

Code of Conduct

Version: 12.01.2024

I. Preamble

The Brockhaus Heuer GmbH recognize her social responsibility. In particular, all those involved in the procurement process, as intermediaries between their own company and the suppliers in the respective procurement markets, bear responsibility towards their own company, towards customers and suppliers, towards the environment and towards society.

The actions of our employees are guided in particular by the values of integrity and fairness.

This Code of Conduct is a voluntary code intended to emphasize the interest of the Brockhaus Heuer GmbH in fair, sustainable, responsible ethical principles of action.

The Code of Conduct applies to the company, its management as well as its employees and shall serve as the basis for all business relationships.

The ethical guidelines described in this Code of Conduct are based in particular on the principles of the UN Global Compact (Annex), the ILO conventions, the UN Universal Declaration of Human Rights, the UN conventions on the rights of the child and on the elimination of all forms of discrimination against women, and the OECD guidelines for international companies. The following points II to V constitute minimum standards and are intended to prevent situations that may call into question the integrity of the companies and their employees. Brockhaus Heuer GmbH observes the principles of the Global Compact and works towards their achievement in its management.

II. General principles, law and legislation

Brockhaus Heuer GmbH undertakes to live up to its social responsibility in all corporate activities and to comply with the applicable laws and other relevant regulations in all business actions and decisions, including the regulations on export controls and economic sanctions of the countries in which it operates to be noted.

Business partners are to be treated fairly. Contracts are honored, taking into account changes in the general conditions.

III. 1. Corruption/antitrust/forced labor/child labor

a) Corruption

When dealing with business partners (customers, suppliers) and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and (purchase) decisions are made free of extraneous considerations and personal interests.

The applicable criminal law on corruption must be complied with. Among other things, note the following:

Crimes related to public officials:

The granting of personal benefits (in particular of a monetary nature such as payments and loans including the granting of small gifts over a longer period of time) by Brockhaus Heuer GmbH and its employees to public officials (such as civil servants or employees in public service) with the aim of obtaining benefits for Brockhaus Heuer GmbH or themselves or third parties is not permitted.



Crimes in business transactions:

Monetary personal benefits in return for preferential treatment in business dealings may not be offered, promised, granted or approved. Likewise, personal benefits of value may neither be demanded nor accepted in dealings with business partners. Brockhaus Heuer GmbH must impose on its employees that they do not allow themselves to be promised corresponding benefits.

Management and employees of the company may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in business dealings that are granted with the intention of improperly influencing a business relationship or where there is a risk of jeopardizing the professional independence of the business partner. This is generally not the case with gifts and invitations that are within the scope of customary hospitality, custom and courtesy.

Brockhaus Heuer GmbH may issue a binding policy on accepting and giving gifts, invitations to entertainment and events. This may provide for exceptions regarding appropriate low-value and symbolic gifts, appropriate business meals and appropriate events of the company itself as well as of business partners (customers, suppliers).

Brockhaus Heuer GmbH shall provide a contact person who can be contacted if employees are in a conflict of interest or they are unsure whether a conflict of interest exists or could arise.

b) Conduct towards competitors (antitrust law)

Brockhaus Heuer GmbH respects fair competition. Therefore, the company shall comply with the applicable laws that protect and promote competition, esp. the applicable antitrust laws and other laws regulating competition.

In dealing with competitors, these regulations prohibit in particular agreements and other activities that influence prices or conditions, allocate sales territories or customers, or impede free and open competition in an impermissible manner. Furthermore, these regulations prohibit agreements between customers and suppliers aimed at restricting customers' freedom to autonomously determine their prices and other conditions when reselling (price and condition fixing).

In view of the fact that the demarcation between prohibited cartels and permissible cooperation can be problematic, the company should provide a contact person for its employees who can be contacted in case of doubt.

c) Forced labor and human trafficking

Brockhaus Heuer GmbH rejects any form of forced labor and human trafficking.

d) Child labor

Brockhaus Heuer GmbH observes the regulations of the United Nations on human rights and children's rights. In particular, the company undertakes to comply with the Convention concerning the Minimum Age for Admission to Employment (Convention 138 of the International Labor Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (Convention 182 of the International Labor Organization).

If a national regulation concerning child labor provides for stricter standards, these must be observed as a matter of priority.



III. 2. Principles of social responsibility

a) Human Rights

Brockhaus Heuer GmbH respects and supports the observance of internationally recognized human rights.

b) Discrimination

Brockhaus Heuer GmbH undertakes to oppose any form of discrimination within the framework of the respective applicable rights and laws. This refers in particular to discrimination against employees on the basis of gender, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

c) Health protection

Brockhaus Heuer GmbH ensures occupational safety and health protection at the workplace within the framework of national regulations. The company supports continuous development to improve the working environment.

d) Fair working conditions

Brockhaus Heuer GmbH respects the right to freedom of association and the working hours of its employees within the framework of the respective applicable rights and laws.

e) Environmental protection

Brockhaus Heuer GmbH is committed to the goal of environmental protection for present and future generations in a sustainable manner. Laws enacted to protect the environment must be observed. The company uses resources sparingly and keeps the impact on the environment low. The company supports environmentally conscious actions of its employees.

f) Trade secrets

Brockhaus Heuer GmbH obligates its employees to observe company / and business secrets. Confidential information as well as confidential documents may not be disclosed to third parties without authorization or made accessible in any other way, unless authorization has been granted for this purpose or the information is publicly accessible.

IV. Suppliers

Brockhaus Heuer GmbH is requested to communicate the principles of this Code of Conduct Section III 1. and 2. to its immediate suppliers, to promote compliance with the contents of the Code of Conduct Section III 1. and 2. among its suppliers to the best of its ability, and to request that these suppliers also comply with the Code of Conduct Section III 1. and 2.

The company is also encouraged to recommend to its suppliers that they in turn ask their suppliers to comply with the Code of Conduct. Furthermore, the company undertakes to fulfill and comply with the principles and requirements of the Supply Chain Sourcing Obligations Act and to implement them to the best of its ability in its daily business activities.



V. Compliance

Brockhaus Heuer GmbH is free to introduce more far-reaching behavioral guidelines with higher requirements for ethical behavior for itself and its employees. The company undertakes to make known to its employees the contents regulated in this Code of Conduct and the obligations resulting therefrom.

Brockhaus Heuer GmbH undertakes to work towards ensuring that the company complies with the principles of this Code of Conduct, in particular by designing and, if necessary, adapting guidelines and processes.

The Company must name a responsible contact person for the Code of Conduct who can provide binding information on compliance with the Code of Conduct. The company must take suitable organizational precautions to ensure that the Code of Conduct is complied with by the company and its management. This is done in particular by introducing and maintaining appropriate controls and plausibility checks.

APPENDIX

United Nations Global Compact

The ten principles

The principles of the Global Compact are based on a worldwide consensus derived from

- the Universal Declaration of Human Rights
- the International Labor Organization Declaration on Fundamental Principles and Rights at Work
- the Rio Declaration on Environment and Development and
- the United Nations Convention against Corruption

The Global Compact requires companies to recognize, support and put into practice within their sphere of influence a set of core values in the areas of human rights, labor standards, environmental protection and anti-corruption:

Human Rights

- 1: Businesses should support and respect the protection of international human rights within their sphere of influence and
- 2: ensure that they are not complicit in human rights abuses

Labor standards

- 3: Businesses shall uphold the freedom of association and the effective recognition of the right to collective bargaining, and shall also provide for
- 4: the elimination of all forms of forced labor,
- 5: the abolition of child labor and
- 6: advocate the elimination of discrimination in employment and occupation.

Environmental protection

- 7: Companies should support a precautionary approach in dealing with environmental problems,
- 8: Take initiatives to create a greater sense of environmental responsibility; and
- 9: Promote the development and diffusion of environmentally friendly technologies.

Fighting corruption

- 10: Businesses should work against all forms of corruption, including extortion and bribery.

