

## 5. CONDUCT TOWARDS THE COMPANY

- The use of WHW Group resources for private purposes is generally prohibited and requires approval in individual cases. This also applies in principle to the use of telephones, computers and the Internet. The relevant guidelines and (operating) agreements must be observed.
- Official statements, in particular to the media, are only made by persons expressly authorized to do so. The right to freedom of expression applies in principle to statements made by WHW employees in public. WHW employees take care that their public appearance does not damage the reputation of the WHW Group.
- Information not made publicly available and confidential business documents of the WHW Group are subject to confidentiality and may not be disclosed or made accessible to third parties even after termination of the employment relationship.
- WHW employees are obliged to contribute to the active protection of confidential data against access by third parties.



## 6. ENFORCEMENT

- Through their conduct in accordance with the Code of Conduct, WHW managers serve as role models for WHW employees. All managers must ensure and monitor that their employees are informed about the contents of this Code of Conduct and act accordingly.
- If they become aware of any violations of this Code of Conduct, each WHW employee must inform his or her supervisor.
- Violations of this Code of Conduct may lead to consequences for the employment relationship and its continuation as well as to claims for damages.

### NOTE

For reasons of better readability, the language forms male, female and diverse (m/f/d) are not used simultaneously. All references to persons apply equally to all genders.



**HILLEBRAND GRUPPE**

#### WHW Walter Hillebrand GmbH & Co. KG

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#### Companies for which this Code of Conduct applies

EWH Holding GmbH & Co. KG  
Hillebrand Chemicals GmbH  
Hillebrand Chemicals Kirmyasal Pazarlama Limited Şirketi  
HM Systems GmbH & Co. KG  
Walter Hillebrand GmbH & Co. KG Galvanotechnik  
WIROX Oberflächentechnik GmbH & Co. KG  
WHW Dienstleistungen GmbH & Co. KG  
WHW Langenfeld GmbH & Co. KG  
WHW Walter Hillebrand GmbH & Co. KG  
nanogy GmbH

Wickede (Ruhr); Version 1.2, July 2021

**CODE OF CONDUCT**

**WHW**

of the  
**WHW Hillebrand  
Group**



**HILLEBRAND GRUPPE**

# PREAMBLE

The WHW Hillebrand Group has grown steadily since its foundation in 1937 and participates in various forms of economic as well as social life. As a result, the WHW Hillebrand Group is committed to various people, institutions, the environment and society. The responsibility that the company and its employees assume in various ways on a daily basis is correspondingly great.

In the future, we will continue to develop and constantly improve as a family-owned company. This can only be done in partnership with our employees, customers, suppliers, the authorities and our other business partners. We are convinced that all actions emanating from the company and its employees should and must be subject to a stable set of values. Performance, quality, innovation, cost awareness, integrity and cooperation are the cornerstones of our actions. Adherence to this set of values is an indispensable basis for sustainable corporate success.

This Code of Conduct conveys concrete rules of behavior based on the values we have defined. It is intended to help in mastering daily challenges in accordance with our values and is binding for all employees of the WHW Hillebrand Group. It represents our commitment to compliance with the principles that follow.



## 1. PURPOSE

Communicating principles for successfully conducting business based on our values.

## 2. SCOPE

- The Code of Conduct is addressed to all companies in which the WHW Hillebrand Group directly or indirectly holds at least 50% of the shares (WHW Group).
- The Code of Conduct is binding for all employees of the WHW Group.

## 3. PRINCIPLES OF ETHICAL, SOCIAL AND SOCIETAL RESPONSIBILITY

- The WHW Group respects and supports the observance of internationally recognized human rights.
- The WHW Group stands for equal treatment and equal opportunities for all people regardless of ethnic origin, skin color, gender, religion or ideology, age, sexual identity, disability or political views, insofar as this is based on democratic principles.

## 4. CONDUCT WITHIN THE SCOPE OF BUSINESS ACTIVITY

- Business affairs shall be conducted in a manner consistent with applicable regulations and laws.
- The WHW Group respects fair competition. We therefore comply with the laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition. In our dealings with competitors, these regulations prohibit, among other things, agreements and other activities that unfairly influence prices or conditions or improperly impede free and open competition.
- The WHW Group rejects corruption and bribery and does not tolerate such conduct. Gifts, favors, hospitality or other benefits by employees to third parties with the aim of obtaining unfair advantages for the WHW Group are not permitted.
- WHW employees must ensure that no personal dependencies or obligations to clients or suppliers arise. In particular, company employees may not accept any

- Child labor and forced labor in any capacity are strictly prohibited.
- WHW Group ensures occupational safety and health protection in the workplace within the framework of public regulations. The company supports continuous development to improve the working environment.
- Employees shall be protected from physical punishment and from physical, sexual, psychological and verbal harassment. The privacy of employees shall be respected.
- All WHW employees should receive a fair wage for their employment.
- The WHW Group respects the right of its employees to freedom of association and assembly within the framework of the respective applicable rights and laws.
- WHW Group complies with the regulations and laws for the protection of the environment and actively pursues a resource-saving business policy.
- The WHW Group observes data protection. Personal data may only be collected, processed or used in the WHW Group insofar as this is necessary for legitimate purposes. The use of data must be transparent for those affected. Their rights to information and notification as well as, if applicable, to objection, blocking and deletion must be safeguarded.

gifts that, when viewed reasonably, must be assumed to be capable of influencing business decisions.

- No employee may use his or her position or role in the company to gain personal advantage.
- The giving and receiving of occasional gifts of nominal value are permitted as long as this is consistent with generally accepted business practices.
- The WHW Group respects and safeguards the trade and business secrets of others. Confidential information and documents may not be passed on to unauthorized third parties or made accessible in any other way.
- Each employee of the WHW Group, in his or her respective role, must ensure that the activities of the WHW Group that depend on him or her comply with the applicable rules concerning health, safety and environmental protection.