

CODE OF ETHICS

HEUNISCH Group globally enjoys great esteem for its business trustworthiness.



This is due to the fact that we are always firmly tying all of our business activities to our integrity.

That means: For all activities, all laws and rules are observed by us without exceptions. HEUNISCH Group's business values and associated commit-

ment for sustainable developments characterize our company policies, all our decisions and activities. We reflect, impart and live them continually.

Improvements are constantly striven for and implemented if possible.

Scope of application



HEUNISCH Group's Code of Ethics was developed with one single goal: to clearly express the principles according to which the group handles its relationship with employees, business partners and other associates. They apply to all of us equally – to all members of management as well as to all employees within Heunisch Group.

We expect our suppliers, distributors, consultants and other business partners to also live out these principles. When assessing potential and current suppliers we will consider the principles described in this document.

Business principles

ADHERENCE TO THE LAW

HEUNISCH Group shall observe the laws applying in each country it works in.

In situations in which no legal regulations are available each of us will orientate themselves by our business values and business culture.

In all cases in which there is a contradiction between applicable law and this Code of Ethics the relevant applicable law takes precedence.

CONSTANT IMPROVEMENTS

We are committed to constantly improving all areas of our company and all our processes. Our employees and customers, as well as the company itself, should benefit from this.

RELATIONSHIP WITH BUSINESS PARTNERS

The business relationship between HEUNISCH Group and its business partners shall be characterized by fairness.

We may not offer rewards or benefits contrary to applicable law or good business ethics to potential customers, public authorities, public institutions or other representatives of such institutions. Our employees may not accept from third parties payments, presents or other remunerations which may result in the decisions' objectivity to be regarded as doubtful.

ACCOUNTING AND REPORTING

All financial transactions of HEUNISCH Group

have to be documented in accordance with generally accepted accounting principles. For this all bookings have to be provided with a clear, unambiguous, not misleading description of the transaction's content. Heunisch Group commits itself to honest, pertinent and prompt disclosure.

CONFLICTS OF INTEREST

Employees and members of management of HEUNISCH Group are obliged to pursue their private and other activities as well as their financial interests in a way not conflicting with the group's interests or so they might not give rise to conflicts.

If such a conflict of interest arises the concerned person shall immediately inform their superior.

COMMUNICATION WITH PARTNERS

HEUNISCH Group endeavours to have a continuous discourse with its partners.

DATA PROTECTION ON A LEGAL BASIS

The HEUNISCH Group complies with the legal data protection requirements at all times. The management board and staff are all obliged to comply with the provisions and actively contribute to ensuring that personal data is reliably protected against unauthorised access.

Principles of environmental awareness

RESSOURCE EFFICIENCY

HEUNISCH Group's products and processes are designed in such a way that energy and raw materials are used efficiently and waste and residue are minimized in relation to a product's whole life cycle.

PRINCIPLES OF ENVIRONMENTAL

We support the principles of environmental precautions by avoiding the use of materials and processes harmful for environment and health if there are alternatives.

Human rights and working conditions

HUMAN RIGHTS

HEUNISCH Group respects the internationally acknowledged human rights. We undertake to support them – insofar as we are able to exert influence – and not to participate in any way in human rights abuse.

ANTI-DISCRIMINATION

We recruit and treat our employees in a way not discriminating against sex, race, religion, age, disabilities, sexual orientation, nationality, political opinion, union membership, social or ethnic background. At the same time we endeavour to provide varied working conditions on all levels.

MANPOWER

No form of forced or child labour is tolerated within HEUNISCH Group. The minimum age for employment within the group is determined by com-

pleting the compulsory education.

The freedom to be member in a union and the right for negotiations for collective agreements and contracts shall be respected within HEUNISCH Group.

WORKING CONDITIONS

The necessary conditions to create a safe working environment not hazardous for their health shall be provided for all employees of HEUNISCH Group.

REGULATION ON WORKING HOURS AND HOLIDAY

The HEUNISCH Group has designed its regulation on working hours and holiday for its employees on the basis of legal provisions and in conformity with collective bargaining agreements.

WAGES AND SALARIES

The HEUNISCH Group offers its employees a

decent wage and provides equal pay for work of equal value.

Responsibilities of managers and employees



The managers of HEUNISCH Group are responsible to be a living example for the content and purpose of this document for their employees within their organisation and to impart its content and purpose on them. They are obliged to urge them to behave according to these principles. There will be no tolerance for explicit or implied approval of questionable actions.

Reports on breaches of the rules of conduct expressed in this Code may be addressed to the management anonymously and confidentially.

Persons reporting offenses in good faith shall not expect any disadvantages to arise from it.

This Code of Ethics comes into effect immediately and indefinitely. Not agreeing with the provisions may have disciplinary consequences.

This Code of Ethics was passed by the management of HEUNISCH Group and may only be abolished or amended by the management. Any abolition or amendment shall be announced.