



Hettich Code of Conduct

Technik für Möbel


Hettich

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As an internationally operating family business, we have been producing furniture fittings very successfully for more than 125 years under our mission „Technik für Möbel“. Every day our products reach many people all over the world – which is not only a privilege, but also a great responsibility. We are proud to lead a company that has a long history of high ethical business practices. It also means that we all shall be able to do the right things.

Our mission statement and our values – quality, innovation, reliability and closeness to customers – are our compass; our code of conduct is the road map and the framework for achieving our goals.

An essential function of this code of conduct is to provide us with guidance in our daily work in order to sensitise us to critical and questionable situations. As a binding guideline for legally compliant and responsible action in our company, this code defines a standard for collaboration at Hettich and with our business partners (customers, suppliers, consultants, etc.). We all adhere to the principles and values set out in this Code with the same goal: Let us protect what we love.



J. Schönfeld
Jana Schönfeld

S. Groß
Sascha Groß

2 OUR FOUNDATION

2.1 Applicable legislation

We comply with applicable legislation: locally, nationally and internationally. Each of us is responsible for knowing of and complying with applicable laws, regulations and corporate rules. If there are stricter regulations in individual countries or markets than those described in our Code of Conduct at Hettich, the stricter requirements apply.



As part of the Compliance Network at Hettich, there is a contact person in each Hettich company for each of the following compliance aspects:

Foreign trade law, customs, business licenses	Antitrust law	Anti corruption, money laundering	Quality, products (safety)	Environment, health, safety	Tax, finance	Labour conditions	Information security, privacy data protection	Patents, copyright, trademarks
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Compliance @ Hettich

2.2 Openness and contact partners

We live an open learning culture in which we share our insights. This way, we can all contribute to our common development. We also address critical and confidential issues within an appropriate manner. If there is an indication or suspicion of an infringement of applicable laws, binding rules or our Code of Conduct, we report this to our specialist colleagues designated for this purpose in accordance with our compliance processes.



2.3 Trust and appreciation

We treat every colleague, applicants and business partner with trust, appreciation and respect; regardless of race, colour, nationality, social origin, disability, age, gender, sexual orientation, marital status, pregnancy, religion, political affiliation or union membership. We promote an environment of tolerance and honesty, where everyone has equal chances, and where the values and dignity of each individual are recognized. We create a working environment that is free from prejudice, harassment, bullying or intimidation of colleagues or third parties.

2.4 Corporate property

We always deal responsibly with all kinds of corporate property, such as our products, work equipment and intellectual property. Any illegal or other unlawful misappropriation is prohibited.

2.5 Conflict of interest and decision making

In day-to-day business it may happen that the interests of the company and personal interests conflict with each other. If there is a conflict of interests, no objective decision can be taken in the interests of the company. If uncertainties arise during decision-making, we always call the responsible contact person or the experts for advice so that they can provide support. The following questions can help you to make the right decision in the sense of Hettich:

- Does my decision contradict the legislation or our values and rules at Hettich?
- Is there a conflict in my decision between my personal interests and those of Hettich?
- Can I reconcile my decision well with my own conscience?
- Would outsiders be able to understand my decision?
- Will my decision damage the good reputation of the company?
- Can I live with the potential consequences?

3 HUMAN AND ENVIRONMENT

3.1 Human rights

The dignity and personal rights of our colleagues, business partners and third parties are respected and protected by us. We ensure strict compliance with the legislation and we categorically reject any form of forced, compulsory or child labour, exploitation or discrimination. We do not do have business with companies that do not comply with these principles.

3.2 Occupational health and safety

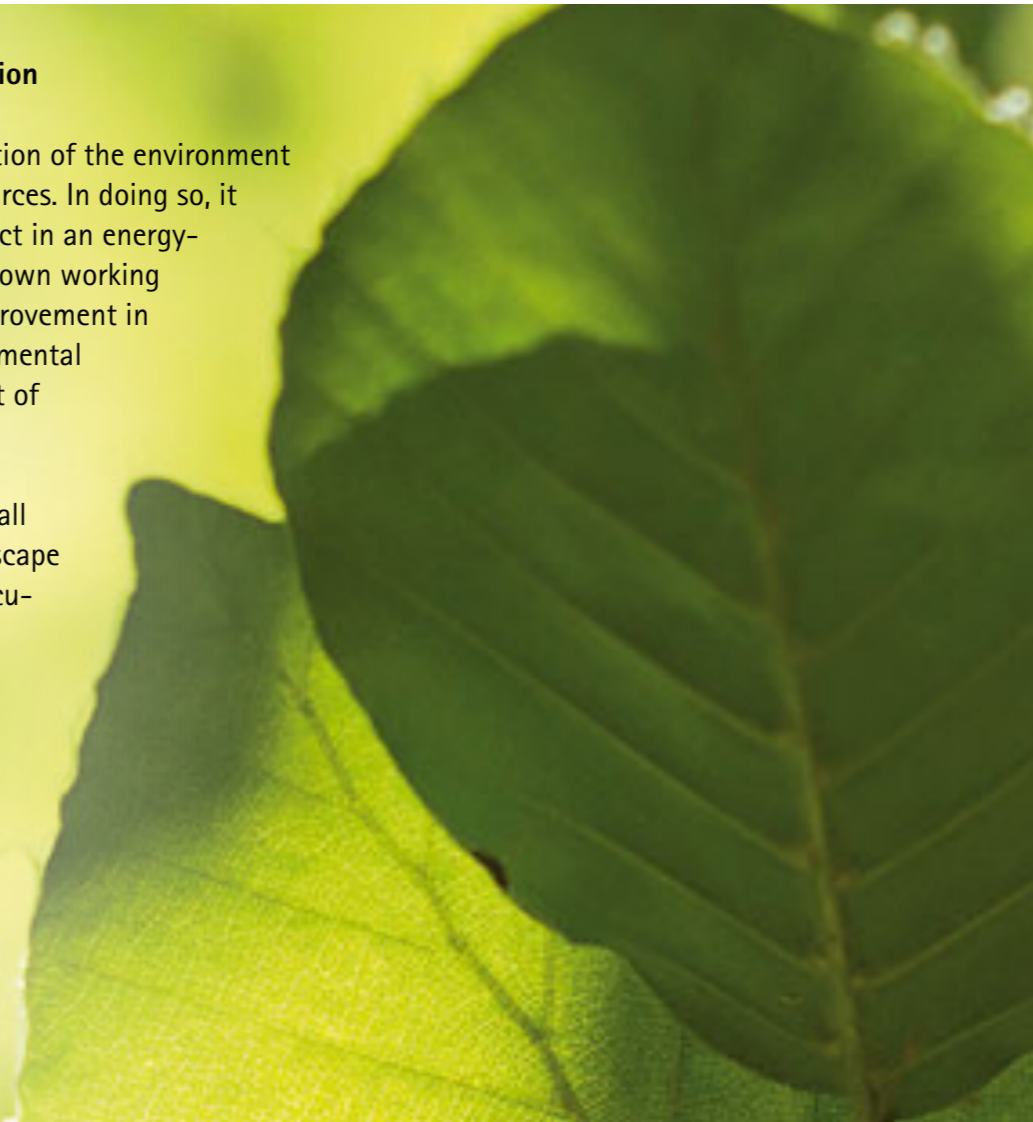
We ensure a safe working environment. Our own health and that of our colleagues is our top priority. Concentrated, foresighted work and safety-conscious behaviour reduce the risk of accidents at work. This applies equally to production, logistics, administration and road traffic. We do not endanger ourselves by consuming alcohol, illegal drugs or other substances that can influence attention and concentration during working hours.



3.3 Environmental and fire protection

We take responsibility for the protection of the environment and the preservation of natural resources. In doing so, it is essential that everyone strives to act in an energy- and resource-saving manner in their own working environment. We see continuous improvement in the sustainable avoidance of environmental pollution as an obligatory component of our corporate culture.

Violations of legal requirements and all unsafe conditions, such as blocked escape routes, missing fire extinguishers, accumulations of combustible material, visible building damages, etc., must be reported immediately to the responsible functions in the company.



3.4 Fair working conditions and freedom of association

We are committed to fair working conditions. We pay salaries at least in accordance with the applicable regulations. We also ensure compliance with the working hours and occupational health and safety acts. We respect the fundamental right of all Hettich colleagues to form or join associations to represent their social or economic interests within the framework of the applicable law and order.

4 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES

4.1 Relationships with business partners

The way we adhere to the law in our dealings with our business partners, we expect the same of them. We are a reliable partner, which requires that we are familiar with the contractual obligations of our business partners beyond law and order and comply with them.

4.2 International trade

Applicable rights and laws govern our business with our partners. We comply with import and export controls, applicable economic embargoes and trade regulations. We clearly distance ourselves from any terrorism financing. Regarding capital and payment transactions, we always follow the given legal regulations.

4.3 Authorities and political institutions

Hettich maintains a cooperative and open relationship with the relevant authorities and political institutions. It is our ambition to be always compliant with all applicable legal requirements. In case of unplanned enquiries of any kind, we advise to involve the management as well as our legal specialists.

4.4 Donations

As a responsible member of society, Hettich contributes financial and in-kind donations for education and science, art, culture and social matters. Donations must be purpose-built and transparent. They shall be tax-deductible and may only be donated to charitable and reputable organisations. Donations are only to be made after approval by the management.



4.5 Corruption, bribery and money laundering

We strictly reject any form of bribery from or towards business partners or public officials. In addition, we maintain only safe and secure business relationships and distance ourselves from any money laundering activity. Contributions may only be accepted or given if they serve a legitimate business purpose and are not in return for an unlawful advantage. In case of uncertainty, please contact our compliance specialists.



4.6 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 allocation, or other unfair competitive practices. We do not enter into any written or oral agreements that restrict competition and are outside the legal framework. We are affiliated with Hettich and therefore do not engage in competitive activities, nor do we acquire shares or interests in competing companies.

4.7 Product safety

We develop and produce safe and high-quality products for our customers. The safety of our customers is our top priority, which is why our products must not have any harmful or other dangerous properties. We bear responsibility for our products and therefore rely on progressive and efficient technologies. During product development, we evaluate and mitigate possible risks arising from the products and prove readiness for series production by means of appropriate tests. Tests during production ensure that products are delivered to our customers and later to their furniture buyers without defects.

5 DEALING WITH INFORMATION

5.1 Protection of intellectual property

All intellectual work is considered as protected intellectual property. Intellectual property is protected by laws: such as copyright, trademark or patent laws – or as a business secret. We maintain this protection by not publishing or distributing intellectual property without permission.



5.2 Privacy data protection and confidentiality

The protection of confidential information, know-how and trade secrets is particularly important when working with customers, business partners and market participants. We therefore treat data and information with the greatest possible care. For this reason, everyone is obliged to use data and information disclosed to them in their business exclusively within the permitted scope. If data is passed on inside and outside the company, it must be checked whether the addressee is entitled to receive it. We always ensure that the information is passed on securely and we respect and protect confidential information.

Depending on the protection class of the data, additional security measures such as non-disclosure agreements or checks must be agreed. In particular, personal data are only collected, processed or used within the scope of purpose limitation, necessity and legal legitimation. In the case of data originating from generally accessible sources, the interests of the company are always weighed against the interests of the concerned persons worthy of protection.

5.3 Financial integrity

We adhere to the principles of orderly accounting and do not manipulate any documents with false or misleading entries. This requires the highest level of accuracy and completeness and a sense of responsibility in all business processes. Entrepreneurial investments in soft currency countries shall not be financed by hard currency liabilities. Foreign exchange and commodities transactions must never be predominantly speculative in nature; particularly forward exchange transactions always solely serve to underpin specific commodities transactions.

5.4 Product information

We do not deliberately make misleading or untruthful statements about our products in marketing. False statements and misleading information about products can damage both our customers and our own reputation. To maintain market confidence, sales and marketing colleagues must pay particular attention to this.

5.5 IT-systems and information security

In an increasingly digital world with constant data processing, security precautions are necessary. To guarantee security, we rely on the use of passwords and proven technologies. This use ensures the protection of intellectual property and personal data. Because digital information can be quickly distributed, easily reproduced and are virtually indestructible, we pay great attention to the content of messages, attachments, downloaded files and stored voice messages. If you have any questions or concerns, colleagues can contact their responsible Information Security Officer.

www.hettich.com

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