



Code of Conduct

- Code of Conduct for all employees of the Hirschvogel Group -

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1. Mission statement and principles

As a family-owned business, the Hirschvogel Group is committed to its social responsibility towards its own business and its employees, customers and suppliers, as well as to the environment and society. Their well-being is a top priority.

At the Hirschvogel Group, it's not about quick profits. Instead, our focus is on sustainable operations and healthy growth. In line with this mission statement, the Hirschvogel Group has adopted the principles and guidelines set out in this Code of Conduct, which are intended to promote and ensure law-abiding, value-compliant and sustainable behaviour on the part of each individual employee.

All employees may expect all principles and guidelines contained in this Code of Conduct to also be the benchmark for all actions of the Hirschvogel Group's management, including all executives.

Every employee is responsible for complying with the principles and guidelines set out in this Code of Conduct. Even the appearance of unlawful conduct can lead to a loss of trust in the Hirschvogel Group's approach to work and should therefore be avoided to the extent possible. All employees are encouraged to discuss questions and issues relating to this Code of Conduct and, in particular, to give and receive feedback on the code.

2. Responsible conduct

Avoidance of corruption

We reject corruption and bribery in our dealings with business partners and state institutions and pursue a zero-tolerance policy in this regard. It is forbidden to demand, accept, offer or grant unlawful benefits. Neither may donations from nor sponsoring by the Hirschvogel Group be used in a way that conceals such a benefit.

Minor gratuities in dealings with business partners and customers may be customary in trade and are therefore permissible. However, it is imperative that these be within the appropriate scope of the individual case, and they may generally only be accepted or granted restrictively.

Particularly when dealing with government officials, we try to avoid the mere appearance of possible influencing, which is why we refrain from using financial means to expedite or initiate an administrative process by so-called "facilitation payments".

Prevention of money laundering

We are committed to combating money laundering and the financing of terrorism, and check our business partners in accordance with the applicable laws and regulations in this regard. Within the scope of the information available to us and our diligence obligations, we neither participate in nor facilitate activities in connection with money laundering and terrorist financing.

Foreign trade law

As a globally active company with locations worldwide, the Hirschvogel Group sells its goods across numerous national borders. In this regard, we comply with all applicable laws and regulations of foreign trade law, including export control regulations and anti-terrorism laws, as well as customs laws. This applies when we deliver goods, provide services and transfer or provide software and technology.

All employees of the Hirschvogel Group must ensure compliance with these regulations within the scope of their position and prevent violations or infringements of these to the best of their ability. In case of doubt, the Corporate Logistics, Customs and Export Control Department should be consulted.



Compliance with fair competition and avoidance of cartels

We respect fair competition and comply with all applicable laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition.

We do not participate in agreements or other activities that are likely to influence prices or conditions on the market or otherwise hinder competition.

This principle also applies to the exchange of confidential market and company information in the context of conferences, industry or association meetings and the initiation and implementation of market research and benchmark projects. Such meetings must be held in strict compliance with the applicable antitrust laws.

Furthermore, we do not participate in agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their own prices and other conditions for resale.

Data protection and information security

At the Hirschvogel Group, we have set ourselves the goal of protecting the confidentiality and integrity of information and personal data and ensuring the availability of critical systems. We comply with the laws and regulations on cyber security and data protection. The education and sensitization of our employees are important success factors, as is also the continuous improvement of our security measures.

Protection of assets and intellectual property

Hirschvogel is aware of the value of the company's own assets and intellectual property (know-how, industrial property rights along with trade and business secrets). We protect our assets and intellectual property on the one hand and recognize that our competitors, business partners and other third parties also have an interest in these on the other. Every employee protects these assets and the intellectual property of the Hirschvogel Group and does not pass them on without express authorization. This applies to the use of company resources, the procurement of materials and services, the deployment of employees and all other business and strategic decisions. Company property may only be removed from the company premises with the express consent of the company and only for agreed professional purposes. The private use of company property may not exceed the usual scope.

All employees who have been given access to assets or intellectual property of business partners or other third parties must treat these exclusively in accordance with the agreements made with the business partner or third party.

Communication and marketing

All communication and marketing measures on behalf of the Hirschvogel Group (online, print, TV/radio and social media) must be managed and monitored exclusively by the central Corporate Marketing and Communication department. This department is also responsible for all inquiries from external media representatives. Individual statements made by employees of the Hirschvogel Group (e.g. at public, professional or cultural events and on the internet, such as on social media) are personal opinions expressed by such employees. In all cases of external communication, we remain committed to our principles, in particular those set out in this Code of Conduct, and respect the integrity of our employees in particular.

3. Sustainability and environmental protection

Responsibility for environmental rights

The Hirschvogel Group is committed to using resources of all kinds as sparingly as possible and to responsible corporate management. We are committed to the UN Global Compact principles (Davos, 01/99) - Goals 7 to 9 - the 17 Sustainable Development Goals of the United Nations and the Minamata Convention on Mercury of October 10 2013. We comply with all national and international regulations and environmental protection standards that apply to us. Environmental pollution must be actively minimized, and environmental protection must be continuously improved. We actively promote the concept of a circular economy and support the use of recycled materials to reduce waste and our negative impact on the environment. We are committed to setting emission reduction targets. We strive to find solutions to improve energy efficiency and minimize our energy consumption and greenhouse gas emissions. We operate a suitable energy and environmental management system and are able to report regularly on our environmental performance (emissions, water, waste, etc.), for example, in the form of sustainability reports.



Greenhouse gas emissions

We have undertaken to reduce our emissions in accordance with the recommendations and guidelines of the Science-Based Targets Initiative (SBTi). We are committed to finding solutions to improve energy efficiency and minimize our energy consumption and greenhouse gas emissions.

Hazardous substances

Chemicals, waste and other materials posing a risk to the environment or humans must be identified, marked and dealt with in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing such substances and when they are disposed of. The Hirschvogel Group does not use products containing mercury, nor does it use mercury or mercury compounds. Similarly, the Hirschvogel Group does not use any persistent organic pollutants (POPs).

Dealing with conflict minerals

We have established processes in accordance with the guidelines of the Organization for Economic Cooperation and Development (OECD) for the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, to ensure that we meet our due diligence obligations to promote responsible supply chains for minerals from conflict-affected and high-risk areas.

4. Social responsibility

Responsibility for human rights

The Hirschvogel Group is committed to the agreements of the UN Human Rights Charter, UN Convention on the Rights of the Child, UN Women's Rights Convention, the UN Guiding Principles on Business and Human Rights, the principles and rights adopted by the International Labor Organization (ILO, Geneva 06/98), the OECD Guidelines for Multinational Enterprises and the UN Global Compact Principles (Davos, 01/99) - Goals 1 to 6. Further details can be found in our policy statement on our human rights strategy, which can be viewed at the following link <https://hirschvogel.com/grundsatzerklaerung>.

Child labour

Hirschvogel rejects all types and forms of child labour and also expressly requires this from its suppliers. We promote and protect the dignity and rights of children. Irrespective of compliance with statutory provisions on child labour, such as compliance with a legally prescribed minimum age, Hirschvogel does not tolerate work that is dangerous or exploitative, that is likely to be harmful to the physical or mental development of children or that prevents children from attending school. This applies to the entire supply chain.

Forced labour and slavery

Hirschvogel also strictly rejects all forms of forced labour, involuntary or exploitative labour, human trafficking and other forms of exploitation. We stand for an inclusive and collaborative work environment that is free from retaliation, violence and harassment. All work must be voluntary and not under threat of punishment. Furthermore, employees must be able to terminate the employment relationship at any time. These principles also include all forms of modern slavery, human trafficking and unethical recruitment practices.

We also expect our suppliers to comply with the aforementioned principles. Accordingly, they must prohibit any form of forced or compulsory labour and slavery as well as any form of physical, psychological, sexual or verbal violence, abuse and economic exploitation on their own premises and in their supply chain.



Occupational safety and health protection

Protecting the health and physical integrity of our employees is a high priority for the Hirschvogel Group. Not only do we comply with the applicable national regulations and provisions on occupational health, occupational safety and health protection to this end, but we also maintain and improve a health and safety management system on an ongoing basis that is aimed at creating and maintaining a permanently safe working environment for our employees. This includes the provision of personal protective equipment, regular training on occupational safety and the promotion of good safety practices. All employees should be open to giving and receiving feedback on safe behaviour. We operate an emergency management system, and fire safety and the responsible and handling of chemicals in line with health protection are very important to us.

Our goal is zero accidents at work, and we expect a continuous reduction in accidents at work. Employees whose tasks involve physically demanding work are specially trained and equipped with tools and knowledge for working in an ergonomic and safe environment.

Diversity, equal opportunity and inclusion

We stand for an appreciative and unprejudiced working environment that is free from discrimination, unequal treatment, intimidation, harassment and bullying. All employees must be appreciated, regardless of age, gender, gender identity, ethnic origin, nationality, religion or ideology and physical or mental disability or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected. These standards also apply in full to the personnel recruitment processes of the Hirschvogel Group.

Minimum wage, working hours and freedom of association

The Hirschvogel Group complies with all statutory remuneration regulations, such as those regarding the type and amount of salary or salary components that are paid. In addition, the Hirschvogel Group complies with all regulations regarding the establishment and definition of working hours, rest periods and holiday.

The Hirschvogel Group respects the right of employees to form and join organizations of their choice, to engage in collective bargaining and to strike. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative options for independent and free association of employees must be made possible. Employee representatives must be protected against discrimination. Employees may not be discriminated against on the basis of their founding, joining or membership of such an organization. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

5. Implementation of the Code of Conduct

Scope of application

This Code of Conduct applies to the entire Hirschvogel Group, i.e. Hirschvogel Holding GmbH based in Denklingen, and all companies affiliated with Hirschvogel Holding GmbH within the meaning of Sections 15 et seq. of the German Stock Corporation Act (AktG). The Hirschvogel Group will request its direct suppliers to agree to the content of this Code of Conduct and to comply with same. In the relationships with indirect suppliers and third parties, the Hirschvogel Group will work towards compliance with the contents of this Code of Conduct to the best of its ability.

Responsibility of all employees

We expect all employees to meet the requirements of the principles and guidelines set out in this Code of Conduct at their own responsibility. In particular, this primarily applies to all employees who perform management tasks. They have a role model function and must actively demonstrate that compliance with all the principles and guidelines set out here is very important for the protection of our Group.

Every employee is required to consult an appropriate internal contact (e.g. the responsible HR employee or the direct manager) if there is any uncertainty about proper behaviour.



Further support

If you have questions regarding the implementation and interpretation of this Code of Conduct, the team of the Hirschvogel Group's legal department will be available for advice any time. You can find contact details along with more handouts and guidelines that further specify, explain and concretize individual points of this Code of Conduct at "Departmental Information - Corporate Governance" on the Hirschvogel intranet.

Whistleblowing and protection from retaliation

The Hirschvogel Group pursues an open-door policy and requires all employees to report any violations of this Code of Conduct or of the guidelines and procedural instructions issued on the basis of same. Any inappropriate behaviour will be actively addressed at Hirschvogel! At the same time, however, we, the Hirschvogel Group, want to have a culture of error in which mistakes can be recognized, addressed and reported without fear of reprisal. We want to learn from mistakes and use them to improve our processes. Accordingly, employees are encouraged to speak out freely and without fear of reprisal and - if internal departments are unable to remedy the situation - to report violations of this Code of Conduct to the external Chief Compliance Officer by using the Hirschvogel whistleblower system (<https://www.hirschvogel.com/en/company/compliance/whistleblower-protection-act/>), by sending an email to compliance@hirschvogel.com or by calling +49 8243 291-4455. Both the establishment of contact and further communication with them can be completely anonymous if desired and will be handled in strict confidence. Reprisals against employees and external parties who raise concerns in good faith about misconduct within the company are prohibited.

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