



CODE OF CONDUCT

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Markus Höfliger
Chairman of the
supervisory board



Thomas Weller
CEO

PREAMBLE

To ensure the integrity of Harro Höfliger's business activities at all times, we have developed this Code of Conduct. It sets out the fundamental requirements for the conduct of all employees and is binding for all staff. A separate Code of Conduct applies to our external business partners, in particular suppliers and service providers..

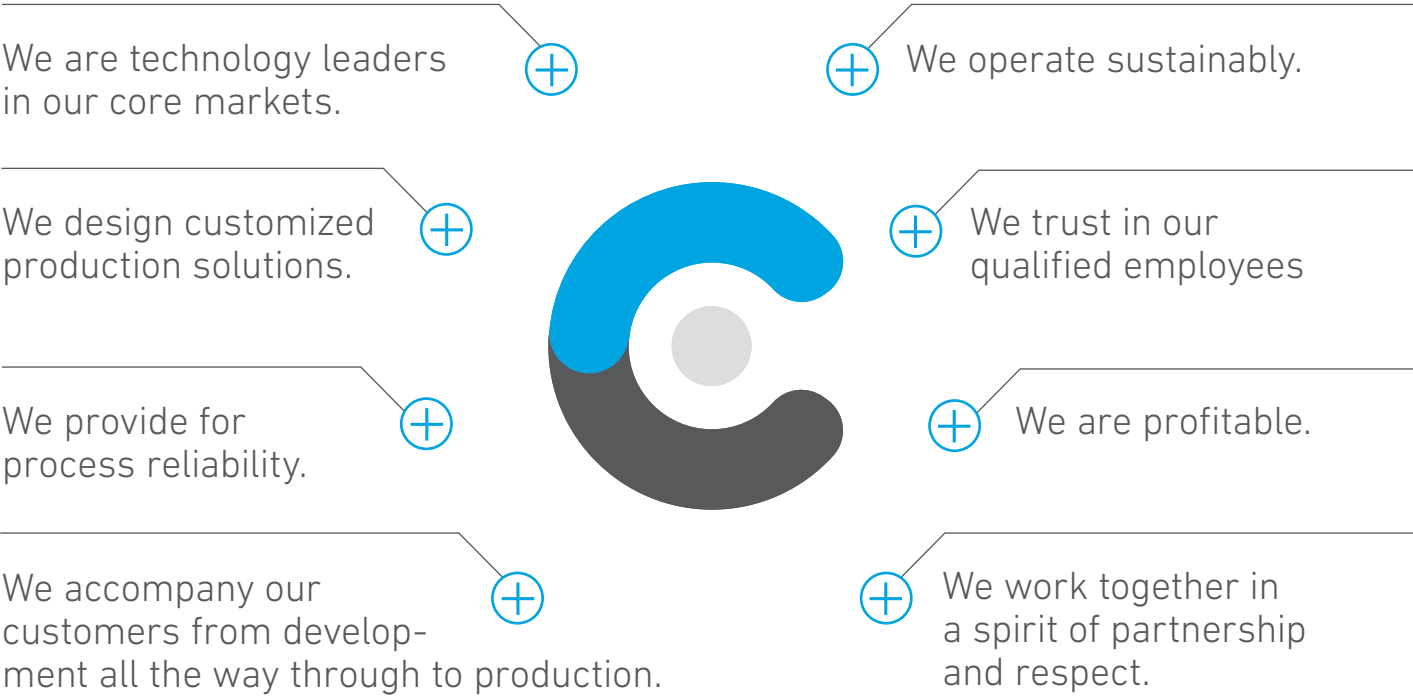
The Code of Conduct is our binding commitment to fair, transparent and responsible behavior within the company and in our dealings with our stakeholders.

The principles described in this Code are specified in greater detail in internal company policies, procedural instructions and work instructions. These particularly govern the areas of anti-corruption, data protection, export control, information security and the whistleblower system.

OUR MISSION: ALL YOU NEED

MISSION

Our company's purpose is defined in our mission statement:



VISION

Our vision describes our image of the future.
We strategies and corporate goals are aligned with this vision.

LAW AND INTEGRITY



WE COMPLY WITH ALL LAWS AND APPLICABLE REGULATIONS

We are committed to consistently complying with applicable laws and regulations. National legal requirements always take precedence over internal policies.

In the spirit of effective compliance and integrity management, we are committed to internationally recognized human rights and are guided in particular by the 10 principles of the UN Global Compact, the core labor standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. We reject all forms of child and forced labor. To prevent, identify and combat corruption, we are guided by the requirements of ISO 37001 and implement appropriate measures such as clear responsibilities, suitable control mechanisms and transparent decision-making processes.

Our legal obligations are systematically recorded in a company-wide legal register, reviewed regularly and serve as the basis for ensuring legal compliance. We also observe the applicable regulations in international trade in goods and services, particularly in the areas of export control, sanctions, embargoes and customs. To support compliance with legal and internal requirements, we maintain a compliance management system based on the requirements of ISO 37301.

“We are and remain: a future-proof family business, appealing to employees and partners.”

VALUES AND RESPONSIBILITY

RESPECT, EQUAL TREATMENT AND FAIR CONDUCT

We promote a corporate culture characterized by respect, integrity and responsibility, and we respect the dignity of every individual.

Discrimination and any form of exploitation or disregard for human dignity are not tolerated. Equal opportunity is a matter of course for us. Decisions, particularly in personnel selection and development are made regardless of age, disability, ethnic origin, skin color, gender, pregnancy, sexual identity, nationality, religion or marital status.

We respect personal rights, privacy and the right to freedom of expression. All employees are entitled to appropriate remuneration and are assessed fairly on the basis of their performance.

We treat one another with respect and foster a working environment characterized by trust and openness. Employees are encouraged to raise possible violations and contribute to solving problems. Managers support their employees in reconciling professional and personal matters.

WE SUPPORT OUR EMPLOYEES IN THEIR PROFESSIONAL AND PERSONAL DEVELOPMENT

The abilities and skills of all employees are essential for a secure and successful future for Harro Höfliger. We therefore continuously provide comprehensive introductory, ongoing and workplace-related training and development. We also promote everyone's personal development and support the desire for professional advancement.

SAFETY AND HEALTH

Occupational safety and health are our highest priority. Every employee is required to consistently comply with applicable occupational safety regulations and instructions and to actively contribute to a safe and healthy working environment. Work equipment, machinery and systems must always be used in accordance with their intended purpose and prescribed protective measures must be observed. Defects or hazards must be reported immediately.

We promote open communication regarding safety matters and expect all comments and suggestions for improvement to be taken seriously. Participation in occupational safety training is mandatory and serves to minimize risks and prevent accidents. Together, we create a working environment in which health and well-being are protected.

SUSTAINABLE ENVIRONMENTAL AND CLIMATE PROTECTION

Environmental and climate protection are of great importance in our company. We are committed to using resources responsibly and continuously reducing our ecological footprint. To this end, we rely on energy-efficient processes, sustainable materials and the avoidance of waste and emissions. This is carried out within the framework of our environmental management system certified in accordance with DIN EN ISO 14001.

Every employee actively contributes to minimizing environmental impact and acting in an environmentally conscious manner. We also promote innovations that support sustainable solutions and continuously improve our environmental performance. In this way, we jointly make a responsible contribution to protecting our environment and the climate.



QUALITY

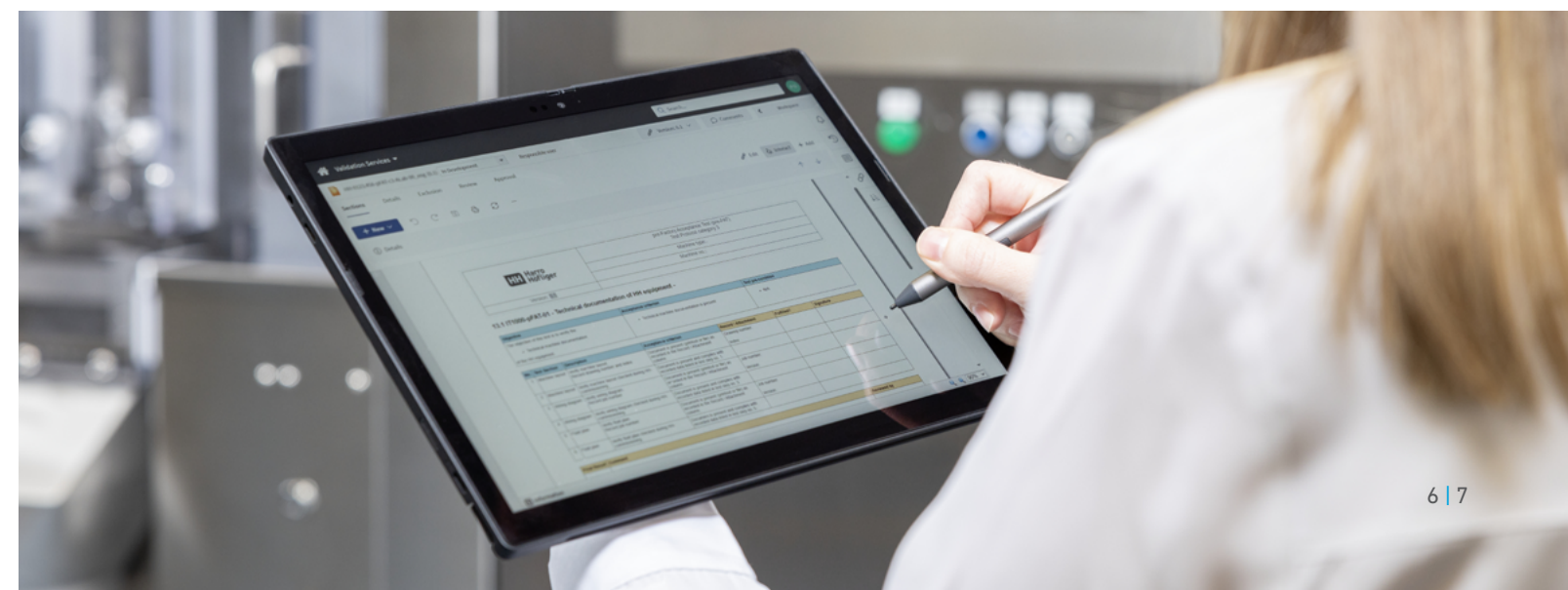
CUSTOMER SATISFACTION

Customer satisfaction is a core element of our commitment to quality. We are committed to offering high-quality products and services and reliably meeting our customers' expectations. We place great value on the continuous improvement of our processes and align our actions with the needs and feedback of our customers. Our quality management system is certified in accordance with DIN EN ISO 9001. This certification confirms our systematic, transparent and process-oriented approach to ensuring consistently high quality and the continuous optimization of our procedures.

COMPETITION AND TRANSPARENCY

WE ARE COMMITTED TO FAIR AND LAWFUL COMPETITION

Anti-competitive conduct is strictly prohibited. This includes, in particular, agreements with competitors and the exchange of sensitive market information that could influence prices, bids, capacities or market behavior. We make our decisions independently and on the basis of objective criteria; we do not tolerate unfair or non-transparent influence. Employees avoid situations that could give the appearance of unlawful agreements and report possible violations through the designated reporting channels.



INFORMATION SECURITY

IT SECURITY

To strengthen the protection of data and information, both our own and the data and information made available to us, we operate a certified information security management system (ISMS) in accordance with ISO/IEC 27001. This system provides a structured framework for identifying, assessing and managing information security risks.

This includes measures such as access controls, data encryption and regular security training. We place great importance on the completeness and accuracy of the information we create, never misuse confidential information and do not disclose it to third parties without authorization. Regular internal and external audits and reviews of the ISMS enable continuous improvement and adaptation to new threats.

This proactive approach fosters the trust of our stakeholders and protects the integrity of all data, ultimately contributing to the long-term stability and security of our company.

DATA PROTECTION

The protection of personal data is a central concern for us. We process personal data of our employees, customers, suppliers and other partners exclusively within the framework of applicable data protection laws.

Personal data is collected, processed or used only when this is necessary for establishing, carrying out or terminating an employment or business relationship, or when explicit consent has been given. In doing so, we observe the principles of purpose limitation, data minimization, transparency and storage limitation.

We use appropriate technical and organizational measures to protect personal data against unauthorized access, loss or misuse. These include access restrictions, encryption, training and regular reviews of our data protection measures. All employees are required to comply with data protection requirements and to consult the data protection officer in case of uncertainty. Data protection violations are systematically investigated and addressed through appropriate measures.

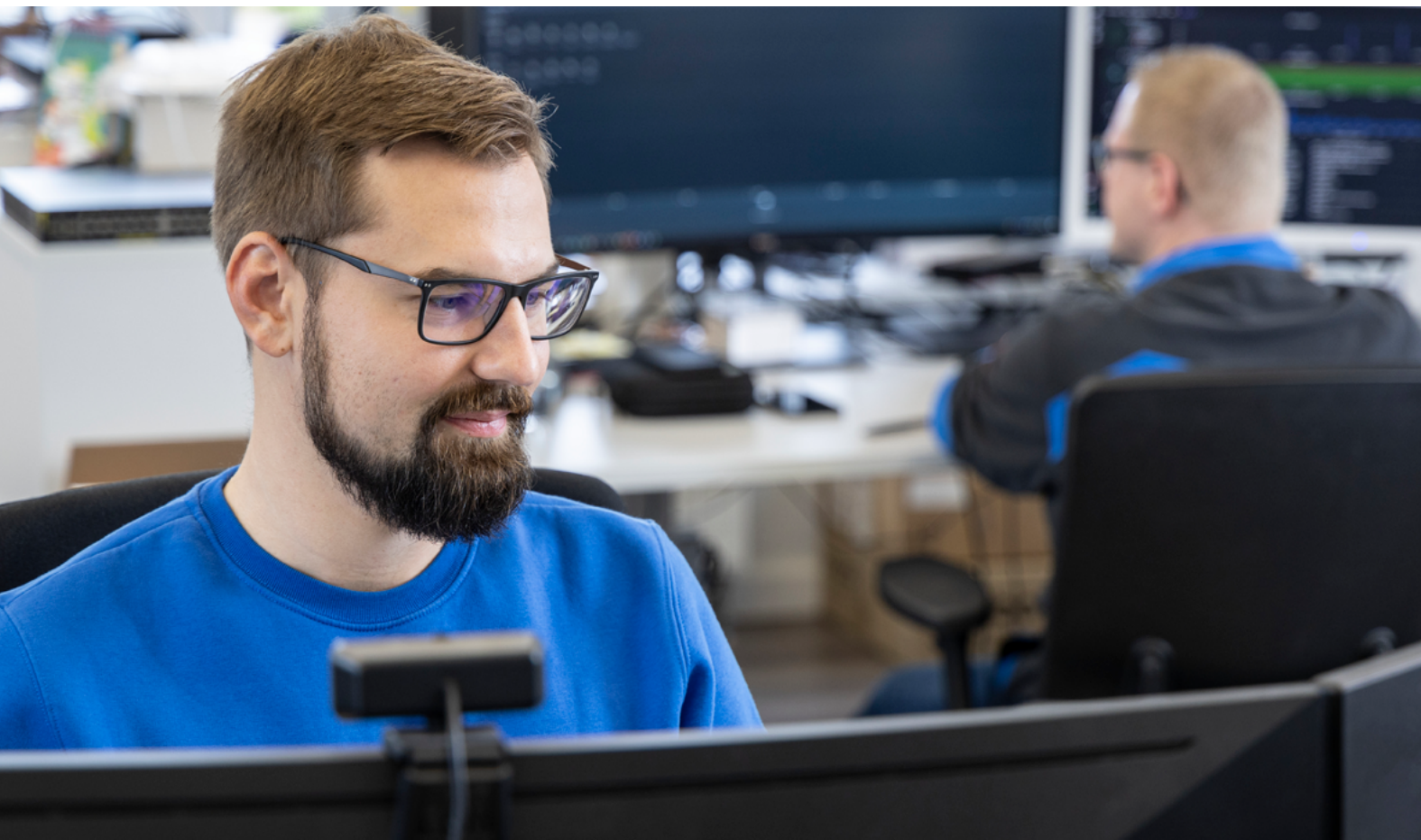
PROTECTION OF INTELLECTUAL PROPERTY

We treat both our own intellectual property and that of third parties with the utmost care and ensure that third-party intellectual property rights are neither used without authorization nor infringed upon. All employees are required to treat information relating to intellectual property confidentially and protect it from unauthorized access. Since innovation and knowledge are essential pillars of our company's success, their protection is particularly important to us.

CONFIDENTIALITY

The careful handling of confidential information is of the utmost importance to us.

All employees are obliged to protect internal company information and sensitive data against unauthorized access, disclosure or misuse. This applies both to our own company data and to information from our business partners and customers. The duty of confidentiality continues without restriction even after termination of the employment relationship. When exchanging information, we ensure that confidentiality is maintained and that access is limited to authorized persons.



DUE DILIGENCE

INTEGRITY AND DILIGENCE GUIDE OUR ACTIONS

We act fairly, honestly and diligently, thereby contributing to sustainable corporate success. We maintain trusting, respectful and fair relationships with our business partners and expect the same from them. We align our conduct with our ethical principles and are guided by recognized standards of responsible corporate governance. All employees contribute to ensuring that our business transactions are documented completely, accurately and traceably. A transparent financial reporting system serves to manage our company.

CONFLICTS OF INTEREST



WE AVOID CONFLICTS OF INTEREST AND ACT TRANSPARENTLY

When personal interests conflict with the interests of the company, this is referred to as a conflict of interest. We avoid such conflicts and disclose unavoidable situations in order to resolve them as quickly as possible. In doing so we respect the privacy of every employee. In the course of our professional activities we are guided by the interests of the company.

Our employees act independently and do not demand or accept impermissible monetary benefits, gifts or other favors. The acceptance of gifts within the legally permitted framework up to a maximum value of 50 euros or an equivalent amount in a local currency is permitted.

SOCIAL RESPONSIBILITY

PROMOTING THE COMMON GOOD

We see ourselves as part of society and assume responsibility beyond our business activities. We support voluntary engagement as well as recognized aid organizations and sustainability projects.

MEASURES IN CASE OF VIOLATIONS

WE DO NOT TOLERATE ANY VIOLATIONS OF THE CODE OF CONDUCT

We do not tolerate violations of the Code of Conduct or any other applicable internal policies. Where necessary, employees concerned will be expected to take steps to ensure alignment with company standards. In the case of serious violations, disciplinary, civil or criminal actions may be taken. We foster a corporate culture based on openness and trust. Indications of potential violations of our Code of Conduct can be reported at any time directly to the Executive Management or the Supervisory Board.

Alternatively, reports can be submitted anonymously via our [whistleblowing system](#). All incoming reports are received, documented and reviewed by an independently operating monitoring body. After completion of the investigation, the cases are archived in accordance with a standardized procedure.

ENTRY INTO FORCE

This Code of Conduct enters into force upon its adoption by the Management Board and the Supervisory Board.

Allmersbach im Tal, July 2026

**“OUR GUIDING PRINCIPLES ARE
DEDICATION AND FAIRNESS.”**

