires actions and decisions that are transparent and comprehensible because only then will they be accepted.

For collaboration, transparency also means dealing with problems and errors in an open and honest manner.

### **1.2 Compliance with applicable laws**

Sickert & Hafner GmbH and its employees respect and comply with all applicable local, national and international laws and regulations, wherever Sickert & Hafner GmbH does business. Compliance with these laws and regulations is a prerequisite for lasting corporate success. Violations can have severe consequences such as criminal convictions, fines and reputational damage.

Sickert & Hafner GmbH does not tolerate such violations and expects its employees and business partners to conduct business according to applicable laws and regulations. Where national legal requirements are more restrictive than the rules applying at Sickert & Hafner GmbH, these national legal requirements take precedence.

The basic principles described in this code constitute a minimum standard for Sickert & Hafner GmbH and do not affect country-specific additions that are based on relevant cultural circumstances.

### **1.3 Respect for human rights**

Respect for human rights is an integral part of our corporate responsibility. Sickert & Hafner GmbH and its employees respect the dignity and individual rights of every employee and colleague as well as third parties with whom we do business.

### **1.4 Handling company assets with due care**

Sickert & Hafner GmbH takes great care to protect its company assets, including all physical and non-physical assets, such as computers, information systems and intellectual property. Generally, all company assets should be used for company purposes only.

Additionally, protected intellectual property includes any products and designs developed by Sickert & Hafner GmbH employees for Sickert & Hafner GmbH's use.

## **1.5 Avoidance of conflict of interests**

Sickert & Hafner GmbH expects loyalty and integrity from all its employees. This means that all employees will act solely in the interests of Sickert & Hafner GmbH within the scope of their employment in the company. Private or personal business interests must not be allowed to interfere with or obstruct the business interests of Sickert & Hafner GmbH.

A conflict of interest exists when actions or private interests interfere in any way – or even appear to interfere – with the interests of the company.

## **2 BEHAVIOR TOWARDS BUSINESS PARTNERS AND THIRD PARTIES**

### **2.1 Integrity**

Sickert & Hafner GmbH and its employees act with integrity when dealing with others and also expect business partners (e.g. private or business customers, suppliers, agents and consultants) to observe relevant legal requirements.

Sickert & Hafner GmbH will only do business with third parties that conduct business ethically and do not subject the company to criminal or other liability or cause Sickert & Hafner GmbH reputational harm.

Sickert & Hafner GmbH does not participate in any activities in connection with money laundering, nor will it facilitate or tolerate such activities.

### **2.2 Fair competition**

Sickert & Hafner GmbH stands for fair and undistorted competition. Sickert & Hafner GmbH and its employees respect and follow the anti-trust provisions in the markets of which they are part.

In virtually all countries, laws and regulations prohibit relationships or arrangements with competitors, suppliers, distributors or dealers that may distort competition.

Sickert & Hafner GmbH expects its employees to refrain from taking part in agreements or concerted practices with other companies that restrict competition or breach anti-trust laws.

### **2.3 Anti-corruption**

Benefits are only permitted if they are received or offered in accordance with the Anti-Bribery and Anti-Corruption Guideline. This means that they have to be appropriate and transparent.

Offering a benefit in any form to a person in either the public or private sectors with the purpose of influencing them is prohibited. The same applies for accepting a benefit. Benefit and payments of any kind or offers of benefits and payments (such as gifts, invitations or discounts) to any public or government official or to representatives of such persons in order



to promote company business are not permitted. Similarly, indirect payments, e.g. by business partners, are also not permitted.

The giving or receiving of gifts, invitations or any other form of benefits can influence the independence of Sickert & Hafner GmbH judgement of its business partners.

All employees and representatives of Sickert & Hafner GmbH must comply with anti-corruption laws in the countries in which Sickert & Hafner GmbH does business. In addition, the Anti-Bribery and Anti-Corruption Guideline applies to all employees.

Care must be taken when requests or offers are made for sponsorship or donations because such payments can also be interpreted as bribery.

Sickert & Hafner GmbH wants to avoid even the appearance that business decisions or economic success depend on improper benefits.

## **2.4 Trade controls**

National und international laws regulate the import, export or domestic trade of goods, technology, services and the handling of specific products. Sickert & Hafner GmbH must ensure that adequate procedures are used to ensure that transactions with third parties do not violate economic embargoes or trade regulations, import or export controls, or regulations, import or export controls, or regulations for preventing the financing of terrorism.

All employees, especially those involved in import, export or domestic trade of goods, technology, services and the handling of specific products must comply with applicable laws and regulations.

## **3 HANDLING OF INFORMATION**

### **3.1 Protection of confidential information**

All managers and employees must protect all company information and treat it in the strictest confidence. This does not only apply to the company's own information but also to confidential information entrusted to Sickert & Hafner GmbH by business partners and customers.

Managers and employees with insider information, i.e. specific confidential information that could have a potential influence on the price of listed securities, are not allowed to use this information for the trading of securities or other financial instruments, nor may they pass on insider information to third parties or use it for recommending the purchase or sale of securities and other financial instruments.

### **3.2 Compliance with data protection regulations**

Sickert & Hafner GmbH places great importance on protecting the personal data of its employees and business partners. Great care and sensitivity is shown when processing data relating to business partners or employees. Personal data is always handled according to the

applicable data protection regulations. The checks and processes implemented at Sickert & Hafner GmbH ensure the best possible protection of all sensitive data.

## **4 TREATMENT OF EMPLOYEES AND COLLEAGUES**

### **4.1 Fair working conditions and employee development**

Sickert & Hafner GmbH recognizes its employees' entitlement to adequate remuneration and observes the legally guaranteed minimum wages in the respective labor markets. Sickert & Hafner GmbH observes applicable labor law regulations in all of its companies.

A great deal of importance is attached to the further development of employees at Sickert & Hafner GmbH. Employees are the most valuable asset for the future of the company and investment in their training is important.

With this in mind, Sickert & Hafner GmbH provides a comprehensive training program, which offers every employee the opportunity to train according to his capabilities and professional interests, so far as these are consistent with the interests of the company.

The development of social and technical expertise is also highly valued at Sickert & Hafner GmbH.

### **4.2 Diversity and the principle of equal treatment**

Sickert & Hafner GmbH works consistently to provide workplaces free of discrimination and harassment on the basis of gender, ethnic background, religion, age, disability or sexual orientation.

This diversity is promoted and respected without exception by Sickert & Hafner GmbH. Employees in the Sickert & Hafner GmbH corporate world deserve mutual respect.

Every person is entitled to fair and respectful treatment. Sickert & Hafner GmbH is committed to a diverse working environment, in which each person's uniqueness is recognized and every individual is treated with courtesy, honesty and dignity. Harassment, bullying or intimidation is not tolerated.

### **4.3 Compatibility of work and family**

As a family-owned company, Sickert & Hafner GmbH strives to enhance the satisfaction and motivation of its employees and hence increase the performance of the company by means of family-friendly arrangements and provisions.

Sickert & Hafner GmbH works with all employees and their representatives in a trusting manner. Sickert & Hafner GmbH is committed to achieving a balance between the economic interests of the company and the interests of its employees. Trust is the solid foundation for successful cooperation in the interests of the company and the employees.



## **4.4 Rejection of forced and child labor**

Sickert & Hafner GmbH rejects any form of forced labor or child labor within the company. Sickert & Hafner GmbH condemns any form of exploitation or discrimination and strictly complies with legal regulations.

## **4.5 Dialogue with employees and employee representatives**

Sickert & Hafner GmbH respects its employees' right to freedom of association. Irrespective of this right, Sickert & Hafner GmbH always allows its employees to express their interest directly.

# **5 ENVIRONMENT, HEALTH AND SAFETY**

## **5.1 Acting sustainably**

The protection of the environment is an integral part of Sickert & Hafner GmbH's corporate responsibility.

Sickert & Hafner GmbH is committed to complying with all environmental regulations and standards applicable to its operations, and using environmentally conscious practices at all its locations. Environmental pollution is to be minimized and environmental protection will be continuously improved.

The protection of people and the environment against waste, waste water and exhaust gases resulting from industrial production processes and the operating business occurring before, during or up to the completion of transportation, disposal and recycling is a corporate responsibility. To ensure that this responsibility is met, Sickert & Hafner GmbH has implemented systems that ensure the safety, control and measurability of all activities occurring in the areas of transportation, disposal and recycling, which could potentially have negative effects on human health and the environment.

Sickert & Hafner GmbH is committed to implementing systems suitable for ensuring the effective control and measurability of these activities.

Every employee bears responsibility for reducing energy and water consumption, and the emission of greenhouse gases in all their activities.

## **5.2 Safe working environment**

Sickert & Hafner GmbH maintains a comprehensive quality management system at all of its production facilities. Sickert & Hafner GmbH attaches importance to complying with local environmental protection laws as well as international regulations across its locations and collaborates with business partners to ensure that they acknowledge and exercise their responsibility for the environment.

Sickert & Hafner GmbH provides a safe working environment for its employees by meeting or exceeding applicable legal requirements or company guidelines with regard to occupational health and safety. Managers, in particular, have the task of ensuring that appropriate health

and safety precautions and measures are in place to ensure compliance with the company's requirements.

All young employees must be protected from work that could endanger their health or safety.

## **6 REPORTING AND CONTACT PERSONS**

### **6.1 Reporting of misconduct**

At Sickert & Hafner GmbH, employees will always find an open door and are encouraged to speak up freely and without fear of repressive measures. Reprisals against employees who express their concerns in good faith are forbidden.

The following contacts are available for employees and third parties.

### **6.2 Local contact persons**

To clarify questions with regard to this Code of Conduct or address misconduct, employees can always contact a person in their immediate working environment, for example:

- Managers, • Compliance Officer, • HR department

### **6.3 Compliance Officer**

Compliance Officer: Jürgen Blasek, Berliner Straße 9, 63628 Bad Soden-Salmünster,  
Tel. 06056/90057-0, [compliance@sickert-hafner.de](mailto:compliance@sickert-hafner.de)

### **6.4 Whistleblower system**

Notifications about substantial violations of the Sickert & Hafner GmbH Code of Conduct, specifically illegal business practices, can be made at any time. There is a confidential, secure communication with our investigation team in the compliance department.

Link: [compliance@sickert-hafner.de](mailto:compliance@sickert-hafner.de)

Sickert & Hafner GmbH will thoroughly investigate every report of misconduct according to the principle of proportionality. Every individual case will be examined. A comprehensible decision will be taken about any suitable, necessary and appropriate consequences according to the results of the investigation.

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