

September 01, 2022

**Code of Conduct**  
**Ed. Heckewerth Nachf. GmbH & Co. KG**  
**(Extract)**

**Scope:**

The Code of Conduct of Heckewerth applies to all Heckewerth employees and companies affiliated with Heckewerth at home and abroad, as well as to all customers, suppliers and subcontractors.

**§ 2 Prevention of corruption**

Heckewerth does not tolerate immoral or corrupt behavior of employees or its business partners. Any participation in or tolerance of bribery or any other form of corruption is prohibited as a criminal offense.

**§ 3 Avoidance of conflicts of interest**

Every employee is obliged to report potential conflicts of interest to his or her superior, even if an outside third party could suspect the improper influence.

**§ 4 Fair business practices in free competition**

Heckewerth commits to strictly comply competition law. Our employees and managing directors may not participate in practices which eliminate or limit the risks of entrepreneurial activity that are always associated with competition.

**§ 6 Confidentiality / data protection**

Business and company secrets of Heckewerth or other companies which have been surrendered to Heckewerth are to be treated as strictly confidential. They may not be made accessible to outsiders.

**§ 7 Fair, honest and collegial behaviour at the workplace, prohibition of discrimination**

Therefore, we judge and support our employees only according to their skills and performance and do not differentiate employees and applicants according to their ethnic origin, race, gender, religion etc.

**§ 8 Health protection and safety at work**

Our responsibility as employer towards our employees requires an optimal health care and prevention of accidents by careful technical planning of workplaces. Always be careful and report defects if you recognize them.

**§ 9 Careful handling of company assets**

Heckewerth company assets must be handled with care.

**§ 10 Proper accounting**

The management of an honorable businessman includes proper accounting and bookkeeping. Acts of fraudulent intent, breach of trust, falsification of accounts and embezzlement will not be tolerated.

**§ 11 Compliance with the code of conduct**

The compliance officer monitors the compliance with the code of conduct and in addition to the management he is the contact for advice and reporting of critical situations and violations.

**§ 12 Reporting of violations**

Employees can and should report violations of legal regulations or the code of conduct to the compliance officer or the management, anonymously if necessary.

**§ 12a Whistleblower protection**

Information on violations of legal regulations or the code of conduct can be sent confidentially to the following e-mail address.  
compliance@heckewerth.de

**§ 13 Consequences of violations**

The violation of the Code of Conduct or other regulations or guidelines of the company leads to disciplinary measures under personnel law.

**If you have any questions please do not hesitate to contact us. The detailed version of this code can be obtained upon request.**