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# Code of Conduct (CoC)

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This Code of Conduct (HIMA CoC) is based on a mutual, basic understanding of social responsibility in corporate management. The reputation and credibility of the HIMA Group as a trusted and respected enterprise is one of our greatest assets. Our reputation and the confidence of our customers, employees and business partners largely depend on the behaviour of each individual working for or with the HIMA Group.

This HIMA CoC provides minimum binding standards to offer support in meeting the legal and ethical challenges of our daily work as well as to provide guidance for action.

## 1. Area of application

This HIMA CoC applies to everyone who is employed by or works with HIMA Group (“HIMA”), including HIMA Paul Hildebrandt GmbH and all its subsidiaries.

Within the scope of its abilities and areas of activity, HIMA commits to promoting adherence to the content of this HIMA CoC among its suppliers, to business partners as agents, contractors, or consultants.

## 2. Compliance with HIMA’s Code of Conduct

### **Compliant behaviour**

It is our personal responsibility to comply with the HIMA Code of Conduct, whether we are a manager or an employee. Failure to follow the Code of Conduct may result in disciplinary measures up to, and including, dismissal. Any indication will be investigated. Therefore, fair dealing is the basis for all business activities and valid laws, rules and regulations are applied without exception. Regular training is obligatory for everyone who is employed by, or works with, the HIMA Group.

### **Leadership**

Our managers bear a special responsibility; therefore, each manager is called upon to set example by acting in accordance with this Code. They are also the first point of contact for questions of their subordinates. One of their main tasks is to ensure compliance with this Code in their scope of responsibility.

### **Contact persons**

Whenever necessary, or in cases of doubt, you must immediately report any potential violations of this Code to one or more of the following:

- your manager or senior management team

- the compliance coordinator
- the HR & Legal department, Auditing department or
- your employee representative(s), if applicable

### **Whistleblowing system**

Notifications about misconduct, in particular illegal business practices or potential human rights violations, can be made using the HIMA Group's reporting channel system. This system can be reached by the following means: <https://hima.reporting-channel.com/>

### **Anti-Retaliation & Personal Identity**

In accordance with respective laws and regulations, we prohibit any form of retaliation against HIMA employees for reporting a compliance concern in good faith or for good-faith participation in any investigation. In addition, the personal identity is protected.

## **3. Employment - fair working conditions, no discrimination and health**

We owe the success of HIMA to the knowledge, experience and commitment of each individual employee. HIMA invests in enhancing employee qualifications and skills while encouraging personal responsibility in action. We foster fair communication and trustworthy relationships and expect the same from our employees.

### **Fundamental rights**

As HIMA, we support the "UN Guiding Principles for Business and Human Rights", which respect and recognise the principles of internationally recognised human rights. To respect the fundamental rights of our employees, we are obliged

- to promote equal opportunities for, and treatment of, everyone irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age, summarized as diversity mentioned in our HIMA Company values.
- to respect the personal dignity, privacy and rights of each individual.
- to refuse to employ or make anyone work against his or her will.
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual and personal harassment or discrimination.
- to prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

- to provide fair remuneration and to guarantee the applicable national statutory minimum wage.
- to comply with the applicable local laws pertaining to the maximum number of working hours.
- to recognise, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions.

### **Working Environment**

As a Safety and Security Company, HIMA will make every effort to ensure a safe working environment for our employees. All applicable regulations concerning health and safety at the workplace must therefore be adhered to. We will neither tolerate violence and threats at the workplace nor work under the influence of legal or illegal drugs. Every employee shares the responsibility to support HIMA in creating safe working conditions and must therefore devote constant attention to occupational safety.

The International Labour Organisation (ILO) Declarations of Principles concerning Multinational Enterprises, as well as the ILO Declaration on Fundamental Principles and Rights at Work (elimination of child labour, minimum for admission to employment, abolition of forced labour, prohibition of discrimination, freedom of association and the right to collective bargaining) are imperatives for our actions.

## **4. Business integrity**

### **Compliance of Laws**

This HIMA CoC expresses the commitment of our worldwide operating group to conduct business in accordance with applicable laws, rules and regulations. Compliance with country-specific laws is a matter of course for HIMA. In addition to the internal corporate and local guidelines, we follow the laws and regulations applying in our working environment.

HIMA rejects corruption and bribery as stated in the relevant UN convention. Therefore, we act in line with global anti-corruption laws. We comply with all applicable regulations relating to international trade, especially export control, embargo regulations, customs, anti-boycott laws and anti-money-laundering regulations.

We ensure that we provide accurate and complete information to government authorities, including ensuring that accurate and complete import and export declarations are made.

### **Entertainment, Gifts and Payments**

Gifts or entertainment can be misunderstood as an improper advantage. The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, not to gain unfair advantage with customers or others. We neither offer nor accept illegal, incorrect and/or inappropriate benefits under any circumstances.

No gift or entertainment should ever be offered, given, provided or accepted by any employee unless it:

- is not a cash gift
- is consistent with customary business practices (courtesy gifts), business related, in line with any corporate or local guidelines and not defamatory for HIMA,
- is not excessive in value (< € 40 per person),
- cannot be construed as a bribe or payoff and
- does not violate any laws, regulations (e.g. taxes), and local customs.

HIMA employees must report any gift or entertainment accepted, rejected or returned to their manager. Invitations worth more than € 150 per person or gifts worth more than € 200 must be approved by the Group Management.

In cases of doubt about the appropriateness of accepting an unsolicited gift or entertainment, you must consult your manager.

When accepting and giving permissible gifts, the relevant tax regulations must be observed by the individual employee and by the respective companies of the HIMA Group. If required by tax law, the correct tax treatment must be pointed out when gifts are given.

## **Fair Dealing, Conflict of interest and public officials**

### Fair Dealing

HIMA strives for ethical and recognized business practices and fair competition. We compete for contracts by relying on the quality of our products and services and their benefit to our customers. In particular we adhere to prevailing anti-trust laws as well as laws that regulate competition.

Illegal actions are not in the interest of HIMA and we never knowingly act illegally. They are unethical, can result in considerable loss of reputation and lead to criminal prosecution, civil damages and loss of business.

### Conflicts of interests

A conflict of interest arises when an employee is in a decision-making position that endangers, or could endanger, the individual judgment, objectivity, or independence. Business dealings and personal interests that cause or create a potential conflict must be avoided. We, as HIMA employees, avoid situations where our personal interests' conflict, or may conflict, with the interests of HIMA. If any HIMA employee is in a situation that could lead to a conflict of interest, they report it to their line manager and HR representative.

### Public officials

We are truthful, accurate, cooperative, and courteous when we deal with public officials. We are aware of the corruption levels worldwide and we stand firm against possible corruption. We act politically neutrally and uniformly inside and outside of HIMA. We observe and follow the rules to avoid undue influence in public tendering processes and to ensure fair competition.

### **Financial Integrity and Responsibility**

Our business decisions are based on thorough analysis of opportunities and risks. We ensure that our financial and non-financial information is true, fair, and complete. We ensure accurate reporting and accounting based on the accepted accounting guidelines.

We are responsible for safeguarding and making appropriate use of the assets of HIMA with which we are entrusted in order to do our jobs and meet HIMA's business objectives.

### **Export control**

We ensure that we do not violate any relevant sanctions, trade embargoes, export controls or other trade restrictions imposed by international legislators, including but not limited to EU and UN embargo resolutions.

We take care of the necessary approvals with the relevant national authorities.

## **5. Interests of the company**

### **Information security**

We protect information relevant to the company against misuse, loss, destruction, and manipulation. We utilize the relevant safety standards to do this and implement appropriate confidentiality measures.

### **Work Products and Intellectual Property**

Innovation and Know-how are of prime significance for the future success of HIMA.

For this reason, all programs, inventions, innovations, improvements, developments, methods, designs, analyses, reports, patents (IP) and all similar or related information which relate to the business of HIMA, actual or anticipated, or to any actual or anticipated research and development conducted in connection with the business of HIMA, and all existing or future products, services or solutions, which are conceived, developed or made by employees (alone or with others) during the term of their employment ("Work Product") belong to HIMA. The respective country-specific standards regarding employee inventions are complied with at all times.

We protect intellectual property and reject the use of counterfeit parts.

We expect our employees, as well as our business partners, to handle information and data in the strictest confidence even if non-disclosure has not been expressly agreed upon.

#### **Dual control principle**

We ensure that two or more employees are involved in business processes or that the results of such processes are reviewed by a second employee (dual control principle).

We have contracts and other legal documents signed by two employees who have the necessary signature authority.

## **6. Social responsibility**

#### **Social commitment**

We are aware of our social responsibility. Participation in social, ecological, cultural and other charitable projects is important to us.

#### **Sustainability & Environment**

We are striving for sustainability because sustainability is firmly anchored within HIMA's Company values and conduct. For the benefit of sustainability, we identify long-term opportunities and risks for our stakeholders and ourselves as well as the careful use of resources.

Our operations are conducted in compliance with applicable environmental, health, safety and security laws and regulations. Through environmentally conscious behaviour at all of our locations, we actively contribute to preserve and protect the environment, therefore we maintain an active self-monitoring program to ensure compliance with government and company regulations. Our employees are encouraged to avoid waste. If

waste cannot be avoided, we separate our waste in accordance with local requirements and recycle it where possible.

We strive for transparency and traceability of the origin of raw materials. Our suppliers are required to exercise reasonable care with respect to all materials and minerals contained in products supplied to us. Declarations of conformity shall be provided upon request.

### **Data Protection**

We protect the personal rights of our employees and our business partners. HIMA takes a variety of technical and organizational actions to ensure the confidentiality of personal data. Our employees comply with the respective data protection regulations and in particular respect and observe the comprehensive rights of the persons whose data they collect, process and use.