

# ETHICAL CODE

We are part of an international voluntary group of self-managed companies with the same values called the HENNLICH Group. We are committed to a free market economy. It is important to us that our customers, suppliers, co-workers and owners benefit from our activities. Beyond our legal obligations, we also assume a greater degree of responsibility for our surroundings. This Code of Conduct is part of that commitment and approach.

# The idea of the company's business

The key ideas of our business are trust, responsibility, tolerance and respect. We believe that differences of opinion drive success and progress. The success of the company goes hand in hand with innovation and the introduction of new processes, technologies and products. We are committed to long-term prosperity, the development of ourselves and the place where we do business.

# **Relationship to the Code of Ethics**

The Code of Ethics is first and foremost HENNLICH's position and an expression of our values. It applies to the management and employees of the company as well as to cooperating persons (self-employed persons). It also influences our relationship and attitude towards business partners such as our suppliers and customers.

# Human Rights

We respect fundamental human rights and freedoms. We strive to create an environment where these rights are guaranteed and respected. Child or forced labour and any other forms of discrimination are unacceptable to us.

# **RESPONSIBLE COMPANY**

We comply with the laws of the Czech Republic and international standards. We set high demands on the quality of our services and products so that they stand up to international competition and so that our business partners are always maximally satisfied. Fair dealings and a high level of transparency are key for us.

- Our products and services maintain high standards and contribute to improving lives.
- We do business without corruption. Any form of bribery, giving of benefits or kickbacks is prohibited and we do not tolerate it, whether it involves public officials or business dealings. Our employees and associates may not accept, offer or provide any bribes or other monetary contributions in connection with business activities.
- We honour both written and oral agreements and execute them to the best of our knowledge and conscience.
- We pride ourselves on a fair and professional approach not only to business partners but also to potential competitors.

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HENNLICH s.r.o.

CZ – 412 01 Litoměřice | Českolipská 9 | hennlich@hennlich.cz | +420 416 711 111 | www.hennlich.cz Zapsán do obchodního rejstříku u Krajského soudu v Ústí nad Labem v oddíle C, č. vložky 274



- Our employees and associates (self-employed) always act in a way that does not damage the company's reputation, takes into account the wishes and needs of customers and tries to support the long-term interests of both parties.
- We strive to minimize the risk of counterfeit materials or components being integrated into our products. Should counterfeits be identified, they will be stored securely. At the same time, we will inform our business partners and the relevant authorities.

# Privacy and handling of sensitive data

We handle sensitive data of business partners and employees responsibly and in accordance with GDPR. All handling of personal data is carried out in accordance with applicable legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"), Act No. 127/2005 Coll. on electronic communications, as amended, and Act No. 480/2004 Coll. on certain information society services, as amended. For more information on how we handle personal data, please visit https://www.hennlich.cz/ochrana-osobnich-udaju.html

We place the utmost importance on confidentiality when handling business information and are committed to protecting the security of sensitive data and personal information. Personal data is protected by specific legal provisions, which we fully comply with to prevent unauthorised processing and misuse of personal data. All employees are subject to a duty of confidentiality regarding information that is not generally available. This applies in particular to operational and business secrets of any kind as well as personal data. The private use of information obtained in the course of employment is prohibited.

## **Financial responsibility**

We are a responsible taxpayer that is compliant with the law. Investors, creditors and others have a legitimate interest in our financial statements. We maintain all financial and non-financial statements carefully, completely and accurately. We treat all business transactions transparently and responsibly. We record all business transactions fully and fairly in accordance with the firm's accounting policies and other applicable requirements.

## Fair competition and antitrust policy

We comply with the rules of fair and open competition. Each company representative protects the rules of fair and open competition by his or her actions, or prevents and avoids situations that would lead to their violation. Employees and associates of the Company shall not engage in any cartel activities, which may include the exchange of information with competitors or trading companies to increase or otherwise fix e.g. sales prices, etc., the conclusion of bid contracts (negotiations with competitors or trading companies on price offers or who will be the successful bidder, etc.) or other illegal business practices that impede free and fair competition.

## **Conflict of interests**

Employees avoid situations in which there could be a conflict between their personal interests and those of the company. When dealing with existing and potential customers, suppliers, public officials, investors and competitors, employees act in the best interests of the company, regardless of their personal benefits. Each employee or co-worker is required to immediately inform his or her supervisor of any situation in which a

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conflict of interest may arise. If in doubt or feeling that an employee or co-worker is in a delicate situation, he/she shall inform his/her supervisor.

# Intellectual property

We protect our own secrets and respect the intellectual property rights of others. Employees may not obtain other parties' confidential information by unauthorized means and may not disclose it without permission.

## **Export Controls and Economic Sanctions**

When exporting, we follow the export and re-export laws of the countries involved. We comply with economic sanctions legislation.

## **Suppliers**

At HENNLICH, we consider it important that our suppliers share our values and principles. The Supplier Code of Conduct (the "Code") sets out the minimum requirements we expect of all our suppliers. This is to ensure that our business operations are conducted with the highest level of integrity and in compliance with applicable laws and regulations.

## **RESPONSIBLE EMPLOYER**

We comply with all legislation and standards in relation to our employees. We create an environment in which the strengths and energies of our employees can develop freely. We are aware of and respect the diversity of cultures and experiences at all levels. We believe that differences of opinion create strength for further progress. Our colleagues are able and ready to work together to find solutions in such situations. We are aware that a pleasant working environment based on a stable, open and predictable relationship with employees, on fair evaluation and remuneration, on the opportunity to effective, meaningful work-life balance, is the key to the long-term and satisfying development of our employees and the entire company.

- We observe maximum safety in the workplace.
- We do not tolerate any discriminatory behaviour based on social status, ethnicity, race or gender.
  We create a company culture in which there is an open and safe environment for all employees and co-workers.
- We do not tolerate bullying or sexual harassment in any form.
- Our priority is the long-term development of the skills and abilities of our employees and associates. In the event of conflicts or other problems arising in the workplace, an employee always has the option of contacting his or her supervisor, Human Resources or management. If the situation cannot be resolved within the company's organizational structure, the employee can use the free and anonymous SOS Line or the services of a competent person.
- If complex ethical issues arise where there may be a conflict of interest in relation to employees, we will seek independent advice.



# Whistleblowing and protection from retaliation

If an employee, customer, supplier, or member of the public becomes aware of a work ethic issue or violation of CR laws, he or she will notify his or her immediate supervisor or manager within a timeframe that allows those personnel to provide appropriate advice or make an appropriate decision. Both the immediate supervisor and the Company's management have a duty to help the employee resolve any difficulties he or she may encounter. In case of doubt, the Human Resources and Economic Department or external advisors are consulted. For this purpose, the NNTB (Don't Let It Be) application has been set up for employees.

An employee who has reported a suspected breach of the rules of this Code in good faith and in good faith may not face any penalty. We have selected an appropriate person for this, determined within the accepted principles in accordance with the Whistleblower Protection Act.

More information about our measures under the Responsible Employer section of our Code of Conduct can be found in a separate document: the HENNLICH Code of Conduct - Human Rights and Working Conditions

# MEMBER OF THE COMMUNITY

Beyond our legal obligations, we take a greater level of responsibility for our surroundings. In doing so, we are guided by our conscience and our capabilities. We strive to be a good neighbour and to build and develop good relationships with our neighbourhood. This also includes a focus on environmental protection not only within our buildings but also within our production programme.

## Part of the community

In the cities where we are based, we want to have a long-term presence and help develop the local community. That's why we work not only with local representations, but also with our neighbours. In these places, we support civic and non-profit activities aimed at the development of the localities.

We cooperate with schools (primary, secondary and higher education), organize excursions and lectures.

## Environment

We comply with all laws that set environmental protection. We also follow our own environmental policy, which takes into account standards and measures beyond the law.

In addition, we strive to build and operate corporate campuses with the least environmental impact. Our products, production programmes and research and development are largely directed towards areas that support environmental protection. Our long-term goal is to achieve energy neutrality and long-term sustainability.

More information about our measures under the Member of Society - Environment section of our Code of Conduct can be found in a separate document: the HENNLICH Code of Conduct - Environment

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