



HVL GmbH Code of Conduct and Ethics (Corporate Code of Conduct)

FOREWORD

HVL GmbH takes responsibility for its employees, the environment, society, and our business activities. We are committed to responsible and value-based economic activity. Compliance with the law at all levels is a fundamental principle of our organisation's conduct. We also attach great importance to the sustainability of our business, both in terms of protecting the environment and in terms of good product quality as well as healthy relationships with our business partners. We are aware of our responsibility towards society, nature, our customers, and suppliers as well as our own organisation and are committed to maintaining high ethical standards in all aspects of our business activities.

As an internationally active company, this also includes recognising and defending global initiatives and standards for corporate sustainability, such as the ten principles of the [UN Global Compact](#) (UNGC). We are committed to anchoring these principles in our day-to-day business activities and expect the HVL workforce to comply with and promote them. We are also convinced that we can add value to our business environment through a high level of transparency in the area of corporate social responsibility. For this reason, we publish important documents such as this Code of Conduct or environmental certificates on our website (www.hvl-online.com).

This Code of Conduct describes the binding standard of behaviour that we as HVL expect from our company - our employees and our management. The Code reflects our values and demonstrates our commitment to ethical, lawful and responsible behaviour in business. Our aim is to gain trust by conducting our business in an honest and compliant manner and to have a positive influence on our business environment.



RESPONSIBLE BUSINESS PRACTICES

GENERAL CONDUCT

We are committed to fulfilling our business and social responsibilities in a manner that reflects the highest level of integrity and honesty. The relationship with contractual partners, third parties and the public in general has always been based on trust and goodwill. Only by continuing our commitment to these principles can we ensure the trust, acceptance and goodwill of our contractual partners and customers in the long term. Our business success is the result of the joint efforts of all employees in fulfilling their responsibilities in an ethical manner. Every employee should always endeavour to:

- serve our contractual partners honestly and fairly and to advise them comprehensively on their rights and obligations;
- fulfil out contractual obligations and other commitments;
- avoid putting business partners in a compromising position or impairing their judgement through gifts or remuneration;
- promote and sell our products in a responsible and lawful manner;
- maintain the integrity and reputation of HVL by protecting confidential and proprietary information disclosed to employees in the course of their employment;
- understand the proper use of our electronic communication systems, including social media; and
- carry out activities for HVL in compliance with all applicable policies, procedures, laws and regulatory requirements.

COMPLIANCE WITH LAWS, REGULATIONS AND DIRECTIVES

HVL is a global company focusing on the European market. In this role, we as an organisation are committed to complying with all applicable regulations, such as national and international laws and treaties on human rights, social rights, employment rights in accordance with the International Labour Organisation, export controls, sanctions, in particular international sanctions imposed by the European Union, the United Nations and the USA, the control of certain raw materials and all applicable environmental protection legislation. This also includes internal regulations and company guidelines aimed at promoting ethical and legally correct conduct.

COMPETITION AND ANTITRUST LAW

Antitrust laws are designed to promote a fair and open market by prohibiting certain agreements and the sharing of information with competitors. Examples of prohibited agreements include price fixing or bid rigging, territory or customer sharing, boycotting customers or suppliers and tying agreements. We at HVL are committed to complying with applicable antitrust laws and laws against unfair competition and do not approve of any activities that could constitute or appear to constitute an anti-competitive agreement.

Our aim is to promote transparent and lawful business practices and avoid distortion of competition. All HVL employees are responsible for complying with applicable antitrust law.

MONEY LAUNDERING AND FRAUD

It is part of our corporate culture at HVL not to do business with persons or companies that we know to be involved in criminal or illegal activities. Money laundering, as an example of such a potentially criminal activity, is the smuggling of illegally obtained funds into the legal financial and economic cycle in order to conceal the true origin of the funds.

HVL is actively committed to preventing money laundering by implementing strict control mechanisms and reporting suspicious transactions immediately. Our employees are trained and sensitised to recognise potential risks and act accordingly.



BRIBERY AND CORRUPTION

Compliance with anti-bribery and anti-corruption laws around the world is not only a legal requirement. It reflects our determination to act with the highest level of integrity and honesty. We prohibit any form of bribery or corruption. We demand that our employees:

- do not offer anything as a bribe or engage in any act of bribery or offer or give any unusual or unauthorised payments or inducements of any kind in the course of business;
- do not acquire any business in which a bribe, unofficial payment or inducement is offered to customers, potential customers or third parties;
- reject and report any bribes or unusual payments offered in the course of business activities;
- do not pay bribes.

Invitations to business meals are excluded.

CHILD LABOUR AND FORCED LABOUR

HVL does not accept practices that are incompatible with the rights enshrined in the Convention on the Rights of the Child (UN Resolution of 20 November 1989). We do not tolerate the exploitation of children and young people in any form.

HVL does not employ anyone under the age of 18. This does not apply to work experience placements organised by schools. A minimum age of 16 years applies here.

HVL will also not tolerate, permit, accept or make use of any form of forced labour, modern slavery or involuntary prison work. All work, including overtime, must be carried out on a voluntary basis.

COMPLIANCE WITH FOREIGN TRADE RESTRICTIONS

HVL GmbH complies with all applicable foreign trade and customs laws in the countries and regions in which we do business. We undertake to comply with the applicable import and export laws, and in particular to comply with official sanctions, embargoes against companies and persons as well as other applicable laws, regulations, state and national guidelines and principles. HVL employees must comply with internal trading restrictions and obtain sufficient information when preparing for transactions. Any violation of sanctions and embargoes can lead to substantial fines and penalties for the company, cause significant damage to the reputation of HVL GmbH externally and lead to legal consequences for all parties involved. All employees are therefore obliged to comply with national and international trade laws, regulations and restrictions.

CONFIDENTIALITY AND SECURITY OF INFORMATION

HVL employees recognise that, in the course of their employment with HVL, they have access to confidential and proprietary information belonging to HVL's customers, potential customers and business partners. This information may be of various types, including data stored in databases, recommendations and other content in reports, email messages and attachments, research tests and results, client lists and details of clients' assets, business operations, personally identifiable information and internal documents relating to HVL's business approach, strategy and organisational structure. Regardless of how such information is created, communicated or stored, all employees are responsible for protecting it against unauthorised disclosure, preventing its improper destruction or modification, ensuring its access and availability based on business requirements, and informing HVL in the event of unlawful appropriation or unauthorised access or use of information, and complying with all applicable legal, regulatory and contractual requirements regarding the use and handling of information. Confidential and protected information may not be used for personal use, reproduced or misappropriated. It may also never be discussed outside the organisation or made available to external persons without the express permission of HVL.

DATA PROTECTION AND INFORMATION SECURITY

HVL respects and protects the right to personal privacy. We comply with all applicable laws, guidelines and regulations on the collection, processing and use of personal data. Unlawful collection, processing or use of personal data of suppliers, customers, employees and external persons is strictly prohibited. For this reason, all personal data must always be handled and processed with great care and protected against access by unauthorised third parties.

We recommend that all HVL employees contact the management if they have any questions or doubts regarding the processing of certain data.

PROTECTION OF HVL PROPERTY

We require all employees to use HVL property appropriately and treat it responsibly. Company property must be protected from damage, misuse, unnecessary wear and loss during use.

HVL's property includes all tangible assets such as office equipment, office supplies, laptops, IT equipment, furniture, vehicles etc., as well as all intangible assets such as product expertise, patents, brands, trade and business secrets and software. The property of colleagues and other persons must be respected in the same way.



HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

ENVIRONMENTAL AND CLIMATE PROTECTION

Sustainability has been deeply rooted at HVL GmbH since its founding in 1994. Respect for the environment and the conservation of natural resources is a high priority for us. We are convinced that protecting the environment and the climate is one of the central and most important challenges of our time. Climate change is a global phenomenon that knows no national borders and whose far-reaching effects can only be overcome through the joint efforts of organisations and people worldwide. We endeavour to make a positive contribution.

Climate change therefore also has an impact on HVL's business activities. These include, for example, a change in demand for our products in the area of winter chemicals or potential challenges in logistics and the supply chain in relation to increasing extreme weather events. For example, hurricanes can block the transport of goods by sea from the USA to Europe and low water levels on the River Rhine can disrupt inland waterway transport. Our task is to recognise these effects at an early stage, take appropriate measures to mitigate the negative consequences and seize potential opportunities.

For this reason, we are constantly working to analyse and ultimately minimise the environmental impact of our business. Investments and projects are therefore subject to the potential impact on the environment and climate, among other things. It is obligatory for us to fulfil and comply with all legal requirements in the respective countries in which we operate.

When it comes to environmental protection, we stand for transparency and value-based action in order to make a positive contribution together with our business partners. Accordingly, all employees are required to contribute to the efforts and obligations of our organisation by complying with the applicable environmental protection regulations.

HEALTH AND SAFETY AT THE WORKPLACE

The health and safety of our employees is a top priority at HVL GmbH. Alongside our customers, our employees are our most valuable asset. We ensure that the legal requirements for health and safety at work, including restrictions on the sale and use of chemicals, are complied with at all sites.

HVL is also committed to ensuring that all employees have the right to a safe and healthy working environment without the risk of their personal integrity being violated.

We guarantee that laws and regulations to protect the health and safety of our employees are enforced and that safety is guaranteed. In addition, it is particularly important to us to go beyond the legal requirements and create an environment for all employees in which health and satisfaction are particularly promoted, for example through standardised, modern and ergonomic workstations. We believe that a healthy and safe working environment leads to greater satisfaction and a positive coexistence.

EMPLOYMENT CONDITIONS AND HUMAN RIGHTS

EQUAL TREATMENT

HVL GmbH is committed to creating a working environment in which all employees, applicants and service providers are treated fairly and respectfully. We want to create a working environment characterised by integrity, respect and fairness. We respect and support the protection of internationally recognised human rights. Any behaviour that discriminates against people or tolerates the violation of human rights will not be tolerated by us.

We are committed to equal opportunities for all HVL GmbH employees and provide equal opportunities for professional development, promotion and further training, regardless of personal characteristics. We endeavour to create a working environment that is free of prejudice and stereotypes and in which all employees are valued equally. We do not tolerate any form of discrimination against people based on their gender, ethnicity, religion, sexual orientation, age, disability, nationality, marital status or other protected characteristics. Furthermore, it is a matter of course for us to treat all employees with respect, dignity and courtesy. We do not tolerate any form of verbal, physical or sexual violence, harassment or bullying in the workplace. We are also convinced that diverse personal backgrounds and perspectives contribute to innovative solutions and a better working environment.

FAIR WORKING CONDITIONS

We see it as a fundamental element of our corporate culture to offer our employees a working environment that is not only fair and respectful, but also contributes to a high level of employee satisfaction and development. It is a matter of course for us that all employees are paid above the statutory minimum wage and appropriately according to their responsibilities. We also ensure that all employees have access to social benefits in accordance with the applicable national or local standards.

HVL complies with all applicable laws regarding maximum working hours in the respective countries in which we will employ staff.

We ensure that the legal rights to freedom of association and collective bargaining are not restricted.

WHISTLEBLOWING PROCEDURE

HVL expressly encourages its employees to report observed or suspected violations of this Code of Conduct or other ethical violations to our management. We want to recognise problems at an early stage and solve them together. We will not tolerate retaliation or the threat of retaliation for reporting a violation or suspected violation of this Code of Conduct if such a report is made in good faith. Violations of this Code of Conduct are pursued accordingly and appropriate measures can then be taken.

FOR ANOTHER 30 YEARS OF SUCCESSFUL BUSINESS

Together, we want to take responsibility for our actions with these guidelines and rules so that we as a company and as employees can survive in today's market environment in a legally secure and sustainable manner. We would like to thank all our employees for their support!

Badenweiler, 17 June 2024



Ulrich Lips

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