

CODE OF CONDUCT



For Business Partners

Content

- I.** Foreword
- II.** Scope of application
- III.** HCS Group Code of Conduct
 - 1. Our responsibility for compliance
 - 2. Our responsibility as a member of society
 - 3. Our responsibility as a business partner
 - 4. Our responsibility in the workplace
- IV.** Violations and consequences
- V.** Contact

I. Foreword

For our Company, HCS Holding GmbH including all our affiliates worldwide ("HCS Group"), and its employees, it is expected standard practice to adhere to the law in the performance of our duties. To reinforce this and to further protect our employees and the Company we have drawn up an „HCS Group Code of Conduct“. It is based on our corporate values and is aimed at all employees of the HCS Group. The Code of Conduct forms a binding guide for the conduct of all of us in our daily business.

Our business partners contribute significantly to our success and we see a common understanding of ethical and sustainable action as an essential basis for this.

The „HCS Group Code of Conduct for Business Partners“ is based on the HCS Group Code of Conduct and is founded on the principles of internationally recognised standards for responsible corporate management. For us, the requirements and principles of this Code of Conduct are an essential part of any relationship. We therefore expect our business partners to fully comply with applicable laws and to recognize, support and comply with internationally recognized environmental, social and corporate governance standards.

Frankfurt am Main, 1. January 2020

Henrik Krüpper
CEO

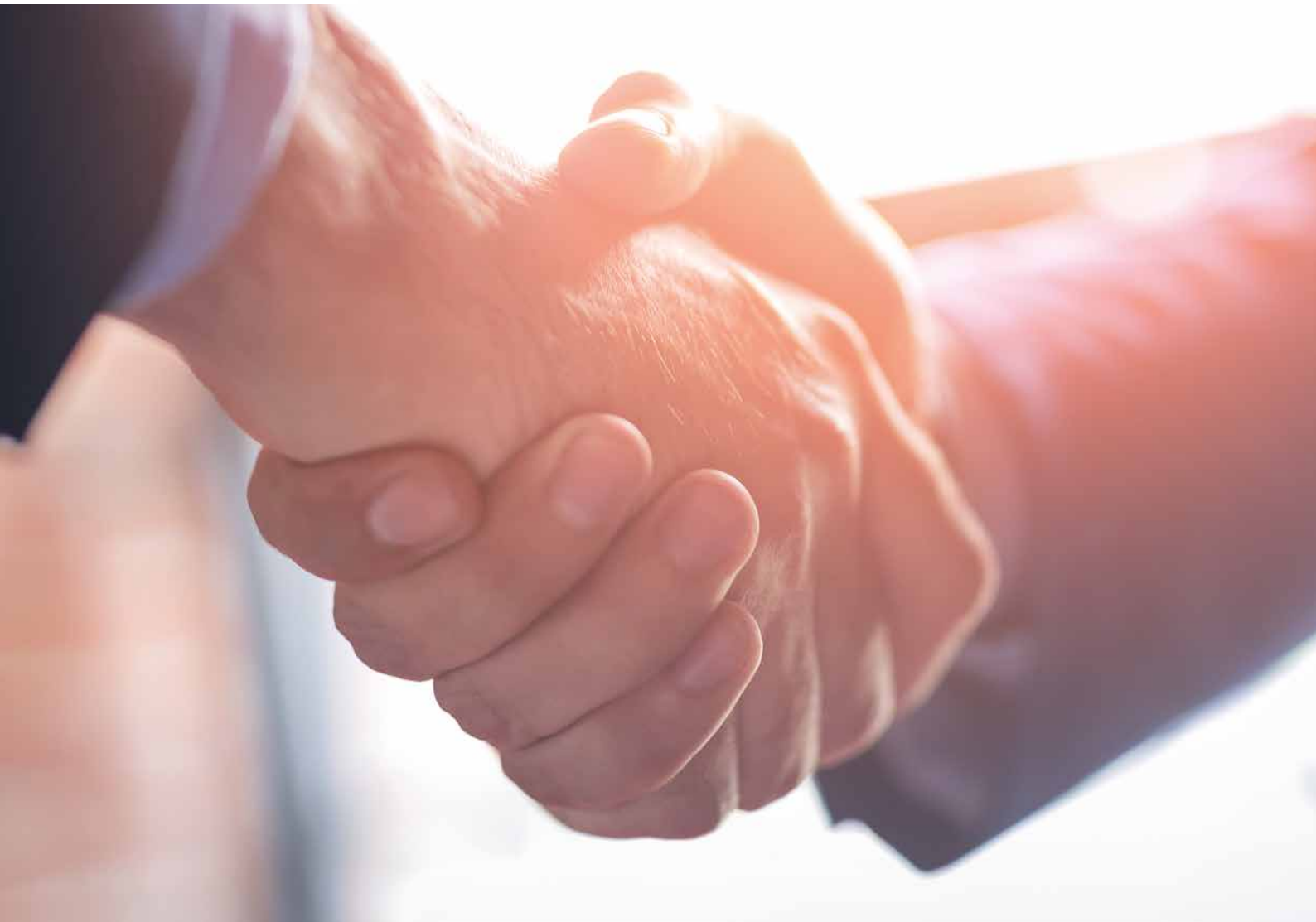
Peter Stubbe
CFO

Dr. Stefanie Leiterholt
SVP Group HR,
Legal & Compliance

Dr. Andreas Schröder
SVP Production &
Technology

II. Scope of application

Business partners are all third parties from whom HCS Group obtains supplies and services. These may be suppliers, sales partners, consultants, brokers, subcontractors, commercial agents, free-lancers and other providers of goods and services, etc.



III. HCS Group Code of Conduct

1. Responsibility for compliance

a. Compliance with the law

Our business partners comply with applicable local, national and international laws.

b. Responsibility

Our business partners guarantee the implementation of and compliance with the HCS Group Code of Conduct in their contractual relationship with HCS Group.

Our business partners shall ensure that their own business partners who are employed for or on behalf of HCS Group are also aware of and comply with the requirements of the HCS Group Code of Conduct.

2. Responsibility as a member of society

a. Respecting human rights

Our business partners respect and support the observance of internationally recognized human rights and actively ensure that they are not complicit in human rights violations.

b. Rejection of forced labour, slavery, trafficking in human beings and child labour

Our business partners take action against forced labour, such as modern slavery and human trafficking, and child labour. All forms of forced and child labour are prohibited at our business partners.

c. Fair labour conditions

Our business partners comply with the legal regulations for fair labour conditions and enable their employees to address issues openly and without worrying about reprisals.

d. Bullying and harassment in the workplace

Our business partners provide a working environment that is free from discrimination, violence and harassment.

e. Environmental protection and sustainability

Environmental issues, climate protection and the responsible use of natural resources are an integral consideration in the business activities of our business partners.

f. Donations and sponsoring

Donations are made by our business partners only on a voluntary basis and without expectation of consideration. Sponsorship of individuals, groups or organizations is not used to gain unlawful business advantages.

3. Responsibility as a business partner

a. Fair competition and compliance with competition and antitrust law

Our business partners behave fairly in competition and comply with applicable antitrust and competition law.

b. Anti-Corruption

Our business partners condemn all forms of corruption and bribery.

c. Gifts and invitations

Our business partners only accept or issue invitations in connection with their activities for HCS Group if they are reasonable, are not made in anticipation of improper consideration or other preferential treatment and do not violate applicable law (in particular anti-corruption laws). The same applies to the acceptance or granting of gifts, other benefits or advantages of any kind.

d. Prevention of money laundering

Our business partners comply with the relevant statutory provisions on the prevention of money laundering.

e. Avoiding conflicts of interest

Our business partners make decisions on the basis of factual considerations and do not allow themselves to be guided in an inadmissible manner by personal interests.

f. Regulations covering foreign trade, export control and customs duties

Our business partners comply with foreign trade requirements as well as export control and customs regulations.





SECURE

4. Responsibility in the workplace

a. Occupational safety and health protection

Our business partners ensure health and safety in the workplace.

b. Confidential Information

Our business partners ensure that confidential information of HCS Group is kept secret and that intellectual property is protected. This also applies after termination of the business relationship.

c. Data protection

Our business partners observe the applicable laws and regulations when collecting, storing, processing or transmitting personal data and information.

d. Information security

Our business partners use the information provided to them by HCS Group exclusively for the performance of their duties within the scope of services for HCS Group and protect them from internal and external misuse.

e. Protection of property and ownership

Our business partners condemn all forms of fraud and other property damaging behaviour towards HCS Group and third parties.

IV. Violations and consequences

We expect our business partners to identify risks within supply chains and to take appropriate action. In the event of suspected violations and to safeguard supply chains with increased risks, HCS Group requires disclosure of supply chains.

HCS Group reserves the right to check compliance with the standards and regulations listed in this Code of Conduct by means of a self-assessment questionnaire and audits.

HCS Group reserves also the right to take appropriate measures against business partners who do not meet these requirements, which may ultimately lead to the suspension or termination of a business relationship.

V. Contact

The Legal & Compliance department of HCS Group is at the disposal of business partners for questions and suggestions regarding this Code of Conduct at compliance@h-c-s-group.com.



HCS Holding GmbH • Edmund-Rumpler-Str. 3 • 60549 Frankfurt - Germany •
Telephone: +49 69 695 386 0 • E-Mail: compliance@h-c-s-group.com

PASSION PRAGMATISM PARTNERSHIP