

Code of Conduct

For better readability, only the masculine form is used in the texts of this Code of Conduct. The female form is always included.

1. Compliance with the Code of Conduct

Responsibility

I know the Code of Conduct. Every employee is responsible for complying with it in his or her area of responsibility.

If I am unsure how to behave or whether a planned action complies with the rules of the Code of Conduct, I first clarify the situation with my superior. I only act after he or she has given his or her consent.

Violations

If I recognise or I am made aware of a violation of the Code of Conduct, I immediately report it to my superior.

I am aware that violations of the Code of Conduct will be consistently punished. In the event of an investigation for non-compliance, each employee is required to fully disclose all relevant facts known to him/her.

Violations of the Code of Conduct may have consequences for the employment relationship (including notice of termination in case of serious violations) and may lead to criminal proceedings or claims for compensation against the offenders.

2. Compliance with laws and regulations

Compliance	<p>I comply with the laws and regulations relevant to my area of responsibility.</p> <p>It is my personal responsibility to inform myself about the legal requirements and restrictions and to comply with them.</p>
Enquiry	<p>If I am unsure how to act or whether an action is legally permissible, I first clarify the situation with my superior. I only act after he or she has given his or her consent.</p>
Export regulations	<p>I comply with national and international export control regulations and war material export laws. This applies in particular when goods or services are purchased, brokered, manufactured or placed on the market or when technologies are transferred or received. To this end, I check in advance whether an official licence is required.</p>

3. Handling confidential information

Confidentiality

I consider all information that is not publicly available or known to be confidential.

I protect private data and confidential information of HEULE Werkzeug AG and business partners. This also applies after the termination of my employment with HEULE Werkzeug AG.

Confidential information includes, but is not limited to, and regardless of its form (oral, written, electronic), price agreements, drawings, specifications, data on employees and business partners, patents, technical knowledge, inventions and other know-how, and financial information.

Communication

I communicate actively, openly and honestly with employees and external persons. In doing so, I inform them of all the information they need to fulfil their tasks and duties.

Statements I make and documents I produce are correct and truthful.

I know that communication with the media is the sole responsibility of the company's management and the employees appointed by it.

4. Acting according to ethical standards

Equal treatment	<p>I act honestly and fairly and respect people's rights and dignity.</p> <p>I treat all employees and business partners equally, regardless of their characteristics such as race, gender, age, religion, origin, nationality, sexual orientation, physical condition, trade union membership or political affiliation.</p>
Preferential treatment	<p>I do not use my function to gain personal advantages for myself or persons close to me. This applies in particular to the exploitation of insider knowledge.</p>
Infringement of personality	<p>I respect and protect the privacy of employees. I follow the company's privacy policy when dealing with personal data. For any use of personal or company data, I obtain consent for the use of such data from the parties involved.</p> <p>I avoid any harassment or violation of personal rights. This includes, but is not limited to, bullying, slurs, intimidating, aggressive actions or words, and sexual intrusiveness.</p>
Diligence	<p>I treat the property of HEULE Werkzeug AG responsibly and carefully. This includes, but is not limited to, the furniture, equipment, machines, vehicles, buildings as well as intellectual property such as patents, trademarks, copyrights, know-how, business and corporate plans, technical knowledge or confidential information.</p>
Endangerment	<p>I protect myself and other employees from endangerments. Therefore, I am sober and drug-free during working hours, wear protective equipment where prescribed and comply with the established safety regulations.</p> <p>If I detect a risk to the safety or health of employees in the workplace, I take appropriate measures to remedy it.</p>
Child labour	<p>HEULE Werkzeug AG does not tolerate forced or child labour in its factories. HEULE Werkzeug AG does not work with partners who accept forced or child labour.</p>
Forced labour	<p>As an employee, I share responsibility for ensuring that forced labour is not used under any circumstances or in any way. We define forced or compulsory labour as any form of slave labour that is required of a person under threat of any form of physical punishment, confinement or force as a method of discipline or control, such as the withholding of identity papers, passports, work visas or worker deposits as a condition of employability.</p>
Environmental protection	<p>I am committed to protecting the environment in the interest of present and future generations. In my activities, I respect the regulations that have been enacted to protect the environment. I strive to conserve and protect resources, minimize emissions, improve energy efficiency, and comply with all applicable environmental laws, rules and regulations. Through training, I ensure the economical use of materials and energy. Whenever possible, I close material loops. In addition, I ensure that all waste is disposed of properly.</p>

Thanks to the modern building technology, HEULE Werkzeug AG air-conditions the company building with zero CO2 emissions. In summer, all rooms and machines are cooled with ground water. In winter, the ground water and the waste heat from our production machines are used for heating with the help of heat pumps.

Working hours

As a supervisor, I ensure that employees do not exceed a weekly working time of 60 hours in accordance with all applicable legislation and mandatory standards for the sector in relation to specified working hours and overtime, including breaks, rest periods, holidays and maternity and paternity leave. Employees are entitled to at least one day off after six consecutive days of work and overtime is compensated voluntarily and at an increased rate or by days off.

Salaries

As a supervisor, I am responsible for ensuring that our salaries and benefits are at least in line with national legislation or industry standards, whichever is more advantageous, and that they are governed by binding agreements, including overtime and other remuneration schemes. Regardless of the circumstances, salaries and benefits must always be sufficient to meet the basic needs of workers and their dependents.

5. Commitment to fair competition

Corruption	<p>I am not on the take. I do not demand or accept gifts or payments.</p> <p>I do not bribe. I do not promise or offer gifts or payments.</p>
Gifts	<p>Gifts do not exclusively include any kind of material goods, services, invitations, favours and discounts. Exceptions are made for gifts if they are in line with courtesy and country-specific customs and it can be reasonably assumed that they do not influence business transactions.</p>
Sponsoring	<p>Donations and sponsoring are approved centrally by the authorised managers at HEULE Werkzeug AG. The allocation must always be transparent.</p>
Commissions	<p>I fully document legitimate, business-based brokerage commissions, bonuses, rebates, refunds, etc. I do this openly to avoid involvement in money laundering and other dishonest transactions. I handle these openly in order to exclude involvement in money laundering and other dishonest transactions.</p>
Agreements	<p>I do not engage in discussions with competitors about prices, conditions or capacities. I know that agreements on a waiver of competition, on the submission of sham bids in tenders or on the division of customers, territories or production programmes are inadmissible. This also includes informal discussions, informal "gentlemen's agreements" or other agreements which have as their object or effect any of the above-mentioned restrictions of competition.</p>
Conflicts of interest	<p>I avoid conflicts of interest and situations where family ties or personal interests conflict with those of HEULE Werkzeug AG.</p> <p>Conflicts of interest may arise, for example, in the following activities:</p> <ul style="list-style-type: none">• Part-time job• Participation in companies that have a business relationship or competitive relationship with HEULE Werkzeug AG• Membership in administrative, supervisory or foundation boards• Exercise of public office• Business relationships with companies run by family members or life partners or in which family members or life partners have an interest. <p>I clarify in advance with the person in charge whether these activities are permissible.</p>
Fairness	<p>I respect and abide by the rules of fair competition.</p> <p>I conduct myself with integrity and do not use illegally procured information.</p>

Influence

I shall refrain from any unfair actions with which I could influence decisions of customers, suppliers, competitors or authorities.

These acts do not include, in an exhaustive manner, the giving of gifts as defined above, collateral agreements in contracts, payment of bribes, granting of advantages or price-fixing agreements.

6. Health and safety

- Readiness for emergencies I act quickly and in a coordinated manner in an emergency to minimise damage to the environment and can also save the lives of staff. As a supervisor, I designate employees who are trained and prepared to follow emergency procedures for this type of situation.
- Incidents and accidents As a supervisor, I am aware of the need to check medical certificates to control and prevent work risks. The topic is also addressed in the induction training to maintain a trained and qualified team to prevent incidents and accidents. We document the monitoring of accidents and near accidents with the assessment of the responsible area, which has the ambition to mitigate accidents and near accidents.
- Fire protection As a supervisor, I ensure that the company has a fire brigade inspection certificate, which ensures that the points and places where there is a real need are marked by a signalling system both on the floor and on the walls, indicating the escape route and the location of fire extinguishers. I ensure that staff are trained to assist in an emergency, thus improving protection and fire-fighting.