



Code of Conduct

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Foreword

Dear employees
Ladies and Gentlemen,

The HUESKER Group is committed to conducting all business in an ethical and legally impeccable manner. To ensure this, we are providing you with this Code of Conduct as a guideline to help you answer the ethical and legal questions that arise in day-to-day business - in strategic considerations and decision-making processes - correctly and appropriately. Please always be aware that the reputation of the HUESKER Group is largely determined by the conduct and actions of each individual employee, regardless of their position in the organisation. Incorrect behaviour by an individual can also cause considerable damage to the HUESKER Group. Personal integrity and a strong sense of responsibility help to decide which behaviour is appropriate in which situation.

You should always ask yourself:

- # Do my actions and decisions comply with the relevant laws and standards as well as the values and standards of the HUESKER Group?
- # Do I act and decide appropriately in every case and free from personal conflicts of interest?
- # Will my decision stand up to critical scrutiny by the public?
- # Does my behaviour promote the reputation of the HUESKER Group as a company committed to high ethical and legal standards?

As a global company, we have to take into account cultural differences in the various countries. We are obliged to comply with and apply local laws and regulations. The HUESKER Code of Conduct is intended as a practical guide. It is intended to provide orientation and information, but also to emphasise the special responsibility and obligation of each individual employee to comply with the Code.

The Code of Conduct is to be understood as a binding guideline for our responsible daily actions and describes the application of these principles to the most diverse aspects of our daily business life. The guiding principle here is that there must be no difference between what we say and what we do. The Code of Conduct is binding.

A key element of our corporate culture is our commitment to having an open corporate culture in which everyone feels safe to seek advice or raise concerns. We do not want to create a culture of mistrust, but if you are unsure about what to do in certain circumstances or are concerned that the Code of Conduct is being breached, you are encouraged to speak up. Nobody has to fear reprisals. You can also use our electronic whistleblower system for this purpose, which you can find on our homepage.

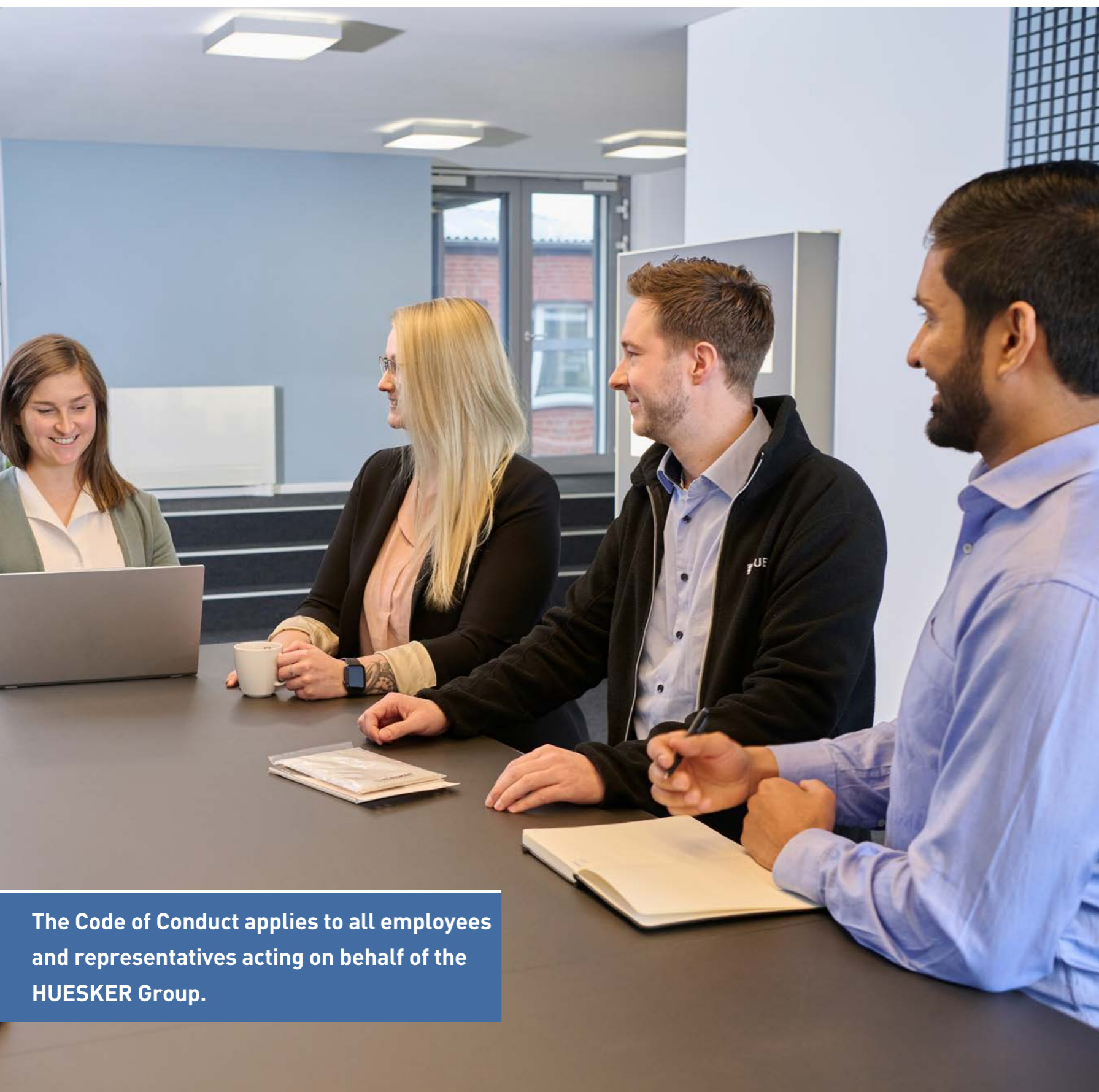
At the same time, we also want to protect you as an employee with these clear rules of conduct. We are confident that we are well equipped for the future with this Code of Conduct. Be a role model and help to implement our principles in your daily life.

Your HUESKER Group

CEO
Dr.-Ing. F.-Hans Grandin

CSO
Sven Schröer

Gescher, April 2026



The Code of Conduct applies to all employees and representatives acting on behalf of the HUESKER Group.

1. Scope of the Code of Conduct

With the Code of Conduct, the HUESKER Group undertakes to fulfill all legal requirements and to comply with the high ethical standards listed here as part of its corporate activities. Compliance with statutory provisions and other regulations to which a company voluntarily commits itself is generally referred to as “compliance”. In a broader sense, compliance is also understood to mean avoiding liability by observing the legal rules of all kinds that apply to the company.

The Code of Conduct contains so-called legal and ethical rules that serve to ensure compliance with legal provisions. Furthermore, regulations are listed to which the HUESKER Group has voluntarily committed itself. To ensure that all employees and all locations can fulfill this obligation, the HUESKER Group’s Code of Conduct clearly and comprehensibly defines what conduct is expected of employees.

The HUESKER Group is a globally active company. The Code of Conduct is applied by all companies and branches of the HUESKER Group. However, the Code of Conduct does not take precedence over local laws and regulations or existing company agreements that apply at the individual locations. In such cases, deviations from the Code of Conduct may come into force.

The Code of Conduct applies to all employees and representatives acting on behalf of the HUESKER Group. Intentional or negligent breaches of the Code of Conduct will result in appropriate disciplinary action. The management of the HUESKER Group expressly welcomes and supports information about actions that are not in accordance with the law or our Code of Conduct. Reprisals against persons who provide such information with conscientious intent are prohibited.

Supervisors have a special responsibility under the Code of Conduct. They must set a good example in complying with the principles and demonstrate through their own behaviour what the HUESKER Group understands by acting with integrity. Managers must ensure that their employees understand the requirements of the Code of Conduct and have the necessary resources to meet them. They also have the task of ensuring consistent compliance with the Code of Conduct and supporting their employees.

2. Environment and sustainability

The HUESKER Group is aware of its social and ecological responsibility and is committed to the principles of sustainability. Sustainability is an integral part of our corporate culture. We have therefore committed ourselves in our corporate values to operate in a sustainable and socially responsible manner. We develop products without jeopardising the development opportunities for future generations.

We act in a resource-conserving manner, record our greenhouse gas emissions and actively contribute to climate protection. Sustainability management within the company is ensured by the management. A staff unit regularly supports, advises and trains employees on a regular basis.

Every employee pays attention to energy efficiency, waste avoidance and sustainable procurement in their day-to-day work. Together we are committed to innovations that combine ecological and social responsibility. Of course, we also pay attention to sustainability when selecting our business partners.



3. Employees

We encourage all employees to always use their common sense and judgement with regard to the Code of Conduct. If you have any doubts, ask your line manager or a colleague for advice.

3.1 Fairness, tolerance and equal opportunities

The HUESKER Group promotes a working environment of equal opportunities that is free from any form of harassment and discrimination. Diversity and inclusion are key strengths for innovation and collaboration. Any behaviour aimed at intimidation is prohibited, whether in the office, in an internal or in a customer-related context. Child labour and forced labour are not tolerated in any of our operations.

Fair working conditions:

The HUESKER Group pays attention to fair and appropriate remuneration that complies with statutory or collectively agreed requirements and values the performance of employees. Statutory regulations on working hours and vacation are implemented in an exemplary manner.

Employee development:

We promote the professional and personal development of our employees, through training, qualifications and individual development meetings.

Zero tolerance:

Insulting, harassing or offensive behaviour of a verbal, non-verbal or physical nature by employees towards colleagues will not be tolerated. Examples of this are derogatory and offensive remarks and actions on the basis of skin colour, ethnic origin, nationality, social origin, any disability, sexual orientation, political or religious beliefs, age and gender.



Speak openly if you are uncomfortable with the behaviour of an employee or colleague and report any harassment immediately. In the event of harassment or discrimination, contact the Compliance Committee, the Works Council or the management directly. Alternatively, you can use our anonymous whistleblower system via <https://huesker.integrityline.com>. If your concern relates to the management, you can also contact directly the Chairman of the company's Advisory Board.

3.2 Values and culture

Our corporate culture is based on the values of inventiveness, progressiveness, excellence, attractiveness and reliability.

We respect and promote human rights in all areas of our business and we are committed to socially - locally, globally and in terms of sustainable development (SDGs = Sustainable Development Goals).

The HUESKER Group values open, honest, transparent and respectful communication. This also includes dealing with problems openly and constructively, passing on information and findings to affected managers and colleagues and demanding information.

3.3 Conflicts of interest

Employees are not permitted to abuse their position or property of the HUESKER Group for personal gain. Possible conflicts of interest may arise if your own private interests impair or threaten to impair your work duties or the interests of the HUESKER Group. Therefore, you may not represent the HUESKER Group in a business relationship in which you or a close family member has such a personal or financial interest.

Furthermore, you are not permitted to conduct private business with customers or suppliers of the HUESKER Group if this results or may result in undue influence. In particular, the standard market price must be paid and payment documented if employees purchase goods or services from suppliers, dealers or customers of the HUESKER Group for private purposes. Furthermore, HUESKER employees may not accept any activity outside the HUESKER Group (including membership of the management boards and supervisory boards of other companies) which may impair their duties towards the HUESKER Group or the interests of the HUESKER Group. Therefore, any secondary employment must be approved by HUESKER and any potential conflict of interest must be reported to the line manager immediately before taking up the activity.

4. Health and safety

4.1 Occupational safety

Occupational health and safety is a top priority.

All employees are responsible for ensuring safety in the workplace by complying with health and safety regulations and practices and therefore receive regular training in this area. Please report accidents, injuries and dangerous equipment, practices or working conditions immediately to your supervisor or the person responsible for occupational safety.

5. Communication and information

5.1 Business documents and communication

All documents and communications (whether on paper or electronic form) written by employees are company documents and may be used as evidence in legal proceedings or investigations by supervisory authorities and thus become public knowledge. Company documents and data of the HUESKER Group are the property of the HUESKER Group and may not be used illegally by employees.

All employees are required to be extremely careful when disclosing information about the company. Any hasty comment to the media, authorities, business partners or other third parties could be misinterpreted or misunderstood, which could lead to the HUESKER Group being seen in the wrong light and ultimately even increase the HUESKER Group's liability risk.

Please observe the following guidelines when communicating:

- # Think carefully about possible statements.
- # Always communicate in a considered and legally compliant manner.
- # Never write anything that you do not want to be identified with.
- # Only speak to the authorities or the media if you are authorised to do so. Forward corresponding inquiries to the Marketing department, the Finance department or, in the case of inquiries relating to "Environment" or "Production" to the plant management.

5.2 Data protection

The HUESKER Group attaches great importance to the protection of personal data and the privacy of employees and business partners. Personal data may therefore only be processed within the framework of the applicable data protection standards, in particular the EU General Data Protection Regulation (GDPR). All employees also receive regular training in this area.

Therefore, collect personal data only to the extent strictly necessary for a legitimate and lawful purpose. In particular, seek advice before transferring personal data to countries outside the European Union. And report any data breaches immediately.

5.3 IT security / digital competence

The requirements for IT security in companies are changing every day. This makes it all the more important to take suitable security precautions that not only ensure the protection of intellectual property and personal data, but also the fundamental ability of a company to act. The HUESKER Group is aware of this responsibility and has created the necessary infrastructure.

HUESKER employees receive regular training and are obliged to comply with the necessary security precautions when using the IT systems. The systems may only be used for business purposes. Guidelines, for example on secure passwords, avoiding malware and paying attention to phishing emails, must be strictly adhered to. Suspicious events must be reported immediately.

The use of digital technologies, artificial intelligence and automation is both future-focused and responsible. We promote the use of digital skills for all employees and actively shape change. Company agreements, guidelines and instructions must be strictly observed.

6. Business partner

6.1 Prohibition of corruption

Corruption prevention represents a particularly important aspect of the compliance efforts within the Huesker Group.

All HUESKER Group business is conducted in a fair, legal and ethical manner. The HUESKER Group attaches great importance to long-term relationships and communicates with business partners, supervisory authorities and state.

Some specific examples - including of less obvious and hidden cases of corruption - can be found under point 6.1.3.



Corrupt behaviour is punishable both for the (active) bribe-giver and for the (passive) bribe-taker.

The company's corporate bodies are based on ethical principles, performance and trust. Unauthorised payments or other unlawful benefits are excluded for the HUESKER Group and its employees.

If you have any doubts, always contact your line manager and/or the Compliance Committee (see point 10).

6.1.1 Corruption and bribery - General information

Corruption is possible in dealings with public authorities in the broadest sense (public officials), but also in general business transactions (between private individuals). It is usually characterised by the fact that the granting of an unlawful advantage, the dishonest preference over a competitor or a (lawful or unlawful) official act of a public official is sought.

Corrupt behaviour is punishable both for the (active) bribe-giver and for the (passive) bribe-taker.

(Active) bribery and (passive) corruptibility in business transactions (without the involvement of a public official) is regulated in Section 299 of the German Criminal Code (StGB). The so-called official offenses can be found in §§ 331 ff. StGB.

Corrupt conduct is generally very broadly defined. In addition to cash benefits and gifts in kind, this can also include event invitations, restaurant visits or discounts on private transactions through special conditions.

In the case of benefits to public officials, it is recognised that benefits to secure the "general good will" or mere "climate care" can trigger criminal liability. A consideration is therefore not immediately necessary. Also vis-à-vis employees in the private sector, it may be sufficient if the advantage is only intended to be used to initiate future (but not yet conclusively (but not yet conclusively determined in detail)).

German criminal law on corruption does not only penalise the actual payment to the bribed party or the receipt of the payment, but also permits punishment for prior acts. In the case of active bribery, for example, the offer and promise of an advantage are punishable in addition to the granting of an advantage. Conversely, this also applies to the passive variant, when someone is promised or even demands an advantage. Even simply talking about corrupt benefits can constitute a criminal offense.

It is therefore important to avoid even the appearance of receptivity to benefits and the willingness to grant them.

Accordingly, HUESKER employees may not promote the sale of HUESKER products by offering decision-makers on the customer side advantages for placing orders. Conversely, company employees are prohibited from demanding benefits for the placement of orders by HUESKER.

6.1.2 Possible consequences of corruption

Corruption is a crime in almost every country in the world. Corrupt behaviour can lead to very serious sanctions, and not only for the employees directly involved. There are also serious consequences for managers, board members and the company itself.

POSSIBLE LEGAL CONSEQUENCES FOR EMPLOYEES

Persons directly involved in corrupt behaviour may be subject to:

- # Prison sentences,
- # Fines,
- # Personal claims for damages,
- # Professional bans and bans on the exercise of certain functions or offices, and
- # Consequences under labour law

calculate.

The following justifications do not help either:

- # Local "customs" or practices that conflict with anti-corruption laws
- # Anti-corruption laws are opposed to "industry-standard" customer care ("Everyone does it that way")
- # The initiative for the corrupt behaviour did not come from the employee, but from the other party
- # The employee felt compelled to commit an act of corruption through blackmail, e.g. in order not to jeopardise the existing business relationship
- # The corrupt employee acted solely for the benefit of the company without any intention of personal enrichment

Anyone who bribes is using company funds for illegal purposes and, according to German case law, may also be committing embezzlement and/or - if they disguise their actions by deception - fraud.

In addition, managers - even if they have no knowledge of a punishable act of corruption by their directly affected employee - can be personally fined or even be (jointly) liable under criminal law if they violate their organisational and supervisory duties.

POSSIBLE LEGAL CONSEQUENCES FOR THE COMPANY

If an employee acts corruptly, this can also lead to serious consequences for the company itself, in particular:

Direct financial losses (not exhaustive):

- # In Germany and various other countries, fines can be imposed on the company, and the profits or even the revenue generated by the behaviour of its employees can be confiscated.
- # Contracts that are the result of corrupt behaviour are considered invalid from the outset or can at least be declared invalid retrospectively. In this case business partners can reclaim payments already made.
- # Customers and affected competitors may also be able to assert claims for damages.
- # There is a risk that the company will be blacklisted, for example by public sector clients.
- # Expenses for corruptive purposes cannot be claimed as business expenses for tax purposes. They increase the taxable profit and thus the company's tax burden. Unjustified assertion as a business expense also constitutes a tax offence

Indirect financial losses (not exhaustive):

Dealing with corrupt behaviour usually leads to enormous costs for a company:

- # The investigative work of the authorities requires considerable internal resources and often disrupts operational processes and thus leads to increased workloads for many employees.
- # In addition, the necessary use of external consultants (lawyers, forensic auditors, etc.) regularly results in high fees for the company.
- # Subsequent court proceedings also usually drag on for several years and cause a great deal of great expense.

Reputational damage:

Corrupt behaviour regularly results in a loss of reputation (reputational damage) for the company concerned, which can hit the company just as hard as fines or other official measures. Such reputational damage is conceivable on the sales market, for example, but also on the labour, capital or procurement market. Even the suspicion of corrupt behaviour can therefore have serious negative consequences for the company.

6.1.3 Practical tips and instructions

The following explanations are intended to serve as a guideline for future decision making. The case constellations and instructions for conduct mentioned are to be understood as examples and applied analogously to comparable situations.

DEALING WITH GIFTS, INVITATIONS, ETC.

Gifts are gifts in cash or in kind. Invitations to meals, events and trips, for example, also constitute gifts. The provision of products or services at a discount can also be regarded as a gift in this sense.

The granting or acceptance of such gifts must always be carefully checked for any possible issues.

Gifts which, in view of their value or the way in which they are given, suggest that the objectivity and independence of the recipient of the benefit could or even should be influenced are not permitted and must be avoided both in the interests of the HUESKER Group and in the interests of the specific HUESKER employee concerned. Whether this is the case depends on the specific circumstances of the individual case, taking into account the following factors in particular:

- # Financial value of the benefit (see description below);
- # Frequency of benefits;
- # Position of the recipient within his company or authority;
- # Plausibility of an alternative - non-corruptive - objective of the benefit;
- # Temporal proximity to business decisions of the grant recipient (e.g. current tender).

General practical guideline:

Although neither the law nor current case law specify generally applicable value limits for permissible donations, the following values can be seen as guidelines:

In business transactions between private individuals, the granting of gifts and invitations can be viewed critically by law enforcement authorities, even with a value of 50.00 euros (including VAT) – or even lower.

Benefits to public officials are generally subject to even stricter restrictions. The administrative directives of the federal states and the federal government can provide guidance on the limits of permissible invitations and gifts to public officials. In most cases, the respective employer only permits the acceptance of small gifts (e.g. promotional items such as pens or notepads) and invitations up to a total value of around EUR 10.00.

Even if the value limits specified above are observed, the risk of prosecution cannot be ruled out. It always depends on the overall view of all circumstances. It should also be noted that in the case of repeated benefits to one and the same beneficiary, the individual benefits may be added together and the permissible value limit may be exceeded as a result. In general, the following applies:

- # Never give gifts secretly, but only with the approval of superiors of both the donor as well as the recipient. Giving gifts to partners or public officials is generally prohibited;
- # The economic situation of the recipient must always be taken into account when selecting the gift.
- # Gifts may never be offered or given in direct temporal and/or factual connection with the awarding of a contract or tender.
- # Always rely on your common sense when applying these rules of conduct. Ask yourself whether certain gifts or invitations are acceptable:
 - # Would I feel comfortable reading about it in the newspaper tomorrow?
 - # Does this exert pressure to provide a corresponding service in return, to grant special favours or to make a decision based on subjective factors?
 - # If you still have doubts, refrain from accepting or making a gift yourself.

It is HUESKER's policy to properly document and correctly account for all donations.

THEORETICAL SCENARIO "HIDDEN ADVANTAGES" If a public authority in whose current tender a HUESKER Group company is participating demands payment of a cash amount from an external (local) HUESKER sales partner (e.g. sales representative). He holds out the prospect that payment of this cash amount would significantly increase the chances of the contract being awarded to HUESKER. The external sales partner discusses this matter with HUESKER Sales and assures that he will pay the cash amount out of his own pocket to the government employee without HUESKER being "officially" involved. In addition, the consultant proposes to conclude a supplementary agreement under which he is to receive the cash amount from HUESKER for alleged consulting services.

Instructions for action:

Don't let yourself be blackmailed. The company would rather forego a deal than accept corrupt offers.

In this respect, the relationship between the amount of the bribe demanded and the financial significance of the order in question is also irrelevant for HUESKER. The company is also unwilling and unable to respond to a relatively small claim.

THEORETICAL "DOOR OPENER" SCENARIO A technical expert based abroad offers HUESKER his support in selling products in his home country as a sales representative with numerous useful contacts to government officials and potential private sector customers. In return, he demands a cash payment, which must be paid in advance.



Instructions for action:

In some countries, so-called „door openers,“ which a company pays to a third party, are a common means of being able to get in touch with a potential business partner. Of course, cases are conceivable in which the third party provides a reputable and valuable service as an appointed representative. However, this person may not be used as an intermediary for the payment of bribes or kickbacks. The mere suspicion that the intermediary intends to use part of his fee to bribe potential business partners - which is not far-fetched, especially in the case of a demanded advance payment - is reason enough to refrain from involving him.

Payment in advance is not permitted in any case. In addition, a written agreement must generally be signed with commercial agents before they act for or on behalf of HUESKER. This contract must clearly and precisely regulate which specific - lawful - service the commercial agent is to provide and what consideration (consultancy fee or commission) he will receive from HUESKER in return.

THEORETICAL SCENARIO “FACILITATION OR ACCELERATION PAYMENTS”

In some countries, it is customary for small payments to be offered or demanded in order to accelerate official actions to which there is already an entitlement. This can, for example, include areas of customs clearance and stamping of import licenses.

Instructions for action:

Such “facilitation payments” should be avoided. Although these are not “bribes” in the narrower sense under German law (because the public official is not required to provide any consideration in breach of duty), they nevertheless also constitute “granting of advantages” that are punishable.

6.2 Cartel prohibition

The Huesker Group follows the principles of fair and open competition. For this reason, it does not enter into agreements with competitors on commercially sensitive issues such as prices, terms and conditions or market sharing. The competition rules do not only apply to formal, written agreements, they also apply to loose, informal agreements, confidential agreements and so-called “gentlemen’s agreements”.

Do not enter into any agreements with competitors and do not exchange any information with them, concerning competitive behaviour, in particular about:

- # Conditions (e.g. prices) for business lines or customers
- # The scope or timing of changes to such conditions
- # The division of markets according to contract territories and/or customers
- # Behaviour during tenders
- # Behaviour when applying for the award of contracts

Agreements on exclusive supplies with suppliers or customers can also exceed antitrust law limits, depending on the market share and position on the market, if other market participants are unduly impeded as a result. If you have any doubts as to whether the agreements are in fact anti-competitive, please contact the Finance and Legal Department.

6.3 Participation in associations and business organisations

Regardless of the fact that participation in associations and business organisations can be beneficial for HUESKER, it involves the risk of potentially violating competition law regulations, since competitors typically also participate in such institutions. Employees of the HUESKER Group may only participate in events that pursue permissible purposes. Minutes of such events should be taken and made available. Any comparison with competitors or exchange of information must be in accordance with the relevant laws.

6.4 Money laundering

Money laundering is a process in which funds from illegal sources are channelled into legitimate financial channels or legitimate funds are diverted for illegal purposes. In order to prevent the HUESKER Group from becoming involved in money laundering activities, the principle of “know your customer” must be followed consistently. This establishes the identity of the respective customer or business partner.

It is essential to establish the identity of your customer. As far as possible you should:

- # Require proof of the identity of the customer, including the sources of his assets and his transactions,
- # Check all powers of attorney of your business partner,
- # Determine the underlying purpose of the transaction.

The following business practices in particular may be suspicious:

- # Payment for deliveries from third-party accounts
- # Instruction from a customer to credit a third-party account
- # Any form of cash payment

7. Assets of the company and financial integrity

FRAUD OR OTHER UNLAWFUL USE OF COMPANY PROPERTY

The HUESKER Group does not tolerate any fraud (deception for personal enrichment or enrichment of third parties) and will cooperate with investigative authorities and other state bodies if necessary. Any business information or assets of the HUESKER Group may not be misused by employees, even after they have left the company.

The property of the HUESKER Group, such as funds, computers or other valuable items, may only be used for permissible business or authorised purposes and may under no circumstances be used unlawfully. Do not hesitate to inform your line manager if you have reasonable grounds to suspect that fraudulent activity is taking place.

COMPLIANCE WITH TAX REGULATIONS

The transactions of the HUESKER Group comply with the applicable tax regulations and are transparent for all authorities. The HUESKER Group does not support any measures or intentions that lead to unlawful tax advantages for the company, its employees or customers.

FILE STORAGE

The HUESKER Group operates a proper and legally compliant record retention system. Business documents are a significant asset and we see it as our duty to treat them with appropriate care. Business documents, including e-mails, must be stored or destroyed in accordance with the relevant statutory retention periods and the HUESKER Group's internal retention guidelines. Business documents that are the subject of a judicial or regulatory investigation may not be altered or destroyed.

FINANCIAL DOCUMENTS

All transactions of the HUESKER Group are supported by correct and legally compliant accounting and documentation. The correct and legally compliant recording and reporting of information is crucial to our ability to make responsible and correct business decisions.

The financial statements of the HUESKER Group and the books and records on which they are based must:

- ✚ Correctly reflect all transactions of the company,
- ✚ Comply with all legal and accounting regulations and
- ✚ Comply with the HUESKER Group's internal control system.

False or misleading entries in our books are strictly prohibited.

Financial reporting must always comply with applicable laws and generally accepted accounting principles. All relevant financial data must be available to internal and external auditors on request.

USE OF INFORMATION TECHNOLOGY

The IT facilities and IT systems may only be used for legitimate business purposes. The HUESKER Group may access employees' e-mails and Internet activities to the extent permitted by law and where this is necessary for security or operational reasons. All employees are required to use the HUESKER Group's IT responsibly. Follow your common sense here too and do not access, send any messages or save any information that is not of a business nature.

CONFIDENTIALITY

Employees must maintain the confidentiality of business information entrusted to them in the course of their work at or for the HUESKER Group. Confidential business information of the HUESKER Group, including information of its customers, may under no circumstances be used for personal gain or otherwise misused for improper purposes. The obligation to maintain the confidentiality of information continues to exist even after termination of your employment with the HUESKER Group.

Only pass on information internally or externally if the recipient absolutely needs to know or use this information and is authorised to do so. In the case of information that requires particular confidentiality, conclude a non-disclosure agreement before handing this information over to the external partner. The Finance and Legal department will support you in this.

Business records or other operational documents containing confidential and/or legally protected business information of the HUESKER Group may not be used unlawfully. The unlawful use of such business information is a criminal offense. This could also harm the HUESKER Group or its customers and favour competitors.

INTELLECTUAL PROPERTY

Just as we protect our own business information, we are committed to respecting the intellectual property of others, while striving to protect the intellectual property of our own products and brands.

The protection of this intellectual property is safeguarded by so-called IP rights. IP rights is the abbreviation for Intellectual Property Rights. They include numerous forms of data and media, for example on the Internet, in e-mail systems or other image or written documents, products, brand names and technical processes - regardless of whether these are recorded in paper form or electronically.

Your work products and the associated IP rights, for example copyright, trademark and patent rights, are the property of the HUESKER Group, unless otherwise agreed.



8. Prevention of liability risks

8.1 Contractual risks

The HUESKER Group stands by its obligations arising from agreements with third parties. In order to avoid possible misunderstandings and unintended consequences, it is necessary that all employees whose area of responsibility includes the conclusion of agreements and contracts must carefully weigh up the resulting rights and obligations or risks before concluding a contract. In view of the complexity and legal implications of agreements, not least with regard to existing obligations, the Finance and Legal department must be involved in good time in the preparation or review of such agreements, unless otherwise stipulated.

8.2 Product safety

The HUESKER Group aims to supply its customers with safe, high-quality products of impeccable quality. Products must not have any defects or dangerous properties that could impair health or cause other damage.

All employees, regardless of their position, must contribute to ensuring that safety is never compromised. Always remember that it is our duty to ensure the safety of the public and the users of our products. Pay attention to how you can contribute to the safety of our products in your daily work. Report any safety concerns immediately.

8.3 Export control

States enact export control laws and impose sanctions and embargoes for reasons of national security, to curb the proliferation of arms, and for various other reasons. Violations can have serious consequences for the entire HUESKER Group.

As a reliable exporter, there is no question that HUESKER attaches great importance to export control. HUESKER has therefore also created the necessary internal organisation for this, so that we check in each individual case what we deliver to whom, where and for what use.

Every employee is obliged to strictly adhere to the relevant guidelines and decision-making processes. Circumventions are expressly prohibited and have consequences under labour law.

9. Compliance with the Code of Conduct

This Code of Conduct must be observed by every employee of the HUESKER Group. Every manager is responsible for ensuring that the employees reporting to them or assigned to them are familiar with this Code. The HUESKER Group will investigate all reported incidents of questionable or unethical behaviour. In any case of improper or inappropriate behaviour, appropriate measures will be taken.

Violations of this Code of Conduct will result in disciplinary measures, up to and including termination of the employment contract without notice, depending on the severity of the violation and fulfillment of the legal requirements. If necessary, they can also lead to external legal consequences.

The Code of Conduct is regularly reviewed and updated. All employees receive training on compliance and sustainability at set intervals.

10. Contact person

What should you do if you have questions or concerns about legal or ethical standards? If, despite using your common sense and judgement, and you are not sure what to do, contact your supervisor or the specialist departments mentioned.

If you have any concerns about involving your line manager or the relevant specialist departments, or in cases where this Code of Conduct expressly provides for this, you should contact the Compliance Committee directly. The names and contact details of the members of the Compliance Committee are published and made accessible within the company. The Compliance Committee reports directly to the Management Board on all issues relating to the Code of Conduct. It also has access to the Chairman of the Advisory Board of the company at all times.

Whistleblowing & whistleblower system

To report compliance violations or justified suspicions, our employees, business partners and third parties can also access an electronic whistleblower system around the clock at <https://huesker.integrityline.com/>, which enables a protected dialogue, anonymously, if desired.

Requests will always be treated confidentially and carefully processed and examined. The anonymity of whistleblowers is guaranteed by the certified "EQS Integrity Line" system.

HUESKER Synthetic GmbH

Fabrikstrasse 13-15, D-48712
Gescher, Germany
Tel.: +49 (0) 25 42 / 701 - 0
Fax: +49 (0) 25 42 / 701 - 499
Mail: info@HUESKER.de
Web: www.HUESKER.com

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