

# **Code of Conduct**

This Code of Conduct lists the relevant basic values and principles that we observe in our day-to-day dealings with our employees, customers and suppliers, as well as society and the environment in connection with our global business activities.

We consider and regularly reassess the economic, technological, sociological and ecological consequences of our business decisions and actions. The basis of our actions is sustainable and reputable.

By observing these principles, we contribute to the well-being and sustainable development of society within the scope of our options and scope for action. We observe ethical and legal principles.

Our many years of membership of the "Assembly of Honourable Businessmen" (Verein Eines Ehrbaren Kaufmanns zu Hamburg) also emphasises this responsibility. The mission statement of VEEK is based on three fundamental principles: the self-conception as a human being, the self-commitment as an entrepreneur and the self-claim as a member of society. The members of the association support these objectives and commit themselves to observe the standards of the Assembly.

HTK Hamburg GmbH undertakes to adhere to the principles listed below:

## Compliance with the Law

We comply with applicable laws of the relevant jurisdiction in which we operate. This also applies to applicable laws on competition, third party ownership, privacy, insider trading and money laundering.

## Respect for Human Rghts

We are committed to the promotion of human rights, and adhere to these in accordance with the UN Human Rights Charter.

### **Exclusion from Child Labour**

We comply with the ban on child labour and do not employ any persons who do not meet the legally prescribed minimum age.

## **Corruption and Bribery**

Corruption and bribery are not tolerated by us and we do not engage in them under any circumstances. We do not accept unlawful payment offers, nor do we offer payments to Government officials or decision-makers in an attempt to influence decisions. Our services are provided as agreed and will be billed correctly.

# **Employees' Rights**

We respect the right of employees to freedom of assembly and expression. We do not force anyone to work and do not employ anyone against their will. We do not tolerate inappropriate treatment to any of our employees. This includes discrimination, verbal or physical abuse, sexual harassment, exploitation or coercion.

We support equal opportunities and equal treatment of employees. We do this regardless of race, ethnic origin, gender, religion or sexual orientation.

We guarantee the statutory National Minimum Wage and adhere to and comply with the respective statutory rules on working hours.

## Health and Safety

We protect the health and safety of our employees by ensuring a safe and healthy working environment in order to prevent accidents and injuries. We regularly train our employees in occupational safety.

#### Observance of Environmental Protection

We act in an environmentally conscious manner, and meet all standards for environmental protection. We handle natural resources responsibly, and regularly review our environmental protection measures.

## **Suppliers and Partners**

We also promote compliance with these principles and basic values of our Code of Conduct among our suppliers and partners. Fair negotiations and commercial trust are a matter of course for us.

## **Export Regulations**

We act according to the rules of the European Union and the Federal Republic of Germany and strictly comply with export bans. We do not tolerate any circumvention of these regulations and do not get involved in it.

#### Communication and Documentation

All documents shall be prepared by us in strict accordance with our duties and responsibilities, and retained in a proper manner. Corporate confidences and sensitive business information are treated with the utmost discretion and confidentially.

Hamburg, May 2019 HTK Hamburg GmbH