



# COMPLIANCE

The HAINBUCH Principles Of Conduct  
[Version: January 2023]

# Compliance

## The HAINBUCH Principles of Conduct

HAINBUCH has established itself as a company in which trust is placed. This is primarily due to our fundamental values that we have been living for 70 years. Customers, employees, suppliers, and other persons that contact us build on a fair collaboration, on a polite, courteous tone and style in our dealings. We treat humanity and the environment with respect; we value their beliefs and the environment, and stand for honorable, honest, and rule-compliant behavior in day-to-day business. Our principles of conduct are anchored in our identity, which is binding on every employee, and which should help our employees obey our rules and live our values.

HAINBUCH expects from all employees and business partners that they conduct their business dealings with integrity and fairness in accordance with statutory regulations, rules, and standards, and that all employees and business partners accept and implement the precepts defined in the principles of conduct, and that they also demand acceptance and implementation of the principles of conduct from their own business partners.

Our requirements and the fundamental principles imposed on the collaboration with business partners of HAINBUCH are specified in these principles of conduct. The business partners are HAINBUCH defined.

A handwritten signature in blue ink, appearing to read 'Sylvia Rall'.

Sylvia Rall  
CEO & Owner

A handwritten signature in blue ink, appearing to read 'A. Feinauer'.

Dr. Achim Feinauer  
CEO

A handwritten signature in blue ink, appearing to read 'Gerhard Rall'.

Gerhard Rall  
CEO & Owner

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## Law and responsibility

### **Working conditions and human rights**

HAINBUCH and its business partners are obligated to comply with the national and international laws and regulations that apply at the worldwide locations of HAINBUCH and its business partners. Such laws ensure that human rights are respected and that human dignity, in particular, is safeguarded. The business partners do not tolerate any harassment or discrimination whatsoever due to skin color, gender, religion, age, citizenship, social or ethnic origin, disability, world view, sexual orientation, political or trade union activity.

### **Work standards**

HAINBUCH rejects and is committed to the abolishment of any form of slavery, thralldom, compulsory labor, human trafficking, forced labor, or child labor, and likewise expects this from its business partners. Business partners must comply with the minimum age for underage employees for permission to work as defined in the applicable statutory regulations.

HAINBUCH and its business partners respect the freedom of association including collective pay negotiations, as well as the right to form interest groups. Thus, within the national laws and regulations, HAINBUCH and its business partners grant their employees the right to look after their interests.

HAINBUCH demands from itself and its business partners an awareness of their social responsibility and that wages, benefits and work time of their employees are fair and reasonable. HAINBUCH and its business partners support the upskilling of their employees in order to ensure a high level of performance.

The protection of privacy and data protection have top priority.

### **Whistleblowing and protection against retaliation**

For HAINBUCH it is important that employees, business partners or other third parties who report known or suspected misconduct or violations are protected from retaliation and that their identity is protected.

### **Responsible procurement of raw materials**

HAINBUCH and its business partners support all efforts that ensure a responsible procurement of raw materials. We do not tolerate the procurement and the use of raw materials that are extracted or promoted in conflict regions [key word: conflict minerals]. To exclude the possibility of such procurement, and to identify possible conflict minerals in manufactured products, we are obligated to take precautions to disclose the origin or source of supply of your resources.

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## **Fair competition and antitrust law**

HAINBUCH is committed without restriction to the principles of fair and free competition as an elementary component of the free-enterprise order. HAINBUCH also expects this from its business partners. Consequently, HAINBUCH and its business partners are obligated to comply with the applicable statutory regulations of antitrust law and competition law. In particular, HAINBUCH and its business partners do not participate in unlawful price arrangements or in prohibited agreements between competitors concerning market behavior. Likewise, HAINBUCH and its business partners do not exchange any sensitive or competition-relevant information with competitors.

HAINBUCH and its business partners obey all relevant foreign trade regulations in their worldwide business activities. They ensure not only that they comply with the respective relevant laws for import and export, but also that they comply with applicable economic embargos.

## **Export controls and economic sanctions**

HAINBUCH complies with all applicable import and export control laws, sanctions and embargoes that impose restrictions on the export or re-export of goods, software, services and technology to certain destinations and prohibitions on transactions involving certain restricted countries, regions, organizations and individuals.

## **Combating corruption**

### **Prohibition of corruption**

Corruption is prohibited through international conventions and national laws. HAINBUCH does not tolerate from its employees or its business partners any form of bribery or any business practices whatsoever that give the impression of undue influencing or exertion of influence. HAINBUCH and its business partners are obligated to neither offer advantages of any kind, directly or indirectly to third parties, nor to provide direct or indirect advantages to themselves or to others. Also HAINBUCH and its business partners do not allow any advantages to be promised to them that constitute an unlawful action as stipulated in the relevant anti-corruption laws.

HAINBUCH expects from itself and its business partners that they do not tolerate any form of unlawful benefits, particularly in business transactions with public officials and government agencies either domestically or abroad. Likewise HAINBUCH and its business partners ensure that their employees conduct themselves with integrity. Likewise HAINBUCH and its business partners are obligated to reject facilitation payments [i.e. unforeseen payments to public officials for the purpose of urging that the public official accelerates or undertakes an official act, to which a claim fundamentally exists].

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## **Money laundering**

HAINBUCH is committed to participate in the international fight against money laundering and implements suitable measures to comply with relevant regulations. HAINBUCH also expects this from its business partners

## **Conflict of interest**

Transparency in all business transactions is of the utmost importance for HAINBUCH and its business partners. Decisions must be made exclusively on the base of factual considerations. On the other hand, in particular, personal or family-related conflicts of interest that can result in extraneous considerations must be avoided. HAINBUCH and its business partners ensure that even the appearance of extraneous considerations is avoided.

## **Financial responsibility**

HAINBUCH documents all significant business transactions in a traceable and timely manner. Financial records shall be prepared in accordance with applicable law and generally accepted accounting principles.

## **Disclosure of information**

Accordingly, HAINBUCH discloses information in accordance with applicable regulations and customary industry practices. This includes, among other things, financial and non-financial information, as well as information about our employees and occupational health and safety measures, environmental practices, business activities and information about HAINBUCH's financial position.

## **Counterfeit parts and intellectual property**

HAINBUCH places high demands on all employees in terms of creativity, diligence, neatness and precision. Deliberate or negligent behavior that results in a reduction of our quality will not be accepted. For this reason, the use of plagiarized or counterfeit parts is prohibited.

HAINBUCH respects intellectual property. This applies in particular to intellectual property which is protected by patents, copyrights or trademarks.

## **Gifts, invitations, and other benefits**

When dealing with benefits, e.g. in the form of gifts or invitations, HAINBUCH and its business partners strictly ensure that any appearance of dishonesty or incorrectness is always avoided. HAINBUCH and its business partners do not tolerate the acceptance or granting of benefits that occur in the expectation of obtaining an unlawful consideration or an advantage that could give rise to doubt regarding the integrity of HAINBUCH and its business partners, or that constitutes an influencing of business decisions.

## **Donations and sponsoring**

When making donations HAINBUCH and its business partners follow the principle of altruistic action. The donations of HAINBUCH and its business partners occur only on a voluntary basis

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and in accordance with the applicable legal order. HAINBUCH and its business partners do not use their sponsoring activities to obtain unlawful business advantages.

### **Occupational health and safety and environmental protection**

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HAINBUCH and its business partners support the safety and protection of health of their employees through appropriate measures, such as preventative and consistent occupational health and safety, as well as a safe and healthy work environment.

#### **Environmental protection**

HAINBUCH and its business partners are committed to a sustainable, responsible, as well as careful use of resources and raw materials. With their products and processes, they pay attention to reducing CO2 emissions, good energy efficiency, the use of renewable energy, maintaining water and air quality, reducing water and electricity consumption, sustainable resource management and waste reduction, and responsible chemical management. They generally commit their employees to minimizing hazards to the environment and to use resources sparingly. This sustainability policy also applies to the company's own suppliers.

**We reserve the right to change these requirements, should it be necessary.**