



Hilgefort GmbH

Code of Conduct

Foreword

Dear employee and prospective employee,

Dear prospective customer and interested party

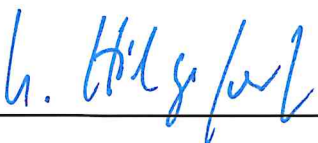
the trust of our customers in our company and our services is our most valuable asset. The success of Hilgefort GmbH is based on partnership relations with customers and suppliers as well as on the competence and loyalty of our employees. Only if we behave with integrity and sincerity do we strengthen social trust and protect Hilgefort GmbH, its employees and our environment. This includes knowing the applicable legal requirements and internal rules - and complying with them. The basis of our actions is this Code of Conduct.

We, the management and executive board, sincerely ask you to join us in observing and complying with the principles outlined here, as well as in developing them further.

To this end, you can submit anonymous comments, suggestions for improvement and/or other information at the following address:

compliance@hilgefort.de

Thank you for your cooperation



U. Hilgefort

Executive Director

Please note that in the following document, for reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) has been dispensed with. All references to persons apply equally to all genders.

Conduct in compliance with the law

Hilgefort GmbH attaches particular importance to consistently implementing and clearly communicating the legal framework, internal company guidelines and corporate values. This also includes that we sell our services exclusively through our authorized, communicated sales channels.

In detail, Hilgefort GmbH's responsibility as a business partner results in the following principles in the context of cooperation with customers, suppliers and other parties.

Cooperation with customers, suppliers and other business partners

Dealing with business partners and third parties

Irrespective of the following requirements, it is essential in the cooperation with external parties to clearly communicate the values of Hilgefort GmbH.

Employees are required to behave with integrity towards business partners and third parties at all times.

This includes formal dealings in communication and in field activities as well as visits to Hilgefort GmbH.

Agreements, arrangements and meetings must always be carefully documented and confirmed by the other party.

Observance of competition and antitrust law

Only fair competition enjoys the right to develop freely. The principle of integrity also applies in the battle for market share. Every employee is obligated to comply with all rules of fair competition. Employees are therefore prohibited from entering into price and capacity agreements or similar arrangements with external parties, in particular competitors.

Agreements with competitors on a waiver of competition or on the submission of bids are also prohibited. We grant our suppliers fair contractual conditions and appropriate

consideration, but also expect them to behave fairly and with integrity toward their employees and suppliers. This set of values must be represented to suppliers at all times.

Problems, violations or other offences must be reported to the internal department at **compliance@hilgefort.de**.

Offering and granting benefits

We compete for orders on the basis of the quality and price of our services. No employee may offer or grant benefits to others - directly or indirectly - in connection with business activities. Neither as monetary payments nor in the form of other tangible or intangible benefits. Gifts and gratuitous benefits to employees and participants of business partners must therefore be selected in such a way as to avoid any appearance of impropriety on the part of the recipient. In case of doubt, the recipient should be asked to obtain prior demonstrable approval for the receipt from his or her superior. If the recipient is not willing to do so, this shows that he himself considers the receipt to be incorrect. Employees who conclude contracts with consultants, intermediaries, agents or comparable third parties must ensure that these also do not offer or grant unauthorized benefits.

Requesting and accepting benefits

No employee may use his or her official position to demand, accept, obtain or be promised advantages.

This does not include the acceptance of occasional gifts of nominal value; other gifts must be refused or returned.

Hilgefort GmbH defines occasional gifts as follows:

Food and beverages (e.g. wines, spirits), small electrical and electronic devices (e.g. USB sticks, Bluetooth devices) as well as vouchers, whereby a total value of goods of **35, - €** may not be exceeded.

Special rules for awarding contracts

Anyone who applies for a contract expects us to examine their bid fairly and without bias.

Employees involved in awarding contracts must observe the following rules in particular:

- Employees shall promptly disclose to their supervisor any personal interest that may exist in connection with the performance of their official duties.
- Suppliers may not be unfairly favored or hindered in the competition for orders.
- Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate, i.e. the material or immaterial value does not exceed € 100 and refusal of the invitation would be contrary to the requirement of politeness.
- Gifts from business partners are to be refused and returned, unless they are insignificant occasional gifts of low value (maximum € 35.-)
- No employee may have private orders carried out by companies with which he or Hilgefort GmbH has contractual relations if this would result in advantages for him.

Donations

As a company, Hilgefort GmbH grants donations in cash and in kind for education and science, for art, culture, sports and for social causes. Requests for donations are made to our company by a wide variety of organizations, institutions and associations.

The following rules apply to the allocation of donations:

- Requests for donations from individuals must always be rejected.
- Payments to private accounts are not permitted.
- Donations will only be made to individuals or organizations with an impeccable reputation.
- The objectives must be compatible with those of Hilgefort GmbH.
- The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time.
- Donations must be tax deductible. Otherwise, a donation is excluded.

Avoidance of conflicts of interest

Principle of avoidance

Hilgefort GmbH attaches importance to the fact that its employees do not get into conflicts of interest or loyalty during their work. Such conflicts may arise if an employee works for or has an interest in another company or maintains close, family relationships with employees of the company. Therefore, the principle of avoiding conflicts of interest applies.

Non-compete clause

Employees are not permitted to operate a company that competes with Hilgefort GmbH in whole or in part. Furthermore, direct or indirect participation in a company not listed on the stock exchange which is in competition with Hilgefort GmbH in whole or in part is not permitted.

Prior written permission is required in the case of participation in a company that is a business partner of Hilgefort GmbH. The permission is granted by the management and documented in the personnel file. Permission is not granted or can be withdrawn again if the employee is involved with the respective company on official business. Any participation by close relatives in a competitor company or another of the companies described above must be reported in writing by the employee to the Human Resources Department if the employee is aware of this and will be documented in the personnel file.

Secondary activities and assumption of political offices

Hilgefort GmbH has a fundamentally positive attitude towards active participation in politics and the assumption of political offices. The personnel department must be informed in writing in advance of the commencement of secondary employment for remuneration and the assumption of political office. Approval must be requested. The secondary activity may be prohibited if it leads to an impairment of the work performance, contradicts the duties in the company or there is a risk of a conflict of interests.

Handling public facilities, information and property

Use of facilities

The equipment and facilities in offices and workshops (e.g. telephone, copier, PC, software and internet/intranet, machines, tools) may only be used for official business. Exceptions and, if necessary, payment will be regulated locally. Under no circumstances may information be accessed or passed on that incites racial hatred, glorification of violence or other criminal acts, or has content that is ethically incorrect or offensive against the respective cultural background. No employee is permitted to make recordings, files, visual and audio documents or reproductions without the consent of his or her supervisor, unless this is directly related to the professional activity and, where applicable, consent declarations have been obtained in accordance with the General Data Protection Regulation.

Records and reports

Open and effective cooperation includes correct and truthful reporting. This applies equally to the relationship with the shareholder, employees, customers, business partners and the public as well as government agencies.

Every employee is required to comply with signature regulations, to pass on truthful and up-to-date information and to refrain from manipulation.

Data records and information

All records and reports made internally or given externally must be accurate and truthful. In accordance with the principles of proper accounting (GoBD), data collection and other records must always be complete, accurate, timely and system-compliant.

The requirement to provide truthful information also applies to expense reports.

Confidentiality

Confidentiality must be maintained with regard to internal company matters that have not been disclosed to the public. This includes, for example, details concerning the organization of the company and its facilities, as well as controlling figures.

The obligation to maintain confidentiality with regard to the above-mentioned information applies beyond the employment relationship.

Data protection and data security

Access to the intranet and Internet, electronic information exchange and dialog, electronic business transactions - these are crucial prerequisites for the effectiveness of each and every one of us and for business success as a whole. However, the advantages of electronic communication are associated with risks to personal privacy and data security. Effective precautions against these risks are an important part of IT management, management duties and also the behavior of each individual.

Personal data may only be collected, processed, or used if this is necessary for defined, clear, and legitimate purposes and is done in accordance with the General Data Protection Regulation. A high standard must be ensured in terms of data quality and technical protection against unauthorized access. The use of data must be transparent for the data subjects, and their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

Information can be requested at any time from the data protection officer at Hilgefort GmbH using the following contact details.

Contact data protection officer

Christina Böckmann (Emil Tepe GmbH)

Industriering 1, 49413 Dinklage, Germany

Phone: 04443 963080

E-mail: datenschutz@tepe-online.de

Handling/ protection of company property

The company property of Hilgefort GmbH is to be treated with care. Each employee is obligated to protect the company property belonging to him from loss, damage and theft.

The private use of certain company property (company car, company cell phone, notebook) is permitted with the written consent of the management.

Environment, society, safety and health

Environment and society

Protecting the environment and conserving its resources are corporate goals of high priority. Environmental management ensures compliance with the law and sets high standards for this. Every employee is required to cooperate in these areas with an exemplary performance. Our company acknowledges its shared responsibility for general, public concerns.

Honorary commitment is always welcomed and supported by Hilgefort GmbH.

Occupational safety

The responsibility towards employees and colleagues requires the best possible precautions against accident hazards. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal behavior in everyday work. The working environment must meet the requirements of health-oriented design. Every employee must pay constant attention to safety.

Technical safety

The safety of our equipment and tools as well as the quality of our end products are our top priority. To this end, we operate and maintain an integrated, comprehensive management system.

Inspection deadlines are always met and tests and inspections are carried out with the utmost care.

Dealing with employees

We are convinced that our success is based on our employees. The growth of our company and the associated increase in diversity require a clear attitude on the part of our employees in their dealings with one another.

Values and attitude

Our corporate culture is characterized by open dialog. This takes place not only internally, but also with external interested parties. Trusting cooperation is the basis for our actions.

We support and encourage our employees through regular training and further education, thus raising our awareness of quality, customer orientation and safe, responsible work.

In addition to further training opportunities and an open culture, we rely in particular on our employees themselves. That is why we foster collegiality among ourselves and offer security through permanent employment.

With career prospects, the transfer of responsibility and a fair salary, we bind our employees to our company in the long term and accompany and support them in their personal and professional development.

Our three core values are openness, partnership and reliability.

Discrimination, insult, harassment, preferential treatment and others

We distance ourselves from any direct or indirect discrimination of any kind. Discrimination and insult will neither be tolerated nor accepted unpunished at Hilgefort GmbH.

Furthermore, we ask that the premises and grounds of Hilgefort GmbH be treated as a space free of negative influences. Neither insulting others nor harassment, especially stalking and mobbing, shall take place.

Furthermore, nobody shall be disadvantaged or preferred by others, neither because of their gender, ethnicity or other. Equal treatment has the highest priority at Hilgefort GmbH and is not only lived and communicated by the employees, but also by the management.

It goes without saying that we do not tolerate violence, sexual harassment or similar.

Whistleblower and organization

Complaints and tips

Any employee may make a personal complaint to his or her supervisor, to the Human Resources Department, or to another person/office designated for this purpose, or may point out circumstances that indicate a violation of the Code of Conduct. The matter will be thoroughly investigated. Appropriate action will be taken as appropriate. All records will be kept confidential. Retaliation, of any kind, will not be tolerated. Employees should exhaust internal mediation options.

The workforce is actively encouraged to report any incidents, immediately anonymously. This expressly includes reporting incidents against other employees.

Reports will be treated in strict confidence.

Implementation and control

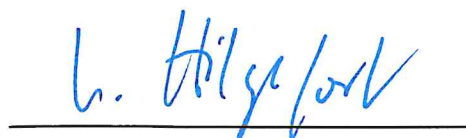
The management of Hilgefort GmbH actively promotes the broad communication of the Code of Conduct and ensures its sustainable implementation.

The Code of Conduct is therefore accessible to every private and public body on our website.

Compliance with the law and the observance of the Code of Conduct are to be monitored regularly in all organizational units of Hilgefort GmbH.

Entry into force

This Code of Conduct was issued by the management of Hilgefort GmbH on **08.11.2021** and comes into force upon its publication.



U. Hilgefort

Executive Director