

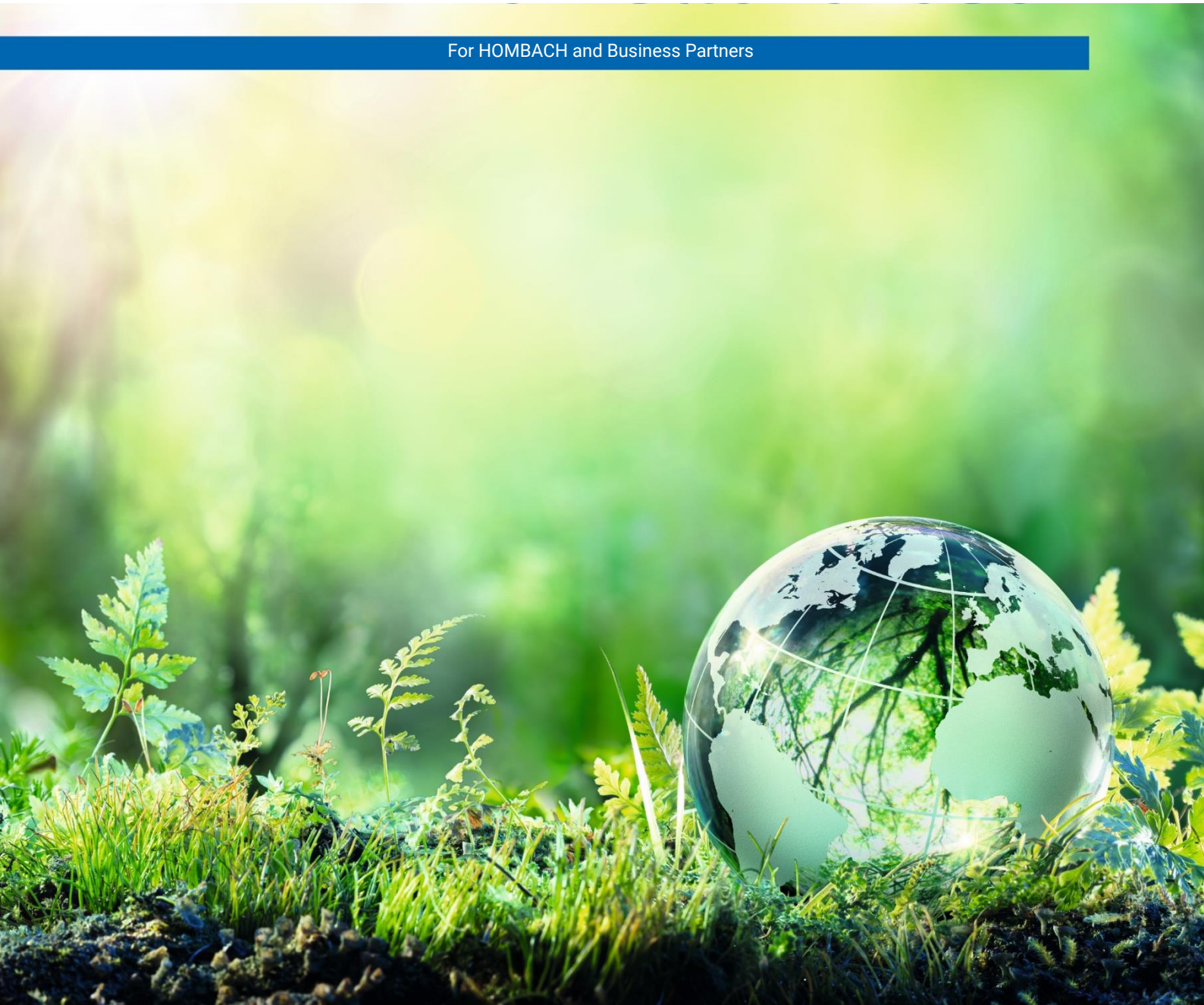


**HOMBACH**

We perform different

# Code of Conduct

For HOMBACH and Business Partners



# HOMBACH

## Code of Conduct

Ernst HOMBACH GmbH & Co. KG (hereinafter referred to as "HOMBACH") is a family business operating globally that meets its ethical, social and environmental responsibilities within the company and in dealings with its business partners. Our sustainable action is designed to contribute to protecting and preserving our valuable resources for future generations.

This Code of Conduct is based on the principles under international standards, such as the OECD Guidelines, the ILO Conventions, the International Covenant on Economic, Social and Cultural Rights (ICESCR) and country-specific laws and guidelines.

The conduct set out in this Code of Conduct defines the basic requirements that HOMBACH applies to its suppliers, subcontractors and service providers (hereinafter referred to as "Business Partners") AND to HOMBACH itself. Such conduct relates in particular to our responsibility towards people and the environment. For simplicity and to improve readability, any reference to a specific gender or sex is intended to refer to all genders and sexes equally.

HOMBACH expects its Business Partners AND employees to comply with the following principles.

Compliance with this Code of Conduct by our Business Partners is the basis for any long-term, trust-based business relationship with HOMBACH.

### Legislation

All business activities and decisions must comply with applicable national and international laws and regulations.

### Human rights

All internationally recognised human rights must be guaranteed by avoiding causing or being complicit in human rights violations.

#### Ban on child labour and forced labour

- All forms of child labour and forced labour (slavery and human trafficking) must be rejected.

#### Respect and equal opportunities

- Equal treatment must be guaranteed for all individuals, regardless of their skin colour, race, nationality, ethnicity, social or economic background, physical/mental limitations, sexual identity and orientation, political or religious beliefs, age, pregnancy, marital status and other characteristics protected by law.
- Any demeaning treatment must not be tolerated.
- This applies in particular to emotional abuse, sexual harassment and discrimination, including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative.

#### Pay and benefits

- Employees must be paid in accordance with applicable laws – which includes minimum wages, overtime and statutory benefits.

#### Employee rights

The legal rights of workers to freedom of association, freedom of expression and to form or join trade unions must be recognised.

### Occupational health and safety

Applicable regulations on protecting health and on occupational safety must be complied with, as a minimum.

### Planning and implementation

- Potential hazards at the workplace must be identified and assessed
- The most effective precautionary and protective measures possible must be implemented
- The work environment must be assessed and improved on an ongoing basis

### Information and training

- Information and training regarding hazards and protective measures for the applicable areas of work must be provided
- Employees must receive training

### Environmental protection and sustainability

Business activities must be organised so that they are environmentally friendly and climate-friendly. Impact on the environment must be minimised as far as possible, including in order to protect and preserve valuable resources for future generations.

#### Planning and implementation

- Environmental impact must be identified and assessed
- The most effective measures possible must be implemented to protect the environment and climate
- Protection of the environment must be assessed and improved on an ongoing basis

#### Minimising environmental impact

- Emissions of air pollutants and greenhouse gases must be reduced
- Harmful changes to soil, pollution of water and harmful noise emissions must be reduced
- Waste must be avoided and must be properly treated and disposed of
- The use of hazardous substances must be minimised or avoided
- Procurement must be sustainable

#### Minimising the use of natural resources

- Energy efficiency must be increased
- Water consumption must be reduced
- The recycling rate must be increased
- Renewable energy must be used

#### Information and training

- Information and reporting
- Employees must receive training

### Business practices

Fair competition and compliance with applicable statutory and other general conditions must be guaranteed.

#### Preventing corruption and bribery

- Applicable anti-corruption laws and standards must be complied with.
- Corruption and bribery must not be tolerated. This includes any benefits paid or offered to the representatives of public authorities or other third parties in order to obtain a business advantage. This includes refraining from granting or accepting unauthorised bribes as well.

#### Fair competition

- Business must be conducted in accordance with national and international competition and antitrust legislation.
- Anti-competitive agreements such as price fixing and market or customer allocation are not allowed.
- The applicable statutory provisions regarding the prevention of money laundering must be complied with.

#### Conflicts of interest

- All conflicts of interest that may influence business relationships must be avoided.
- Business decisions must be made solely on the basis of factual and objective criteria.
- When dealing with business partners, customers, government institutions, administrative offices, the judiciary and the public, the interests of the company and the personal interests of employees on both sides must be kept strictly separate. Action and (purchasing) decisions must not be influenced by personal interests. Applicable criminal law relating to corruption and bribery must be complied with at all times.

#### Confidential data and personal data

- Applicable data protection regulations and standards must be complied with.
- The privacy of each individual must be respected and guaranteed.
- Personal data must be treated as confidential and must be protected.
- The right of access, the right to rectification (correction) and, where applicable, the right to object, the right to restriction and the right to erasure (deletion) must be guaranteed.

#### Protection of intellectual property

Intellectual property must be protected and safeguarded against unauthorised access (products, patents, designs, know-how, copyrights, proprietary information, trademarks, etc.).

### Conflict minerals

Ensure that no products are used and delivered that contain metals the source minerals or derivatives of which originate from a conflict region where they contribute directly or indirectly to the financing or support of armed groups or to human rights violations. The current EU regulation on the definition of obligations to fulfil due diligence requirements in the supply chain applies.

### Expectation of and relationship with Business Partners

- We expect our Business Partners to act in accordance with the principles and requirements set out in this Code of Conduct that apply to them.
- Our Business Partners support their suppliers, subcontractors, service providers AND their own employees to comply with this Code of Conduct.
- HOMBACH reserves the right to check that the principles and requirements of this Code of Conduct are being complied with, either itself or via independent third parties, in the form of audits or by inspecting certificates.
- On request, our Business Partners provide all the necessary documents to demonstrate compliance with this Code of Conduct.
- HOMBACH reserves the right to take measures (up to and including immediate termination of contract without notice) against any Business Partner for a breach of this Code of Conduct.

### Reporting concerns

Communication channels must be provided that can be used to report any potentially unlawful conduct confidentially. When any such reports are received, the necessary investigation and, if applicable, appropriate corrective measures shall be carried out. The contact details are available on the HOMBACH company website.

If a Business Partner discovers that a HOMBACH employee or a person appointed by HOMBACH is acting contrary to the applicable laws or the principles of this Code of Conduct, the Business Partner is encouraged to report this to HOMBACH immediately.

**Ernst Hombach GmbH & Co. KG**  
Veit-vom-Berg-Str. 24  
D-91486 Uehlfeld, Germany

## Confirmation

We hereby confirm receipt of and agreement with this Code of Conduct.  
We undertake to comply with this Code of Conduct as far as we possibly can and to the extent that we can take action and agree that non-compliance may lead to immediate termination of contract or to claims for damages.

Address and contact details of the Business Partner

Company \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Name of the person signing \_\_\_\_\_

Job title \_\_\_\_\_

Contact details (email; phone)  
*Optional* \_\_\_\_\_

\_\_\_\_\_  
Place, date

\_\_\_\_\_  
Business Partner signature and company stamp

Send the fully completed and signed confirmation to HOMBACH.