

The HAM GmbH Compliance Program

This Code of Conduct is binding for all employees of HAM-GmbH. It defines basic, valid standards of conduct and describes what behavior is expected of you. It does not describe every single law and internal guideline. Please ensure that you understand the standards of the Code of Conduct as well as the relevant local laws and internal policies, always act in accordance with them and participate in all mandatory and necessary training. It is the responsibility of supervisors to support their employees in this regard.

Human rights, labor and social standards

We act in accordance with internationally recognized human rights, labor and social standards and strictly adhere to the laws that apply to us.

HAM GmbH is particularly committed to the abolition of all forms of child and forced labor, the principle of non-discrimination, the recognition of freedom of association and social partnership, fair pay and benefits in accordance with local market conditions, reasonable working hours and paid leave, and proportionality in disciplinary and security measures.

HAM GmbH is committed to equal opportunity in the labor market and complies with all relevant laws prohibiting discrimination, in particular on the basis of age, race, color, gender, sexual orientation, identity or expression, origin, religion or disability.

This principle applies to all personnel decisions such as recruiting, hiring, training, job changes, promotions, compensation, benefits, disciplinary actions and terminations.

In addition, sexual harassment and other workplace harassment are strictly prohibited. We promote a diverse and inclusive work environment in which all employees must treat each other with respect and dignity.

Environmental protection, health and safety

Every employee shares responsibility for the protection of people and the environment in his or her working environment

Compliance with all laws for the protection of people and the environment is one of our essential principles. This applies to both our products and our work processes.

Every employee has a duty to use natural resources responsibly and to protect the environment in their work area.

Each employee is responsible for working safely at all times and for complying with all applicable laws and regulations, as well as internal company policies for the protection of the environment, health and safety.

All supervisors have a duty to guide and support their team in exercising this personal responsibility. Unless there are explicit legal or company regulations for environmental protection, health and safety, you must make your own reasonable decision, asking your supervisor for advice if necessary.

Korruption

You must never accept or grant material benefits that may create the impression of (attempted) improper influence

Our business partners, especially our suppliers, customers, partners and dealers, are to be treated fairly. HAM GmbH expects the same from its business partners. Our relationships with all business partners shall be based solely on objective criteria, in particular quality, reliability, competitive prices, and compliance with ecological and social standards and the principles of good corporate governance. Anti-bribery laws in most countries of the world prohibit bribery of domestic and foreign public officials as well as employees of domestic and foreign private sector companies.

Gifts and invitations

Accept only gifts or invitations that can be understood solely as a gesture of courtesy

Imports and exports

All employees must comply with trade control laws when purchasing and selling, producing or marketing goods and technologies

Various national and international trade control laws restrict or prohibit the import and export of goods or services. These restrictions relate not only to the type of product, but also to the country of origin or destination and, in some cases, to the person of the customer (embargo). Similar restrictions may also affect the export of technology or software. Country-specific embargoes exist for certain countries. The check is performed once a day.

Protection of company property and property of business partners

Handle company property with care.

Every employee must handle company property responsibly and protect assets of HAM GmbH against loss, damage, theft, misuse and unauthorized use. Intangible assets such as proprietary knowledge, intellectual property rights and copyrighted works are also part of company property.

Anti-money laundering

Raise awareness of questionable financial transactions and insist on clarification when in doubt

Money laundering is the smuggling of assets (not only cash) resulting from criminal acts into the regular financial and economic cycle. Money laundering is a criminal offense in the member states of the EU, the USA, China, and various other countries.

Information protection and insider trading

If you are unsure what information and data you are allowed to share, ask your supervisor, the responsible information protection officer or the legal department

Any internal information about HAM GmbH, the disclosure of which could be detrimental to the company or would give someone an unfair business or personal advantage, is confidential property of the company. If you have any questions regarding the classification of information, please contact your supervisor or the management.

Privacy

We attach great importance to data protection. Personal data is only processed for a specific purpose and in accordance with the respective applicable data protection laws

HAM GmbH is committed to respecting the privacy and integrity of its employees and business partners. We adhere to strict standards when we process personal data of our employees or business partners. All personal data that HAM GmbH collects and stores is processed exclusively for the intended purpose, comprehensibly, carefully and in accordance with the applicable data protection laws, this is checked at regular intervals by a law firm.

Schwendi-Hörenhausen, 2018/04/18

last examination: 2023/11/15

A blue ink signature in a cursive style, appearing to read 'G. Eberle'.

Günter Eberle

A blue ink signature in a cursive style, appearing to read 'P. Eberle'.

Petra Eberle

A blue ink signature in a cursive style, appearing to read 'R. Eberle'.

Raffael Eberle