

Hoffmann + Krippner Code of Conduct

Table of Contents

1.	В	Basic	understanding	3
2.	C	Comp	pliance with legislation	3
3.	li	nteg	rity and compliance	3
	3.1		Corruption	3
	3.2		Fair competition	4
	3.3		Prevention of money laundering	4
	3.4		Protection of information and intellectual property	4
	3.5		Data protection	4
	3.6		Export controls	4
	3.7		Avoidance of conflicts of interest	4
4.	H	Healt	h and safety	4
5.	R	Remi	neration and hours of work	5
6.	C	Obse	rvance of human rights	5
	6.1		Prohibition of child labour	5
	6.2		Prohibition of forced labour	6
	6.3		Freedom of association and collective bargaining	6
	6.4		Promotion of diversity, equal opportunities	6
7.	Е	Envir	onment, energy and climate protection	6
8.		Deali	ng with conflicxt minerals	6
9.	S	Supp	ly chain	7
10).	E>	recution and implementation	7
	10.3	1	Communication	7
	10.2	2	Information on infringements	7
11		Si	gnature	7

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1. Basic understanding

This Code of Conduct is based on a shared conception of socially responsible company management as defined

by the following guiding principles. We, Hoffmann + Krippner GmbH & Co. KG, accept responsibility for the

consequences of our business decisions and activities in respect of the legal, economic, technical, social and

environmental implications as far as possible within our available scope of action. We thus contribute to the

societal and economic development of the countries and regions in which we operate.

Our actions are consistent with the relevant legal regulations. We are guided by ethical values and principles, in

particular integrity and honesty, as well as respect for the dignity of human beings as set out in the principles of

the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for Multinational

Enterprises, the Core Labour Standards oft he International Labour Organisation and the United Nations Guiding

Principles on Business and Human Rights.

This Code of Conduct defines the basic principles of our actions, and we actively demand that it is observed by

our employees.

We expect the same basic understanding from our business partners. It is not intended to constitute a basis for

third-party rights.

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 compliance

We have implemented suitable compliance¹ 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 intension of influencing business decision or which could give the appearance of doing so or to obtain some

other undue advantage 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).

¹Compliance refers to observance of legal regulations, regualtory standards, voluntary self-imposed commitments and internal guidelines

Seite 3 von 7

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3.2 Fair competition

We operate in compliance with national and international competition and anti-trust legislation and 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 unauthorised use or disclosure using

appropriate technical and organisational 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.

Where this is not successful, we disclose these conflicts.

4. Health and safety

We protect our employees' health by taking suitable measures in relation to health and safety at work (e.g. the

implementation of a company health and occupational safety management system) 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 work²;

• Suitable workplace design, safety regulations and provision of suitable personal protective equipment;

² See ILO work and social standards (ILO Guidelines on Occupational Safety and Health); SA 8000 Social Accountability or ISO 45001

Occupational Health and Safety Management, etc.

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Seite 4 von 7

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 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 standards³ 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 recognised 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 labour⁴. 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. For countries which fall within the exception for developing countries according to ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not hire employees for dangerous work who, according to ILO Convention No. 182, cannot prove that they are at least 18 years old.

QSE 18600023 03

³ ILO Convention No. 1 (Hours of Work (Industry) Convention), 1919

⁴ ILO Convention Nos. 79, 138, 142 and 182



6.2 Prohibition of forced labour

Forced labour, modern slavery or comparable acts that involve the deprivation of liberty are forbidden.⁵ 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 negotiations⁶ 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, worldview or

other personal attributes.

7. Environment, energy and climate protection

We act in compliance with current legislation and are guided by international standards8in order to minimise

negative impacts on the environment and continuously improve our activities in respect of environment and

climate protection. All employees are made aware of environmental issues and the necessary training is offered.

We have implemented appropriate environmental protection measures (e.g. the implementation of a company

environmental management system) that cover the following topics appropriately:

· Setting objectives, defing 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 conflicxt 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.

⁵ ILO Convention Nos. 29 and 105

⁶ ILO Convention Nos. 87, 135 and 154

⁷ ILO Convention No. 111

8 ISO 14001 Standards of OECD Guidelines/COP21

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9. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply comparable codes of conduct. 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 would like to pass on any information, please contact the following person/office directly or anonymously.

11. Signature

Hoffmann + Krippner GmbH & Co. KG

Frank Wahlandt CEO – Partner & Markt Thomas Grimm