

Code of Conduct Heinz Gothe GmbH & Co. KG

Preamble

The company Heinz Gothe GmbH & Co. KG is committed to ecologically and socially responsible corporate management. Our employees share this idea and commit themselves with us to live the principles of social, ethical and ecological thinking and acting in their daily work. We strive to continuously optimize our products and services in terms of sustainability and efficiency. For a holistic approach, we ask our suppliers to follow this mission statement and the principles listed below.

We adopt a Code of Conduct to make it clear in the supply chain that, outside of the national laws and regulations that must necessarily be applied, we also comply with the international declarations of the United Nations with regard to: Observance of Human Rights, Prohibition of Child Labor, Observance of International Labor Standards, etc. and expect the same from our suppliers.

1. social values and responsibility

- We exclude any kind of forced employment (slavery) or similar work.

The employees must work voluntarily (against payment of a legally compliant remuneration) and without any sexual or other personal harassment or psychological hardship.

- Child labor shall not be used at any time. The minimum age for the employment of children shall not be less than the age at which compulsory education ends.

The rights of young workers shall be protected. Special exceptions apply to so-called school internships, in which students from secondary schools are given a brief insight into a company and are supervised by the schools.

- Fair pay must correspond to the national statutory minimum wage as a lower limit. Workers* must be granted all legally prescribed wage benefits. Wage deductions as punitive measures are not permitted. It must be ensured that every employee regularly receives a written, detailed and easily understandable statement of his or her pay. This should also document statutory deductions without error.

- Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is worked on a voluntary basis.

- Employees are entitled to form or join organizations and to engage in collective bargaining. To this end, it must be ensured that employees can contact each other.

- Any kind of discrimination is inadmissible. The personal dignity, privacy and personal rights of each individual are respected. There must be no discrimination

based on gender, origin, skin color, disability, political conviction (provided it does not contradict constitutional principles), religion, age, pregnancy or sexual orientation.

2. health protection

- We provide and expect a safe and healthy working environment. The use of appropriate occupational safety systems and the observance of necessary precautionary measures against accidents and damage to health are a matter of course.

Training of employees in this regard must take place on a recurring basis. Clean sanitary facilities and break rooms must be available in sufficient numbers at the place of work.

3. complaints management

- The introduction and maintenance of an effective complaints system at all levels of the company is essential. Employees must be able to report grievances without fear of reprisals. If grievances exist that violate legal regulations or common decency, the company must take remedial action.

- If this is not the case, the complainants must still be heard and informed about compliance with the standards.

4 Dealing with conflict minerals

For the raw materials tin, tungsten, tantalum and gold, which are considered to be conflict minerals, as well as other critical minerals, the company is establishing guidelines to promote responsible supply chains. This involves compliance with the OECD's conflict minerals objective and environmentally sound and responsible mining, smelting and refining processes.

5. ecological responsibility

- Waste and hazardous materials are systematically segregated and safely stored, and transferred to certified disposal facilities without release of environmentally hazardous materials.

- Air and noise emissions are categorized and routinely monitored in order to implement emission control systems and noise abatement measures as needed. Care must be taken to minimize all types of emissions.

- Wastewater from manufacturing processes and operations, as well as sanitary facilities, shall be typed, monitored, inspected, and treated as necessary prior to discharge. Reducing wastewater generation is an important measure.

- The use and consumption of resources during production and the generation of waste of all types shall be reduced and, at best, avoided.

- Energy consumption must be documented and monitored. Solutions to operate in a more energy efficient manner must be constantly sought.

6. ethical business conduct

- In fair competition, the standards of fair business conduct and fair advertising shall be observed. The application of applicable antitrust laws, as well as the freedom to conclude contracts, must be guaranteed.

- The obligation to protect all personal data and private information applies.

The laws on data protection, information technology and official regulations shall be observed in the collection, storage, processing, transmission and transfer of such data.

- Intellectual property rights are to be respected.

- The highest standards of integrity shall be applied to all business activities. Bribery, corruption, extortion and embezzlement are prohibited. No exceptions to this will be tolerated.

Heinz Gothe GmbH & Co. KG

The Management