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1 Preamble

Höcherl & Hackl GmbH (hereinafter referred to as H&H) is committed to ecologically and socially responsible corporate leadership. We expect the same behavior from all our suppliers. We assume that the principles of ecological, social and ethical behavior are observed and integrated into the corporate culture. Furthermore, we strive to continuously optimize our business activities and our products in terms of sustainability and request our employees and suppliers to contribute to this in the sense of a comprehensive approach.

Like our employees, our suppliers are also obliged to comply with the principles and requirements of this Code of Conduct and to endeavor to contractually obligate their subcontractors to comply with the standards and regulations stated in this document.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labor Standards of the International Labor Organization.

2 Social Responsibility

2.1 Protection of Human Rights

Internationally accepted human rights must be protected, respected and promoted. This is based on the United Nations Guiding Principles on Business and Human Rights.

2.2 Ethical Recruitment

The recruitment and hiring of employees must be conducted fairly, transparently, and in accordance with applicable legal provisions. Job seekers and employees must not be required to pay, either directly or indirectly, any fees or other costs associated with their placement or hiring. If such fees have been incurred, they must be reimbursed to the affected individuals.
Identity documents, passports, or work permits must not be withheld, nor must access to them be restricted. The essential terms and conditions of employment must be communicated in writing before the employee begins work. Deceptive or misleading information regarding the job, work location, compensation, or other terms of employment is prohibited. Any recruitment agencies or other third parties engaged for this purpose must be selected appropriately and required to comply with these principles.

2.3 Exclusion of Child Labor and Special Protection of Employees Under 18 Years of Age

Child labor may not be used in any phase of production. The recommendation from the ILO conventions on the minimum age for the employment of children must be observed. According to this, the age should not be less than the age at which compulsory schooling ends and in any case not less than 15 years. If children are found at work, the company must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers shall be protected and special protective regulations shall be observed.

2.4 Exclusion of Any Form of Forced or Compulsory Labor

No forced labor, slave labor or work comparable in this way may be used. All work must be voluntary and employees must be able to leave work or employment at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

2.5 Non-discrimination and Equal Opportunities in the Workplace

Discrimination against employees in any form is not permitted. This applies, for example, to discrimination based on gender, race, caste, skin color, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual person are respected.

2.6 Right to Freedom of Organization and Assembly

The right of employees in the company to form and join organizations of their choice and to engage in collective bargaining shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of employees for the purpose of collective bargaining shall be provided. Employee representatives shall be protected against discrimination. They shall be granted free access to the workplaces of their colleagues in order to ensure that they can pursue their rights in a lawful and peaceful manner.

2.7 Occupational Safety and Health Protection

A safe and healthy working environment must be ensured. Our safety officer takes necessary precautionary measures against accidents and damage to health that may arise in connection with the various activities and workplace ergonomics in the company. For this purpose, risk assessments are prepared and constantly improved. He also constantly monitors and improves the areas of personal protective equipment, machine safety, emergency preparedness, incident and accident management, handling of chemicals and hazardous substances, hand and skin protection, and fire protection. Employees are regularly informed and trained on these topics. Qualified and regularly trained first aiders support the activities of the safety officer, e.g. in the event of accidents. Employees always have access to sufficient quantities of drinking water and clean sanitary facilities.

2.8 Adequate Remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Pay for overtime must exceed pay for regular hours. Employed persons must be provided with all benefits required by law. Deductions from wages as a punitive measure are not permitted. The company must ensure that employees receive clear, detailed and regular written information about the composition of their remuneration.

2.9 Limitation of Standard and Maximum Working Hours

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if it is performed on a voluntary basis and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

2.10 Entitlement to Regular Paid Leave

All employees are entitled to regular paid leave.

2.11 Social Security

Undeclared work is not permitted. All contributions to the social security funds must be paid.

2.12 Complaint Mechanisms and Whistleblower Protection

The company is responsible for establishing an effective anonymous grievance and whistleblower protection mechanism at the operational level for individuals and groups who may be affected by adverse impacts. Reports must be treated confidentially. Whistleblowers must be protected both in terms of their person and from possible sanctions.

2.13 Protection Against Forced Eviction and Deprivation of Land

Unlawful forced evictions must be avoided. Land, forests and bodies of water may not be unlawfully seized through acquisition, construction or otherwise.

2.14 Use of Security Forces

The use of security forces is prohibited if there is a risk of torture, physical or psychological injury, inhuman or degrading treatment or an impairment of the right to organize and assembly.

3 Ethical Responsibility

3.1 Fair Competition

The standards of fair business, fair advertising and fair competition shall be observed. In addition, the applicable antitrust laws must be applied, which, in dealing with competition, prohibit in particular agreements and other activities that influence prices or conditions. Furthermore, these regulations prohibit agreements aimed at restricting customers' freedom to determine their prices and other conditions autonomously when reselling.

3.2 Confidentiality/Privacy Protection

When collecting, storing, processing, transmitting and disclosing personal information, the laws on privacy and information security and the official regulations must be observed.

3.3 Intellectual Property

Intellectual property rights shall be respected. Technology and know-how transfers must be carried out in such a way that intellectual property rights and customer information are protected.

3.4 Integrity/Bribery, Benefits

The highest standards of integrity must be applied in all business activities. The company shall have a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be applied to ensure compliance with anti-corruption laws.

3.5 Conflicts of Interest

When dealing with business partners, decisions must be made on an objective basis and must not be influenced by personal interests. If conflicts of interest arise, they must be disclosed so that appropriate measures can be taken.

3.6 Money Laundering

The relevant statutory regulations on the prevention of money laundering must be observed. The reporting obligations must be duly complied with.

3.7 Conflict Minerals

In politically unstable areas, trade in so-called conflict minerals such as tin, tungsten, tantalum and gold could finance armed groups, promote forced labor and other human rights abuses, and support corruption and money laundering. To break the link between conflict and the illegal mining of minerals, and thus end the exploitation and mistreatment of local communities (e.g. miners), we commit ourselves and our suppliers not to knowingly purchase any material containing minerals that could serve to finance any armed conflict.

3.8 Customs and Export

International customs and export control regulations must be complied with. Information relevant to foreign trade must be exchanged proactively.

3.9 Financial Responsibility

All business transactions must be documented completely, correctly, and comprehensibly. Financial records, reports, and documents must comply with the applicable legal regulations and recognized principles of proper accounting. Incorrect or misleading information and the deliberate falsification of documents are not permitted. Relevant documents must be archived in accordance with the statutory retention periods and made available when required.

3.10 Disclosure of Information

Relevant information about business activities, structure, financial situation, and sustainability and social standards must be disclosed truthfully and transparently in accordance with applicable legal provisions. Upon request by H&H, the necessary information must be provided in a complete and comprehensible manner, as long as this does not conflict with any legal or contractual confidentiality obligations.

3.11 Avoidance of Plagiarism

The creation and use of products, documents, technical documentation, and other work results must be carried out in compliance with applicable legal provisions and the rights of third parties. Plagiarism and the unauthorized adoption or use of third-party services are not permitted. Suppliers must ensure that no imitation or counterfeit products are delivered.

4 Environmental Responsibility

The H&H environmental statement is publicly available for download at
https://www.hoecherl-hackl.com/download/1337/ .
We set detailed targets and measures for all employees to fulfill our environmental responsibility. All employed persons are periodically trained in environmental and sustainability matters. We expect the same from our supplier companies.

In particular, the company shall engage in the following topics:

4.1 Processing and Draining of Industrial Wastewater

Wastewater from operational processes, manufacturing processes and sanitary facilities should be typed, monitored, inspected and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

4.2 Air Emission and Soil Quality

Emissions from operations, such as air, noise, heat, radiation, light, and greenhouse gas emissions, must be typed, routinely monitored, verified, and treated as necessary prior to their release. The company is also responsible for monitoring its emission control systems and is required to find economical solutions to minimize any emissions. At the very least, the relevant legal and local official requirements must be complied with.

4.3 Dealing With Waste and Hazardous Substances

The company shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transportation, storage, use, recycling or reuse, and disposal.
The requirements of the conventions on the use of hazardous substances, for example the Minamata Convention (use of mercury), the Stockholm Convention (persistent organic pollutants) and the Basel Convention (transboundary movements of hazardous waste and their disposal), must be complied with.

4.4 Reduce Consumption of Raw Materials and Natural Resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of generation or through procedures and measures, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, by savings, by recycling or with the help of the reuse of materials.

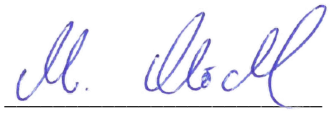
4.5 Dealing With Energy Consumption and Energy Efficiency

Energy consumption is to be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

5 Awareness and Agreement

By signing this document, the company commits itself to act responsibly and to comply with the principles and requirements listed. The company commits itself to communicate the content of this code in an understandable way to the employed and contracted persons and subcontractors and to take all necessary precautions for the implementation of the requirements. H&H may monitor and verify the measures taken by suppliers, e.g. in the form of on-site audits.
H&H may monitor and verify the measures at supplier companies, e.g. in the form of on-site audits. A violation of this code of conduct may be reason and cause for H&H to terminate the business relationship including all related supply contracts.

Konzell, Sep 21, 2026
Höcherl & Hackl GmbH



Marco Höcherl, CEO



Laura Hackl-Späth, CEO

Contracting party/supplier:

_____
Place, date

_____
Company name

_____
Company stamp

_____
Name, function

_____
Signature