

Change log:

Date	Version	Author	Change
23.06.2023	1	MKB	<ol style="list-style-type: none">1. Adaptation to ISMS according to VDA5.12. Regulation for whistleblower protection law added

General

With this document Heck + Becker GmbH & Co. KG commits itself in all its business activities to promote the enforcement of principles on human rights, labor law and environmental protection and to comply with the internationally recognized standards on these matters. As a globally binding guideline for legally compliant and ethically responsible actions in our company, the "Code of Conduct" defines the standard for our behavior towards employees, business partners and the public.

In order to ensure compliance with the principles of this Code, Heck + Becker also expects this from its suppliers. Heck + Becker is committed to ensuring that its suppliers respect this "Code of Conduct" and that their own "Code of Conduct" reflects these principles we have established. Heck + Becker's "Code of Conduct" complies with national laws and regulations.

Heck & Becker GmbH & Co KG
- Management -



(Martin Baumann)

NOTE: The masculine form used in this text applies to persons of any gender.

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2 Business Ethics

2.1 Compliance with employee rights, laws and regulations

It is of outstanding importance to our company that all our corporate activities are characterized by social responsibility towards our employees and society as a whole. We respect the personal rights of our employees, offer them good and safe working conditions and a stable environment in which they can develop their talents. The aim must be to observe the guidelines of the UN Global Compact initiative (Davos, 01/99) and the principles and rights adopted by the International Labor Organization (ILO) in the "Declaration on fundamental principles and rights at work" (Geneva, 06/98).

2.2 Human rights, health, environment

We respect the dignity and personal rights of our employees and third parties with whom we have business contact. Compliance with internationally recognized human rights is to be respected and supported. Respect for human rights is an integral part of corporate responsibility.

2.3 Rejection of forced and child labor, human trafficking

Any form of forced labor and child labor is rejected. Participation in human trafficking, use of violence, use of involuntary labor shall not be tolerated. The principle of freely chosen employment is to be accepted. Child labor as defined by ILO conventions and the exploitation of children or the support of child labor is not tolerated.

2.4 Discrimination and equal opportunities

Discrimination against employees on the basis of skin color, ethnic or social origin, gender, age, nationality, marital status, disability, political affiliation, sexual orientation and religious affiliation or belief will not be tolerated.

2.5 Anti-corruption

The Company, in particular its corporate bodies and employees, undertake not to commit any acts that may lead to criminal liability for a pecuniary offense, in particular fraud or breach of trust, theft or embezzlement, insolvency offenses, offenses against competition, the granting of an advantage, acceptance of an advantage, bribery, venality or comparable offenses.

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2.6 Compensation, working hours and benefits

We commit ourselves and our suppliers that compensation and benefits must comply with legal requirements regarding minimum wages, overtime and legally required social benefits. Legal requirements on working hours and vacations must be complied with. If no national laws on working hours exist, the labor and social standards of the International Labor Organization (ILO) apply.

2.7 Occupational safety, fire protection and health protection

For occupational safety, fire protection and health protection, compliance with national legislation and regulations for a safe, ergonomic and healthy as well as hygienic working environment must be ensured as a minimum.

2.8 Education and training

Knowledge and skills mean opportunities in modern society. The company recognizes the importance of employee qualifications as a value for the company and sees its commitment to vocational training and continuing education as an investment in the future. Through targeted information and training measures, we promote the awareness of our employees with regard to all entrepreneurial requirements.

2.9 Freedom of association and collective bargaining

We respect the rights of employees to freedom of expression, freedom of association, membership in trade unions, the formation of employee representative bodies and membership in works councils. We also expect our suppliers to comply with the applicable national laws and regulations of the countries in which employees are deployed. Employees and their representatives must be enabled to communicate with management without fear of reprisals, intimidation or harassment.

2.10 Open debate

The open discussion of concerns makes a decisive contribution to ensuring that misconduct occurs less frequently or is identified and corrected at an early stage. We therefore attach great importance to an open atmosphere in which employees can approach their supervisors or the management with critical issues without hesitation and in a spirit of trust.

2.11 Whistleblowing and protection against retaliation, whistleblower protection law

In the event of ethically incorrect behavior or violations of national laws or of the guidelines of the UN Global Compact initiative (Davos, 01/99) and the principles and rights adopted by the

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International Labor Organization (ILO) in the "Declaration on fundamental principles and rights at work" (Geneva, 06/98), it must be possible to seek advice and assistance and to address the concerns or suspected violations through defined communication channels without fear of retaliation. The procedure for reporting violations is explained below under the heading "Decision-Making Guidance."

2.12 Conflict of interest/ sponsoring activities

In everyday business, we may be faced with decision-making situations in which the interests of the company conflict with our personal interests. Conflicts of interest can mean that decisions are no longer made impartially in the interests of the company. Employees who are affected by a potential or actual conflict of interest are obliged to inform their supervisor or the management quickly in order to bring about a rapid clarification.

We use our sponsorship activities to promote specific goals, e.g. cultural activities, educational purposes, natural sciences and sporting events. We donate voluntarily, do not expect anything in return, and comply with applicable laws and regulations. We categorically exclude donations to political parties, political candidates, political office holders or civil servants / administrators.

3 Compliance

3.1 Relations with business partners

Our business partners (e.g. customers, suppliers, representatives and consultants) expect that they can rely on Heck + Becker as a legally compliant business partner. This also requires that we are familiar with our contractual obligations towards our business partners. We work dutifully with the understanding that national and international laws must be complied with.

3.2 Dealing with political institutions and authorities

When dealing with governments and authorities, we always act honestly and transparently and in accordance with applicable law. This applies, for example, to contacts with authorities in our day-to-day business (for necessary licenses, permits or contract conclusions), in the case of political representation of interests or in the case of official inquiries (requests for information, official investigations, legal proceedings)

3.3 Protection against corruption and bribery

At Heck + Becker GmbH & Co. KG, any form of bribery and corruption is prohibited. Benefits, for example within the scope of invitations or in connection with advertising measures, which

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serve the purpose of promoting business relations or presenting products or services, are - as far as moderate - permissible. In any case, compliance with the relevant legal provisions must be ensured. However, such benefits may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage.

3.4 Fair competition

For us, the global understanding of the prohibition of relationships and agreements with competitors, suppliers, distributors and dealers that harm fair competition applies. We are committed to fair competition and comply with its laws and rules in all countries.

3.5 Product safety

We see ourselves as a partner to our customers. Long-term customer relationships serve our business success. Our claim is therefore to provide our customers with safe and flawless products and services of high quality.

3.6 Disclosure of information

Information on the business activities, structure, financial situation and performance of the company is disclosed in accordance with the relevant regulations. Factual information and communication are used to create trust among the public, employees and business partners.

3.7 Export controls and economic sanctions

We check for export and economic sanctions and provide appropriate evidence, certificates or declarations.

3.8 Intellectual property protection and plagiarism

The protection of intellectual property is of essential business importance to us. It is therefore essential, irrespective of commercial value, to exclude the infringement of any author's exclusive right to his protected works. This also applies to the products of his intellectual work. Technology and know-how transfers must be carried out in such a way that intellectual property rights are protected.

It must be ensured that neither we nor our partners use plagiarism and that no conflicts of interest arise. Furthermore, we expect our partners to comply with the respective commercial regulations and laws on import and export controls in all countries in which they operate.

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3.9 Money laundering

The relevant legal provisions for the prevention of money laundering must be complied with

3.10 Privacy

When collecting, storing, processing or transmitting personal data (e.g. name, address, telephone number, date of birth, health information) from employees, customers or other third parties, we take the utmost care and maintain strict confidentiality.

3.11 Information about products and services

We always make truthful statements regarding our products and services. False statements and misleading information about products and services can cause damage to both our customers and our reputation. This is contrary to our principles and is inadmissible.

3.12 Use and security of IT systems

IT systems are regularly used and data processed in everyday business. This requires appropriate security measures (passwords, approved technologies and licensed software) to ensure the protection of intellectual property and personal data. Ignoring necessary security measures can have serious consequences, such as data loss, theft of personal data or copyright infringement. Since digital information can be quickly disseminated and readily duplicated and is virtually indestructible, we pay due diligence to the content of e-mails, attachments, downloaded files and stored voice messages.

The company Heck & Becker GmbH & Co KG has established a management system for information security (ISMS) according to VDA5.1.

3.13 Confidentiality and public relations

Confidential information is intended only for the named recipients, not for internal dissemination or external publication. Discussing confidential information in public or unauthorized disclosure of information about the company or its customers to third parties, is a breach of confidentiality.

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4 Decision making guide

If you are ever unsure whether a decision is in line with the requirements of the Code of Conduct, check it against the following questions.

- Is my decision legal, and is it in line with the company's rules?
- Can I make the decision in the best interest of the company and free from competing self-interest?
- Can I reconcile the decision well with my own conscience?
- Can I easily disclose the decision to the outside world? Would it also stand up to scrutiny by third parties?
- Will my decision preserve the company's reputation?

If you can answer "yes" to each of these questions, your decision is probably defensible. If doubts remain with regard to any of these questions, seek qualified advice.

Your contacts for the Code of Conduct:

You can contact people in your immediate work environment to ask questions about the Code of Conduct or to report violations of the Code. These are, for example:

Supervisor, HR department, works council

If you do not want to raise your concerns locally or you do not find adequate support there, then you can report the violation on an external whistleblowing portal . You can find the associated link on our web page.

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