



CODE OF CONDUCT of Hartmann & König Group

PREAMBLE

Hartmann & König is a customer-oriented family company with a global focus, which specialises in the development, production and sale of high-quality motorised cable reels, spring cable reels and slip ring assemblies for the energy supply of mobile consumers.

Alongside economic success in order to secure jobs, embracing social responsibility and treating each other with respect and mutual support are aims that lie at the very core of our family business. Creating sustainable corporate values is always at the heart of everything we do.

The key pillars of all our company activities and interactions with our business partners are specified in the following Code of Conduct.

The Code of Conduct applies equally to all staff at Hartmann & König, from the board of directors and managers to each individual employee, and serves as a specific and binding guideline for responsible conduct within the company. It aims to provide orientation and prevent misconduct.

Every employee at Hartmann & König undertakes to comply with legal regulations and provisions as well as this Code of Conduct.

1. BASIC PRINCIPLES

1.1. Lawful conduct

The observance of and compliance with applicable national and international laws is a matter of course for Hartmann & König. Therefore, every employee is obliged to observe the legal rules and regulations that apply to them. We uphold the principle of strict legality for all actions, measures, contracts and other company transactions. This principle is not only based on the consideration that infringements can lead to significant business disadvantages due to criminal prosecution, fines or claims for damages. Every employee is personally responsible for complying with the applicable laws in their area of work. It is strictly prohibited to incite third parties to commit unlawful acts or knowingly participate in them.

Managers fulfil their function as role models by demonstrating a high degree of social competence and ethical behaviour. They are responsible for compliance with and implementation of the Code of Conduct in their area of responsibility. As part of this, mutual trust is the most important basis for successful cooperation.

1.2 Responsibility for the reputation of Hartmann & König

Societal acceptance of our activities is key to long-term, sustainable success. In the performance of their duties, all employees must consider and uphold the reputation of Hartmann & König.

1.3 Conduct towards employees and partners / human rights

Hartmann & König respects and protects the dignity of every individual and promotes the personal development of its employees. Hartmann & König invests in their qualification and skills. Hartmann & König does not tolerate discrimination, harassment or disadvantage based on gender, race, disability, ethnic or



cultural origin, religion or belief, age or sexual orientation. We respect the right to freedom of expression and encourage all employees to engage in an open and fair culture of discussion.

Mistakes, regardless of who caused them, are not hidden, but are rather seen as sources of improvement and avoidance of economic damage.

We fully support the regulations of the United Nations and vehemently oppose child labour, forced labour and any violation of human rights.

Hartmann & König does not associate with the methods and technologies of L. Ron Hubbard and guarantees its business partners and customers that it does not work or train its employees using Scientology methods or technology. Hartmann & König rejects all collaboration with any individual or company who uses such methods and technology.

Hartmann & König treats its employees with respect and openness and expects all staff to behave in a professional, friendly and fair manner towards superiors, colleagues and third parties. Managers must also act as role models in this respect, and must not expect anything of employees that they would not be willing to do themselves.

1.4. Protection of company assets

All company assets provided must be used exclusively for the intended purpose and handled responsibly. In principle, employees should treat company property as if it were their own.

2. AVOIDANCE OF CONFLICTS OF INTEREST

All actions should be aligned with the achievement of company goals. If employees are unable to make neutral, objective decisions against this background, their superior must be informed and involved in the decision-making process.

2.1 Equity investments and secondary employment

Secondary employment at companies that are competitors, suppliers or customers of Hartmann & König is strictly prohibited. This excludes secondary employment that has no impact on the area of activity of Hartmann & König and that has been approved by the HR department. The HR department must be notified of any equity investments in competitors, suppliers or customers.

2.2 Commissioning business partners for private purposes

In order to prevent conflicts of interest between the company and the private sphere, employees are not permitted to use any business partners who are closely related to their field of activity for private purposes. Exceptions must be agreed in advance with the superior and responsible HR manager.

2.3 Private and business expenses

Business and private expenses must be kept strictly separate; merging them is strictly prohibited. Business expenses must be recorded in a clear, transparent and verifiable (receipts) manner.



3. INFORMATION HANDLING

3.1. Written documents

Records and reports (both internal and external) must be correct and truthful. The principles of proper bookkeeping and accounting must be upheld. In particular, every entry must be based on a truthful document and all transactions must be recorded.

All funds and assets pertaining to Hartmann & König must be recorded in the accounts. Slush funds are strictly prohibited. The creation of records, files and similar using confidential company information is only permitted if in the direct interest of Hartmann & König.

3.2 Confidentiality

Confidential information pertaining to the company must be kept secret and not passed on or otherwise made accessible to third parties, unless authorisation has been issued or the information is publicly accessible. This obligation to maintain confidentiality continues to be valid after employment termination.

3.3 Data protection and information security

Protecting the personal data of our employees and business partners is a key pillar in trusting collaboration. Therefore, we ensure that our security technology is always kept up to date.

Personal data may only be collected, processed or used to the extent necessary for defined, explicit and legitimate purposes. The use of data must be transparent for data subjects. Their right to information and rectification, and, if applicable, objection, blocking and deletion must be safeguarded.

4. CONDUCT TOWARDS BUSINESS PARTNERS AND THIRD PARTIES

4.1 Competition and anti-trust law

Hartmann & König values fair competition. The company complies with the applicable legislation that protects and promotes competition, in particular the relevant anti-trust laws and other regulations regarding competition. Market participants can only develop freely if fair competition exists. This is why Hartmann & König applies the principle of integrity when competing for market shares. Every employee must comply with the rules of fair competition within the framework of legal regulations.

In particular, competitors may not divide up territories or customers, make agreements or exchange information regarding prices/price components, supplier relationships and their conditions or their capacities or supply behaviour. The same applies to the exchange of information on market strategies and investment strategies. Agreements or the exchange of information on research and development projects are only permitted as strictly limited exceptions. The company's market positioning may not be unlawfully exploited, for example, to enforce price discrimination, unsolicited deliveries or delivery refusal.

4.2 Supplier and customer relations



Suppliers must be selected solely using objective criteria after comparing price, quality, performance and suitability of the products or services offered. Agreements with customers and suppliers must be complete, unambiguous and properly documented, including any subsequent amendments and additions. All employees adhere to the internal regulations on the application of dual control (four-eyes principle) and the separation of action and review functions.

4.3 Corruption, gifts and other benefits

Agreements or ancillary agreements concerning the acceptance of benefits or favours by individuals in connection with the procurement, awarding, delivery, processing and payment of contracts are not permitted. It is prohibited to grant employees, bodies, shareholders or agents of customers of Hartmann & König any benefits (monetary or other assets) in exchange for orders for Hartmann & König. It is irrelevant whether such benefits are granted or promised to the recipient or third party directly or indirectly via intermediaries (agents, advisers, distributors, etc.) It is also prohibited to accept such benefits in order to place orders on behalf of Hartmann & König. Employees who allow themselves to be unfairly influenced by customers or suppliers or who attempt to influence them in a dishonest manner will face disciplinary action, regardless of any consequences under criminal law.

Attempts by suppliers or customers to unfairly influence Hartmann & König in their decisions must be reported to the relevant superiors. Commissions and remunerations paid to authorised dealers, representatives or advisers must be reasonable and justifiable in relation to their activities. Commissions and remunerations must always be approved in writing by the board of directors.

Entertainment that serves the business purpose – providing it is measured – is permitted.

Gifts and gestures that are more than merely symbolic must not be accepted. The relevant superior must be notified of any such offers.

4.4 Donations

In the spirit of civic engagement, Hartmann & König can make monetary and in-kind donations for education, science, culture and social causes. Donations must always be made in a transparent manner. In other words, the recipient and specific use must be known, traceable and verifiable at all times. Such donations are to be made on the principle of altruistic action.

5. PRODUCT QUALITY, SAFETY AND SUSTAINABILITY

Hartmann & König is deeply committed to the principles of sustainability. We pay close attention to the high quality and safety requirements of our customers and implement all required improvements. We ensure that our products and manufacturing processes correspond to sustainable ecological, economic and social development and are always state of the art. If, despite our efforts, defects do occur, we endeavour to rectify them in accordance with legal requirements and contractual obligations.

6. OCCUPATIONAL HEALTH AND SAFETY, FIRE AND ENVIRONMENTAL PROTECTION

Hartmann & König is committed to ensuring the safety of its employees in the workplace and offers a health-focussed working environment. The quality of our products largely depends on the performance of our employees, which is why occupational health and safety is a core aspect of our operational processes across the entire company.

All employees and managers are responsible for avoiding hazards for people and the environment, minimising environmental impact and using resources sparingly. Processes, operating sites and equipment must comply with the applicable legal and internal regulations on occupational health and safety and fire and environmental protection.

7. INFORMATION AND TRAINING

Every employee must receive a copy of this Code of Conduct and be made aware of the regulations it contains. Employees can discuss any doubts concerning appropriate conduct with their superior. Hartmann & König employees receive regular information and training about current issues relating to this Code of Conduct.

8. VIOLATIONS AND PENALTIES

Deliberate misconduct and violations of the applicable legal regulations and company rules will not be tolerated. Violations of the Code of Conduct may put the employment relationship at risk and lead to claims for damages.

9. MONITORING

Each business unit is responsible for compliance with the regulations contained in this Code of Conduct and other internally defined company rules in their area. Within their area of responsibility, managers are required to ensure that any violations of the Code of Conduct and regulations issued in accordance with it are detected, investigated and rectified.

Dated: Graben-Neudorf, 01/01/2019