

We embody responsibility

Compliance Guidelines of the HÖRMANN Group



Dear Colleagues,

The HÖRMANN Group, comprising HÖRMANN Holding GmbH & Co. KG and Hans Hörmann Holding GmbH & Co. KG and their subsidiaries and affiliates, is a highly diversified group of companies that operates worldwide in four strategic business areas: Automotive, Communication, Intralogistics, and Engineering. The high level of heterogeneity in its products, services, technologies and markets also leads to substantial diversity among our employees and business partners.

The success of our group of companies is based on the long-established philosophy of the company's founder, Hans Hörmann, that each individual company and its employees are "entrepreneurs within the company" and should therefore operate and develop their business with a high degree of entrepreneurial freedom, but also of personal responsibility within the framework of the values defined and guidelines set out by the HÖRMANN Group. The values of the HÖRMANN Group – innovative spirit, energy, partnership of equals, and responsibility – provide clear guidance here.

Acting in accordance with business standards and ethical values, while also complying with defined guidelines and rules, must be a fundamental part of our attitude to work every single day in order to protect our group of companies from harm. "Accountability" is the overriding principle that has underpinned the HÖRMANN Group as a family business for more than 70 years and helped it to keep growing. And we all want to see this continue for many generations to come.

We cannot take the trust of our customers, suppliers, business partners, investors or the public for granted – we must work constantly to earn it. If we all live up to our responsibility, we will also maintain the trust of our business partners in the HÖRMANN Group. These guidelines, which are binding for our day-to-day activities, are intended to support every one of us on this path and to ensure that the good reputation of the HÖRMANN Group and all its affiliated companies will also be safeguarded well into the future.

We wish you continued joy and success in tackling the wide-ranging and exciting challenges at HÖRMANN and in shaping our future together.



Anna Hörmann



Dr. Michael Radke

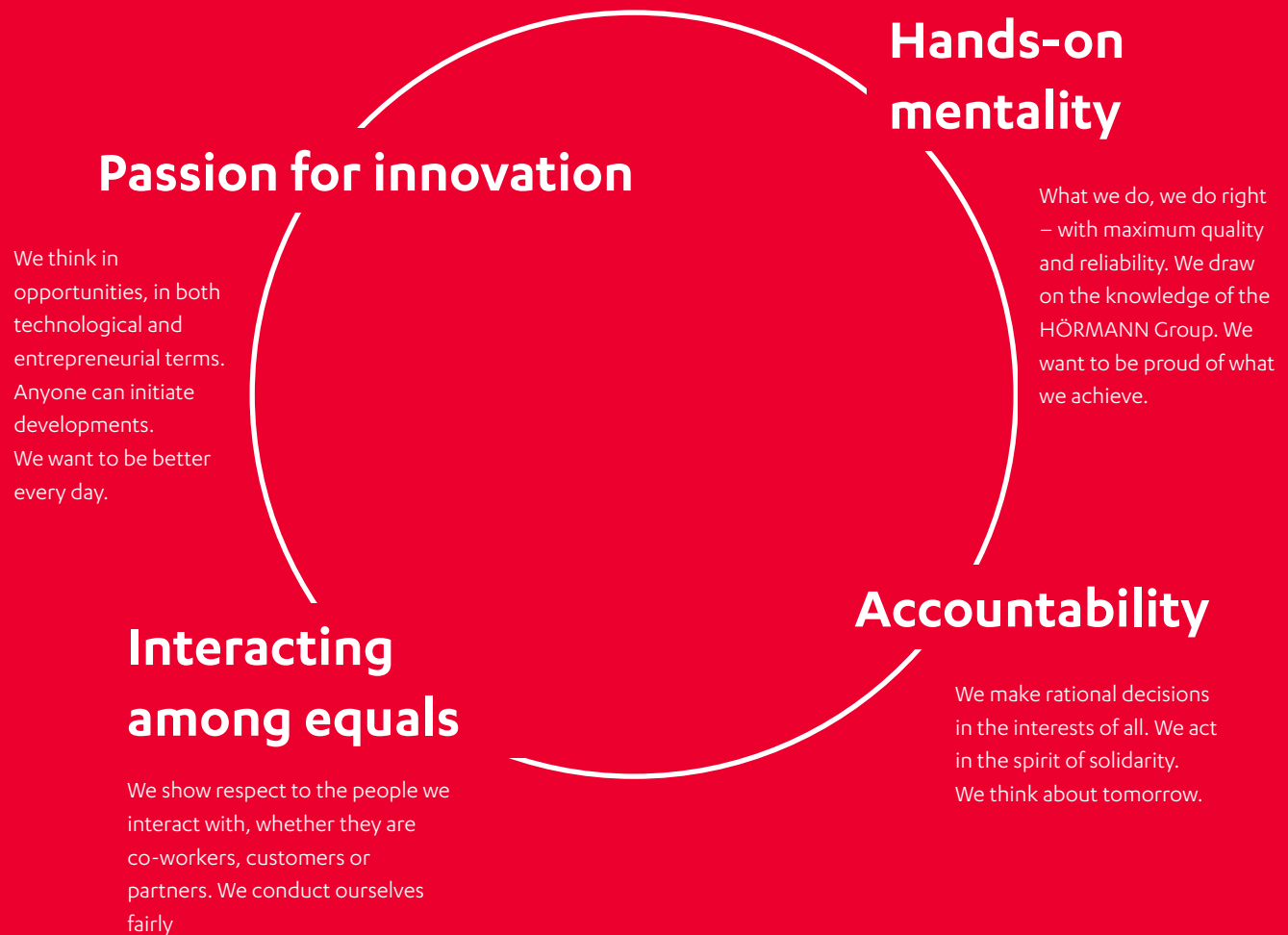


Johann Schmid-Davis

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Values of the HÖRMANN Group



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Scope of application



These compliance guidelines of the HÖRMANN Group set out the common framework for HÖRMANN Holding GmbH & Co. KG and Hans Hörmann Holding GmbH & Co. KG as well as their subsidiaries and affiliates.

These compliance guidelines apply to all employees of the HÖRMANN Group. They are supplemented by a variety of other guidelines and work instructions (referred to in the following as “regulations”). The management boards of the subsidiaries and affiliates are required to ensure that these regulations are applied as binding in their companies.

These regulations must be communicated and made accessible to employees. The management teams of the companies must also ensure appropriate communication and monitor compliance with the regulations. It is essential for the credibility and strong public image of the HÖRMANN Group that all employees act with personal integrity. Every employee is therefore obliged to be familiar with and comply with the relevant laws, regulations and internal rules, including these compliance guidelines. Any violation may result in claims for damages and/or disciplinary consequences, including termination of the employment relationship.

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Organization, leadership, supervision



The combination of the high degree of independence and personal responsibility enjoyed by the management of the individual group companies ensures that they are extremely motivated and able to respond quickly, expertly and successfully to the requirements of the market and our customers. The management structure selected for this purpose –

comprising responsible management boards and managing directors advised and monitored by supervisory boards, advisory boards and company representatives – serves to protect the legitimate interests of the company, its employees and its shareholders, while also providing the best possible support for the operating business.



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Responsibility and integrity

a. Compliance with the law, legislation and internal regulations

Strict compliance with the law, legislation and the regulations laid down by the HÖRMANN Group and the individual group companies for their employees form the basis for the employees' actions. Fair, correct, and respectful behavior when interacting with colleagues, customers, suppliers and all other business partners lays the foundation for cooperation conducted in a spirit of mutual trust. The detailed provisions are set out in additional binding regulations.

b. Social responsibility

The HÖRMANN Group is aware of its corporate responsibility to its employees, customers and business partners. This also includes a responsibility to society and its underlying principles. The HÖRMANN Group and its employees respect the personal dignity of every individual and do not tolerate any discrimination, harassment or bullying in the company's activities around the world. Discrimination on account of race or ethnic origin, gender, gender identity or sexual orientation, religion or belief, disability or age is not tolerated and is remedied immediately where necessary.

c. Occupational safety

The welfare of our employees is of great importance to us. We therefore implement health and safety measures that ensure their physical and mental well-being. Every employee plays a crucial role in implementing these measures and is required to play an active role in workplace safety, comply with all relevant regulations, rules and work instructions and report potential hazards in order to continuously improve occupational safety. The separate regulations in each of the group companies apply in this regard.

d. Environmental responsibility

The HÖRMANN Group is aware of the scarcity of resources and is guided by the principles of sustainability. We strive to use resources responsibly and promote environmentally friendly practices in order to secure the quality of life for future generations. Every employee is called upon to play an active role in the implementation of sustainable measures.

e. Conflicts of interest

In working for the HÖRMANN Group, employees are required to protect the interests of the Group. When performing their work, they are required to avoid conflicts between their private or personal interests and the interests of the HÖRMANN Group. To avoid potential conflicts of interest, employees must separate their private interests from the interests of the company. Decisions may not be influenced by private interests or personal relationships (directly or indirectly or via related parties). If there is a possibility that a conflict of this kind may arise, employees are required to inform their supervisor or the compliance officer immediately.

f. Combating corruption and bribery

Good business relationships with customers, suppliers and even competitors are a prerequisite for business success. Managing these business relationships, however, must never cross the line into undue influence: The use of corruption in any form to achieve business objectives is prohibited. Corruption occurs, among other things, in the form of active and passive bribery of public officials, such as civil servants, as well as through the acceptance or granting of advantages from or to non-public officials. Corruption in its various forms is punishable by law in Germany and in almost every country around the world. The HÖRMANN Group does not tolerate corruption or bribery in its global activities. Accordingly, no employee of the HÖRMANN Group may offer or procure any undue advantages. No employee of the HÖRMANN Group may demand or accept undue advantages.

This prohibition of corruption applies in relation to German and foreign public officials as well as to business partners and other companies in the course of business. If employees become aware of such actions, they shall immediately inform their supervisor or the compliance officer and assist in clarifying the circumstances and documenting the incident. It should be noted that benefits in the form of gifts, invitations to hospitality, events, donations and sponsorship can also constitute an undue advantage. Benefits that could potentially influence business decisions made by partners can already be interpreted as corruption. Even the impression of potential influence must be avoided. Every employee who accepts or grants invitations or gifts shall comply with the relevant internal processes in order to ensure that they provide the necessary transparency and thus also that the correct tax treatment is applied.

» As a family business, we don't think solely in numbers – we think, above all, about the future, responsibility, solidity, and integrity. «

Johann Schmid-Davis





g. Cooperation with business partners

With regard to its cooperation with business partners and the associated risks, the HÖRMANN Group has established its own process for screening, approving and documenting third parties that is specifically tailored to the company and that serves as a binding standard for all companies in the HÖRMANN Group. All employees of the HÖRMANN Group are required to adhere to the relevant processes and to ensure that the applicable “business partner compliance screening” is carried out before commissioning or entering into a contractual relationship with these third parties.

h. Integrity in competition

Freedom of competition is protected in Germany and in most countries around the world by strict competition and antitrust laws. All employees are prohibited in particular from entering into agreements and concerted practices between competitors that have the object or effect of preventing or restricting competition. Anti-competitive agreements in tenders may be punishable by long prison sentences. Abusing a dominant market position is also prohibited. Any agreement with competitors of the HÖRMANN Group that affects competition (for example, regarding prices, estimates, planning or other internal company matters) could be relevant in this context.

Giving preferential treatment to a supplier or service provider without verifiable and objectively justifiable reasons is neither permitted nor tolerated. Contracts are awarded on the basis of the business model of the HÖRMANN Group company in question, which must set clear regulations for this purpose within the framework of the applicable legislation. If an employee is in any doubt or has other questions, they can contact the compliance officer.

i. Integrity in foreign trade

The HÖRMANN Group ensures compliance with all provisions governing the export of goods, services and information in accordance with the applicable statutory export control and customs regulations. Employees who are entrusted with the import, export or transfer of goods, services or information are required to be familiar with and comply with the legal provisions governing foreign trade in order to ensure that international trade proceeds without disruption and in compliance with the rules.

j. Money laundering

The HÖRMANN Group ensures compliance with the legal prohibitions on money laundering. Money laundering means that the origin of illegally obtained money or other assets (e.g. from terrorism, drug trafficking and other criminal activities) is disguised by injecting it into the legal economy, thereby creating the appearance of legality. We do not wish to be involved in money laundering activities either directly or indirectly, so we carefully screen business partners before working with them.

If there are any doubts about whether financial transactions are permitted, every employee of the HÖRMANN Group is required to call in the relevant management immediately

k. Protection of company assets and intellectual property rights

Every employee entrusted with company property belonging to or controlled by the HÖRMANN Group is responsible for the careful use, protection and management of these assets. This includes both tangible and intangible assets (including intellectual property rights).

Employees must protect confidential company information during their employment and after it has ended in accordance with the applicable laws and taking into account legal or regulatory disclosure requirements. All employees must comply with the applicable legal and company regulations on the protection of personal data and on data and information security.

l. Data protection

The protection of personal data is a top priority for the HÖRMANN Group. We undertake to comply with all legal requirements regarding data protection, in particular the provisions of the General Data Protection Regulation (GDPR) and the Bundesdatenschutzgesetz (BDSG – Federal Data Protection Act). We process personal data exclusively in a lawful and transparent manner and for specific purposes.

Every employee is required to exercise the utmost care when collecting, processing and using personal data and to maintain the confidentiality and integrity of the data. Personal data will be disclosed to third parties only if there is a legal basis for doing so or if the data subject has given their express consent.

Violations of data protection regulations can have significant legal and economic consequences. If you have any uncertainties or questions about the handling of personal data, please consult the company's data protection coordinator immediately.

m. Financial responsibility

The HÖRMANN Group is required to report accurately to employees, customers, business partners, suppliers, the public and the regulatory authorities and is aware of its responsibility to maintain complete, accurate and true business records and documentation, including financial statements, quality reports, time sheets and expense reports. The requirement to provide accurate information also applies to travel expense reports and other expense reports.

The employees of the HÖRMANN Group are required to ensure full compliance with these principles. The above-mentioned documents shall be prepared promptly and in accordance with applicable law and generally accepted accounting principles.

» We think in the long term – not in quarters. «

Anna Hörmann



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What to do in cases of doubt?



Employees are requested to report any doubts they may have about whether certain behavior or a particular action complies with legal, regulatory and internal company regulations, other requirements and prohibitions or the HÖRMANN Group's values and guidelines or any suspicions that an irregularity may have occurred.

Internally, they can notify their supervisor or the responsible compliance officer. The contact details of the compliance officers responsible for the individual companies within the HÖRMANN Group are displayed and communicated within the companies in the usual way on bulletin boards or by e-mail or on the intranet and can also be requested from the management of the company in question.

In addition, employees can also contact the Compliance unit of HÖRMANN Industries GmbH and an external ombudsperson. Their contact details can be found on the bulletin board of the whistleblower and complaint management system or on the intranet.

<https://www.hoermann-gruppe.com/beschwerdemanagement>

All employees are expressly requested to use one of these channels to report irregularities. Employees who submit reports can rest assured that they will not suffer any negative consequences as a result of submitting their report and are protected from reprisals and threats of reprisals. This is also the case if they have acted to the best of their knowledge and belief but the report ultimately proves to be unfounded.

Speak up



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