



HARKE
GROUP

Code of Conduct

HARKE GROUP
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Germany

Introduction by the Management

Dear Colleagues,

Building a reputation can take a lifetime, but one moment can be enough to destroy it. Just one wrong decision can irreparably damage our Group's reputation. In difficult times, it is important to maintain the core values that have characterized our company since more than 50 years. This starts with our commitment, integrity at the center of our business activities – for the benefit of our company, customers and principals.

However, this Code of Conduct is not only intended to raise your awareness of our shared values, it also provides you with practical guidance for appropriate behavior, which is a prerequisite for building trusting relationships between HARKE GROUP and its stakeholders. We take responsibility for our actions as part of our promise to care for both people and the environment:

Therefore, read carefully and ensure that it is adhered to in your environment and speak up if you have notice anything unusual in the course of your work. Let us focus together on what really matters: maintaining our integrity and living our values, in the best interests of our company, HARKE GROUP.

This Code of Conduct is the basis for all of our operations at the HARKE GROUP.

HARKE GROUP's Code of Conduct applies to the company's Board of Directors, management and each employee irrespective of their position.

Under this Code of Conduct, every HARKE GROUP employee is also obligated to immediately report all suspicions or observations of inconsistencies with or violations of the Code of Conduct.

The following guidelines apply to all companies of the HARKE GROUP.

We are committed to communicating this policy to employees, contractors and business partners.

1. Ethics

Fairness, honesty and incorruptibility are the basis for good corporate practice. We are committed to fair competition and compliance with the applicable local legal system. Management ensures that the employees concerned are aware of and comply with the relevant laws and regulations.

1.1 Prohibition of Corruption and Undue Influence

The company management ensures that framework conditions are created that prevent corruption and unfair influence. They act as role models and must live up to this role by demonstrating honesty and fairness on a daily basis.

Employees are required to comply with these ethical principles.

It is a violation of ethical principles to:

- offer, promise, grant or approve a benefit to a business partner/agency or its employees for preferential treatment in awarding of a contract or supply;
- conversely, demand, allow himself to be promised or accept an advantage for preferential treatment of a business partner/authority when making deliveries or awarding contracts;
- procure unauthorized advantages for himself or third parties directly or indirectly to the detriment of the client;
- collude between competitors in violation of antitrust law.

1.2 Responsible Handling of Gifts

Attempts by business partners or authorities to unfairly influence employees in their decision-making will not be tolerated; this also includes that gifts (except for promotional items of low value) should not be distributed or accepted as a matter of principle.

1.3 Avoidance of Conflicts of Interest

It must be ensured that secondary activities and equity investments by employees and business partners do not result in damage to the Group. There is a duty to disclose sideline activities and equity investments, with the exception of the acquisition of marketable securities or pure investments of a non-significant volume.

1.4 Donations

As a medium-sized family business, we feel an obligation to society and support social projects. Donations are always within the framework of the legal system and are initiated and regulated by the company management.

1.5 Whistleblowing and Protection Against Retaliation

All employees and business partners are encouraged to report unfair business practices. No disadvantage of any kind may result from such a report.

2. Labor and Human Rights

HARKE GROUP maintains business relationships worldwide and is committed to comply with local legislation. All work must be voluntary and without threat of punishment. Forced labor and the undercutting of the minimum age prescribed by law in the respective country are rejected.

The safety and employee protection regulations laid down by law in the respective country, in particular the maximum working hours and minimum wages applicable in each case, must be complied with. Employees must be able to terminate the employment relationship at any time.

Furthermore, we are committed to respecting the values and customs of the communities and countries in which we do business.

We regard the personal dignity, privacy and personal rights of each individual as a high good – in particular, unacceptable treatment of employees, such as bullying, sexual harassment and discrimination are strictly condemned and will result in disciplinary action.

3. Health, Safety and Environment

HARKE GROUP companies take responsibility for their actions as part of their promise to care for people and the environment. We focus our sustainability goals on essential topics such as safety, health and environmental protection, resource efficiency and legal compliance.

The safety of employees and our environment is our top priority. Health hazards are to be minimized by preventive measures and potential risks are to be reduced as far as possible. For this purpose, an occupational health and safety concept has been implemented, which realizes both the work organization, production processes, safety technology and a high level of health protection for employees.

In order to protect the environment, we are committed to keeping our consumption of resources and emissions as low as possible, thereby conserving the natural basis of life.

Every employee shares responsibility for safety in his or her working environment, environmental protection, and their continuous improvement.

4. Sustainable Procurement

A responsible, sustainable supply chain represents the connection between the protection of people and the environment with economic success in the HARKE GROUP. As a family-run, globally operating, medium-sized company, we exemplify responsible corporate governance and promote as well as demand this from our partners.

We take our responsibility towards all economic stakeholders and society seriously and try to remedy or minimize negative effects.

In particular, we support our innovative partners in their efforts to establish sustainable, "green products" with a low CO₂ footprint in the market. To this end, we use our large network of supply sources/manufacturers and optimize our procurement logistics.