

CODE OF CONDUCT

HAHN AUTOMATION GROUP GMBH

CODE OF CONDUCT

This Code of Conduct is aimed at creating a reliable framework for the continued success of the HAHN Automation Group's business activities and at ensuring a pleasant working environment at our company as the basis for our success. It describes all the general principles to which the management and staff of the HAHN Automation Group companies are committed. It also outlines the prevailing statutory regulations for our internal and external dealings to ensure compliant behaviour at our company. The Code of Conduct thus provides further details on duties under employment and service contracts. Any existing provisions in statute, collective bargaining agreements or works agreements and internal rules will continue to apply.

I. General principles of conduct

1. Compliance with law and statute

We profess our commitment to law and statute and expect this of all our staff and business partners. This applies worldwide and in all legal systems in the countries in which we operate.

All staff must comply with the relevant legal regulations and social norms in each country. Breaches of law and statute will not be tolerated and may have employment law and/or even criminal law consequences. There must not be any involvement in transactions, which clearly aim to bypass the law.

If a provision of the Code of Conduct conflicts with a provision of national law, only the respective provision of national law will apply.

If a provision of the Code of Conduct is in conflict with local commercial practice or a local custom, the Code of Conduct alone must be complied with.

2. Respect and diversity

We acknowledge cultural diversity and appreciate how diversity can benefit our company. Good cooperation between all our staff, based on mutual respect and open, honest interaction is the basis of our success. Our aim is to offer all our staff challenging and fulfilling opportunities for their personal and career development.

Discrimination, verbal abuse or harassment of any kind in respect of fellow-workers or any person with whom we are in contact will not be tolerated. The personal dignity and integrity of an individual must be respected at all times.

3. Management, responsibility and supervision

Our management bears special responsibility. Our management sets an example to staff. They always keep their sights set firmly on the company's interests and its economic success.

Our management actively promotes cooperation between different business areas and working on a basis of trust. They inform staff of important developments. Tasks and responsibilities are delegated in a clear and transparent manner.

Those in positions of responsibility must ensure that their staff are aware of and comply with the applicable laws and this Code of Conduct. They bear responsibility for any breaches which proper monitoring could have avoided or impeded.

II. Dealing with our business partners

1. Offering, granting and accepting gifts and favours

Our success on the global market is determined by the quality of our products and services, our focus on the customer in advice and service and our competitive prices. We also select our suppliers and business partners based on these criteria.

None of our staff may offer or grant business partners, or persons or bodies associated with them, personal gifts or other favours either directly or indirectly in connection with their work.

None of our staff may accept personal gifts or other favours either directly or indirectly in connection with their business activity, nor may they request same for themselves or for third parties. This applies to gifts in money and kind as well as any other form of favour. Only promotional gifts and invitations to meals within reasonable and appropriate limits are permitted.

a) Gifts and invitations to business meals

The value of promotional gifts should be such that the recipient does not feel under any obligation.

Invitations to business meals must be voluntary, serve a justified business purpose, not be excessive in value, not take place on a regular basis and always be within the scope of usual business practice. In the event of any doubt, approval must be granted by the respective superior.

b) Accepting gifts and invitations to business meals

Staff may not use their position at our company to demand or accept any favours for themselves personally or for third parties.

Accepting occasional gifts of nominal value is governed by "HAHN Anti-Corruption Guideline" and is generally permitted. In the event of any doubt, approval must be granted by the respective superior.

Accepting invitations to business meals must be voluntary, serve a justified business purpose, not be excessive in value, not take place on a regular basis and always be within the scope of usual business practice. In the event of any doubt, approval must be granted by the respective superior.

c) Public officials

No gifts or favours, not even of nominal value, may be made to public officials or public administration employees. Employees at state-owned companies may also be classified as public officials. In the event of any doubt as to whether the person concerned is a public official or public employee, consent must first be obtained from the superior in charge.

d) Training, further education and events

The teaching purpose is always the main focus of training and further education events. Participation in or organisation of events with a leisure time programme not paid by the participants requires the prior consent of the superior in charge.

e) Cooperation with third parties

We exercise particular care when collaborating with third parties (advisors, intermediaries or other service providers) especially in countries with increased risk potential. Remuneration to advisors must always be proportionate to the actual services rendered. For any remuneration, an invoice complying with local laws must be given by third parties to the companies of the HAHN Automation Group. Intermediaries may not be used to develop business in an unlawful manner.

More detailed rules of conduct are described in "HAHN Automation Group Anti-Corruption Guideline".

2. Conduct which complies with competition rules

We protect the good reputation and integrity of the company by our exemplary conduct complying with the law in competition matters. Business for the good of all will only work long-term on the basis of fair and free competition and in strict compliance with the law.

All staff must comply with the rules of fair and free competition. We do not hold any discussions with competitors regarding their or our prices, terms and conditions or costs. We do not make any agreements on prices, terms and conditions or sharing customers or markets with competitors. In tenders, we submit the best-possible bid and do not exchange information with our competitors regarding our bids. In the event of any doubt, all staff must consult their superior before contacting a competitor.

Compliance with the rules of fair and free competition also applies in particular at trade fairs and in associations. All staff must immediately end discussions with competitors even at trade fairs and association meetings and if need be leave meetings if the rules of fair and free competition are not complied with.

More detailed rules of conduct are described in "HAHN Automation Group Competition Law Guideline".

3. Money laundering, export control

We respect legislation on controlling international payment transactions and trade in goods.

We do not support the smuggling of money obtained illegally into the legitimate financial system ("money laundering"). Payments of dubious origin (such as cash and payments from high-risk countries) must be reviewed before being accepted.

Export restrictions ("embargoes") imposed on specified countries, goods or individual persons and any other export control regulations must always be checked and respected. This also applies to the possible use of our products for non-civilian purposes (so called dual-use goods).

4. Avoiding conflicts of interest

Conflicts of interest or loyalty may occur anywhere. For example, there could be a conflict between one's own private interests (or those of family members and close friends) on the one hand and the interests of the company on the other, certain ancillary activities or interests in business undertakings or competitors as long as these are not purely small-scale asset investments, in particular listed shareholdings (shares).

We attach great importance to avoiding conflicts of interest at our company.

III. The environment, health and safety

To protect human life, we must first protect our environment. We are committed to conserving natural resources and preventing waste. The HAHN Automation Group complies with relevant environmental protection requirements. In particular, we respect the regulations on correct and environmentally friendly waste disposal.

Protecting human beings also means protecting our staff. We strive towards a safe and healthy working environment for all our staff.

IV. Company property

We respect the property of our company and our staff. We will use the equipment we have been provided with appropriately and economically and will treat this work equipment with care. Company property and the property of our staff must be protected from loss, damage and theft. This also includes protecting confidential information, for example on products we have developed.

V. Information and data protection

Truthful internal and external reporting is of fundamental importance to effective cooperation based on trust.

Disclosing internal information to third parties may only be carried out by the staff responsible in this respect.

Data protection and confidentiality is always a priority when handling personal data of business partners or our staff. Confidential information must be protected from unauthorised access by third parties.

Personal data are only collected, processed or used if this is necessary for defined and clear purposes and is permitted according to statutory regulations. It is essential to ensure that there is no unauthorised access to personal data. Rights to information, correction, objection, blocking or deleting data must be respected.

More detailed rules of conduct are described in the "HAHN Automation Group Information Security Policy".

VI. Implementation and organisation

Our company's internal organisation takes into account the objectives of this Code of Conduct. The principle of dual control, avoiding conflicts of interest in assigning responsibilities and fully documenting potentially critical transactions can prevent irregularities and allow problems to be identified and remedied.

It is the responsibility of each individual to comply with the Code of Conduct. If all staff make a joint effort, our objectives can be achieved and problems can be identified and remedied.

Anyone who suspects a possible breach of the Code of Conduct or the guidelines based on this Code of Conduct can raise the matter via the HAHN Automation Group Whistleblower System under this link: <https://hahnautomationgroup.integrityline.app/>. The system also allows for anonymous reports of breaches. The “HAHN Automation Group Whistleblower System Policy” describes the central procedural rules of the HAHN Automation Group Whistleblower System and sets out binding requirements for the protection of whistleblowers.

VII. Contact

In the event of any queries relating to this Code of Conduct and Compliance please contact the Compliance department under compliance@hahnautomation.group.
