

A blurred photograph of a large crowd of people walking through a modern building with large glass windows. The image is overlaid with a semi-transparent red band.

COMPLIANCE GUIDELINES OF THE HÖRMANN GROUP

We exercise  
responsibility



**HÖRMANN**  
Gruppe

# Dear employees

The HÖRMANN Group is a highly diversified group of companies that operates worldwide with more than 25 companies in 15 strategic segments. This high level of heterogeneity in products and services, in technologies and applications and in regional markets also leads to substantial diversity in terms of our business partners, for example customers, suppliers and development partners.

Our constant growth and the success of our business model are based on our founder Hans HÖRMANN's long-established philosophy that each individual company and its employees should conduct and continuously enhance their business and adapt it to the dynamic changes in the market environment as "entrepreneurs in the company" with a large amount of entrepreneurial freedom, but also with substantial personal responsibility within the framework of the values defined and the guidelines set by HÖRMANN Holding. The values of the HÖRMANN Group – energy, innovative spirit, partnership of equals and responsibility – are meant to provide clear guidance here.

The substantial individual responsibility exercised by each individual for the HÖRMANN Group as a community and as a team, acting in line with financial benchmarks and ethical values alike and complying with defined guidelines and rules: all this must be a core part of our attitude to work on a daily basis in order to protect our Group from harm. The overriding principle of responsibility has underpinned the HÖRMANN Group as a family business for more than 60 years and helped it to keep on 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 and the public for granted – we have to constantly 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 binding guidelines for our



day-to-day activities are intended to help us on this path and ensure that the good reputation of the HÖRMANN Group and all its affiliated companies will be safeguarded well into the future.

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

HÖRMANN Industries GmbH

**Dr. Michael Radke**  
Managing director  
CEO

**Johann Schmid-Davis**  
Managing director  
CFO

## Innovative spirit

We think in terms of opportunities, technologically and entrepreneurially. Developments are possible for everyone. We want to improve every day.

## Energy

What we do, we do it right – with maximum quality and reliability. We use the entire knowledge of the Group. We want to be proud of our performance.

## Partnership of equals

We treat our counterparts with respect, regardless of whether they are colleagues, customers or partners. We act fairly.

## Responsibility

We make decisions with reason and in the interest of all. We act in solidarity. We think of tomorrow.

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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 its subsidiaries and equity investments (hereinafter also referred to collectively as the "HÖRMANN Group").

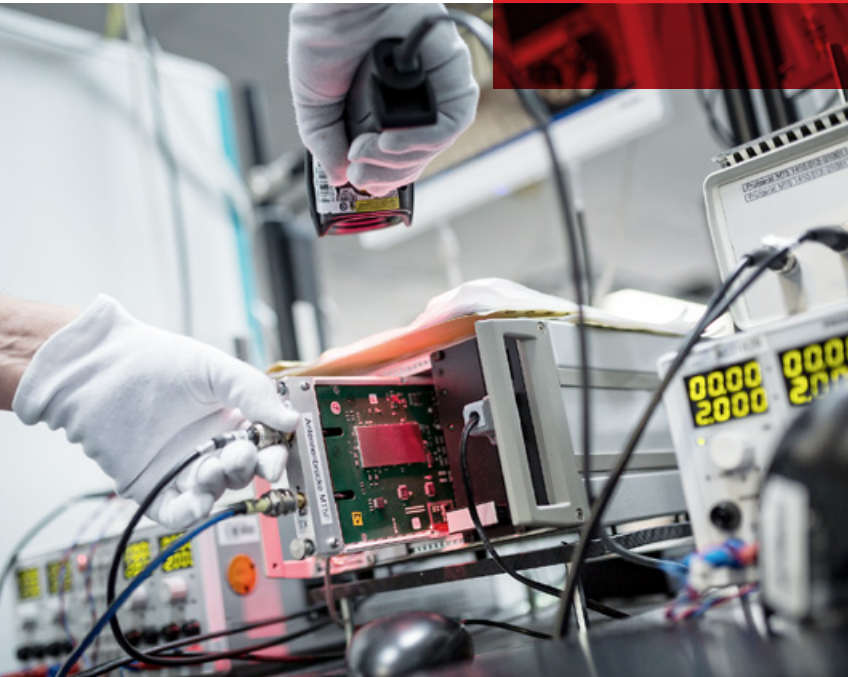
The management boards and managing directors of the subsidiaries and equity investments are obliged to ensure that these guidelines are applied as binding within their respective companies.

Employees who conduct themselves with personal integrity are essential to the credibility and strong public image of the HÖRMANN Group.

Every employee is obliged to know and comply with the relevant laws and provisions, including these compliance guidelines. Any breach may have disciplinary consequences up to and including the termination of the employment relationship.

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Organisation,  
leadership, supervision



The high degree of independence and personal responsibility enjoyed by the managing directors of the individual Group companies ensures that they are extremely motivated to respond quickly, expertly and successfully to the requirements of the market and customers. The management structure selected to achieve this – comprising responsible

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



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Integrity: Compliance  
with laws and  
internal regulations

Strict compliance with the law and the regulations prescribed by the HÖRMANN Group for its employees forms the basis for the actions of the HÖRMANN Group's employees. Fair, correct and legally sound business dealings with customers, suppliers and all other business partners create the foundations for cooperation in a spirit of mutual trust. More detailed provisions are set out in additional binding guidelines of the HÖRMANN Group.

#### 1. Good business relationships

Good business relationships with customers, suppliers and competitors are a prerequisite for business success. Managing these business relationships must never cross the line of undue influence. The use of corruption in any form to achieve business purposes is prohibited. Corruption primarily takes the form of the bribery or venality of public officials, for example civil servants, and the acceptance or granting of advantages in respect of non-public officials. Corruption in its various forms is punishable by law in Germany and almost every country of the world. Accordingly, no employee of the

HÖRMANN Group may offer or provide business partners, their employees or third parties with illegal advantages. No employee of the HÖRMANN Group may demand or accept illegal advantages. Benefits in the form of gifts, invitations to business hospitality, events, donations and sponsorship that may be suitable to influence the business decisions of partners can in themselves be interpreted as corruption. Even giving the impression of potential influence must be avoided.

#### 2. Cooperation with business partners

With regard to cooperation with certain business partners and the associated risks, the HÖRMANN Group has adopted a standard process for the examination, approval and documentation of these third parties that is tailored to the respective company and that is required to be applied by all HÖRMANN Group companies. HÖRMANN Group companies are obliged to establish corresponding processes that ensure this business partner compliance check is conducted before commissioning or entering into a contractual relationship with such



third parties. The separate “Business Partner Integrity Check Guideline” applies.

### **3. Integrity in competition**

In Germany and most countries of the world, freedom of competition is protected by strict competition and anti-trust laws. In particular, agreements and concerted practices between competitors with the aim of preventing or restricting competition are prohibited.

Anti-competitive arrangements in tender processes may be punishable by strict custodial sentences. Furthermore, it is not permitted to abuse a dominant position in the market.

Any form of coordination with competitors of the HÖRMANN Group that could be relevant to competition between the HÖRMANN Group and the respective company is prohibited. The protection of competition is monitored by the anti-trust authorities – in Germany, the Federal Cartel Office. This protection is a key regulatory task in any economic system based around a market economy. Giving preference to a supplier or service provider with no verifiable or objective reasons is not permitted. Contracts are awarded on the basis of the business model of the respective HÖRMANN Group company, which sets clear rules within the framework of the applicable legislation.

### **4. Integrity in foreign trade**

The HÖRMANN Group ensures compliance with all provisions concerning the export of goods, services and information in accordance with the applicable statutory export control regulations. The HÖRMANN Group ensures compliance with the applicable statutory prohibitions on money laundering.

### **5. Prevention of conflicts of interest**

In working for the HÖRMANN Group, employees are obliged to safeguard the interests of the HÖRMANN Group, maintain confidentiality with regard to company matters and not enter into competition with HÖRMANN Group companies. In performing their work, employees must not enter into any conflict between the interests of the HÖRMANN Group and their own interests. If the possibility of such a conflict exists, employees are obliged to inform their superior.

### **6. Protection of business assets and certain information**

Employees of the HÖRMANN Group are entrusted with business assets in the course of their work. All employees are responsible for the careful handling and protection of business assets. Confidential company information must be protected as required by law and taking into account statutory or regulatory disclosure obligations. The applicable statutory and company rules on the protection of personal data and on data and information security must be observed.

» As a family business, we don't just think in terms of figures; above all, we think about the future, responsibility, solidity, integrity. «

JOHANN SCHMID-DAVIS, CFO

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## Corporate responsibility



The HÖRMANN Group is aware of its corporate responsibility to its employees, customers and business partners. This includes a responsibility to society and its underlying principles. The HÖRMANN Group and its employees respect the personal dignity of every individual and tolerate no discrimination in the company's activities around the world. Prejudice on account of ethnic origin, gender or sexual orientation, religion or belief, disability or age is

not tolerated by the HÖRMANN Group. Accordingly, we undertake to uphold human rights and international standards on employee protection. The HÖRMANN Group is aware of the scarcity of resources and acts in line with the principles of sustainability. This includes environmental responsibility and occupational safety and protection measures that ensure employees' physical and mental well-being.

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## What to do in cases of doubt?



If employees are in doubt as to whether a certain behaviour is consistent with these guiding principles or suspect that an irregularity may have occurred, they are requested to report this. They can do this internally by informing their supervisor or the responsible compliance officer. Details of the employees responsible for compliance at the individual HÖRMANN Group companies are displayed on noticeboards and made available by e-mail or in the intranet and can also be requested from the management of the respective company. Employees can also consult the Compliance Officer of HÖRMANN Holding. Contact details and further information can be found at: [www.hoermann-gruppe.com/en](http://www.hoermann-gruppe.com/en)

All employees are expressly requested to make use of one of these channels for reporting irregularities. No employee who reports an irregularity should fear being placed at an unfair disadvantage as a result, even if the notification ultimately proves to be unjustified.

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