

HDO Code of Conduct

Code of Conduct

Respect
We are respectful, when we meet
comprehensive social responsibility



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WE ARE HDO IS AT THE CORE OF OUR
COMPANY CULTURE AND IT IS WHAT MAKES US
A RELIABLE, RESPONSIBLE AND FAMILY-ORIENTED
” PARTNER.

WERNER BENEKEN
Managing Partner of HDO Druckguß- und Oberflächentechnik GmbH

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BEING A SUCCESSFUL FAMILY COMPANY, WE
COMBINE TOP TECHNOLOGICAL PERFORMANCE
WITH RESPONSIBLE BUSINESS CONDUCT. THIS IS
HOW WE ACHIEVE SUSTAINABLE AND LONG-TERM
VALUES FOR CUSTOMERS, BUSINESS PARTNERS
” AND EMPLOYEES.

MARTINA GUNDELACH
Managing Director of HDO Druckguß- und Oberflächentechnik GmbH

PREAMBLE

HDO Druckguß- und Oberflächentechnik GmbH (hereafter simply referred to as HDO) is the European market leader in manufacturing decorative zinc, magnesium and aluminium die-cast parts and components. As a medium sized, internationally operating family company, we have been producing high-quality die-cast components for the automotive, sanitary, industrial goods and household appliances industries for over 60 years.

With our clear goal of achieving customer satisfaction, combined with our passion and excellence, we work to impress our customers with our products and services everyday. On the basis of the central concept of 'We are HDO', we can only achieve this goal together. Here especially, responsible conduct, openness and transparency, as well as continued compliance with laws and ethics, play an important role.

Our company's advancement into new sectors, increased internationalisation and digitalisation all introduce new challenges for us daily. Thereby, binding rules which guarantee fair and sustainable conduct, both socially and economically for HDO as a whole, are a prerequisite for enduring success.

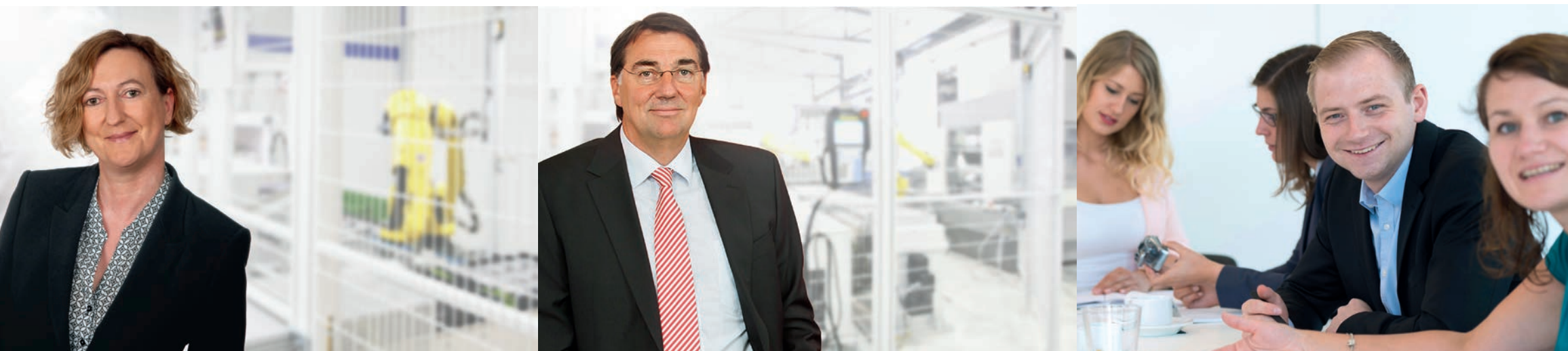
This Code of Conduct brings our most important basic rules and principles together in one document for the first time. It forms the foundation of a sustainable company culture, which, as a family business, we feel committed to maintaining.



MARTINA GUNDELACH
Managing Director



WERNER BENEKEN
Managing Partner



1 BASIC PRINCIPLES OF CONDUCT

It is HDO's top priority to comply with laws and regulations. Every employee must be committed to this too. Any violation of the law and/or regulations will be met with disciplinary consequences, irrespective of the applicable legal sanctions.

In addition, HDO's reputation is significantly impacted by the behaviour, actions and conduct of its employees. Inappropriate behaviour can therefore lead to considerable losses for the company. Thus, every employee is requested to respect the company's reputation in society when carrying out his tasks.

EQUAL OPPORTUNITIES AND MUTUAL RESPECT

HDO is committed to equal opportunities in the labour market and adheres to all relevant laws which prevent discrimination. Current and future employees are exclusively evaluated based on their qualifications, skills and abilities. No employee is to be discriminated against, favoured or marginalised based on their ethnic origin or skin colour, nationality, descent, religion, social origins, gender, age, marital status, physical characteristics or appearance, sexual orientation, their membership in groups, political affiliation, physical condition or parental status. Furthermore, current and future

employees must not undergo any medical testing that could be used in a discriminatory manner.

FORCED LABOUR AND HUMANE TREATMENT

Forced labour is not permitted in the company under any circumstances in the. This includes involuntary prison labour, bonded labour and labour linked to human trafficking. Furthermore, HDO must treat its employees fairly and free from sexual harassment or abuse, corporal punishment or torment, mental or psychological pressure or verbal abuse. This also applies to threatening such behaviour.

CHILD LABOUR

HDO prohibits any use of child labour. The term 'child' covers persons under 15 years of age (or 14 years in accordance with state laws) or persons who are younger than this age who are still in compulsory education in the country in question. If the age for leaving compulsory education is above the age limit given here, the first definition applies. However, approved training programmes that comply with all laws and regulations are expressly supported. Employees under 18 years of age must not be assigned to tasks that could jeopardise their health and safety.



WORKING STYLE AT HDO

The recipe for success at HDO is enthusiasm. It serves as the foundation in paving the way for a successful common future. The result of enthusiasm is reflected in *Speed and Spirit*, a concept coined by HDO themselves. *Speed* stands for particularly rapid and efficient working methods and process design. *Spirit* describes taking personal responsibility in pro-actively developing company processes.

LEADERSHIP CULTURE AND COOPERATION

Supervisors are managers and they bear particular responsibility for their employees. Managers set an example and their behaviour must be largely aligned with the principles pertaining to the company's code of conduct. The basis for positive cooperation lies in managers granting and entrusting their employees with as much responsibility and freedom as possible. HDO's culture is to take social responsibility seriously and to recognise employees so that they feel proud of their active contribution to success. Employees enjoy working at HDO. Ensuring the successful implementation of the HDO philosophy is down to the managers, who ought to challenge and encourage employees to achieve agreed goals.

This also involves training employees in accordance with their tasks.

Teamwork is supported by the reciprocal, smooth and fast exchange of information between employees and supervisors. Therefore, it is necessary to provide complete information on operational relationships and circumstance, to guarantee the ability to act and make decisions.

It is also the task of managers to prevent unacceptable behaviour from employees. Included in their sphere of responsibility is ensuring that no violations of rules occur, which could have been avoided or restrained by adequate supervision.

2 HANDLING BUSINESS PARTNERS AND THIRD PARTIES

Achieving the overarching goal of customer satisfaction requires individuals to work together trustingly and responsibly - not only with customers but also with colleagues and suppliers. In this regard, each individual decisively contributes to the company's success. For this reason, at HDO, every individual is seen as a partner and treated accordingly.

Partnership is not just a catchword at HDO. Mutual respect and commitment form the foundation of long-term trust at the company. This almost family-like approach with all those in dialogue with HDO is not only a source of joy, but an approach that makes economic sense too. Feeling good is, and will always be, the strongest and most sustainable source of motivation.

INTEGRITY AND ANTI-CORRUPTION MEASURES

HDO must forbid and refrain from corruption, extortion, breaches of trust and misappropriation of any kind and must not tolerate such behaviour. Bribery and other unfair practices Departments, justice and representatives of other business partners

Exercising influence is prohibited. This behaviour is also not to be condoned.

CARTEL AND COMPETITION LAW

HDO employees must adhere to the statutory regulations and rules within the framework of fair competition. Special arrangements regarding the allocation of customers and territories, prices and price components, supplier relationships and their capacities as well as specific details or offer agreements will not be tolerated. The same applies to the exchange of investment or market strategies. In particular, regarding this matter, oral or implicit agreements that lead to conscious parallel behaviour are fundamentally prohibited.

Furthermore, agreements or the exchange of information on development and innovation plans are only permitted in very limited exceptional cases.

GIFTS, INVITATIONS, DONATIONS AND SPONSORSHIP

HDO employees must not give suppliers, customers or other partners gifts or other contributions which could present a personal advantage to suppliers, customers or partners from the business relationship and which could positively influence their business with HDO.

When accepting a favour, one must take care that, as an act of courtesy, it complies with general business practices. In dealings with business partners or otherwise, no material benefits may be accepted or even requested, which exceed the practices mentioned.

ANTI-MONEY LAUNDERING

HDO must always comply with laws on fighting money laundering. Compliance with legal regulations concerning business relations with partners, customers and consultants is a prerequisite for working with HDO. In particular, it is always necessary that the funds of partners, customers and consultants are derived from legitimate sources. Any suspicious-seeming behaviour is to be reported immediately. Applicable regulations concerning the documentation and accounting of cash transactions, other transactions and contracts must be followed.

3 AVOIDING CONFLICTS OF INTEREST

HDO employees must act in the interest of the company. To that end, conflicts of interest must be avoided. Personal relationships or interests must not influence business activities. This means, personal interests must not be in conflict with HDO's interests or influence decision-making.

SECONDARY EMPLOYMENT

HDO must be notified prior to the commencement of any other future remunerated work. If the second job clashes with HDO's interests, approval may not be given. A second job may be forbidden in cases where the employee has business dealings with the company in question. Approval can also be revoked should it be established that either of the above situations apply. Occasional lectures or writing engagements in the case of an author, for example, are tolerated.

4 HANDLING INFORMATION

So that a trusting environment is created and maintained, it is very important to HDO that information is dealt with conscientiously. Naturally, this includes information from and about employees, customers, suppliers, partners and consultants too.

DATA PROTECTION AND SECURITY

The privacy and integrity of HDO employees and business partners is to be unfailingly respected. For this reason, HDO follows stringent guidelines when an employee or business partner's personal data is further processed. Such data is to be collected and saved in a traceable manner and for a specific purpose only.

HDO also ensures its information technology infrastructure is up to date in order to protect against unauthorised access to internal HDO data as well as access to data from business partners.

CONFIDENTIALITY

Innovations, concepts and new products are valuable business secrets. The same applies to technical know-know, which is made available to us over the course of the collaborative work we do with our contractors. Non-disclosure of this type of information provides an essential foundation of trust for collaboration with our contractors and, moreover, is a

contractual obligation when working with HDO. It is hereby stated that the non-disclosure of such know-how, which forms business and company secrets, is part of HDO employee contracts. These points not only ensure advantage over competitors, but also work to the advantage of customers and business partners.

INSIDER TRADING

HDO supports the fair and sustainable trading of securities. Thus, insider trading is to be prevented. Insider information includes, for example, information regarding technical innovations, the order situation, important changes in business relationships, mergers and acquisitions. Non-public information about HDO, as well as other partners, is always handled confidentially and is not misused or passed on for private security transactions.

INTELLECTUAL PROPERTY

In order to maintain a creative and productive basis for innovations at HDO, the company will continue to respect and adhere to intellectual property laws in the future. It is very important for HDO employees' creative and innovative skills to be allowed to fully and freely evolve and be put into practice. Protection of intellectual property is therefore an important element of the company.

5 ENERGY, ENVIRONMENT AND SAFETY

As the company with the largest zinc pressure die-casting galvanisation process in Europe, HDO is aware of its obligation to the environment and its inhabitants, and acts accordingly. This applies, in particular, to the protection of the environment and the preservation of natural resources for coming generations, but also to the safety of our most valuable company assets - our employees.

In order to fulfil these obligations, HDO has introduced a process-oriented, integrated management system, which consists of the following components, amongst others: work safety management, energy management, environment management and safety management.



WORK, FIRE AND HEALTH PROTECTION

HDO is aware that the success of a company depends significantly on its employees. Only healthy and motivated employees are in a position to do their best every day for their company. The occupational safety management system (OSMS for short) installed at HDO is certified in accordance with the BS OH-SAS 18001:2007 standard (Occupational health and safety management system) and ensures the safety of every employee. Our goal is to reduce the number of accidents at work and to improve employee health conditions in the workplace.

To guarantee the safety of visitors and neighbours, the company has defined safety guidelines on how to act in a hazardous situation and has made these accessible to all.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

The objective of HDO's environmental policy is to manufacture products that are environmentally compatible and do not pose a risk to people's health, whilst consuming as few materials and as little energy as possible in the process. This commitment is underlined at HDO by its DIN EN ISO 14001 certificate. This standard requires all those involved in the production process to provide a contribution to en-

vironmental protection. This applies to both employees and suppliers. Moreover, environmental considerations are taken into account as far as production plants and equipment with the latest technological standards are concerned.

ENERGY POLICY

HDO is committed to the realisation, maintenance and continuous improvement of its energy management system in accordance with DIN EN ISO 50001:2011. The goal is to utilise the energy resources required as efficiently as possible, without producing waste, as well as to consider sustainability and energy saving opportunities. This requires the company and its suppliers to make energy efficiency a decisive criterion when buying new products and services. As the foundation of the energy policy, HDO is committed to complying with all applicable legal and otherwise received requirements with regards to energy use, energy consumption and energy efficiency. Management is aware of the importance of energy management and will make all the resources necessary for the energy management process and for achieving the ambitious goals available.

6 HANDLING HDO PROPERTY AND PARTNER PROPERTY

Every employee must treat company and partner property responsibly and protect assets against loss, damage, theft, abuse and unauthorised use. Immaterial assets such as the company's knowledge and partners' knowledge, intellectual property rights and copyright-protected work are included in this. Company computers and other equipment are to be used for business purposes and are not intended for personal use. Without the explicit consent of the relevant department, company and partner property must not be used for private purposes.





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