HGDF

HGDF Employee Code of Conduct

At HGDF Familienholding GmbH & Co. KG, we are committed to respecting human rights and environmental obligations within our supply chain and consider the protection of human rights to be a central element. This starts in our own area of business. We expect our managers and employees to act as role models in representing our company.

We therefore expect you, our employees, to implement applicable law when performing your work, to respect internationally recognised human rights and environmental obligations, and to take care to prevent human rights violations and environmental pollution throughout the supply chain.

Principles:

- · Child labour, forced labour and slavery: We condemn all forms of child labour, forced labour and slavery.
- Occupational health and safety: We are committed to complying with the occupational health and safety obligations applicable under local law and to preventing the risk of accidents at work as well as work-related health hazards.
- Freedom of association: We reject any disregard for freedom of association. All of our managers and employees, regardless of their position in our company, are obliged to respect the right of our employees to establish or join trade unions and not to use the establishment of or membership in a trade union as cause for unjustified discrimination or reprisals. In addition, all our managers and employees respect the right of trade unions to operate freely and in accordance with local law.
- Discrimination: All people enjoy equal treatment. We reject any form of unequal treatment, such as on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is based on employment requirements; unequal treatment includes, in particular, the payment of unequal pay for equivalent work.
- · Reasonable pay: We expect a reasonable wage to be paid.
- · Land rights: We condemn all forms of illegal forced eviction and the removal of land, forests and waters that serve as a basis for people's livelihoods.
- · Hiring of security forces: We refuse to hire or use insufficiently trained or monitored security forces to protect the commercial project.

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Environmental damage: We expect our managers and employees to prevent any kind
of environmental damage. This includes harmful soil changes, water and air pollution,
in particular through the illegal export of waste, the treatment of persistent organic
pollutants or the use of mercury, harmful noise emissions and excessive water
consumption.

Further information on the principles can be found in the Supplier Code of Conduct, which can be found on our website www.hgdf.de. Further literature recommendations on the topic can be obtained from the two human rights representatives if necessary.

In addition, we train our employees in the relevant business units on the principles and internal company policies and guidelines. If you have any questions, please contact Sandra Mau and Antje Friedrichsen (HGDF Reporting Office and Human Rights Representatives).

If you, as an employee of HGDF, discover violations of this Code of Conduct, we expressly encourage you to report these to Sandra Mau and Antje Friedrichsen (HGDF Reporting Office and Human Rights Representatives). You can also access our internal and protected complaints procedure, which you can find on our website www.hgdf.de.

We expressly reserve the right to amend this Code of Conduct at any time if this is necessary according to the risk analysis we carry out regularly. We will inform you of any changes by e-mail and, if necessary, in a staff meeting.