



CODE OF CONDUCT

Code of conduct for HAINBUCH and its business partners
[As of: October 2024]

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HAINBUCH has established itself as a company in which trust is placed. This is primarily thanks to the values that we have lived by for the past 70 years. Our customers, employees, suppliers and partners expect fair cooperation, a polite and courteous tone, and respectful interactions. We conduct our business fairly and with integrity, in accordance with legal regulations, rules and standards, and we expect the same from our partners.

Our code of conduct and duties of care are an integral part of our HAINBUCH identity; they are binding for all our employees.



Sylvia Rall
CEO & Owner



Dr. Achim Feinauer
CEO



Gerhard Rall
CEO & Owner

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Working conditions and human rights

HAINBUCH and its business partners are committed to complying with all applicable national and international laws and regulations worldwide. We ensure the comprehensive protection of human rights and, in particular, the preservation of individual dignity. This includes the protection and promotion of the rights of women, minorities, and indigenous peoples, as well as advocating for their equality and inclusion. We do not tolerate any form of discrimination or harassment based on skin color, gender, religion, age, nationality, social or ethnic origin, disability, beliefs, sexual orientation, political views, or trade union activities. This applies particularly to recruitment, promotions, and access to training opportunities. Adherence to these principles of conduct is mandatory for all employees at HAINBUCH. We expect the same commitment from our business partners.

In our business relationships, we require compliance with the core labor standards of the International Labor Organization.

[ILO DE](#)

[ILO EN](#)

Labor standards

HAINBUCH rejects all forms of modern slavery, child labor, servitude, forced or compulsory labor, and human trafficking, actively advocates for their eradication, and expects the same commitment from its business partners. HAINBUCH is committed to the abolition of such practices and expects the same from its business partners. The minimum age for employees at all locations of the Group and for our business partners must be in line with the minimum age specified in the ILO Convention (No. 138).

[ILO Convention 138](#)

HAINBUCH and its business partners respect freedom of association, including collective pay negotiations, and the right to form interest groups. Thus, within the national laws and regulations, HAINBUCH and its business partners grant their employees the right to look after their interests.

HAINBUCH requires of itself and its business partners to be fully aware of their social responsibility and legal duty of care towards their employees. This explicitly includes compliance with the national minimum wage as well as ensuring that wages, social benefits, perks, and working hours are fair and appropriate. Furthermore, HAINBUCH and its business partners support the qualification and personal development of all employees to maintain a high level of performance and contribute positively to society by promoting fair working conditions.

Maintaining privacy and data protection is our top priority in all our business dealings.

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Health and safety

HAINBUCH strives to maintain the highest standards of health and safety in the workplace, not only complying with national occupational health and safety laws, but also taking the personal situations of our employees into account. We expect not only our employees, but also all business partners, to share and implement these standards. This includes the use of suitable technologies to reduce exposure to noise and emissions, the safe handling of hazardous substances, and compliance with ergonomic principles. It is also essential that everyone involved is equipped with the necessary personal protective equipment and that this equipment is used on a consistent basis.

We provide regular training to ensure that our employees have the requisite knowledge to identify workplace hazards and to take preventive action. A culture of open communication enables us to effectively address safety concerns and to ensure that our work environment is continuously improved.

Ethical recruitment

HAINBUCH is committed to ethical recruitment based on the core principles of transparency, fairness, privacy protection, inclusion, diversity, and equality, compliance with legal standards, as well as responsibility and accountability. Objectivity and impartiality are central to our efforts, supported by standardized evaluation procedures to ensure fair assessments. The protection of personal data in accordance with applicable data protection laws is a matter of course for us. Furthermore, we actively promote diversity, equality, and inclusion in the workplace by attracting and hiring a wide range of talents. We strictly adhere to all local, national, and international employment laws and regulations, taking full responsibility for our recruitment practices. Through these commitments, we aim not only to protect the rights of job seekers but also to foster a positive and inclusive work environment that drives the long-term success of our company.

Whistleblower protection and anti-retaliation policy

It is important to HAINBUCH that any employees, business partners or third parties who report known or suspected misconduct or violations are protected against retaliation and that their identities are protected from disclosure. To that end, HAINBUCH has set up free reporting channels in accordance with the Whistleblower Protection Act, which make it possible to file a report around the clock, 365 days a year. Cases will be processed by an appointed case manager who is impartial, independent and bound by a set of instructions.

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Reporting channels include:

- Email: hinweisgeber@hainbuch.de
- Voicemail 24/7: 07144/907-540
- Postal mail:

HAINBUCH GmbH
Mario Reinsch
Erdmannhäuser Str. 57
71672 Marbach am Neckar

Fair competition and antitrust law

HAINBUCH is committed without restriction to the principles of fair and free competition as an elementary component of the free-enterprise order. As a result, it is binding for HAINBUCH and its business partners to comply with the existing provisions of antitrust and competition law. In particular, HAINBUCH and its business partners do not participate in unlawful price arrangements or in prohibited agreements between competitors concerning market behavior. Similarly, HAINBUCH and its business partners do not exchange any sensitive or competitively relevant information with competitors and they comply with the applicable foreign trade regulations in all global business activities.

Import and export control

HAINBUCH and all suppliers are committed to complying with all applicable export controls, sanctions, customs laws and regulations, including applicable trade restrictions, embargoes and other restrictions on the import and export of goods, services, information and technology. Suppliers guarantee that they themselves, their beneficial owners, their representatives and the subcontractors that they employ are not listed as sanctioned companies or persons on any current sanctions lists.

Prohibition of corruption

Corruption is prohibited through international conventions and national laws. HAINBUCH does not tolerate its employees or business partners engaging in any form of blackmail, bribery or business practices that could create the impression of undue influence or interference. HAINBUCH and its business partners are obligated to neither offer advantages of any kind, directly or indirectly to third parties, nor to provide direct or indirect advantages to themselves or to others. Also HAINBUCH and its business partners do not allow any advantages to be promised to them that constitute an unlawful action as stipulated in the relevant anti-corruption laws.

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HAINBUCH expects itself and its business partners not to tolerate any form of unlawful benefits, particularly in business dealings with public officials and authorities – either domestically or abroad. Likewise HAINBUCH and its business partners ensure that their employees conduct themselves with integrity. HAINBUCH and its business partners must also reject facilitation payments [i.e. payments to a public official that are not provided for by law and that serve to induce the public official to expedite or carry out an official act].

Gifts, invitations, and other benefits

When dealing with benefits, e.g. in the form of gifts or invitations, HAINBUCH and its business partners strictly ensure that any appearance of dishonesty or incorrectness is always avoided. HAINBUCH and its business partners do not tolerate the acceptance or granting of benefits that occur in the expectation of obtaining an unlawful consideration or an advantage that could give rise to doubt regarding the integrity of HAINBUCH and its business partners, or that constitutes an influencing of business decisions.

Financial responsibility

As part of our commitment to integrity, transparency and ethical conduct, HAINBUCH is committed to maintaining the highest standards of financial responsibility. This includes careful and diligent management of our resources, compliance with all applicable financial laws and regulations, as well as the implementation and maintenance of effective internal control systems to prevent and detect fraud and misconduct. We recognize that financial responsibility is not only a legal obligation, but also a central component of our social contract with our stakeholders, including customers, employees and the communities in which we operate. Our goal is to build and maintain trust through transparency, accountability and continuous improvement in order to create long-term value for all.

Money laundering

HAINBUCH is committed to participating in the international fight against money laundering [AML] and takes appropriate measures to ensure compliance with all national and international laws and regulations. Appropriate procedures with risk-based approaches to identify and verify the identity of customers and to understand the nature of their business activities are an integral part of this endeavor. This includes conducting due diligence on higher-risk customers, establishing a reporting process, and monitoring transactions. HAINBUCH expects the same from its business partners.

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Conflicts of interest

Transparency in all business transactions is of the utmost importance for HAINBUCH and its business partners. Decisions must be made exclusively on the basis of factual considerations. On the other hand, in particular, personal or family-related conflicts of interest that can result in extraneous considerations must be avoided.

HAINBUCH and its business partners ensure that even the appearance of extraneous considerations is avoided.

Disclosure of information

HAINBUCH discloses information in accordance with applicable regulations and standard industry practices. This includes, among other things, financial and non-financial information as well as information about our employees, occupational health and safety measures, our environmental practices, business activities, and information on the financial position of HAINBUCH.

Counterfeit parts and intellectual property

At HAINBUCH we believe that innovation, quality and ethical action are of the greatest importance. Our expectations for creativity, care and precision apply not only within the company, but also to our business partners. With this in mind, the use of counterfeit and fake parts is strictly prohibited in order to protect our products and the innovations behind them. We underscore the fact that we hold deep respect for intellectual property, including patents, copyrights and trademarks, and we expect the same from our partners.

All our business partners are asked to share our high standards and to carefully review their supply chains to ensure that no counterfeit or illegally copied parts are used. In addition, open communication is essential; we expect any indication that these guidelines have been violated to be reported promptly. HAINBUCH will monitor compliance with these principles on a regular basis and violations may result in serious consequences, including termination of business relationships and legal action.

Donations and sponsoring

When making donations HAINBUCH and its business partners follow the principle of altruistic action. Donations by HAINBUCH and its business partners are only made on a voluntary basis and in accordance with applicable law. HAINBUCH and its business partners do not use their sponsoring activities to obtain unlawful business advantages.

Environmental protection

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HAINBUCH and its business partners are committed to the sustainable and responsible use of resources and raw materials by consistently complying with environmental laws, regulations and standards. This includes the fulfillment of all obligations regarding reporting and cooperation within specified deadlines. The focus of our actions is on reducing greenhouse gas and noise emissions, increasing energy efficiency, using renewable energies, and protecting water, air and soil quality. Through sustainable resource management and the promotion of the circular economy, we aim to reduce waste and manage hazardous materials responsibly. Our approach also includes the commitment of our employees to minimize environmental risks and to use resources sparingly, which helps to protect biodiversity.

Responsible procurement of raw materials

HAINBUCH and its business partners support all efforts to ensure responsible sourcing of resources. We do not tolerate the procurement and use of raw materials extracted or produced in conflict regions [keyword: conflict minerals]. Likewise, we are committed to respecting land, forest, and water rights, as well as avoiding violations such as forced evictions. To exclude such sourcing and identify potential conflict minerals in manufactured products within the supply chain, we conduct continuous reviews of all suppliers to disclose the origin or source of the resources. Our fundamental goal is to procure all goods exclusively within legally compliant markets, such as the German market or within the EU, as far as economically feasible.

Supplier relationships

HAINBUCH continues to strive for long-term and mutually respectful business relationships with its suppliers. An elementary component of such relationships is the shared values that are laid out in this code of conduct. In the event of serious violations (corruption, money laundering, etc.) or repeated violations of this code of conduct, HAINBUCH reserves the right to terminate the business relationship. Compliance with this code of conduct is taken into consideration during supplier audits.

Furthermore, we expressly request that our suppliers follow the values of the Global Compact and its ten principles.

[globalcompact](#)

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Code of Conduct - Compliance

The HAINBUCH Code of Conduct applies exclusively to our deliveries and services.

We do not acknowledge any conditions of the Customer that conflict with or deviate from the CoC or that are not regulated in the CoC, unless we have expressly agreed to their validity in writing. Our CoC also applies if we carry out the deliveries or services without reservation in the knowledge of the Customer's conditions that conflict with or deviate from our GTC or are not regulated in our GTC, or if the Customer in his inquiry, in his order or otherwise in connection with the Contract processing refers to the validity of its conditions.

Furthermore, we are not obliged to comply with legal requirements from compliance regulations (e.g. from the Supply Chain Due Diligence Act (Supply chain due diligence law)) that are not applicable to us (e.g. due to failure to reach the threshold values).

We reserve the right to change these requirements, should it be necessary.