

# HAWESKO

## HOLDING SE

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### Code of Conduct for

**lawful and loyal conduct in the course of work for all employees  
in the Hawesko Holding SE group of companies.**

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### 1. Basis: The applicable law

Every employee of a company in our group (hereinafter referred to as "employee") is subject to the following terms and conditions:

An "employee"<sup>1</sup>) must be familiar with the legal provisions and internal regulations that affect his or her work and observe them in the course of his or her activities, even if in individual cases they set limits for the company that may hinder business success in the short term. Unlawful or irregular conduct can cause a wide range of damage and impair the company's good reputation. Hawesko is committed to fair competition and the fair drafting of contracts with its business partners and therefore observes all regulations, in particular competition and antitrust law, consumer protection and environmental protection law, and data protection law.

The good reputation of the Hawesko Group and our economic success depend decisively on how we conduct ourselves in everyday business. There is no alternative to personal integrity and sound judgment.

When faced with a difficult situation or difficult decision, we should ask ourselves the following questions:

1. Is my action or decision legal?
2. Is it in line with our values, guiding principles and policies herein?
3. Is it correct and free from personal interests?
4. Does my action or decision stand up to public scrutiny?

<sup>1</sup> For better readability, only the masculine form is used

5. Does my action or decision protect the reputation of the Hawesko Group with high ethical standards?

If we can answer yes to all questions, then the action or decision is most likely correct and complies with the above guidelines. In order to maintain the good image of the Group companies, the Code of Conduct must be complied with at all times. Even outside the workplace, you will be seen by third parties as a representative of our Group in the course of your work. We ask that you also support other employees in complying with this policy and cooperate with the company in applying the rules. If there is any uncertainty as to the correct conduct, the matter should be discussed with your line manager. If this does not lead to clarification, please contact the compliance officers of Hawesko Holding SE .

The provisions set forth in this Compliance Policy constitute binding work instructions that apply to all business activities and take precedence over all other instructions. Further regulations in employment contracts and/or company agreements remain unaffected.

If you become aware of operational irregularities, conduct detrimental to the company, economic criminality, etc. that jeopardise the protection of our companies, employees, business partners or customers, you have the option of reporting this to your superior or to an external and independent ombudsman's office. The companies of the Hawesko Group have developed a uniform [whistleblower guideline](#) for this purpose, in which you can read about the individual processes and procedures and the necessary contact details.

## 2. Avoidance of conflicts of interest

### 2.1 Business relations with business partners

Hawesko attaches great importance to fair and lawful business dealings and the avoidance of subsequent conflicts of interest.

Hawesko does not tolerate any form of corrupt behaviour and avoids even the mere appearance of it. This applies to both passive and active corruption.

Business partners are suppliers, service providers, commercial agents, dealers and customers (hereinafter: "business partners"). Personal relationships or private interests with business partners must not influence the conclusion of the contract and the content of the contract with business partners, i.e. the activities of the employees. Suppliers and dealers may only be selected according to the criteria of quality, price, reliability and the existence of a long-term, conflict-free business relationship. If unauthorised advantages are offered, promised or granted by business partners in connection with the employee's activities, or if employees are requested to grant unauthorised advantages, the employees are required to inform their managers immediately.

In particular, the following provisions shall be complied with:

*Requesting and accepting benefits*

a) Employees may not, in the course of or in connection with their work, solicit or request invitations to meals or events, or gifts, other benefits, advantages, personal services or favours from business partners for themselves or third parties.

b) Employees must refuse invitations to meals or events, gifts, other benefits, advantages, personal services or favours offered by business partners if their value can/is intended to influence or reward the decision or activity of the employee or if the impression of influence or reward can arise. The acceptance of invitations, gifts, benefits, advantages, services or favours is - irrespective of the restrictions in sentence 1 - only permissible under the following further conditions/restrictions:

(1) As guests of business partners, employees may only accept invitations to events or business meals if the invitation is made voluntarily, serves a legitimate business purpose and the meal takes place in the context of normal cooperation (e.g. lunch during a meeting, a reception following an event or dinner at events lasting several days) and the value of the invitation is in reasonable proportion to the business occasion or refusal of the invitation would be contrary to the rule of courtesy.

(2) The acceptance of an offer by a business partner to pay for travel and accommodation costs by the employee is not permitted. If a business partner invites an employee to stay overnight at his or her premises, the invitation may only be made within the framework of normal cooperation and to a reasonable extent, as in (1), or refusal would be contrary to the rule of courtesy.

(3) When employees purchase goods or services from business partners for private purposes, they may not accept or be granted any special benefits that would not be available to other customers and may not demand such benefits. Excepted from this are general special benefits that employees of the Hawesko Group are entitled to accept as additional beneficiaries on the basis of any existing framework or cooperation agreements between business partners and companies of the Hawesko Group.

(4) It is not permitted to demand payments, loans or other financial benefits of any kind from business partners for personal advantage or the advantage of third parties, to have such promised to oneself or to third parties or to accept such.

(5) Business partners may not act as sponsors of events at Hawesko companies, celebrations to mark the departure of employees, birthday parties or other occasions. Employees may not request or accept support from business partners for events for charitable or comparable purposes, either in their own name or in the name of the company.

(6) Employees may only take advantage of discounts and other benefits offered by business partners if they are granted to all employees. When buying or selling goods or services on behalf of Hawesko companies, discounts or benefits in favour of an individual or a group of employees may neither be demanded nor accepted.

(7) Advertising materials and gifts of convenience with a total value of no more than € 30 may be accepted personally from a business partner per year if they are granted voluntarily by the business partner and it is excluded that decisions of the employee can/should be influenced or rewarded thereby.

(8) Participation in sporting events or attendance at sporting events, shows or other events is permitted to the employee as a guest of one and the same business partner no more than twice per year. A representative of the host business partner must be present.

#### *Offering and granting benefits*

a) Business partners may not be granted special advantages that are objectively unjustified, e.g. because they are based on personal relationships or private interests.

b) Employees may only offer or grant invitations, gifts and benefits to business partners if these are not intended to influence the decisions of the business partner, are appropriate in terms of the reason and the amount and are made in the course of ordinary business activities. In case of doubt, the recipient should be asked to obtain prior approval for the transaction from his or her superior, if any. Gifts may only be sent to the business address of the business partner.

## **2.2 Donations on behalf of the Hawesko Group**

Donations from the assets and in the name of the company by employees to political parties and organisations associated with them are not permitted. Requests for donations from individuals shall be rejected as a matter of principle. Under no circumstances may a donation be made to persons or organisations that are harmful to the reputation. The recipient of the donation and the specific use must be known. It must be possible to account for the reason for the donation and the intended use at any time. Donations should be tax deductible. Payments to private accounts are not permitted.

## **2.3 Financial participation**

Employees may not, without the prior consent of the employer, directly or indirectly participate in companies that maintain ongoing business relationships with companies of the Hawesko Group or, to the knowledge of the employee, seek to do so. Exempt from this are shareholdings for the purpose of private asset management that are so small that influence on decisions of the company concerned is excluded. Employees may not knowingly, without the prior consent of the Board of Management of Hawesko Holding SE, conduct negotiations or other discussions aimed at business relations with persons who have a direct or indirect interest in suppliers or dealers outside the group if these persons also hold executive positions in the Hawesko Group.

## 2.4 Secondary employment

In principle, an employee may engage in secondary employment, regardless of whether it is unpaid or remunerated. The secondary employment must be reported to the employer and must not conflict with the legitimate interests of the company. Secondary employment with competitors of the enterprise is not permitted. The regulations of the Working Hours Act and the Federal Leave Act must be observed.

## 3. Behaviour towards authorities and public officials

The offering or granting of advantages, benefits, gifts and services to political parties, candidates or holders of political office or employees of public authorities, the civil service, state institutions or public-sector enterprises with the aim of obtaining contracts or advantages on the merits or under certain conditions is prohibited.

## 4. Protection of company property

The company's equipment, stocks of goods, vehicles, office materials, documents, files and data carriers may not be used for private purposes unless this is expressly permitted by a special agreement. Data files, programmes or documents may not be copied or removed from the company without permission.

## 5. Documentation of business transactions

Business transactions must be documented carefully and completely. Necessary approvals must be obtained. In the case of operating expenses, the accounts must be prepared carefully and promptly. Business documents shall be prepared and kept in a complete, clear and comprehensible manner so that representation is guaranteed at all times. In the worst case scenario, every piece of paper and every data carrier that is written on can also end up in the hands of a competitor or litigant and then possibly be used against Hawesko.

## 6. Secrecy

Employees must maintain confidentiality about all company and business secrets both during the term of the employment relationship and after its termination. Excepted from this is the provision of information on the basis of a duty to provide information in accordance with the law or official order to the person entitled to provide information in accordance with the law or official order.

## 7. Data protection

The regulations on data protection (DSGVO, BDSG, etc.) must be strictly observed. The success of the Hawesko Group also depends on the trusting and secure handling of personal data.

This requires a high level of data protection. This applies in particular to the personal data of natural persons, especially the data of employees, customers, shareholders, other business partners and third parties.

Personal data may only be collected, processed and used for predetermined, explicit and legitimate purposes and must be accurate at all times.

The use of personal data must be transparent for the data subjects. Their rights of access, complaint, notification, rectification and, if applicable, objection, blocking and deletion must be safeguarded. Appropriate technical and organisational measures must be taken for company processes and IT systems when handling personal data. This is important to prevent unauthorised persons from accessing systems on which personal data are processed or used. In particular, the legal regulations on the handling of employee-related data must be strictly adhered to.

## **8. Investor Relations / Insider Trading**

Hawesko publishes important company information in accordance with the relevant securities trading and stock exchange regulations in order to ensure regulated trading of the company's securities. Unpublished information about the company that is likely to influence the price of these securities or that an investor is likely to regard as important in making an investment decision (insider information) must be treated as absolutely confidential until it is published and may not be used for private securities transactions. It is unlawful to buy or sell shares or other securities on the basis of inside information. It is also illegal to communicate inside information to other persons so that they can buy or sell shares or other securities. If an employee is in possession of inside information, he or she is not permitted to trade or communicate inside information to others for the purpose of having them trade. The same restrictions apply to any person living in the household of or financially dependent on the employee concerned.

## **9. Equal treatment**

Hawesko expects all employees to be treated fairly and their rights and privacy to be respected. There must be no unjustified discrimination on the grounds of gender, disability, ethnic origin, nationality, religion or belief, age, sexual orientation or any other characteristic protected by law. The company does not tolerate harassment or bullying in the workplace or any related discrimination. Hawesko ensures safety and health protection in the workplace. Relations between members of the Board of Management, managers and employees in the Hawesko Group are guided by mutual respect, openness, honesty and a common understanding of trusting cooperation. Interaction with each other is characterised by active, open and constructive communication and mutual feedback.



## 10. Consequences in the event of infringements

Hawesko considers any violation of this policy to be a serious matter. A breach of this policy by an employee is considered a breach of duty towards the employer and may have adverse employment and other legal consequences. Particularly serious cases will be treated as a gross breach of duty, which may ultimately lead to termination of employment, possibly without notice. It is the responsibility of every manager to ensure that all employees are aware of this policy and comply with its provisions. Managers who fail to comply with this obligation may be subject to disciplinary action and legal consequences.

## 11. Complaints and tips

Every employee can make a personal complaint to his/her superior or another person/office designated for this purpose or to an internally existing works council. Likewise, circumstances may be pointed out which indicate the violation of rules of conduct - in particular criminal behaviour within the company. If such information is justified, it will be treated confidentially at the request of the employee, unless mandatory legal provisions require disclosure. In particularly serious cases, especially if there is a suspicion of criminal behaviour within the company, employees also have the option of making anonymous reports; these must be sufficiently specific and must be in writing. In addition to the offices mentioned above, the Group's Compliance Officers are the points of contact. The matters are investigated without delay. Appropriate measures are taken where appropriate. All documents are kept confidential. Civil courage is encouraged within the Hawesko Group. Any reprisals against whistleblowers will not be tolerated.