

# Code of Conduct





## Preamble

Dear employees and stakeholders,

In our efforts to deliver top performance as an innovative electrical engineering company, it is particularly important to us to reflect and live the values and standards that are upheld in Germany. Our Code of Conduct is not only a testimony to our ethical obligations, but also a commitment to the high standards set by our company headquarters in Germany.

We are proud to produce in our plants in Heiligenhaus and Körperich and that our employees live and work here. Our high standards (Made in Germany) in terms of quality, safety and social responsibility are not only legal requirements for us, but also a natural part of our corporate culture.

In this preamble, we would like to emphasize the importance of our Code of Conduct, which serves as a guide for our daily actions. The Code of Conduct is the foundation on which our company is built and reflects the values of respect, responsibility and fairness. It is a guide that helps us to always align our decisions and actions with these high standards.

We encourage each individual to familiarize themselves with the principles of our Code of Conduct and to use them as a daily guideline for our actions.

Together, we can ensure that our company continues to be a place where ethical behaviour, social responsibility and excellence go hand in hand.

Your Management Board

Olaf Zugehoehr  
Managing Director Sales

Dirk Horstmann  
Managing Partner

Michael Mandel  
Managing Director Technology



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## **1 Scope**

The following Code of Conduct contains important basic principles and guidelines for the day-to-day work of our employees and for dealing with our business partners. Our corporate values are the basis for responsible, fair and sustainable action. At Horstmann, we value respectful cooperation, both among our employees and in our dealings with our stakeholders.

This Code of Conduct applies to all employees of Horstmann GmbH.

## **2 Compliance with legislation**

It is a matter of course for us that we will comply with current laws and other legal requirements in the countries in which we operate. In cases where local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. Where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, the local laws shall take precedence. Nevertheless, we endeavour to comply with the content of this Code of Conduct.

## **3 Integrity and regulatory conformity**

We have implemented suitable compliance measures so that the following areas are covered appropriately:

### **3.1 Corruption**

We do not tolerate corruption, bribery or blackmail; they impede fair competitive conditions. Gifts made with the intention of influencing business decisions or which could give the appearance of doing so or to obtain some other undue advantages are neither promised, offered, granted, requested nor accepted in our business relationships. Nor do we allow these to be promised to us. Especially strict standards must be applied when dealing with people for whom particular rules apply under criminal and liability law (e.g. public officials).

### **3.2 Fair competition**

We value fair cooperation with our competitors. We do not participate in price agreements, sharing markets or collusion in respect of customers, markets and bids.

### **3.3 Prevention of money laundering**

Money laundering is the term used for bringing money obtained illegally or from illegally acquired assets into the legal financial and economic system. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to disguise or integrate criminal or illegally acquired assets.

### **3.4 Protection of information and intellectual property**

We protect confidential information and respect intellectual property, transfers of technology and know-how must be made in a way that protects intellectual property rights, customer information, business secrets and information that is not in the public domain. We observe the current laws to protect business secrets and treat our business partners confidential information accordingly.

### **3.5 Data protection**

We process, store and protect personal data in compliance with statutory regulations. Personal data is therefore treated confidentially and only collected for legal, previously defined purposes in a transparent manner. We only process personal data if it is protected against loss, modification and unauthorized use or disclosure using appropriate technical and organizational measures.

### **3.6 Export controls**

We undertake to comply with legal standards relevant to export controls – including but not limited to approval requirements, export bans and support bans – in the course of shipping and exporting our goods.

### **3.7 Avoidance of conflicts of interest**

We avoid internal and external conflicts of interest which could illegitimately influence business relationships.



## 4 Health and safety

We protect our employees' health by taking suitable measures in relation to health and safety at work that provide appropriate cover in the following areas:

- ▶ Compliance with current laws and guidance set out in international standards relating to health and safety at work;
- ▶ Suitable workplace design, safety regulations and provision of suitable personal protective equipment;
- ▶ Implementation of preventive checks, emergency measures, an accident reporting system and further suitable measures for continuous improvement;
- ▶ Provision of access to adequate quantities of drinking water and access to clean sanitary facilities for employees.

We ensure that our employees have received adequate instruction.

## 5 Remuneration and hours of work

Remuneration is based on current laws and, if applicable, current binding collective agreements and is supplemented by the relevant national legislation on minimum wages. Employees are given clear, detailed and regular information on the composition of their remuneration.

We comply with current laws and (international) working standards in respect of the maximum permissible working hours and ensure that

- ▶ working time, including overtime, does not exceed the relevant legally permissible maximum limits;
- ▶ the hours worked per week, including overtime, do not exceed 60 hours per week, even in exceptional circumstances and even if no such stipulations exist;
- ▶ employees have at least one full day per calendar week free.

## 6 Observance of human rights

We pay attention to and support compliance with internationally recognized human rights and

- ▶ respect the personal dignity, privacy and personal rights of each individual;
- ▶ protect and uphold the right to freedom of speech and freedom of expression;
- ▶ do not tolerate unacceptable treatment of employees such as physical and psychological hardship, sexual and personal harassment or discrimination.

### 6.1 Prohibition of child labour

We do not tolerate any child labour. We do not employ any employees who cannot prove that they are at least 15 years old, and we require proof of age to be submitted.

### 6.2 Prohibition of forced labour

Forced labour, modern slavery or comparable acts that involve the deprivation of liberty are forbidden. All work must be voluntary, and it must be possible to end the employment relationship.

### 6.3 Freedom of association and collective bargaining

We respect the right of employees to freedom of association, freedom of assembly and to engage in collective bargaining and pay negotiations, providing this is legally permissible and possible in the relevant country in which we are operating. If this is not permissible, we look for appropriate compromises for our employees.

### 6.4 Promotion of diversity, equal opportunities

We encourage equal opportunities and do not tolerate discrimination. We treat all people equally regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, world-view or other personal attributes.

## 7 Environment, energy and climate protection

We act in accordance with the applicable laws in order to minimize negative impacts on the environment and continuously improve our activities in respect of environment and climate protection.

We have implemented appropriate environmental protection measures that cover the following topics appropriately:

- ▶ Setting objectives, defining and implementing measures and ensuring the continuous improvement of these;
- ▶ Environmental aspects such as the reduction of CO2 emissions, increasing energy efficiency, using renewable forms of energy, safeguarding the quality of water and reducing water consumption, safeguarding air quality, encouraging resource efficiency, reducing waste and disposing of waste in the proper way and responsibly handling substances that are dangerous to human beings and the environment.

## 8 Dealing with conflict minerals

We exercise the necessary care to take measures to avoid using conflict minerals in our products in order to prevent human rights violations, corruption and financing armed groups or similar via this route.

## 9 Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply comparable codes of conduct. Furthermore, we encourage them to implement the criteria in this Code of Conduct in their own supply chains.

We reserve the right to systematically apply this Code of Conduct with our suppliers and to carry out checks as warranted. This may take the form of questionnaires, assessments or audits.

Should this cause doubts as to whether this Code of Conduct is being followed, the supplier is requested to take suitable measures to counter this and to notify its contact in our company of the course of action. If required, the cooperation arrangement will be ended.

## 10 Execution and implementation

We make suitable and reasonable efforts to continuously implement, document and apply the principles and values in the Code of Conduct. All employees are made aware of what this Code of Conduct contains and receive training on relevant topics as required. Violations of the Code of Conduct are not tolerated and can have consequences under employment law.

### 10.1 Communication

We communicate openly in dialogue with employees, customers, suppliers and other interest and stakeholder groups regarding the requirements of this Code of Conduct and its implementation.

### 10.2 Information on infringements

We offer our employees and business partners access to a protected mechanism that will allow them to confidentially report possible violations of the principles of this Code of Conduct.

If you have any information, please contact our external reporting office:

In a personal conversation or by post at

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