



# Code of Conduct

## I. Preamble



This Code of Conduct applies to Armaturenwerk Hötensleben GmbH and its business partners. As a member of the NEUMO Ehrenberg Group, we offer a wide range of applications from a single source. We stand for **innovation, quality, respectful interaction** and **sustainable action**. These principles are anchored in our corporate mission statement.

We see the application of the fundamental principles of **human rights, fair working conditions, sustainability** and the fight against corruption as a self-evident basis for our actions. We comply with applicable legal regulations and other requirements, and are committed to the applicable legal standards and norms with this Code of Conduct; these include the **OECD Guidelines**, the **United Nations Guiding Principles on Business and Human Rights**, and the ten principles of the **UN Global Compact**.

These principles form the basis of all our business relationships, which are also characterized by the integrity of our suppliers, service providers and all other business partners.

We therefore expect our business partners to act in the same way, complying with all relevant legal and ethical requirements as well as recognized **environmental, social and corporate governance standards**.



Thomas Erhorn (CEO)



## II. Applicability

AWH is committed to complying with the standards set out in this Code of Conduct. This Code of Conduct and compliance with the standards also applies to all AWH business partners as a prerequisite for our business relationship. This applies to all business partners who have a direct business relationship with AWH. AWH also

expects its business partners to align their entire value chain and further areas of activity with these standards and requirements in order to ensure responsible action and innovative cooperation across the entire supply chain.





### **III. Compliance with applicable regulations**

We, AWH, comply with all applicable national and international laws and regulations. Compliance with these laws and minimum industrial standards also applies to our business partners. The regulations with the strictest requirements always have priority.

## IV. Respect for human rights



### 1. Ban on child labor

- Compliance with applicable laws regarding child labor
- Permissible minimum age not below the age at which compulsory schooling ends
- No persons under the age of 14 are employed without a minimum age regulation
- No use of workers under the age of 18 for physically dangerous work or night work



## 2. Ban on forced labor

- Forced or compulsory labor is prohibited
- Work is not used as a punitive measure, discipline or punishment
- Every employee has constant control over their identity papers and official documents
- Disciplinary rules and procedures, in accordance with applicable law, are clearly formulated and communicated in a comprehensible manner
- Freedom of termination after reasonable notice

## 3. Prohibition of discrimination

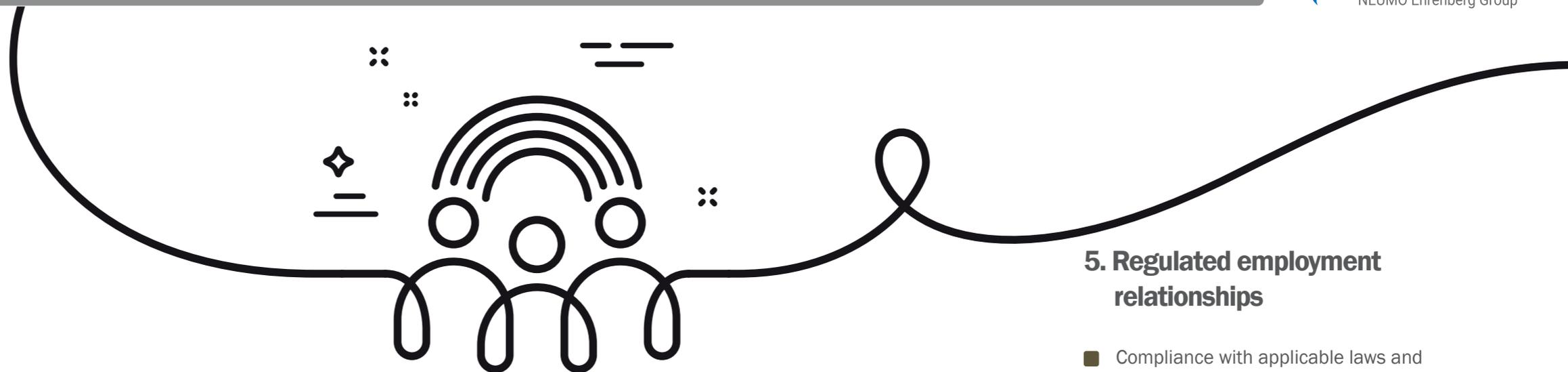
- Any kind of discrimination, disadvantage, harassment, bullying and defamation is strictly rejected
- Ensuring fundamental equal opportunities and equal treatment - regardless of skin color, race, nationality, ethnicity, political affiliation, social background, disability, sexual orientation, religious beliefs, gender and age

## 4. Freedom of assembly and association

- Recognition of the right to form and join trade unions and to participate in collective bargaining
- The independence of trade unions is respected
- Union members are treated equally to all other employees

## 5. Regulated employment relationships

- Compliance with applicable laws and binding industry standards on working hours, overtime, wages and other employer benefits
- Compliance of the contractually agreed working hours with national legislation and industry standards
- Payment of appropriate, sufficient wages in line with national requirements or the industry standard, and compliance with all applicable pay and remuneration regulations
- No application of wage deductions as disciplinary measures and obtaining the consent of the employee concerned in the case of legally permitted wage deductions



## V. Health and safety in the workplace



We, AWH, ensure a **high level of occupational health and safety** and expect the same from our business partners, as well as the creation and introduction of suitable health and safety precautions.

Furthermore, we expect all applicable **health and safety regulations** to be complied with. A **safe and healthy working environment** that focuses on the health of employees is another basis for our actions, which we see in the same way for our business partners. A regular review of workplaces, measures taken and appropriate training is also essential.



## VI. Anti-corruption



We, AWH, pursue a **zero-tolerance policy with regard to bribery/corruptibility, conflicts of interest and all other manifestations of corruption.**

Our business partners are aware of this and are prohibited from offering our employees sums of money of any amount, gifts, loans, discounts or items of value that could tempt employees to act in breach of their duties. Exceptions to this are gifts and invitations that are within the scope of customary business hospitality, manners and courtesy, and therefore fall within the permissible range of dealing with benefits, and comply with our anti-corruption guidelines.

All business and the advancement thereof is based exclusively on quality and integrity. We therefore also expect our business partners to prohibit any and all forms of corruption and corrupt behavior, and to take appropriate measures in the event of non-compliance.



## VII. Fair competition



We, AWH, see it as a further basis of our actions in the value chain to **recognize free and non-distorted competition within the market**, and to deal **fai-ly with our competitors**. We naturally expect this from all market participants, and therefore reject agreements on prices and conditions, as well as agreements for the purpose of market sharing - in line with national and international requirements - in order to avoid violations of antitrust law.



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## VIII. Data protection



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We at AWH take **data protection and its legal regulation** very seriously, on all levels and in all areas of our business activities.



We expect our business partners to act responsibly in accordance with the applicable legal provisions, and to follow the procedure described below:

- Personal data is protected
- Personal data is only collected in accordance with data protection laws, if it is needed for specified and legitimate purposes
- Its use is transparent
- The data will be deleted immediately, as soon as the legitimate purpose no longer applies

# IX. Sustainability and the environment



We at AWH want to make an effective contribution to **climate protection** and **resource conservation**. With our ISO 50001-certified, standard-compliant **energy management system**, we have laid the first foundations for our **ecological and sustainable actions**.

We therefore make our decisions based on a holistic view of the impact on our **ecological footprint**, on the environment, employees, and society, as well as our responsibility toward future generations.



We also take a holistic view of our business partners, and make appropriate decisions in the interests of sustainable, environmentally conscious development.



## X. Self-commitment and monitoring

### 1. Value chain

The business partner shall **communicate** the **principles** set out in this Code of Conduct **to its subcontractors** and other **business partners**. Furthermore, the business partner shall call on its business partners to base their actions on the same standards.



COMPLIANCE

## 2. Joint compliance measures

We, AWH, expect our business partners to comply with the standards set out in this Code of Conduct and are **authorized to verify such compliance**. Ensuring the above standards is a long-term learning and development process. If risks are identified along the supply chain, our business partners undertake, together with us, to immediately develop and implement an effective concept with a corresponding timetable.

In accordance with the **Supply Chain Act**, we, AWH, are entitled to extraordinary termination if:

- the violation of a protected legal position or an environmental obligation is considered to be very serious;
- the implementation of the measures developed in the concept does not remedy the situation after the expiry of the period specified in the concept;
- AWH has no other less severe means at its disposal, and there is no prospect of a success resolution with other means of influence.

## 3. Behavior in case of concerns

We, AWH, would like to encourage all our business partners to report violations of this Code of Conduct, as well as possible unethical or illegal behavior on the part of AWH, via the **AWH reporting channel**.

Please use our reporting channel at **[awh.vispato.com](http://awh.vispato.com)**.



End-to-end-encryption



DATEV Hosting (ISO 27001)



GDPR-/ePVO-compliant



Access to encryption keys



Security audits (Penetration test)



Activity logs



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