



Ein Unternehmen der **HABERKORN** Gruppe

# Code of Conduct of the Mühlberger Group

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*\* This document uses masculine forms solely for the purpose of improved readability.*

# Introduction

In an increasingly complex economic and business world, the trust of our business partners, shareholders, employees and the public largely depends on the behaviour of each individual.

The benchmark for our actions is constant adherence to the law and to all our corporation's internal regulations.

Our Code of Conduct\* summarises the most important mandatory standards that apply to all our staff and thus perpetuates the values of honesty and respect that our corporation has lived by since the beginning.

Our Code of Conduct thus constitutes a universally valid framework in which all staff are bound to act lawfully and responsibly and which provides support when they act on their own initiative. It is intended to help them make the right decision at all times.

Within the scope of their tasks and responsibilities, each employee is responsible for ensuring that their actions comply with the rules and values set out in our Code of Conduct. Our managers have a special function as role models – they not only communicate and live up to the rules and values but also actively ensure that others do so too.

The Code of Conduct applies to all employees. However, we also expect all other persons working on our premises (e.g. consultants, temporary hires) to comply with the rules and values it codifies.

Violations of the law, the Code of Conduct and internal corporate guidelines may have serious consequences, not only for each individual but also for the corporation as a whole.

For this reason, we all accept responsibility for complying with the rules and thus make a decisive contribution to the corporation's success.

*\* Code of Conduct*

# Foreword by the executive board

Dear colleagues,

The enduring success of our corporation is based to a large extent on outstanding performance, reliability, focus on our customers' interests, and fair dealings during the course of our daily cooperation.

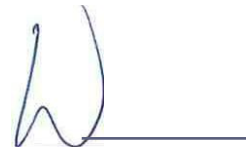
The integrity and lawful conduct of the entire workforce not only helps us maintain and strengthen the esteem in which we are held by our business partners and employees but also constitutes the basis on which the Mühlberger Group can continue to develop as part of the Haberkorn Group.

As the executive board, we have redefined the values we do business by in this Code of Conduct, which applies to the entire corporation. Our aim is to ensure - in keeping with our values - that you and our business partners have access to clear guidelines regarding law-abiding behaviour. We expect all staff to comply with the rules set out in this updated Code of Conduct and to embody our values. This is the best way for us work together to fulfil our social and economic responsibility for the sustainable development of our Group.

Mainz-Kastel, 3 January 2022



Peter Mühlberger



Rüdiger Weber

# Employees

Our employees and their dedication, experience and knowledge are the bedrock of our corporate success. As an attractive employer, this means we can offer an appreciative working environment that fosters good performance.

## Health and safety

We attach the utmost importance to the health and safety of our employees. Occupational safety is an integral part of all our business processes and decisions. Our aim is to consistently improve our occupational health and safety measures at all locations and to prevent any accidents in the long term. We expect our staff to act in a safety-conscious manner and to report safety violations – regardless of their position within the company and in the hierarchy. Our goal is to set an example for our industry in terms of occupational health and safety.

## Equal treatment and respectful interaction

We respect the fundamental rights of people worldwide. When dealing with colleagues, customers and business partners, we respect the personal dignity, privacy and personal rights of each individual. We do not tolerate unlawful, unfair treatment, insults or (sexual) harassment. Misconduct will be punished accordingly. We believe that equal opportunities and tolerance are vital for successful cooperation.

## Fair working conditions

We offer our employees appropriate remuneration and fair working conditions that meet or even exceed statutory requirements, for example with regard to working hours. We regularly pay more than the minimum wages guaranteed by law on the respective labour markets.

## Continuous improvement

We safeguard and strengthen our position on the global market by implementing a continuous improvement process into which all staff are integrated. In doing so, we take a holistic view of all workflows and processes. Strong motivation and the constant improvement of work performance and plant productivity are vital if we are to adapt to increasing global pressure. A culture of trust requires all employees to support and help shape change processes with a high degree of motivation.

# Business partners

Every business relationship is based on trust in the other party's competence, performance and reliability.

## Customers

We are always a reliable partner for our customers, and we invariably offer superb quality and outstanding service. Our products and services promote our customers' success. We focus our attention on customer requirements. We are only satisfied when the customer is satisfied. We aim to establish long-term relationships conducted in a spirit of partnership. We are passionate about working with our customers to find innovative, sustainable solutions and to drive the further development of existing products.

## Suppliers and service providers

We select our suppliers and service providers fairly and without bias, and expect the highest quality and best service at competitive conditions. We expect our suppliers to respect and adhere to the values in our Code of Conduct and to do everything in their power to ensure that these values are respected and adhered to by their suppliers and service providers throughout the supply chain. Violations may lead to the termination of the business relationship.

# Corporate responsibility

We are committed to free, fair competition. Our employees are forbidden to impose unlawful restraints of competition; such restraints will be sanctioned. We also expect our customers and suppliers to adhere to this principle.

## Cartels, collusion and non-competition

Every employee is bound to comply with the respective laws against restraints of competition; a dominant market position may not be exploited unlawfully.

In particular, employees are forbidden to enter into formal or informal agreements with competitors - including potential market players - which have the unlawful restraint of competition as their purpose or actual effect. This applies to both tacit and to involuntary behaviours. This means that agreements between competitors regarding the division of territories or customers and exchanges of information on prices, supply relationships, conditions, capacities, market shares, margins, costs, special customer relations, offer content or bidding behaviour are inadmissible.

## Corruption and bribery, conflicts of interest

We categorically reject any form of corruption, whether active or passive, and take precautions within the scope of our responsibility to ensure that the applicable anti-corruption laws are strictly complied with. We do not accept bribes (e.g. when selecting suppliers), neither do we bribe others (e.g. to secure orders or other advantages). This prohibition applies to everyone, in particular to employees working for business partners and competitors (and persons close to these), whether in Germany or abroad.

Remuneration paid to third parties (e.g. agents such as commercial representatives, brokers or consultants) in the form of commission or other benefits must be transparent and commensurate with the service rendered.

Gifts and invitations are only acceptable if they are not of a nature or scope likely to improperly influence the recipient's actions and decisions or to give rise to a sense of obligation or dependency.

Personal interests may not unduly influence our professional judgement. We disclose actual and potential conflicts of interest as per our internal guidelines, thus facilitating their neutralisation.

## Data privacy and information security

It goes without saying that our corporation complies with national and international regulations governing the protection of personal data. We take appropriate precautions to protect the privacy of our customers, staff, suppliers and other parties in a professional manner as per the applicable statutory regulations. We build trust in our data processing activities by promoting transparency, implementing risk-oriented protective measures and providing staff training.

The unauthorised disclosure or dissemination of confidential information is prohibited both internally and externally as stipulated in the applicable legislation. We understand confidential information to encompass all non-public, strategic, financial, technical and commercial information and all business and trade secrets, both our own and those of our business partners.

## Patents and other intellectual property rights

In-house inventions and technologies contribute significantly to the success of our corporation. These assets must be protected by intellectual property rights if we are to remain competitive. No employee may convey inventions, new knowledge or business secrets to third parties without being authorised to do so.

We likewise respect effective third-party property rights; no employee may procure or use third-party trade secrets without authorisation.

## International trade and combating money laundering

Cross-border trade is a matter of course for us. When doing business internationally, we comply with the relevant statutory regulations, e.g. regarding import and export, intra-Community transfers, applicable sanctions and sanctions lists.

We take appropriate measures to comply with the respective requirements for the prevention of money laundering. Cash payments are generally neither made nor accepted in order to minimise the risk of money laundering.

## Human rights, forced labour and child labour

We respect the internationally regulated human rights of all individuals within our sphere of influence. We respect the basic principles set out in the "Universal Declaration of Human Rights" and the corresponding UN documents.

Furthermore, we reject and are fundamentally opposed to any form of forced labour or child labour. We respect collective rights guaranteed by law at all times.

We also expect this understanding and strict compliance from our business partners.

## Keeping accurate records and making disclosures

We keep accurate, complete, appropriate and comprehensible records in a timely manner in compliance with the applicable statutory and official requirements. We comply with any statutory regulations that oblige us to disclose our records.

## Sustainability

Along with employee protection and our commitment to social causes, the protection of the environment, species and the climate are key considerations when making business decisions. We support the efficient use of energy and other valuable resources. We make an important contribution by reusing and recycling materials whenever this is meaningful and appropriate. We consistently invest in state-of-the-art, environmentally friendly, energy-efficient technologies. We continually improve our processes with the aid of management systems.



# Applying the Code of Conduct

A code of conduct only becomes part of the corporate culture when its values are lived up to. Setting a good example in conjunction with an active, sustainable compliance organisation which engages with staff ensures that it becomes permanently anchored in the awareness of every one of us.

## Management

The executive board and all our management staff take full responsibility for our staff and take the prevailing conditions and impact on the respective economic area in which our companies are domiciled when making decisions. Cultural differences are treated with recognition and respect provided they do not violate corporate regulations or internal guidelines.

## Compliance organisation

Our staff receive regular, risk-oriented training on the content of this Code of Conduct. We are convinced that this makes an important contribution when it comes to preventing violations of the law and putting a stop to them in the long term.

The executive board assists all staff with the fulfilment of any duties of care, supervision, organisation, selection, instruction and control besides monitoring compliance with this Code of Conduct.

Questions regarding compliance can be referred to the respective superior, the compliance officer or the management.

## Whistleblower system

Every employee has the right and opportunity to report actual or suspected violations of this Code of Conduct. We have set up a reporting channel for this purpose which also allows reports to be submitted anonymously.

However, violations can also be reported to the employee's superior, the compliance officer or directly to management.

No employee who, due to specific indications, believes in good faith that this Code of Conduct has been or could have been violated need fear disadvantages of any type as a result of his/her report. The report will be treated strictly confidentially insofar as this is legally permissible and actually possible; the same applies to the identity of the employee who submitted the report and of other employees helping to resolve the issue.

We expressly welcome information of this kind!

Published by:

Mühlberger Group

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