

The HAWE Group is committed to fundamental guidelines on conduct that cover human rights, occupational safety, environmental protection, and fighting corruption. The details of these areas in turn are laid down in the ten principles of the UN Global Compact.¹ In compliance with the UN Global Compact, the following rules of conduct are binding for all HAWE Group employees:

- **Compliance with the law**

We are under an obligation to obey the laws of those countries where we operate. Every employee is responsible for complying with the applicable legal system. In case of doubt, you can contact the officers responsible for monitoring compliance with this code of conduct.

- **Employees' fundamental rights**

No employee may be discriminated against or disadvantaged because of his or her age, race, gender, religion or philosophy, sexual identity, family status, parentage, disability, political opinions, or ethnic origin.

- **Employee health and safety**

HAWE Hydraulik is aware that social justice is a fundamental requirement for doing business successfully, and therefore it opposes the following forms of employee abuse:

- We do not accept any form of forced or compulsory labor, and oppose any form of child labor under the terms of ILO Convention 138.²
- We also do not tolerate any form of discrimination among one another on the job, either in active or in passive behavior.
- We are careful to comply with all occupational safety regulations, whether established by statute, issued by the competent authorities, or governed by corporate guidelines. In our own best interest, but also in the best interest of our colleagues and the company as a whole, safety regulations must be applied systematically at all times.

- **Environmental protection and energy efficiency**

Doing business in ways that protect the environment and use energy as efficient as possible is a guiding principle at HAWE Hydraulik. Active environmental protection, conserving resources, and an environmentally-oriented product and applications strategy are integral parts of this responsibility. This principle is set forth and detailed in our corporate energy and environmental policy. To achieve our goals, we already apply the ISO 14001 environmental management system and the ISO 50001 energy management system in Germany and implement it successively in all subsidiaries.

- **Conflicts of interest**

Corporate management is firmly resolved not to tolerate any form of corruption or bribery anywhere in the company, or to become involved with it in any way whatsoever. The prohibition on accepting or granting favors pertains not only to direct financial benefits, but also to any other advantages that might compromise a person's independence in doing their job, such as invitations or gifts for amounts that exceed modest common practice. Absolute zero tolerance applies in dealings with government or quasi-government entities. In other business interactions, only symbolic, low-value occasional or promotional gifts are acceptable.

- **Confidentiality and data privacy**

We are obligated to maintain confidentiality regarding all internal confidential matters and all confidential information about clients or business partners. All information identified as such is confidential, as is any information which obviously contains business and trade secrets.

Confidential information must be protected from being accessed by third parties. In general, care must be taken that confidential information is given only to employees who need to know it in order to perform their work duties.

Personal data, particularly about our employees, may be gathered, stored or used only to the extent needed for specified, unambiguous and lawful purposes. Data must always be used only for the purpose for which it was collected.

- **Protection of corporate assets**

Innovations, technical expertise and our experience are the foundations for developing and producing high-quality machinery products. To safeguard our lead over the competition, these innovations and abilities must be protected as fully as possible against imitation.

- **Customs and foreign-trade regulations**

The components, systems and services offered by HAWE Hydraulik represent a contribution toward resolving global technological challenges. This includes complying with the applicable export prohibitions, and working freely and openly with the competent authorities. It is entirely contrary to our corporate philosophy for HAWE Hydraulik products to be used in active weapons systems, even where such a delivery would be permitted by law.

- **Implementation of the Code of Integrity**

Every employee is responsible for complying with the Code of Integrity in his or her own job area. If you have any questions or suggestions about implementing the Code of Integrity, please contact the Integrity Team (integrity@hawe.de) at HAWE Hydraulik.

¹ The Ten Principles of the Global Compact
<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

² Convention concerning Minimum Age for Admission to Employment
<http://www.ilo.org>