Hensel & Partner GmbH



### **Preamble**

We are committed to corporate social responsibility worldwide. In particular, in the context of our business activities, we have a responsibility to our own company, to customers and suppliers in the value chain, to the environment and society. This Code of Conduct sets out our shared values with regard to social responsibility and fair competition. By signing this Code, we commit ourselves to upholding these principles. We also expect our suppliers to adhere to this Code. By accepting business from our company, we assume that these principles will be adhered to.

In the following text, our company Hensel und Partner GmbH is referred to as the "company".

## 1. General Principles

### 1.1. Basic Understanding

The Company recognizes its social and corporate responsibilities and is committed to fulfilling these responsibilities in all of its business activities.

### 1.2. Compliance with the law

In all business activities and decisions, the Company is committed to complying with the applicable laws and other relevant regulations of the countries in which it operates. Business partners shall be treated fairly. Contracts shall be honored taking into account changes in the general environment.

### 1.3. Orientation towards generally applicable values and principles

The company shall base its actions on generally accepted ethical values and principles, in particular integrity, honesty, respect for human dignity and non-discrimination.

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## 2. Principles of social and societal responsibility

### 2.1. Human rights

The Company respects and supports the observance of internationally recognized human rights. In particular, it respects human rights in accordance with the United Nations Human Rights Charter (Universal Declaration of Human Rights, General Assembly Resolution 217 A (III) of December 10, 1948).

#### 2.2. Non-Discrimination

The Company rejects any form of discrimination within the framework of applicable laws and regulations. This applies in particular to discrimination against employees on the basis of ethnic origin, gender, religion or belief, disability, age or sexual identity.

### 2.3. Health protection

The Company shall ensure occupational safety and health protection in the workplace within the framework of national regulations. The company supports continuous development to improve the working environment.

#### 2.4. Work Conditions, Prohibition of Forced and Child Labor

The Company respects the right of its employees to freedom of association and assembly within the framework of applicable rights and laws. The Company shall comply with labor standards regarding maximum permissible working hours and remuneration, in particular the level of remuneration, in accordance with applicable laws and regulations.

Employees will be protected from corporal punishment and from physical, sexual, psychological and verbal harassment. Employees' privacy must be respected. The prohibition of forced labor of any kind shall be respected. In particular, the Forced or Compulsory Labor Convention from 1930 (International Labor Organization Convention No. 29) and the Abolition of Forced Labor Convention, 1957 (International Labor Organization Convention No. 105) shall be observed.

The Company complies with child labor standards, particularly the Minimum Age Convention, 1973 (Convention 138 of the International Labor Organization) and the Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, 1999 (Convention 182 of the International Labor Organization). If a national regulation on child labor provides for stricter standards, those standards shall prevail.

## 2.5. Environmental protections

The company is committed to the goal of long-term protection of the natural environment for present and future generations. Laws and regulations enacted to protect the environment must be observed.

#### 2.6. Communications

The company communicates openly and dialogically with employees, customers, suppliers and other interest and stakeholder groups about the requirements of this Code of Conduct and its implementation.

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## 3. Principles of fair competition

## 3.1. Prohibition of corruption

The Company opposes corruption and bribery. In dealings with business partners and government institutions, the interests of the Company and the private interests of employees on both sides are strictly separated. Decisions will be made free from extraneous considerations and personal interests. The applicable criminal law on corruption must be observed. Among other things, the following must be observed

The granting of personal benefits by the company and its employees to domestic or foreign public officials (such as civil servants or employees in the public sector) with the aim of obtaining advantages for the company, themselves or third parties is not permitted.

Personal financial benefits may not be offered, promised, granted or authorized in exchange for unfair preferential treatment in business dealings between companies. Similarly, personal benefits of any kind may not be solicited or accepted from business partners in exchange for unfair advantage in business dealings. Company officers and employees may not offer, promise, solicit, grant or accept gifts, payments, entertainment or services in business dealings that are provided with the intent to improperly influence a business relationship or that could compromise the professional independence of the business partner. This generally does not apply to gifts and entertainment that are within the bounds of customary business hospitality, custom and courtesy.

## 3.2. Conducts toward competitors

The Company respects fair competition. Therefore, it complies with applicable laws designed to protect and promote competition, including, without limitation, applicable antitrust laws and other laws regulating competition.

In dealing with competitors, these laws prohibit, among other things, agreements and other activities that unfairly influence prices or terms, improperly allocate territories or customers, or improperly impede free and open competition. In addition, these rules prohibit unfair agreements between customers and suppliers aimed at restricting the freedom of customers to set their own prices and other conditions for resale (price and condition fixing).

Because the distinction between prohibited cartels and permissible cooperation can be difficult to make, the company should designate a point of contact for its employees who can be contacted in case of doubt.

#### 3.3. Trade Secrets

The Company respects and protects the trade and business secrets of others. Confidential information and confidential documents may not be disclosed or otherwise made available to third parties without authorization, unless authorization has been granted, the information is in the public domain, or an enforceable governmental or judicial order requires it.

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## 4. Scope, Implementation, Suppliers

# 4.1. Scope of application

This Code of Conduct applies to all subsidiaries and business units of the Company.

## 4.2. Implementation of Compliance

The Company shall communicate to its employees the contents of this Code of Conduct and the obligations arising therefrom.

Günter Hensel, Geschäftsführer

26. Oktober 2022

Stephanie Bock, Geschäftsführerin

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