

A professional office setting with several people. In the foreground, a woman with blonde hair, wearing a light blue blouse, is looking to her left and holding a blue folder. In the mid-ground, a woman with short grey hair, glasses, and a pearl necklace is smiling and looking towards the blonde woman. In the background, a man with a beard is seated at a table, and another woman in a red and black patterned top is standing. The scene is brightly lit, suggesting a modern office environment.

VALUES FOR WHICH WE STAND

Code of Conduct of the
Hettich Group

CONTENT



1 OUR BASIC UNDERSTANDING	4
1.1 Applicable law	6
1.2 Openness and confidants	6
1.3 Trust and appreciation	6
1.4 Company property	7
1.5 Conflict of interest and decision-making	7
2 PEOPLE AND THE ENVIRONMENT	8
2.1 Human rights	10
2.2 Fair pay and conditions of employment	10
2.3 Occupational safety and health	10
2.4 Right to freedom of association and collective bargaining	11
2.3 Environment and climate protection	11
2.4 Operational facilities	11
3 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES	12
3.1 Relations with business partners	14
3.2 Cross-border trade	14
3.3 Dealing with authorities and political institutions	14
3.4 Donations	14
3.5 Corruption, bribery and money laundering	15
3.6 Fair competition	15
3.7 Product safety	15
4 DEALING WITH INFORMATION	16
4.1 Protection of intellectual property	17
4.2 Data protection and confidentiality	17
4.3 Financial integrity	17
4.4 Product information	18
4.5 IT systems and information security	18
4.6 Communication in social media	18



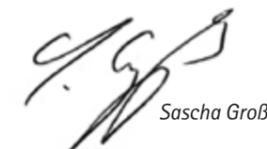
Dear Colleagues,

Together with our customers, we make magical furnishing solutions possible for many people in this world. Our customers value our role as a success-driver for them. We act with sincerity, vision, determination and are there for each other. Our innovative and durable products pass through many millions of hands every day and delight end users all over the world. The Hettich family business has earned its strong reputation over four generations. It is the responsibility of all of us to maintain that reputation. One rash action, one wrong decision, one careless moment can be enough to severely damage our reputation.

Many statements in the Hettich Code of Conduct are self-evident to all of us. Nevertheless, it is important for us to set down in writing binding principles for law-abiding, ethical and responsible action. This is not only to raise awareness of our shared values. The Code of Conduct is intended to provide us with practical guidance for dealing with each other as well as with our business partners - even in difficult situations. We ask all colleagues to take the time to familiarise themselves with our Code of Conduct.

We would like to draw your attention to the training courses offered by the eAcademy. Regardless of where we work and what we do, we all adhere to the principles and values set out in our Code of Conduct under the motto:
Together, let's protect what we love.


Jana Schönfeld


Sascha Groß



"We build on tolerance and honesty. Trust and appreciation determine our actions."



1 OUR BASIC UNDERSTANDING



1.1 APPLICABLE LAW

We comply with applicable law – locally, nationally and internationally. If regulations exist in individual countries or markets that deviate from this Code of Conduct, we follow the stricter requirements in each case. Colleagues with compliance, personnel or budget responsibility have a special responsibility to know the laws, regulations and internal Hettich rules relevant to their functional area and to ensure compliance with them. In case of doubt, or if our legal knowledge is not sufficient, we seek expert advice from the Hettich Compliance Network.

Every Hettich company has compliance specialists for the following areas:



1.2 OPENNESS AND CONFIDENCE

We live an open learning culture in which we share our insights with each other. Only what is addressed openly and without false consideration helps us to develop our interaction with each other in a positive way. This also applies to critical and confidential concerns. Our managers are our first contacts when we want to share insights, clarify uncertainties or give advice.

For specific tips or if we suspect that applicable law, binding rules or our Code of Conduct are being violated, we have the digital Hettich whistleblower portal <https://whistleblowing.hettich.com> available. The portal allows confidential and, if desired, anonymous reports, is multilingual and can be accessed both from the company network and from private devices.

Whistleblowers are under our special protection. We do not tolerate discrimination or threats against colleagues who report actual or suspected misconduct in good faith.

However, the special protection does not apply to persons who intentionally or grossly negligently report incorrect information. Such reports can cause harm to colleagues, the company or third parties, which in turn can lead to legal consequences.

1.3 TRUST AND APPRECIATION

We treat each other and outsiders with trust, appreciation and respect. Diversity and variety shape our corporate culture. This also applies to our appearance in everyday working life. We are aware that we are ambassadors of the Hettich brand both internally and externally and therefore behave professionally and appropriately at all times. Ethnic or social origin, skin colour, nationality, disability, age, gender, sexual orientation, marital status, pregnancy, religion, political views or trade union membership make no difference to us.

We promote an environment built on tolerance and honesty, where everyone has equal opportunities and the values and dignity of each individual are recognised.

We create a working environment that is free from prejudice, harassment, bullying or intimidation. Where many people work together, conflicts are sometimes unavoidable. We settle differences of opinion objectively and without personal attacks. Insults or grossly improper behaviour have no place at Hettich.

1.4 COMPANY PROPERTY

We always use company property – including products, operating equipment, work equipment, vehicles or intellectual property – with care and only for the intended purpose. Any form of misappropriation or unlawful appropriation of company property, such as through theft, embezzlement or fraud, is prohibited.

1.5 CONFLICT OF INTEREST AND DECISION-MAKING

Our Code of Conduct cannot cover all situations we may face. In everyday business, the interests of the company and our personal interests may conflict. We are expected to always address such conflicts of interest with integrity and reason.

To make the right decision for Hettich, the following questions can help:

- Is my decision in line with legal and internal requirements?
- Do I make a clear distinction between corporate and personal interests when making my decision?
- Can I reconcile my decision well with my own conscience?
- Am I preserving Hettich's good reputation with my decision?
- Can I live with the possible consequences?

If all questions can be answered with "yes", the decision is most likely justifiable. If doubts or uncertainties remain with regard to any of these questions, we speak to the contact persons mentioned in chapter 1.1 so that they can provide support.





"Act today - think about tomorrow is an integral part of our Hettich culture. I am proud of that."

Hettich Forum



2 PEOPLE AND THE ENVIRONMENT



2.1 HUMAN RIGHTS

We respect and protect the human rights, personal rights and dignity of all persons with whom we come into contact at Hettich. We ensure strict compliance with the laws against forced labour, child labour, all forms of modern slavery and human trafficking as well as any form of exploitation. We do not maintain business relationships with companies that do not comply with these principles.

2.2 FAIR PAY AND CONDITIONS OF EMPLOYMENT

We comply with the provisions of labour law or collective agreements, e.g. on working hours, holidays, remuneration, continued payment of remuneration, professional development, dismissal, etc. We respect the laws on the protection of special groups of people, e.g. young people, expectant mothers or people with disabilities. We ensure that these regulations are also complied with by subcontractors whose employees work at our sites.

2.3 OCCUPATIONAL HEALTH AND SAFETY

We ensure a safe working environment and comply with the laws and regulations on occupational health and safety. Our own health as well as that of our colleagues, guests or employees of external companies is our top priority. We reduce the risk of accidents at the workplace or on the road through attentiveness as well as anticipatory and safety-conscious behaviour. We consistently address unsafe behaviour, regardless of who is involved, in accordance with our principle of "safety without compromise". If certain dress codes are essential for hygiene, occupational

health and safety or organisational reasons, these are set out in separate agreements. The consumption of alcohol, illegal drugs and other substances that may impair attention and concentration during working hours is prohibited.

2.4 RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the fundamental right to freedom of association and collective bargaining. All Hettich employees have the freedom to form or join associations to represent their social or economic interests within the framework of the applicable laws. No one may be subjected to any form of disadvantage or discrimination as a result of membership or activity in such an association.

2.5 ENVIRONMENT AND CLIMATE PROTECTION

Environmental protection and the preservation of natural resources are part of our sustainability-oriented corporate culture. We comply with all applicable environmental laws as well as our own specifications, such as our sustainability principles or our standard for product ingredients. We procure and use natural resources such as energy and water responsibly and sparingly. We are committed to continuously improving resource and energy efficiency in the production and provision of our products and services. For all of us, the goal is to avoid impacts that are harmful to the climate and the environment as much as possible.

2.6 OPERATIONAL FACILITIES

We keep our operational facilities such as buildings, energy supply, IT infrastructure, fixed and movable inventory and fire protection equipment in a safe and functional condition. We immediately report violations of legal requirements as well as all unsafe conditions, such as visible damage to buildings and inventory, blocked escape routes, defective or missing fire protection equipment, improper storage of materials, etc. to the responsible departments in the company or our manager. We keep our work and common areas clean and always show consideration for others when using them. This helps us to create a working environment in which everyone feels comfortable and safe.

TO READ UP:

2.1. UNIVERSAL DECLARATION OF HUMAN RIGHTS

2.3/2.5. HETTICH SUSTAINABILITY PRINCIPLES



3 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES



*"Integrity and
law-abiding behaviour
are the basis of our
success."*

3 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES



3.1 RELATIONSHIPS WITH BUSINESS PARTNERS

Our business partners can rely on us. This requires that we are familiar with and comply with the contractual obligations of our business partners. In return, we expect our business partners to comply with the law – just as we do. We only do business with reputable customers, suppliers and third parties who are engaged in legitimate business activities. We do not support business processes that enable or facilitate customers, suppliers and third parties to engage in illegal business practices such as tax evasion, illegal employment or sanctions evasion. This is checked by us with every new permanent business relationship and also during the cooperation.



3.2 CROSS-BORDER TRADE

As an internationally active company, we comply with all trade regulations, foreign trade restrictions and applicable economic sanctions. We clearly distance ourselves from any financing of terrorism. In capital and payment transactions, we always observe the given legal regulations.

3.3 DEALING WITH AUTHORITIES AND POLITICAL INSTITUTIONS

We attach great importance to a cooperative and open relationship with the competent authorities and political institutions. We present information completely, on time and transparently in an understandable form. In the event of unscheduled official enquiries of any kind, we inform the management and involve our legal department.

3.4 DONATIONS

As an expression of our social responsibility, Hettich makes donations in cash and in kind for education and science, art, culture and social causes. We make sure that donations are earmarked and transparent. They should be tax-deductible and may only be given to charitable and reputable organisations. Donations are only made after approval by the management.

3.5 CORRUPTION, BRIBERY AND MONEY LAUNDERING

Good business is important to us – but not at any price. We do not tolerate any form of bribery or venality on the part of or towards business partners or public officials. We support the prevention of money laundering activities by carefully screening our business partners and only maintain unobjectionable and secure business relationships. Benefits may only be accepted or granted if they serve a legitimate business purpose. They must be proportionate and not aimed at gaining an unlawful advantage. In case of uncertainty, please contact our Hettich Compliance specialists.

3.6 FAIR COMPETITION

We are committed to fair competition and comply with applicable antitrust and competition laws. We do not engage in price fixing, customer or sales territory sharing or other unethical business practices. We do not enter into written or oral agreements that restrict competition and are outside the scope of the law.

As employees of the Hettich Group, we are associated with our company. To avoid conflicts of interest, we do not work for a competitor company.

3.7 PRODUCT SAFETY

We bear responsibility for the development and manufacture of our products. We ensure that our products meet at least the legal safety regulations and product requirements that apply to the intended use and place of marketing. The safety of the people who use our products or come into contact with them is our top priority. Therefore, we make sure that our products have neither harmful nor other dangerous features.

TO READ UP:

3.1 CODE OF CONDUCT FOR BUSINESS PARTNERS

3.7 HETTICH QUALITY MISSION STATEMENT





"We handle data and information responsibly - they are our capital. "



4 DEALING WITH INFORMATION



4.1 PROTECTION OF INTELLECTUAL PROPERTY

All products of intellectual work are referred to as protected intellectual property. Intellectual property is protected by law – such as copyright, trademark or patent law – or as a trade secret. We uphold this protection by not publishing or distributing intellectual property without permission.

4.2 PRIVACY DATA PROTECTION AND CONFIDENTIALITY

Especially when working with customers, business partners and market participants, the protection of confidential information, know-how and business secrets is very important. Therefore, we treat data and information with the greatest possible care. We make sure that data and information that become known to us in the course of our business dealings are only used within the permitted scope. When passing on data within and outside the company, we always check whether the addressee is authorised to receive it. We always ensure that information is passed on securely and ensure compliance with our rules on information security. We collect, process and use personal data only in compliance with the respective data protection laws. In the case of data originating from generally accessible sources, we always balance the interests of Hettich with the interests of the persons concerned that are worthy of protection.



4.3 FINANCIAL INTEGRITY

Financial integrity is the basis for shareholders, banks and financial authorities to trust us. We ensure that financial risks and operational measures are appropriately reviewed and approved in accordance with our financial policy. We record and document all business transactions, assets and liabilities in accordance with our internal financial reporting rules and in compliance with legal, regulatory and tax requirements. We keep documents relevant to financial accounting, e.g. travel expense reports, factually correct and without false or misleading entries.

4.4 PRODUCT INFORMATION

Incorrect, incomplete or misleading product information can lead to people being harmed by our products. To avoid this, we take the greatest possible care to ensure that our product information is correct and complies with product safety requirements.

4.5 IT SYSTEMS AND INFORMATION SECURITY

In an increasingly digital world that can no longer do without automated data processing, security precautions are necessary. To this end, we use passwords and proven technologies to ensure the protection of intellectual property and personal data. Because digital information spreads quickly, can be easily duplicated and is virtually indestructible, we pay close attention to the content of messages, attachments, downloaded files and stored voice messages. If you have any questions or uncertainties, please contact the Hettich Compliance Information Security Specialist (see section 1.1).

4.6 COMMUNICATION ON SOCIAL MEDIA

Discrimination, insults, bullying or similar behaviour also have no place at Hettich online. When communicating about Hettich, our customers and colleagues, we observe the principles of this Code of Conduct and exercise our right to freedom of expression responsibly. All statements must clearly indicate whether the statement is a private opinion or an official statement for or on behalf of Hettich, which may only be made by persons authorised to do so.

LET US PROTECT WHAT WE LOVE!

VALUES
FOR WHICH
WE STAND.

