

Code of Conduct

HOW our activities are guided

Contents

- Contents 2**
- Scope of application 3**
- Principles 4**
 - Compliance with applicable law 4
 - Human rights, health, environment 4
 - Fair working conditions 4
 - Open discussion 4
 - Trust and Respect 4
 - Conflict of interests 5
- Interaction with business partners and third parties 5**
 - Relationships with business partners 5
 - Interaction with political institutions and authorities 5
 - Protection against corruption and bribery 5
 - Fair competition 6
 - Product safety 6
- Handling of information 6**
 - Protection of intellectual property 6
 - Data protection 6
 - Information about products and services 6
 - Use and security of IT systems 6
 - Confidentiality and public relations 7
- Guide for making decisions 8**
- Contact person for the Code of Conduct 8**

Scope of application

With this document, Heck & Becker GmbH & Co. KG (hereinafter referred to as Heck & Becker) undertakes to promote the implementation of principles on human rights, labour law and environmental protection in all its business activities and to comply with the internationally recognised standards on these matters. As a globally binding guideline for legally compliant and ethically responsible conduct in our company, the "Code of Conduct" defines the standard for our conduct towards employees, business partners and the public. Heck & Becker also expects its suppliers to comply with the principles of this code. Heck & Becker undertakes to ensure that its suppliers respect this "Code of Conduct" and that their own "Code of Conduct" reflects the principles defined by us. The "Code of Conduct" of Heck & Becker corresponds to national laws and regulations.

Dautphetal, 23.10.2019

Heck & Becker GmbH & Co. KG

- Managing Director -

A handwritten signature in blue ink that reads 'Martin Baumann'.

(Martin Baumann)

Principles

Compliance with applicable law

Compliance with all applicable laws and regulations is a matter of course for us. Any violation of applicable laws or regulations may have serious consequences, such as criminal prosecution, damages or damage to reputation. At Heck & Becker we respect and protect the dignity of our employees and treat them with respect.

Human rights, health, environment

We respect the dignity and personal rights of our employees and others with whom we do business. We reject forced and child labor and any form of exploitation or discrimination. We strive for the responsible use and procurement of natural resources (water, energy, materials, etc.) during the manufacture and sale of our products and services.

Health management and occupational safety: We believe that the safety and well-being of our employees are essential to our success. We ensure a healthy and safe working environment for our employees. We are committed to ensuring that all employees can work in an environment free of sexual, psychological and physical harassment.

Fair working conditions

We comply with the legal regulations to ensure fair working conditions, including those on pay, working hours and the protection of privacy.

Open discussion

The open discussion of concerns plays a decisive role in reducing the incidence of misconduct and in identifying and correcting misconduct at an early stage. We therefore attach importance to an open climate in which employees can address their management or senior management with critical issues without hesitation and in a spirit of trust.

Trust and Respect

Every single person has the right to be treated with justice, dignity and respect. We are committed to equal opportunities and promote a work environment characterised by respect and tolerance, in which the value and dignity of each individual are recognised and all employees treat each other with courtesy, honesty and dignity. Harassment, bullying and

intimidation are prohibited. We will not tolerate any discriminatory conduct towards employees or applicants on the grounds of ethnic origin, nationality, sex, pregnancy or parenthood, marital status, age, disability, religion or belief, sexual orientation or any other reason covered by the General Equal Treatment Act.

Conflict of interests

In daily business, we can be confronted with decision-making situations in which the interests of the company conflict with our personal interests. Conflicts of interest can lead to decisions no longer being made impartially in the interests of the company. Employees who are affected by a possible or actual conflict of interest are obliged to inform their manager or the executive management of this as soon as possible, in order to achieve a quick clarification.

Interaction with business partners and third parties

Relationships with business partners

Our business partners (e.g. customers, suppliers, representatives and consultants) expect that they can rely on Heck & Becker as a legally compliant business partner. This also requires that we are familiar with our contractual obligations towards our business partners. We work conscientiously with the understanding that national and international laws must regulate and comply with the import, export or domestic trade of goods, technologies or services as well as the handling of certain products and capital and payment transactions.

Interaction with political institutions and authorities

In our interactions with governments and authorities, we always act honestly and transparently and in compliance with applicable law. This applies, for example, to contacts with authorities in day-to-day business (for necessary licences, permits or the conclusion of contracts), political representation of interests or official enquiries (requests for information, official investigations, court proceedings).

Protection against corruption and bribery

At Heck & Becker any form of bribery is forbidden. Benefits, such as in the context of invitations or in connection with advertisements, which serve the purpose of promoting business relations or presenting products or services, are permitted - insofar as they are moderate. In any case,

compliance with the relevant statutory provisions must be ensured. However, such benefits may only be accepted or granted if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage.

Fair competition

For us, the global understanding of the prohibition of relationships and agreements with competitors, suppliers, distributors and dealers which harm fair competition applies. We are committed to fair competition and comply with its laws and regulations in all countries.

Product safety

We see ourselves as partners to our customers. Long-term customer relationships serve our business success. It is therefore our aim to supply our customers with safe and flawless products and services of high quality.

Handling of information

Protection of intellectual property

The protection of intellectual property is of essential importance for our business policy. Irrespective of the commercial value, the violation of the exclusive right of each author to his protected works must be excluded. This also applies to the products of his intellectual work.

Data protection

When collecting, storing, processing or transmitting personal data (e.g. name, address, telephone number, date of birth, information on health status) of employees, customers or other third parties, we pay attention to the highest level of care and strict confidentiality.

Information about products and services

We always provide truthful information about our products and services. False statements and misleading information about products and services can damage our customers and our reputation. This contradicts our principles and is not permitted.

Use and security of IT systems

IT systems are regularly used and data processed in daily business. Suitable security precautions (passwords, approved technologies and licensed software) are required to ensure

the protection of intellectual property and personal data. Failure to comply with necessary security measures can have serious consequences, such as data loss, theft of personal data or copyright infringement. Because digital information can be quickly distributed and easily reproduced and is virtually indestructible, we take great care with the content of e-mails, attachments, downloaded files and stored voice messages.

Confidentiality and public relations

Confidential information is intended only for the named recipients and not for internal dissemination or external publication. The discussion of confidential information in public or the unauthorized disclosure of information about the company or its customers to third parties constitutes a breach of confidentiality.

Guide for making decisions

If there is uncertainty whether a decision is in line with the requirements of the Code of Conduct, it can be reviewed with the following questions.

- Is the decision legal and consistent with the company's rules?
- Can the decision be made in the best interest of the company and free from competing (own) interests?
- Is the decision compatible with conscience?
- Can the decision be easily disclosed to the outside world? Would it also stand up to scrutiny by third parties?
- Does the decision preserve the company's reputation?

If each of these questions can be answered with "Yes", the decision is probably justifiable. If there is any doubt about any of these questions, qualified advice may be required.

Contact person for the Code of Conduct

Contact persons are employees in the immediate working environment, such as

- supervisor,
- human resources department,
- employee representation (works council).

Questions about the Code of Conduct or violations of the Code may be reported to them. If concerns cannot be addressed locally or if appropriate support cannot be found there, the external data and information protection officer may also be contacted.