

# SUPPLIER CODE OF CONDUCT



## PREAMBLE

Harro Höfliger represents technological progress, entrepreneurial responsibility, and integrity. As an internationally operating family business, we consider compliant, fair, ethical and sustainable conduct a fundamental prerequisite for our long-term success.

Our suppliers, service providers, and other business partners make a significant contribution to the quality, reliability and sustainability of our services. Therefore, we expect them to share a common understanding of lawful, ethical and responsible business practices, as well as respect for human rights and environmental standards.

This Supplier Code of Conduct outlines the key requirements we place on our business partners and forms part of our human rights and environmental due diligence obligations. Compliance with these principles is the foundation of a trustworthy, responsible and sustainable partnership.

## COMPLIANCE AND DUE DILIGENCE OBLIGATIONS

Our business partners are expected to act in accordance with applicable laws, regulatory requirements and contractual obligations. This includes compliance with regulations on taxes and duties, anti-money laundering, customs, foreign trade and export controls, competition and antitrust law, anti-corruption, and the protection of third-party rights.

We expect our business partners to establish appropriate internal processes and responsibilities to fulfill human rights and environmental due diligence obligations. This includes identifying, assessing, and prioritizing risks and implementing appropriate preventive and control measures.

They should align with internationally recognized standards of responsible business conduct, particularly:

- ILO core labor standards
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

Our business partners commit to participating in risk-based analyses as part of our human rights and environmental due diligence expectations. They provide all necessary information completely, accurately and in a timely manner and support appropriate risk assessment and prioritization measures.

## RESPECT FOR HUMAN RIGHTS AND FAIR WORKING CONDITIONS

Our business partners are to respect internationally recognized human rights and comply with ILO core labor standards, especially:

- Prohibition of child labor and forced labor
- Prohibition of human trafficking
- Freedom of association
- Right to fair working conditions
- Non-discrimination



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No child labor, forced labor, modern slavery, or any form of exploitation is tolerated. Discrimination, harassment, and unfair disadvantage are not tolerated. Remuneration, working hours and other employment conditions must at least comply with applicable legal requirements. Where human rights risks exist, business partners must take appropriate preventive measures and cooperate in investigating and remedying any violations.

## EDUCATION AND TRAINING

We expect our business partners to promote the professional and personal development of their employees. Skills and competencies are key to sustainable business success. They must ensure appropriate and continuous training and development, aiming to strengthen expertise, ensure quality collaboration and enable long-term responsible business operations.

## PROTECTION OF SAFETY, HEALTH, AND THE ENVIRONMENT

Our business partners are to ensure a safe and healthy working environment and take appropriate measures to protect employees and all other affected persons. They comply with environmental regulations, avoid harm to people and the environment, minimize environmental impact and use resources responsibly and efficiently.

## INTEGRITY IN BUSINESS CONDUCT (COMPETITION, CORRUPTION, CONFLICTS OF INTEREST)

Business decisions must be based on objective considerations and not improperly influenced by personal interests.

- Conflicts of interest must be disclosed transparently
- Corruption, bribery and improper advantages are not tolerated
- Fair competition rules must be followed
- Anti-competitive agreements and unfair business practices are prohibited

## CONFIDENTIALITY, DATA PROTECTION, AND PROTECTION OF KNOW-HOW

Business partners protect confidential information, personal data and intellectual property appropriately. They comply with applicable data protection laws and ensure confidentiality continues even after the business relationship ends.

## RESPONSIBILITY ALONG THE SUPPLY CHAIN

Business partners commit to passing on the principles of this Supplier Code of Conduct to their own suppliers and to promote compliance.



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## CUSTOMS, FOREIGN TRADE AND EXPORT REGULATIONS

Business partners are to comply with all applicable regulations in international trade of goods and services, particularly regarding:

- Export controls
- Sanctions
- Embargoes
- Customs

They provide complete and accurate information and proper documentation where required.

## IMPLEMENTATION, MONITORING, AND CONSEQUENCES OF VIOLATIONS

Business partners are responsible for implementing and ensuring compliance with this Code.

Harro Höfliger may request information and evidence of compliance and conduct risk-based audits.

Business partners must support these measures appropriately.

Violations of this Code constitute a significant impairment of the business relationship.

Appropriate corrective actions must be taken immediately, including action plans to prevent future violations.

If no adequate improvements are made within a reasonable timeframe, or if the violation is severe, the business relationship may be terminated.

Business partners must document compliance appropriately and provide evidence (e.g., policies, training records, certificates, audit reports) upon request.

## COMPLAINT PROCEDURES AND REPORTING OF VIOLATIONS

Harro Höfliger fosters a corporate culture based on openness and trust. Any concerns regarding potential violations of our Code of Conduct may be reported at any time directly to the Executive Management Board or the Supervisory Board.

Alternatively, reports can be submitted anonymously through our [whistleblower system](#). All incoming reports are received, documented, and reviewed by an independently operating monitoring body.

Upon completion of the investigation, the cases are archived in accordance with a standardized procedure.

## ENTRY INTO FORCE

This Supplier Code of Conduct enters into force upon its publication or its inclusion in the business relationship.

Allmersbach im Tal, July 2026

Handwritten signature of Thomas Heckner in black ink.

Thomas Heckner  
COO

Handwritten signature of Norbert Oetinger in black ink.

Norbert Oetinger  
Vice President SCM