

HÖRMANN

CODE OF CONDUCT
FOR
BUSINESS PARTNERS



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Editorial note: The singular “they” is used in this document for simplicity.

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1 FOREWORD FROM THE MANAGING PARTNERS

*“A good reputation must be earned.”
(August Hörmann, Company founder)*

Dear Business Partner,

In accordance with the philosophy of our company founder, we have always strived for high standards – for ourselves as entrepreneurs, for the companies in the Hörmann Group and for the quality of our products. At the same time, we are very aware of our economic, ecological and social responsibilities and we are striving to make a valuable contribution to this.

We are convinced of our responsibility towards people and the environment, and in particular with the resources available to us. We also believe that business relationships should be established and maintained on a foundation of integrity and legal compliance.

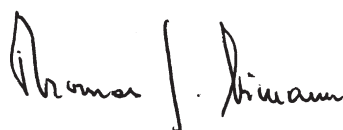
With this Code of Conduct, we define the expectations to which we hold Business Partners of the Hörmann Group and, by making it binding, form the basis of our business relationship.

We thank you for actively committing to this Code and your cooperation in the implementation.

Best regards,



Martin J. Hörmann



Thomas J. Hörmann



Christoph Hörmann



2 SCOPE AND GENERAL PRINCIPLES

This Code of Conduct applies to all Business Partners who provide services of any kind to the Hörmann Group's production sites or sales locations (www.hoermann.com/en/locations; hereinafter referred to as "**Hörmann Group**").

The requirements defined in this Code of Conduct shall apply to all Business Partners and any of their employees.

The Code of Conduct shall also apply to third parties engaged by the Business Partner to perform services for a company of the Hörmann Group (e.g. affiliated companies or subcontractors).

The requirements set out here are based on international standards and agreements – in particular, the Universal Declaration of Human Rights of the General Assembly of the United Nations (UDHR), the UN Convention on the Rights of the Child and the ILO framework of fundamental principles and rights at work – and on statutory requirements, such as the German Supply Chain Due Diligence Act.

Together, the requirements represent a minimum standard for the business relationship between the Business Partner and the Hörmann Group. This Code of Conduct shall not restrict, exclude or otherwise render invalid any additional statutory requirements that may apply to the Business

Partner or its services for the Hörmann Group.

The Business Partner is expected to address the human rights and environmental expectations of this Code of Conduct and compliance with them through its supply chain in an appropriate manner. Our training for suppliers on preventing violations of human rights or environmental obligations can be found at www.hoermann.com/en/compliance.

3 INTEGRITY IN BUSINESS ACTIVITIES

The Hörmann Group believes in trustworthy behaviour and legal compliance.

The Hörmann Group expects its Business Partners to comply with all applicable statutory regulations and to have appropriate measures in place to identify and rectify any infractions.

3.1 AVOIDING CONFLICTS OF INTEREST

The Business Partner shall undertake to avoid conflicts of interest between business and personal interests, of any form whatsoever, in the course of its business activity. The Business Partner shall undertake to inform the Hörmann Group of any potential conflicts of interest and to be actively involved in resolving or avoiding the conflict of interest.

3.2 COMBATING CORRUPTION

The Business Partner shall undertake to refrain from any form of corruption, and in particular from obtaining or exploiting unfair advantages, and from offering or receiving bribes.

If the Business Partner becomes aware of any corrupt behaviour in relation to the Hörmann Group, the Business Partner shall inform the Hörmann Group immediately.

3.3 FAIR COMPETITION

The Business Partner shall undertake to engage in fair competition in accordance with applicable antitrust and competition law. Any unlawful pact, coordinated behaviour or other business practice that could affect fair compe-

tion in any way shall be prohibited.

3.4 PROHIBITION OF MONEY LAUNDERING

The Business Partner shall undertake to ensure that no armed groups or terrorist organisations are funded by the business partner's activities, either directly or indirectly. It is prohibited to channel illegally obtained money or capital assets into financial and economic circulation or to conceal the illegal origin of such assets.

3.5 COMPLIANCE WITH SANCTIONS AND EMBARGOES

The Business Partner shall undertake to comply with the applicable sanctions against natural persons or legal entities and to keep up to date with applicable embargoes on goods and services and to comply with these in all its business activities.

3.6. DATA PROTECTION

The Business Partner shall undertake to comply with applicable data protection regulations. This applies in particular to the content of the European Union's General Data Protection Regulation and the most recent versions of any supplementary national texts that apply.

If a data protection incident occurs, the Business Partner shall inform the Hörmann Group immediately and provide all information relevant to documentation and (where applicable) reporting of the incident by email to datenschutzkoordination@hoermann.de.

3.7 PROTECTION OF CONFIDENTIAL INFORMATION, INTELLECTUAL PROPERTY AND FINANCIAL ASSETS

The Business Partner shall undertake to treat confidential information of or concerning the Hörmann Group confidentially and not to disclose it to third parties who are not entitled to this information.

Furthermore, the Business Partner shall undertake only to make use of intellectual property of the Hörmann Group to the extent and within the context that it has received explicit prior permission from the Hörmann Group.

Assets of the Hörmann Group of any kind whatsoever shall be treated with care and only be used to the extent and in the context that has been agreed in advance.

Theft of confidential information or assets, of any kind whatsoever, will not be tolerated in any form.

3.8 RESPONSIBLE PROCUREMENT

The Business Partner shall undertake to follow a strategy of responsible procurement and to ensure that all goods, products and raw materials it procures originate from responsible, legal sources and are procured by lawful means.

In particular, the Business Partner shall ensure that no goods, products or raw materials delivered to the Hörmann Group contain minerals (in particular, tantalum, tin, tungsten or gold) or composite metals made from minerals that originate from conflict zones or that are subject to regulated trade.

4 LABOUR AND HUMAN RIGHTS

The Hörmann Group respects human dignity and calls for protection of labour rights and human rights. The Hörmann Group's human rights policy statement regarding the German Supply Chain Due Diligence Act can be found on www.hoermann.com/en/compliance.

The Hörmann Group expects that its Business Partners will also commit to the protection of labour and human rights.

4.1 RESPECT FOR HUMAN DIGNITY AND ANTI-DISCRIMINATION

The Business Partner shall undertake to respect the dignity and individual rights of its employees and to refrain from any form of discrimination.

In particular, the Business Partner shall not disadvantage any individuals due to their gender, origin or nationality, sexual orientation, age, family circumstances, health situation, disabilities, or religious or political views.

4.2 PROHIBITION OF FORCED LABOUR AND SLAVERY

The Business Partner shall undertake to explicitly reject any form of forced labour.

It is not acceptable to force employees to work by means of intimidation and/or violence, either directly or indirectly. Employees may only be employed if they are providing their labour of their own free will. Slavery, human trafficking, bonded labour and forced prison labour must not be tolerated in the Business Partner's supply chain.

4.3 PROHIBITION OF CHILD LABOUR

The Business Partner shall undertake to explicitly avoid any form of child labour, in particular the

worst forms of child labour. Child labour must not be tolerated anywhere within the Business Partner's supply chain.

Employment of any child who is still within the mandatory school age must not be tolerated. This means that any child who is employed must be at least fifteen years old – or older, if the applicable law in the location of employment specifies a higher minimum age.

The prohibition on the worst forms of child labour shall be complied with unconditionally. Measures to rectify any such child labour shall be implemented without delay.

4.4 FAIR WORKING CONDITIONS AND REMUNERATION

The Business Partner shall undertake to maintain fair working conditions and fair remuneration for the work done by its employees.

No pay deductions shall be permitted other than the statutorily approved deductions (e.g. taxes and social security contributions). These deductions must be paid in accordance with regulations and in full to the appropriate authority.

Fair working conditions must not be circumvented by means of illegal practices.

4.5 FREEDOM OF ASSOCIATION

The Business Partner shall respect the right of its employees to form or join associations or unions, to establish works councils, to name employee representatives and to strike. Employees who take action to campaign for their rights may not be disadvantaged on this basis.

In addition, the Business Partner shall be involved

in collective negotiations and wage negotiations and shall contribute to constructive communications with its employees and their representatives.

mane or degrading treatment is violated, physical harm is caused, or the freedom to form unions and associations is undermined.

4.6 PROHIBITION OF ILLEGAL EVICTION OR EXPROPRIATION OF LAND

The Business Partner shall undertake to respect ownership of land, woodlands, and bodies of water.

Illegal eviction or expropriation of land, woodlands or bodies of water whose use is essential to the life of other human beings is prohibited.

4.7 EMPLOYMENT AND ENGAGEMENT OF SECURITY PERSONNEL

The Business Partner shall undertake, for the protection of the enterprise, only to use trained and monitored security personnel.

Employment or engagement of security personnel shall be prohibited if, by engaging these personnel, the prohibition on torture and cruel, inhu-



5 OCCUPATIONAL SAFETY AND HEALTH PROTECTION

The Hörmann Group creates a safe, healthy working environment for its employees.

The Hörmann Group expects its Business Partners to likewise establish a safe working environment and to be actively engaged in protecting the health of its employees.

The Business Partner shall undertake to comply strictly with all laws and regulations regarding occupational health and safety. The Business Partner shall ensure that there are adequate safety systems in place, that it has adequate and suitable preventive measures, and that safety and safeguarding regulations are complied with.

In particular, the Business Partner shall ensure that safety risks at work are continuously mon-

itored and appropriate preventive measures are undertaken. The Business Partner shall provide its employees with the protective equipment and tools needed to ensure safe working; all such equipment shall be maintained in good working condition. The Business Partner shall also provide training to all new employees before they begin work, as well as regular refresher training.



6 ENVIRONMENTAL PROTECTION

The Hörmann Group is aware of its responsibility towards the environment and believes in developing sustainable products with innovative techniques as a way to help protect our environment, avoid harmful effects on the climate, and make sparing use of resources.

The Hörmann Group expects that its Business Partners will likewise accept responsibility for helping to protect our environment.

6.1 MINDFUL USE OF RESOURCES AND REDUCTION OF HARMFUL EFFECTS ON THE ENVIRONMENT

The Business Partner shall undertake to use the resources needed to provide its services as efficiently and sparingly as possible. This shall apply to the products and materials required, and to the energy and consumables used. Wherever possible, the Business Partner shall use recycled or other environmentally friendly materials and packaging, and green energy.

The Business Partner shall furthermore undertake to reduce any harmful effects on the environment that could result from its service provision and to ensure its services are as environmentally friendly as possible.

6.2 HAZARDOUS SUBSTANCES

The Business Partner shall undertake to comply with all applicable regulations regarding hazardous substances and to undertake active haz-

ardous substance management. This includes, in particular, identification, substitution, correct handling and labelling, and correct disposal of any hazardous substances incorporated into the Business Partner's products, or used in the course of its service provision.

Any accompanying documentation required by law (in particular, material safety data sheets and SCIP data) shall be submitted to the Hörmann Group voluntarily, prior to the Business Partner providing its service.

Any bans on production or usage (e.g. mercury, persistent organic pollutants) shall be complied with in full by the Business Partner and its entire supply chain.

6.3 SEWERAGE AND WASTE

The Business Partner shall undertake to manage and dispose of sewerage and waste in accordance with regulations and in an environmentally friendly manner.

No activities shall be permitted that could undermine compliant and appropriate management of waste and sewerage – these include, for example, pollution with hazardous waste or not correctly handling/disposing of waste containing POPs.

7 WHISTLEBLOWING SYSTEM

The Hörmann Group places value on a trustworthy interaction as the basis of a business relationship.

The Hörmann Group has appointed an external, independent lawyer of trust to receive information about potential infractions of the law or of this Code of Conduct. The complaints procedure pursuant to the German Supply Chain Due Diligence Act, which can be used to report human rights and environment-related risks as well as violations of human rights or environmental obligations, also falls within the remit of our external lawyer of trust.

The Hörmann Group's lawyer of trust will treat

information confidentially and can accept information anonymously if desired. More information about the Hörmann Group's whistleblowing system, as well as the contact details of the Hörmann Group's lawyer of trust, is available at www.hoermann.com/en/compliance.

The Hörmann Group expects that its Business Partner will likewise establish adequate and suitable reporting systems and follow up on reports received. Whistleblowers shall always be subject to protection in accordance with prevailing law.



8 MONITORING AND LEGAL CONSEQUENCES

The Hörmann Group shall be entitled to evaluate the Business Partner's compliance with the Code of Conduct. For this purpose, the Hörmann Group shall be entitled to request self-disclosure from the Business Partner and/or to undertake an audit of the Business Partner, if this seems appropriate to the Hörmann Group. The Hörmann Group shall have the right to appoint third parties for this purpose, who are bound to maintain confidentiality.

On the basis of this evaluation, the Hörmann Group shall have the right to insist that the Business Partner implements corrective measures to rectify or prevent infractions of the Code of Conduct.

In the case of particularly serious violations, the

Hörmann Group shall be entitled to terminate its relationship with the Business Partner extraordinarily. This shall also apply if the Business Partner fails to implement a corrective measure demanded by the Hörmann Group within a reasonable time.



