



OUR SHARED PRINCIPLES

Code of Conduct



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Definition Huf employees

Employees are defined here as all Huf employees, including managers, part-time staff, temporary employees, trainees, and interns.

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Foreword

Dear employees,
Dear business partners,

As an independent family business, we are value-oriented. Reliability and sustainability shape our actions. Respect, responsibility, and integrity are part of our DNA. They also determine our corporate values. We are aware that we can only continue our successful course as a leading specialist in secure vehicle access and authorization in line with our values and internal guidelines, ethical standards as well as global and national laws.

As part of the continuous improvement of our structures and processes, we also realigned our Compliance Management System and adapted it to meet the needs of our global organization. Our new Code of Conduct is intended as a guide, both for our employees, for whom it is binding, and for our business partners, who we also expect to comply with its provisions. It helps us determine right from wrong and make ethical decisions that comply with the rules. It is enshrined in our corporate culture and helps us overcome legal challenges in increasingly complex day-to-day business, even in difficult situations.

Our most important rule: At Huf, we do not tolerate any illegal or unethical behavior. This applies without exception to all our employees and business partners around the world. As managers at Huf, we are committed to conveying the Huf Code of Conduct to our employees and supporting them to put it into practice, without ifs or buts. Our Group Compliance Officer and the Compliance Managers at our sites are the first point of contact for questions and reports. They give advice in cases of doubt, record confidential reports and clarify suspicious cases.

By complying with the rules, we work together to protect the good reputation of Huf, maintain the trust of our employees, customers, and all other stakeholders, thus contributing to the company's long-term success. Familiarize yourself with the Huf Code of Conduct and let it guide all of us in our daily work.

Velbert, October 2022



Tom Graf, CEO



Tom Graf, CEO Huf Group

A woman with dark curly hair, wearing a blue polo shirt, is sitting at a desk in a warehouse. She is looking at a laptop screen with a thoughtful expression, her hand resting on her chin. The background shows wooden pallets and industrial equipment.

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Integrity and Values

Integrity is the prerequisite for our business relationships and for trusting cooperation with our employees and business partners. Our business activities as a company and the conduct of each and every individual at Huf must be guided by ethical principles, the law, universal standards as well as internal company rules and our corporate values.

Integrity covers the ethical aspects of our actions and means that our actions must comply with ethical standards. It goes beyond simply complying with rules and regulations and appeals to our “inner compass” to decide what is right and what is morally unacceptable.

As an independent family business, Huf is value-oriented. Our corporate culture is based on respect and responsibility. Integrity determines our business activities and how we work together. Our common values are the bedrock of the success of Huf.

This Code of Conduct supports employees and business partners of Huf to comply with all relevant laws and regulations that govern our business operations so that we can achieve integrity together.

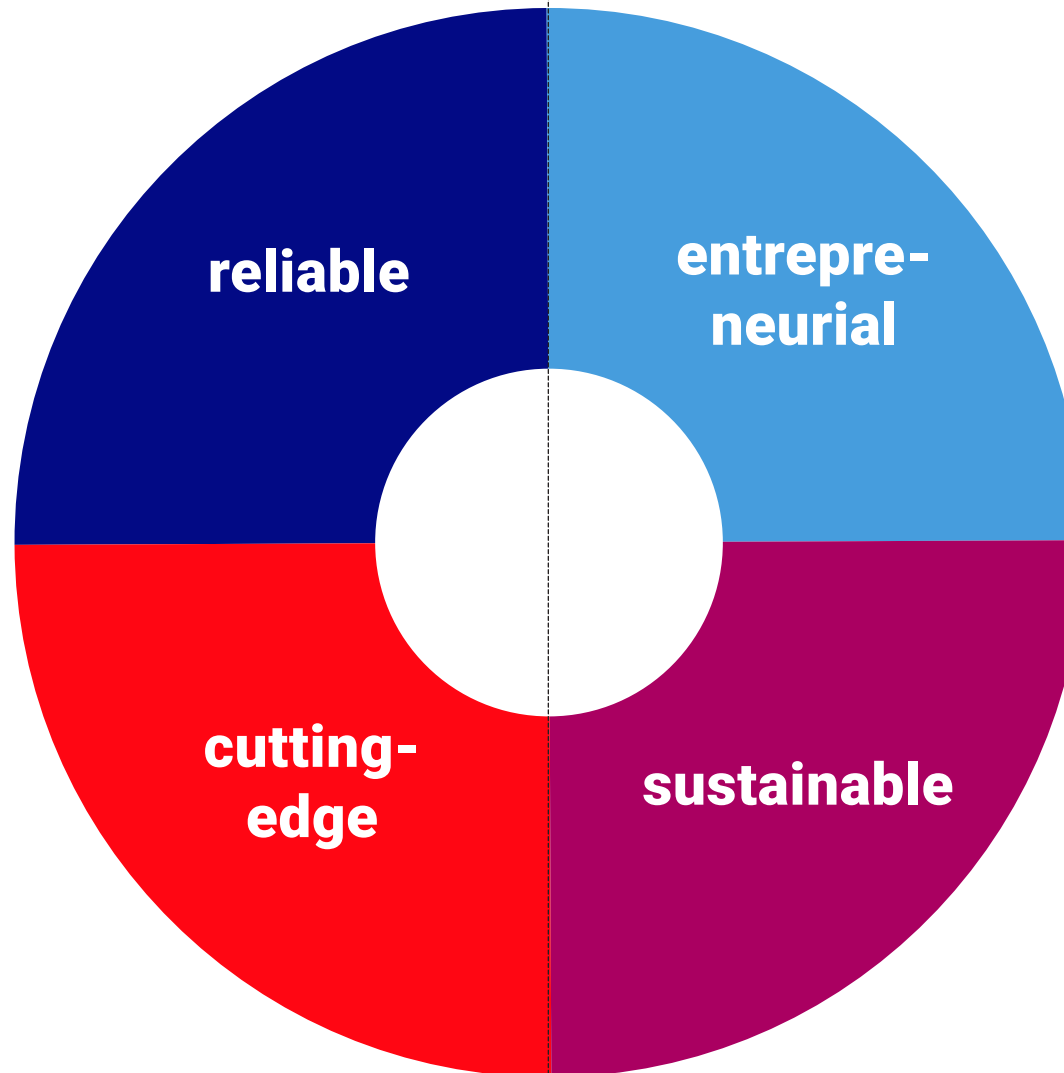
Our Values

reliable

We are where our customers are. Worldwide. As a reliable partner, we provide our expertise with passion and dedication. We strive for the highest product and process quality and the ideal cost-benefit ratio. And we keep our promises. Since 1908.

cutting-edge

We are first movers; we lead the way and set the standard. We are cosmopolitan, curious, courageous, and we love progress. This permanently leads us to new innovative solutions. For us, our innovative strength is origin and future at the same time.



entrepreneurial

We are entrepreneurs. We anticipate our customers' needs and think and act quickly. Committed to change, we continuously improve our performance. We leverage our knowledge lead profitably, and take responsibility for our customers, for our society, and for ourselves.

sustainable

We are a family-owned company and sustainability is our maxim. With our innovative strength, we help to shape the sustainable mobility of the future. Our culture is based on trust, respect, and responsibility for all our stakeholders. We safeguard the future of our company by creating added value and profitability.



2



**Our Code
of Conduct**

Our Code of Conduct

Ethical standards in the business world are becoming higher and higher. Acting with integrity and setting an example play an important role. To reflect this, we have documented our aspiration of a value-oriented business in this Code of Conduct.

Who does this Code of Conduct apply to?

Huf is a global company. People from many countries and with different backgrounds work for us. This Code of Conduct represents a commitment to our values of reliability and sustainability. It provides a general framework for day-to-day business and applies to us all, regardless of the country or our role with the company. To prevent breaches of the Code of Conduct, each and every one of us is responsible for familiarizing ourselves with the Code, basing our actions on its contents and taking it into account when making decisions. All managers at Huf act as role models and are responsible for implementing the Code of Conduct at the company and for monitoring compliance.

This Code of Conduct also applies to our customers, suppliers, and service providers. It is the foundation for reliable, fair partnerships in accordance with the law.

Your supervisor and/or the responsible Compliance Manager is your first point of contact if there is anything in this Code of Conduct that you do not understand, are unsure about or need advice on. You can find more information about points of contact in the “Help and contact” section.

What are the principles I need to adhere to?

This binding Code of Conduct translates our aspiration of a value-oriented business into practical principles of conduct, which are summarized in three sections:

- ▶ **Business integrity**
- ▶ **Integrity at work**
- ▶ **Sustainability and social responsibility**

Our Code of Conduct establishes Group-wide minimum standards, which are described in more detail in internal company guidelines and directives. It provides guidance and certainty for our actions, but cannot and should not issue detailed instructions for all situations. In addition, we always stay up to date with the relevant legal regulations and Huf guidelines.

Additional regulations can be established to account for local conditions, but these may not contradict this Code of Conduct. If the practices, legal regulations, or other rules at the local level differ from the terms of the Code, the stricter of the terms apply.

This Code of Conduct may not be circumvented by contractual agreements or comparable measures.

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**Our Principles
of Conduct**

3.1 Antitrust law

We uphold free and fair competition!

Free and fair competition is a cornerstone of our economic system and benefits all market players. Given this, we expect our employees and business partners to uphold all relevant anti-trust and unfair competition laws in their areas of responsibility.

Agreements with competitors that influence prices or conditions, divide up sales areas or customers or otherwise restrict free competition are forbidden. Agreements between customers and suppliers intended to restrict customers' freedom to determine their prices and other conditions are also prohibited.

Further information

 [GD-090 Antitrust Policy](#)

Q & A

A former colleague who now works for a competitor asks you to pass on information about the pricing structure of Huf. Is this allowed?

No! Sharing this information constitutes a breach of anti-trust law. Information that is not publicly available may not be disclosed to competitors.

3.2 Anti-corruption

We have a zero-tolerance policy towards corruption!

Bribery and granting of undue benefits have no place at Huf. We win over all stakeholders with our products and our performance as a company. We do not grant benefits to public officials, customers, or suppliers, nor do we achieve our business targets through unfair means. Likewise, we do not accept unfair benefits. It is important that we avoid even the suspicion that we have attempted to influence public officials or other business partners or that they have attempted to influence us.

Gifts and invitations are commonplace all over the world when doing business. However, these can lead to undue influence if they exceed a certain value. The Huf Anti-Corruption Policy describes the extent to which individual gifts and invitations can be considered lawful or unlawful.

Further information

 [GD-088 Anti-Corruption Policy](#)

Do

We encourage our employees and business partners to get in touch with the contacts listed in this Code of Conduct if they have any questions or suspect corruption.

Don't

The following gratuities are not permitted:

- ▶ **Cash, cash equivalents (e.g., checks) or vouchers.**
- ▶ **Gifts or invitations to family members or relatives.**
- ▶ **Benefits granted to or accepted by a business partner with whom Huf is in the process of entering into a contract or to whom Huf has made an offer.**

3.3 Conflicts of interest

We disclose conflicts of interest!

Huf employees and business partners should always act and make decisions in the best interests of Huf. We put our private interests aside and select our suppliers and service providers exclusively on the basis of objective criteria. We do not tolerate actions that result in conflicts of interest such as deriving personal advantages from a position or activity. Depending on the severity, this can have serious disciplinary and other legal consequences. This applies in particular in the case of conflicts of interest in connection with customers, suppliers, service providers or authorities. Suspicions or cases where a conflict of interest or the appearance of such cannot be avoided must be disclosed in full without delay. Together with the supervisor or the responsible Compliance Manager, we take suitable measures to clear up suspicions or resolve apparent or actual conflicts of interest.

Further information

 **GD-089 Conflict of Interest Policy**

Q & A

You are negotiating with a service provider and know that a party related to you has a key position in this company's sales department. What do you do?

Careful! You have a conflict of interest and could (unintentionally) give preference to the service provider. Speak to your supervisor or Compliance Manager to resolve the conflict in line with the Huf Code of Conduct.

We keep accurate records!

We value transparency in our business documents. All records and reports, such as annual financial statements, business reports, audit reports, and all other business documents must be correct, complete, and true.

3.4 Accounting, transparency

Q & A

A colleague whose annual budget has already been used up asks whether they can post some costs for a service provider in your department because you still have a sufficient budget. Is this allowed?

No! Deliberately misallocating costs is manipulation of financial records. Costs must always be appropriately allocated!

3.5
Money
laundering
and terrorist
financing

We only do business with reputable partners!

We comply with all anti-money laundering and anti-terrorist financing laws. We enter into business relationships only with reputable partners who uphold the law and operate legal business practices. We encourage our business partners and employees to report any unusual financial transactions that could raise suspicions of money laundering, especially any unusual payment transactions or use of cash.

Do

- ▶ Use funds only within our accounts and record-keeping systems.
- ▶ Be alert and report any unusual or suspicious transactions or changes in bank details that deviate from the standard process (e.g., refunds to business partners to be paid into an account differing from the one into which the original payment was made).

We respect trade control regulations!

It is a matter of course for us to comply with applicable trade rules and restrictions, as well as foreign trade laws. In particular, this covers compliance with sanctions, embargoes, bans and authorization or reporting requirements regarding the trade of goods and the purchasing of services. We are aware that restrictions can apply both to physical goods and to software, technology, and information.

3.6
Export controls and
trade restrictions

Q & A

Huf doesn't manufacture military equipment and so I don't need to worry about sanctions or embargoes. Is that true?

No! Sanctions and embargoes are not just about what products are supplied, they are also imposed because of where (e.g., to countries subject to embargoes) and to whom (e.g., individuals/companies on sanctions lists) products are supplied.

3.7
Equality of
opportunity, anti-
discrimination

Diversity, fairness, and respect are a matter of course for us!

Do

- ▶ **Treat everyone fairly and respectfully.**
- ▶ **Intervene if you witness bullying or discrimination or become aware of this through other channels.**

Huf promotes diversity. We value treating each other fairly and respectfully and respect the dignity of every individual.

All forms of discrimination on the basis of ethnic origin, national or social background, skin color, gender, age, religion, ideology, political activity, membership in a trade union, sexual orientation or other personal characteristics are forbidden.

We do not tolerate harassment, verbal coercion, physical violence, or sexual harassment. Any such misconduct will be subject to disciplinary action. Arbitrary sanctions, fines, other penalties, or disciplinary measures have no place at our company.

Don't

Harassment includes:

- ▶ **Derogatory comments, jokes, slurs, and insults.**
- ▶ **Unwanted physical contact and sexual advances.**

The safety and health of our employees matters to us!

3.8
Occupational
health and safety

We are committed to occupational health and safety and provide a safe, healthy, and hygienic working environment for all employees. We take all necessary precautions to prevent workplace accidents and detrimental health effects and to continually improve the workplace environment.

We oblige our suppliers and service providers, as well as their business partners, to comply with all occupational health and safety requirements under international standards.

Q & A

What should I do if I suspect a safety problem?

Stop your work immediately if work conditions are unsafe. In unsafe situations, contact your supervisor immediately.

3.9 Information security and data protection

We safeguard our know-how from improper use and unauthorized disclosure!

Information, be it physical or digital, is a particularly crucial asset for our company and it is essential that we protect it from being accessed by unauthorized parties. Sensitive company information must therefore be used only for business purposes.





Confidential information and documents may not be passed on to unauthorized third parties or employees or be saved on unencrypted external data carriers, sent to private e-mail accounts or otherwise be made available to the public.

We oblige our business partners to protect existing supply and contractual relationships with Huf and thus also our know-how by implementing, monitoring, and continually improving technical and organizational measures.

At Huf, personal data may be recorded and processed only where there is a legal basis for doing so and this is necessary for the business tasks.

Trade and business secrets and third-party rights, such as patents, copyrights, etc., must be safeguarded.

Further information

-  [CP-068 Corporate Security Management](#)
-  [CSpec-023 Protection of Information and Data Security](#)
-  [CSpec-064 Plant Protection](#)
-  [CSpec-066 Classification of Information](#)

Q & A

An important project needs to be finished and I'd like to keep working on it at home. Am I allowed to do so?

You can do so only by using exclusively the facilities Huf offers you for mobile working. Company data is not allowed to leave the Huf network and, for example, be copied onto private USB sticks. You may not use private devices for company purposes.

3.10
Company property

We protect our property!

Do

- ▶ **Contact your supervisor or security if you think an unauthorized person may have entered your workplace.**
- ▶ **Treat company property as carefully and respectfully as you would treat your own.**

We handle the property and assets of Huf carefully, appropriately, and sensitively and protect them from loss, theft, damage, or misuse.

Don't

Never use company property or the property of our business partners for your own personal gain.

We work together with employee representatives in a spirit of trust!

3.11
Freedom of association and the right to collective bargaining

We respect the fundamental right to freedom of association and collective bargaining within the scope of national laws.

We value open and trustful working relationships with employee representatives.

Q & A

Who can I speak to if I am unsure whether employee representatives need to be consulted about a certain issue?

Please get in touch with the local HR department, which will be happy to help you.

3.12
Child labor, forced labor, working hours

We care about human rights!

We adhere to international human rights regulations such as the ILO Declaration on Fundamental Principles and Rights at Work.

We reject any form of child labor as defined by the ILO Convention and national regulations. Young employees may not be exposed to any situations that are dangerous, unsafe, or hazardous to health. We do not tolerate any form of forced labor or involuntary prison labor that violates human rights. We do not tolerate slavery or human trafficking.

We also require our business partners to comply with these standards in full.

Do

If you become aware of any human rights abuses, do not ignore them. Inform your supervisor, the management team, or the local Compliance Manager.

We are transparent about donations and sponsoring!

3.13
Donations and sponsoring

Huf considers itself a responsible member of society and so we are involved in social issues in a number of ways, such as through donations and other forms of social engagement. However, we do not support any political parties, political candidates, or organizations that are close to or resemble a political party.

All donations and sponsorships must receive prior approval.

Further information

 **GD-088 Anti-Corruption Policy**

Q & A

The local soccer club asks whether Huf can sponsor its shirts.

How do you respond?

Contact the local Plant Director and the Compliance Manager and ask for approval.

3.14

Environmental and climate protection

We are committed to protecting the environment!

We use our innovative strength to protect the environment and nature and are continually working to improve products and processes in our global development and production network. Sustainability is an important yardstick for us. It includes making efficient use of resources (energy, water, raw materials), preventing waste, and optimizing logistics processes. We promote initiatives to raise awareness of environmental issues, use environmentally-friendly materials and improve air quality. Chemicals and other polluting materials must be handled responsibly and safely during processing, storage, transport, and disposal. We expect all our business partners to implement appropriate environmental and climate measures.

We motivate, inform and train employees on environmental issues in line with their job description. Our business partners are expected to do the same.

Do

Be aware of the consequences your actions have for the environment. Our future and future generations depend on protecting our environment. Everyone can play a part in protecting the environment. Even small steps help.

- ▶ **Where you can, opt for digital meetings over business trips.**
- ▶ **Turn off electronic devices, computers, screens, lights, etc.**
- ▶ **Turn down the heating and air conditioning.**
- ▶ **Avoid waste and suggest areas where improvements can be made.**

We are responsible for our products!

3.15

Product responsibility

In our product creation process, the safety of our end products is particularly important. We comply with relevant national and international regulations on product responsibility (e.g., product liability). Our suppliers and service providers are required to do the same.

We expressly forbid the use of counterfeit parts or materials from unauthorized sources throughout the supply chain.

Q & A

You suspect that a supplier is not complying with the required quality assurance measures. How do you respond?

Contact your supervisor or the colleague responsible for Quality Management without delay.

4



**Compliance with
the Code of Conduct**

Handling reports

Unethical conduct and violations of the law can result in major economic losses, consequences under criminal law or fines for Huf as a company and for our employees. Accordingly, we work together to avoid violations or, to at least identify them as timely as possible to minimize risks and prevent damage.

Please do not delay in submitting a report if you observe a breach of regulations or have good cause to suspect that a rule has been violated.

The Compliance Manager is the first neutral, responsible point of contact at all Huf locations for submitting reports. You can use our whistleblower system at <https://huf-group.hintbox.de>, to anonymously report potential violations at any time. Anonymous reports should provide enough detail so that they can be followed up. Your report will be treated confidentially.

We ensure that employees, business partners, or other third parties who report an actual or suspected violation of this Code of Conduct in good faith will not experience any disadvantages as a result.

Please note that, in some cases and/or if there is a legal obligation to do so, it may be necessary to pass information that is fundamentally to be treated as confidential on to third parties (e.g., in an external investigation).

To validate and substantiate the suspicion and thus ensure that the whistleblower does not experience any disadvantages, Huf reserves the right to request disclosure of their identity.

Further information

 [GD-091 Whistleblower Policy](#)

Self-check for making decisions

This Code of Conduct acts as a general guide for our employees and business partners to clarify various ethical and legal questions. If you as an employee are uncertain about what to do in a conflict situation and want to get an idea of whether your actions are allowed, ask yourself the following guiding questions:

- ▶ **Does my decision reflect the fundamental values and regulations of Huf?**
- ▶ **Could my decision/actions be unlawful?**
- ▶ **Is my decision free of other interests or have I been influenced by the interests of third parties?**
- ▶ **Can I reconcile my decision with my own conscience?**
- ▶ **Do I understand the potential risks of my decision?**
- ▶ **Could my decision hurt the reputation of Huf?**

If in doubt, always contact your supervisor, the local Compliance Manager, the Group Compliance Officer, or the local Plant Director to assess what may be a critical situation. This helps to minimize risks, prevent damage to Huf and safeguard our company's good reputation in the long term.

Consequences of violations

Anybody who culpably violates this Code of Conduct will be subject to appropriate consequences. Depending on the severity of the violation, these can range from disciplinary action to claims for damages under civil law to criminal sanctions.

We reserve the right to monitor compliance with the principles of conduct either internally or by independent third parties.

Help and contact

Your supervisor is the first point of contact for any questions or uncertainties. The Group Compliance Officer, local Compliance Managers, and Plant Directors of all Huf locations will support all employees with handling compliance issues and questions. Our managers must set an example and ensure that all employees are familiar with, understand and apply this Code of Conduct.

Contact:

Huf Hülsbeck & Fürst GmbH & Co. KG

Frank Kuppen

Group Compliance Officer

Compliance & Risk Management

Steeger Strasse 17 | 42551 Velbert | Germany

compliance@huf-group.com

