



huelsenberg holding

Code of Conduct

Foreword from the Management

Dear Colleagues

We – the Huelsenberg Group – are meeting the challenges of the future together, delivering excellent quality and continuous innovations along with economically and ecologically sustainable growth.

Our Group is managed in line with high ethical standards while ensuring the observance of all applicable legal provisions. For us, Corporate Governance and Compliance are much more than just legal obligations: they are a basic prerequisite for sustainable operations and we consider them a key success factor. Legally sound and ethical conduct is therefore obligatory for all our employees. We practice open communication. A promising business deal can never justify a contravention of the law or a violation of the ethical values we hold dear. Compliance with the laws and provisions that apply to us is a matter of course for us. It is the principle that guides us in our daily operations. In light of this, we monitor the observance of the applicable laws and internal rules by means of a globally applicable compliance management.

We aim to uphold a corporate culture that is based on trust and integrity and to secure the sustainable success of our company. This Code of Conduct therefore applies to all bodies, executives and employees of the Huelsenberg Group. All these parties are urged to familiarize themselves with the contents of this Code of Conduct and to act in accordance with them. In cases of doubt, employees may seek additional information and advice from the competent parties. The competent parties have been listed at the end of this document under the heading “Contacts”.

Should parts of the Group opt to introduce or continue using a sector-specific Code of Conduct, this must at least contain the principles specified in the Group-wide Code of Conduct.

The Management has approved this Code of Conduct as the foundation for a set of values. The agreed principles of this Code of Conduct lay the bedrock for responsible, ethical and legally compliant conduct. Our decisions should always be based on and benchmarked against this Code of Conduct.

We not only demand these high standards of ourselves, but also of our business partners, particularly the suppliers and service-providers we use. We place these parties under the same obligations. Violations of this Code of Conduct may cause lasting reputational damage and have serious consequences for the entire Huelsenberg Group and its employees. They could lead to a deterioration in or termination of business relationships and public authorities may even step in. Other repercussions may include disciplinary measures against individual employees.



In this regard, both we and you are called upon to use this Code of Conduct as a behavioral touchstone in our day-to-day activities for our Group.

Pinneberg, May 2024

Huelsenberg Holding GmbH & Co. KG

Andrés Pinter

Dr. Jörg Janiszewski

Olivier M. Seiller

Darius Seiller

Compliance, responsibility and whistleblowing system

The term “Compliance” means the observance of the laws and internal rules that apply to us.

The Management collaborates with the Executive Board members and the supervisory bodies, setting out the guidelines, identifying key aspects in terms of the structures they require and thus actively modeling their application.

All employees are obliged to observe this Code of Conduct. As a part of our Group, we are each responsible for our own behavior and the impact that it has.

All employees and impacted parties may use a whistleblowing system to contact the internal complaints office anonymously and report potential violations of this Code of Conduct or applicable laws and internal rules, or to ask questions or clarify any matters of doubt. The multi-language whistleblowing system can be accessed via our websites. The system refers all matters raised to the Huelsenberg Holding Compliance Team. The identity of the whistleblower will not be disclosed to the team processing the matter, to Huelsenberg Holding GmbH & Co. KG, a company affiliated with it or any other third party unless the whistleblowers themselves reveal it.

Details given by whistleblowers will be treated in confidence and constitute legally privileged information. This applies irrespective of whether the suspicions shared prove to be accurate or not. However, the deliberate assertion of false allegations will not be tolerated. Anyone who takes or attempts to take retaliatory measures against whistleblowers can expect to face disciplinary measures. Retaliatory measures include, for example, pressuring or intimidating employees in an attempt to dissuade them from reporting a putative violation.

We advocate respectful interactions

We expect all bodies, executives and employees to treat each other with respect. We foster and cultivate fair, empathetic and courteous interactions, seeing this as the basis for a positive corporate culture. We strive to create a work environment in which everyone feels welcome.

We also apply these standards to our dealings with customers, business partners, authorities and other contacts.

We ensure safety at the workplace and safeguard the health of our employees

We promote the health and safety of our employees. Specifically, we offer a safe, health-promoting work environment that is designed to prevent accidents and injuries. Among other measures, this includes legally compliant fire protection, electrical safety monitoring, preservation of machine safety

by means of preventive maintenance and servicing as well as measures for the personal protection of employees. Implementing occupational safety and health measures is likewise a duty of all bodies, executives and employees. Any reports of unsafe or unhealthy working conditions should be followed up and the relevant problems eliminated without undue delay, working in collaboration with the senior manager concerned, the Occupational Safety Officer or the Human Resources department. Each and every employee must take the protection of their own health and that of their colleagues and third parties seriously.

We operate in accordance with human rights as well as labor and social standards

We are committed to upholding all internationally recognized human rights. We respect the dignity of our employees, customers and business partners in equal measure. Our actions are always in accordance with human rights as well as binding international labor and social standards. In particular, we do not tolerate child labor, penal labor or forced labor, people-trafficking, slavery or any other forms of exploitation and discrimination.

We champion diversity and inclusion. We do not tolerate any kind of discrimination, be it based on gender, age, skin color, appearance, ethnic origin, nationality, religion, ideology, sexual orientation, sexual identity, physical or intellectual disability or labor union involvement. We expect our bodies, executives and employees to stand up for the dignity of every individual and to promote a culture of belonging/inclusion.

We do not tolerate harassment or the abuse of others. We reject the physically, psychologically and emotionally inappropriate treatment of others. This does not include objective criticism, particularly of violations of this Code of Conduct, nor does it include instructions issued in the context of employment relationships which conform to legal requirements.

We always uphold the applicable rights and provisions regarding the freedom of assembly, the freedom of association, collective bargaining and the statutory and collectively agreed regulations for the assurance of fair working conditions. Cooperative interaction with employee representatives is a key aspect of our operations.

We are committed to sustainable management

Sustainable management is an integral part of our operations. We believe that, through our industrial and agricultural activities, we positively contribute to climate protection, education, the industry, innovation and infrastructure, life on the land, water consumption, water quality and a circular economy. We step up to the continual task of sustainable management, applying the approach throughout the entire value-added chain to ensure that our purchasing, processes and products are designed for sustainability. In this way, we collaborate with all our stakeholders, working to secure a

better future that will not only meet the needs of the current generation, but of generations to come as well.

Environmental protection is a key concern

Ecological approaches and practices are an integral part of our corporate culture and our daily operations. We take a proactive and preventive approach to environmental protection. Integral environmental protection is our objective. We pursue this goal in all our operations and in all the services and products of the Huelsenberg Group.

We undertake to comply with the applicable laws and directives as well as any other binding obligations in order to continually improve the environmental performance of our Group and avoid negative environmental impacts. In order to continuously reduce any negative environmental impact of our business operations, we use the resources we require as efficiently as possible and we are working towards the development and distribution of environmentally friendly technologies as well as the appropriate disposal of waste, which we see as a valuable resource. We expect all employees and business partners to continually observe and monitor all applicable statutory and other provisions and requirements as well as any substance prohibitions or restrictions.

The successive expansion of environmental management systems is an essential element of this. It is also a key instrument for the control and continual improvement of our environmental performance.

We focus on product conformity and safety

Our business is built on the quality of our products and services. In each phase of the design, development, production and sale of our products and during the performance of our services, we ensure compliance with statutory and internal corporate requirements and we attach great importance to only using primary products and materials that also meet these requirements.

We meet the applicable regulatory requirements in terms of product development and ongoing product maintenance, manufacturing, certification and approval. We achieve this by means of continual training and advanced training courses.

We are committed to responsible procurement

The Huelsenberg Group procures its raw materials responsibly and in compliance with the applicable statutory provisions and it expects its suppliers and service providers to act accordingly. We expect our suppliers to confirm their compliance with the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG). We place our suppliers under obligation to notify us without undue delay if they are unable to submit such a declaration.

We abide by the rules of fair competition

Due to our global operations, we are always competing with other companies. Fair, lawful and honest competition is essential to the sustainable success of our Group and the interests of our customers.

It is one of our fundamental principles that all of our bodies, executives and employees act in accordance with all valid and applicable competition and antitrust provisions. All suspected violations of applicable competition or antitrust law is investigated and any violations detected are followed up and remedied.

Bearing the above in mind, we do not collude with competitors in respect of prices, price rises, discounts, conditions, capacities, profits, profit margins, costs, sales and marketing methods or other factors of relevance to competition. This standard is universally applicable throughout the Group. We refrain from the impermissible exchange of competitively sensitive information and from coordinated interaction with our competitors; we make no non-competition agreements, make no arrangements with competitors on the submission of bids in tender procedures, the division of customers, markets, regions or product portfolios or on the restriction of business relationships with suppliers. We do not use our participation in association conventions, professional circles, committees, trade shows or other industry gatherings to share confidential and market-relevant company information with the employees of competitors or business partners.

Should we happen to hold a dominant position on a market, we do not abuse this position at the expense of our customers and other business partners.

Since violations of competition and antitrust provisions may not only cause severe reputational damage, but also have major financial implications or lead to criminal prosecution and high fines, we are raising awareness both within the Group and among our business partners and customers. In cases of doubt, the Legal department of the Huelsenberg Group should be contacted or the whistleblowing system used.

We oppose corruption and bribery

Due to our global operations, we are obliged to comply with national and international anti-corruption laws and rules. We oppose all forms of bribery, corruption, the acceptance or granting of undue advantages and fraud and we do not tolerate any violations of the applicable laws. We avoid all forms of undue influence on business partners, be it direct or indirect. All bodies, executives and employees are prohibited from demanding, accepting, offering or granting undue advantages in the course of their business activities, either directly or indirectly, in the form of cash payments, gifts or other gratuities or services. We are aware that the granting or acceptance of such advantages would expose the entire Group to a legal risk, jeopardize our business relationships and damage our reputation.

The conduct of all bodies, executives and employees may at no time convey the impression that any kind of gratuity could be construed or viewed as a consideration for a specific desired conduct when acting for our Group. We only take factual criteria into account. Private interests, relationships, material or immaterial personal advantages or other conflicts of interest never govern our conduct or business practices. In our view, a conflict of interest exists as soon as a person's decision-making objectivity could be influenced by his/her own interests or those of a third party.

We only give and accept material gifts of low value. We ensure that we do not receive or issue invitations in advance of a tender procedure and that the position of the recipient is appropriate. We do not accept any cash or cash-equivalent gifts such as vouchers from business partners. We do not offer business partners any intangible advantages such as gratuitous professional or private benefits. We are aware of and observe the more stringent legal requirements concerning interactions with public officials or persons in an equivalent position. In advance of a business transaction, we check whether the person we are dealing with is a public official or an equivalent person.

We are aware that donations, sponsorships and memberships may also be deemed to constitute corruption. Donations, sponsorships and memberships must always be in compliance with the applicable law and the principles of the Huelsenberg Group. Donations, sponsorships or memberships may not be granted in connection with ongoing contract negotiations or business transactions of any kind.

Should you wish to know whether a specific gratuity or the acceptance of a gratuity is in line with this Code of Conduct, please ask your superior or the Legal department of the Huelsenberg Group.

We observe the anti-money laundering laws

We only ever enter into business relationships with partners whose business operations are in line with the statutory provisions. We vet our contractual partners to determine their true economic beneficiaries and keep our information up to date.

No body, executive or employee may commit acts which contravene the national or international rules on money laundering or the financing of terrorism, whether they are acting alone or in collusion with other parties. The Management must be consulted at an early stage in cases of doubt as to the permissibility of any transactions which involve a cash transfer.

In cases of doubt or suspicion, we inform the responsible executive, the Executive Board member or the Legal department of the Huelsenberg Group. The anonymous whistleblowing system is also available to us.

We comply with foreign trade regulations

Embargos which restrict foreign trade with specific countries or individuals may be introduced for foreign and security policy reasons. As a Group with global operations, we always comply with the currently valid and applicable export and re-export control laws as well as nationally and internationally applicable sanctions (embargos) that apply to countries and individuals.

All bodies, executives and employees are obligated to adhere strictly to the laws on import and export control. We take measures to ensure that we do not breach applicable foreign trade legislation, embargos and sanctions. To this end, we involve responsible staff members from the specialist department in the checking process and keep information on our contractual partners, their end users and their true economic beneficiaries up to date.

We are committed to the protection of corporate assets

Within its field of activity, every corporate body, executive and employee is obliged to protect company property as well as the intangible and tangible assets of the Huelsenberg Group and to handle them responsibly and sustainably. They each bear responsibility for this. Tangible assets comprise all items such as infrastructure, building, sites, fittings and equipment of all kinds, products and materials, vehicles, IT equipment and all forms of papers and documents. Intangible assets include intellectual property, know-how, industrial property rights, technologies, trade secrets and other information which is valuable and important to the Huelsenberg Group and hence requires protection. As a matter of principle, company property may only be used for company purposes. Exceptions, such as the permissible private use of company cars which are also provided for private use, must comply with statutory and, in particular, fiscal provisions. Misuse, particularly for inappropriate, illegal or other unauthorized purposes, will not be tolerated.

We observe data privacy and confidentiality and keep trade secrets

It is becoming increasingly important to protect data as well as the information and communication structure from misuse, manipulation, disruptions and the mining of confidential information. We protect our interests, particularly our working capacity, our trustworthiness and reliability towards employees, business partners and customers as well as our public standing – also and especially with regard to IT-based work and communications equipment.

We only collect, process and use data insofar as this is necessary for clearly specified purposes. We ensure that we remain within the applicable statutory framework. We set high standards in terms of the safekeeping and storage of data in order to maintain confidentiality. Data is only transferred for a legitimate reason, while ensuring that adequate security measures have been taken. In cases of doubt, we contact the Data Privacy Officer or the Legal department of the Huelsenberg Group.

The success of the Huelsenberg Group also depends upon the confidential treatment of information and data on strategic, technical, organizational and commercial knowledge about the Group. All bodies, executives and employees are obliged to observe confidentiality in respect of internal matters of the Huelsenberg Group, the dissemination of which could have a damaging impact. Data and information of which we acquire knowledge in the context of operational activities may solely be used within the permitted scope, in accordance with the IT Security Directive. During and beyond the term and period of validity of the employment contract, we refrain from disclosing confidential information, either directly or indirectly, orally or in writing, particularly to the employees of competitors. We are aware that violations may result in extensive claims and possibly criminal proceedings.

We apply the same standards to existing and prospective business partners and conclude corresponding confidentiality agreements and order data processing agreements with them in accordance with our Group standards.

Closing remarks

This Code of Conduct documents corporate guidelines which have been specified in greater detail in the following directives and policies:

- House Rules
- Fire Protection Code
- Human Rights Strategy
- IT Security Directive and Policy
- General Works Agreement – IT
- Further directives (QHSE/CERT etc.)

Contacts

Compliance Officer	compliance@huelsenbergholding.de
Sustainability Officer	nachhaltigkeit@huelsenbergholding.de
Data Privacy Officer	dsk@huelsenbergholding.de
Group Information Security Officer	security@huelsenbergholding.de
Human Rights Officer	menschenrechte@huelsenbergholding.de
QHSE Agribusiness	qhse@union-agricole.de
QHSE DURAG	qhse@duraq.com
Legal Department	legal@huelsenbergholding.de
Whistleblowing System	Huelsenberg Holding Whistleblowing System