

## Code of Conduct

The Hanomag Heat Treatment Group enjoys an invaluable reputation for corporate trustworthiness around the world, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities.

Success in business depends on building and maintaining the trust of customers, shareholders, employees, governments and the general public.





## ✓ Basic principles:

The Hanomag Heat Treatment Group shall:

- ⇒ comply with the laws and regulations
- ⇒ demonstrate and promote its commitment to responsible business practice in policies, decisions and activities
- ⇒ integrate the principles of this policy into critical processes

### Requirements to business partners

We preferably work with component suppliers, consultants, distributors and other business partners that share the principles expressed in this Code of Conduct. Relating to the defence industry, we only work with those manufacturers who bindingly respect the *War Weapons Control Act* and the *Foreign Trade Legislations*. We do not contract with any suppliers or subcontractors who are using child- or forced labour.



## Business Principles

### Marketing and Sales

The Hanomag Heat Treatment Group shall present its products and services accurately and shall comply with applicable regulatory and legal requirements.

The Hanomag Heat Treatment Group shall not make false statements or provide misleading information regarding its products or their performance, including the safety and environmental attributes of the products.

### Fair Competition practices / Antitrust law

The Hanomag Heat Treatment Group shall compete in a fair manner and with integrity.

The Hanomag Heat Treatment Group shall not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that improperly influences the market place or the outcome of a bidding process.

The Hanomag Heat Treatment Group shall use legitimate methods to gather information about our competitors.

### Intellectual property and information protection

The Hanomag Lohnhärtereier Group respects the intellectual property of third parties and treats it strictly confidentially in the course of its business activities and protects it against disclosure. Similarly, we use licensed services, such as e.g. patented heat treatment processes within the framework agreed with our partners. We expect this approach to the same extent from our customers and suppliers

### Accounting and Reporting

All financial transactions shall be reported in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transactions in a correct and non-misleading manner.

### Anti-Corruption

The Hanomag Heat Treatment Group shall not participate in or endorse any corrupt practices.

Representatives of the Hanomag Heat Treatment Group shall not offer customers, potential customers, suppliers, consultants, governments, agencies of governments, or any representative of such entities, any rewards or benefits in violation of applicable laws or established business practices stricter than applicable laws, in order to obtain or retain business or to gain any other improper advantage.

Hanomag Heat Treatment Group employees shall not accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions.

### Money Laundering

The Hanomag Heat Treatment Group shall not accept, facilitate or support money laundering.

### Taxation

Our company shall comply with the tax laws and regulations of each country in which it operates.

### Ownership/Financial Responsibility

We respect the material and intangible property of the company, which serves to achieve our goals. It is used within the framework of operational regulations.

### Export controls/economic sanctions

The company undertakes to comply with all applicable trade control laws.



## Social Responsibility

### Non - Discrimination

All employees shall have equal opportunities based on competencies, experience and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background or ethnic origin.

All employees shall be treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

### Workplace Practice

The necessary conditions for a safe and healthy work environment shall be provided for all Hanomag Heat Treatment Group employees.

### Political Involvement

The Hanomag Heat Treatment Group shall observe neutrality with regard to political parties and candidates for public office.

### Conflicts of Interest

All representatives of the Hanomag Heat Treatment Group shall conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of the group.

### Freedom of Association

The Hanomag Heat Treatment Group respects the right of all employees to join an association to represent their interests as employees, to organize and to bargain collectively or individually.

### Privacy Policy

The Hanomag Lohnhärterei Group respects the integrity and privacy of its employees, business partners and other stakeholders. In accordance with the applicable data protection laws, personal data is processed exclusively for the stated purpose, carefully and comprehensively and protected against disclosure.



## Environmental Principles

### Resource Efficiency

The Hanomag Heat Treatment Group products and processes shall be designed in such a way that energy, natural resources and raw materials are used efficiently, and waste and residual products are minimized.

### Precautionary Principle

The Hanomag Heat Treatment Group shall avoid materials and methods posing environmental and health risks when suitable alternatives are available .

### Responsibility for Compliance

It is the responsibility of the group managers to implement, maintain and update this policy.



All employees within the Hanomag Heat Treatment Group are encouraged to report suspected violations of this Code of Conduct to their works-council, direct superiors or the managers of their superiors. We ensure that no adverse work-related consequences will result from making a report in good faith of a violation of this Code of Conduct.



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