

# Code of Conduct

January 2024, Rev. 01



## Contents

Foreword .....	3
Principles of the Code of Conduct.....	4
A. Fair competition and antitrust laws .....	4
B. Combating corruption .....	5
C. Money laundering.....	5
D. Environment.....	5
E. Health, occupational health and safety, labor practices and human rights.....	6
F. Prohibition of child labour .....	6
G. Compliance with the human rights of employees.....	6
H. No infringement of own or third-party property rights .....	7
I. Avoidance of conflicts of interest .....	7
J. Handling of information .....	8
K. Data protection declaration.....	8
Which impact does the Code of Conduct have on the daily work of each individual employee?.....	9

## Foreword

HME is a European manufacturer of semi-finished copper and brass products, tubes and rods. With this Code of Conduct, the company defines the basic principles of co-operation with business partners, customers, colleagues, competitors and the public. It is important that all employees - regardless of their function or task - comply with this Code of Conduct in their work.

All employees are obliged to comply with the applicable laws and company guidelines. Furthermore, unethical behaviour of any kind is not permitted under any circumstances, even if not all conceivable situations are explicitly regulated in this Code of Conduct. It goes without saying that violations of the law must be avoided at all costs.

Employees who violate the principles of this Code of Conduct will be subject to severe sanctions, including immediate dismissal. No employee who violates these rules can claim to have acted in the interests of the company, as any violation of the law is detrimental to the company. The Code of Conduct sensitizes HME employees to the applicable legal provisions and obliges them to comply with the established ethical rules and regulations in their daily work.

The Code of Conduct also encourages employees to proactively seek advice in cases of doubt, as ignorance does not protect against possible criminal, civil or labour law consequences of non-compliance. In case of doubt, employees can and must contact their superior or the Managing Director.

We share responsibility for the reputation of our company. Misbehaviour by individuals can cause immense damage to us all. Therefore, please read this Code of Conduct carefully and let us use it as a guide for our daily behaviour.

## Principles of the Code of Conduct

### A. Fair competition and antitrust laws

HME is committed to fair competition. Employees are obliged to comply with the competition and antitrust laws of the individual countries and regions in which they operate. In particular, antitrust laws in the USA and Europe must be complied with. HME will not be lenient with employees who violate antitrust laws. In particular, employees are prohibited from doing the following:

- Exchange of information with competitors in any form and regardless of type and scope about prices, costs, cost structures, discounts, delivery conditions, contract territories, capacity utilisation, production, sales volumes, capacities, offers, customers and suppliers, competitors, profits, profit margins, production information, sales strategies, sales methods or information of a similar nature.
- Agreements with competitors that no competitor is in competition, restrictions in supplier relationships, falsified offers to customers, exchange of information on markets, territories or production programmes.

Influencing the resale prices charged by our buyers or attempting to limit their import or export of goods supplied by HME.

- Exchange of price lists or information on prices or price components with competitors, even if such price lists are publicly available.

If a competitor raises any of these issues, HME employees are obliged to end the discussion and consult the Managing Director.

## **B. Combating corruption**

HME rejects corruption and bribery in accordance with the United Nations Convention against Corruption of 2003, which has been in force since 2005. HME therefore does not enter into business relationships that involve a violation of laws or company regulations on granting or accepting favours, in the knowledge that this will make certain business transactions impossible. A possible additional turnover, regardless of the amount, cannot justify illegal transactions. This applies to all levels of the HME hierarchy without exception.

Gifts may be customary and polite abroad. It must be ensured that neither the donor nor the recipient is dependent in any way and that the applicable national and international regulations are complied with.

## **C. Money laundering**

Our aim is to prevent money laundering and terrorist financing in connection with our business activities. We actively and appropriately inform ourselves about the purpose, background and development of the subsidized projects. When carrying out and processing our tasks, we pay attention to the suspicion criteria for money laundering and observe the money laundering directive.

## **D. Environment**

HME strives to minimise its impact on people and nature through outstanding environmental performance.

Every year, we reduce our consumption of various energy sources, greenhouse gases, water and waste water by optimising our systems and machines and by training our employees. We comply with the legal regulations on air pollution control and regularly make improvements. Our copper and brass materials are 100% recyclable and all production scrap is remelted. Copper and brass are absolutely sustainable products and contribute to a positive supply chain effect for our customers.

#### **E. Health, occupational health and safety, labor practices and human rights**

It is mandatory for us to offer our employees a safe workplace, to always work towards the goal of zero accidents and to train all employees in occupational health and safety and integrate them into the management system. We involve both the works council and the youth training representatives in this process. These work together with the relevant trade union and we are therefore bound by collective agreements. Furthermore, we work very closely with the trade association responsible for us in matters of occupational safety and preventive health protection.

All employees have the same opportunities to participate in the development program within the Hailiang Group.

#### **F. Prohibition of child labour**

HME ensures compliance with the ban on child labour, i.e. the employment of children and young people under the age of 15. In countries that fall under the exception of ILO Convention 138, this means "under the age of 14".

#### **G. Compliance with the human rights of employees**

HME is committed to equal opportunities and equal treatment of employees. Any form of direct or indirect discrimination based on race, origin, skin colour, nationality, religion, ideology, gender, age, physical characteristics or appearance as well as sexual orientation or membership of other protected categories in the respective country is prohibited. These principles apply both to internal co-operation and to dealings with external partners.

HME guarantees respect for the personal dignity, privacy and rights of each individual and does not force anyone to work against their will. HME guarantees compliance with the maximum working hours prescribed by the applicable laws and recognises the right of employees to freedom of association. Employees who are members of employee organisations or trade unions are neither favoured nor disadvantaged.

A violation of these standards will not be tolerated. All disputes should be reported to the line manager, the HR department or the person responsible for ensuring compliance with the Code of Conduct. They will take appropriate action, if necessary, to respond appropriately to the misconduct and prevent the offence from recurring.

## **H. No infringement of own or third-party property rights**

The results of our work in the field of scientific research and technical development are extremely valuable corporate capital. Inventions, patents and other intellectual property are of great importance for the future of the company. Therefore, the greatest possible care must be taken to ensure that the intellectual property rights created by HME are protected. In addition, HME guarantees compliance with the legally recognised rights of third parties.

Business secrets and new findings are neither passed on to third parties nor published without appropriate legal protection.

Care must be taken to ensure that no unintentional transfer of intellectual property occurs through negligent handling of information about the company in the public domain. Company data must be protected against unauthorised access by third parties.

## **I. Avoidance of conflicts of interest**

All employees must separate their personal interests from those of HME in accordance with HME's general guidelines. In particular during working hours, employees are obliged to represent the business interests of HME. Employees must inform their superiors of any conflicts of interest that may affect the fulfilment of their professional duties.

If employees wish to cover their personal needs through/via/with the help of a natural or legal person with whom HME already has a business relationship or enters into other contracts, and if these employees occupy a position that enables them to influence HME's business relationship with the supplier or business partner in question, they must obtain the approval of their line manager before entering into a contract.

A business relationship with a competitor or customer of HME or the performance of secondary activities can lead to conflicts that prevent employees from fully assuming their responsibilities at HME. Business relationships with third parties must be based on objective criteria.

## **J. Handling of information**

An important prerequisite for protection against violations of this Code of Conduct is the complete documentation of all processes and procedures. Documents, especially those that are important for accounting purposes, must be complete, correct, orderly and easy to understand. All records and documents must be kept in such a way that they can be delegated to a colleague at any time.

Employees must retain records for as long as required by law or internal regulations and must not destroy any documents that are relevant to an impending or pending government or legal proceeding. The books of account and related records must both fully and accurately reflect all business transactions and provide a true and fair view of the Company's capital.

## **K. Data protection declaration**

As a European group with worldwide business activities, HME is committed to complying with the relevant national and international data protection regulations.

This applies equally to all HME employees. They must comply with the applicable provisions of national and international data protection law and, in particular, protect personal data from unauthorised access by third parties in accordance with the relevant data protection laws.

In case of doubt and in the event of violations of the applicable data protection law, the respective company data protection officer must be informed immediately.



## **Which impact does the Code of Conduct have on the daily work of each individual employee?**

All HME employees are required to review their behaviour against the standards set out in this Code of Conduct and to ensure compliance with them.

Employees who violate the principles of this Code of Conduct will be prosecuted by the appropriate authorities and may face severe civil and labour law consequences, including termination of employment without notice.

Employees who violate these rules must not claim to have acted in the best interests of the company, as any violation of applicable law will harm the company.

HME will ensure that no employee is penalised in any way for reporting a possible breach of this Code of Conduct. Until the suspicion is confirmed, the suspect(s) will be presumed innocent.