

**Code of Conduct for the
prevention of bribery,
corruption, restriction of
competition and on how to
handle violations at Hlash &
Rainer GmbH**

HLash & Rainer GmbH Anti-Corruption Policy

valid as of 01.01.2021

| Version | CREATED BY | APPROVED BY | APPROVED ON |
|----------------|----------------------|-----------------------|--------------------|
| 01 | Sandra Sallat | Andreas Rainer | 14.01.2021 |

1. Introduction

HLash & Rainer GmbH (hereinafter: HLaSh & Rainer) is a specialist for exactly fitting, standard-compliant cargo securing in containers. Our products can be found wherever cargo needs to be secured in containers in compliance with regulations.

Conduct of integrity by all HLaSh & Rainer employees toward all customers, suppliers, employees, government agencies, public corporations and other stakeholders is important to us.

HLaSh & Rainer is committed to complying with all applicable global anti-corruption laws in all regions of its operations. "Global Anti-Corruption Laws" are, in the broadest sense, all applicable local, national and international anti-bribery and anti-corruption laws and regulations.

This claim is laid down in our corporate mission statement and in our Code of Conduct and represents the basis for the entrepreneurial actions of our employees.

The requirements as well as the behavior of all HLaSh & Rainer employees are specified and described in more detail in this policy.

The Anti-Corruption Policy applies to all employees of HLaSh & Rainer GmbH.

This policy applies to all HLaSh & Rainer business transactions, whether or not they are enacted by law in a particular country or location.

Terminology:

In the text HLaSh & Rainer GmbH uses:

- the masculine notation for easier readability but means all genders without discriminating.
- the wording 'we' for all employees of HLaSh & Rainer GmbH (including the management).

2. Bribery and Corruption - the basics

There are a number of definitions of bribery and corruption in the legislation. However, some basic principles are generally applicable:

Bribery / Corruption

- Is the offering, promising, giving, demanding or accepting of an advantage as an inducement for an act that is illegal, unethical, or a breach of trust.
- Is the offer of a payment or promise by which it is intended to induce the recipient to abuse his or her official position, whether the recipient is a government official or an agent or employee of a private company.
- Acts of bribery are intended to influence persons in the performance of their duties and to induce them to act dishonestly.

It is important to note that anti-bribery and anti-corruption laws prohibit not only bribes made directly by company employees, but also bribes made indirectly by third parties acting on behalf of the company.

For purposes of this policy, third parties are generally defined as persons or entities acting on behalf of the company, including, without limitation, the following:

Agents, consultants, sales representatives, attorneys, accountants, tax advisors, distributors and other business partners.

A bribe can take many different forms, but typically the intention is to influence. It usually involves the provision of something in return - that is, the bribe is offered or paid in exchange for some benefit. Any benefits can be used for bribery, including:

- cash, cash equivalents (e.g., vouchers), or loans;
- payments for travel or entertainment;
- favors, including offers related to employment or internships;
- gifts (e.g., perfume, jewelry, subscriptions, memberships);
- donations to a charity affiliated with a government official;
- political contributions.

3. The Code of Conduct

The following regulations apply to all employees of HLash und Rainer GmbH, including the management.

- **Bribery and Corruption**

No bribes or other personal benefits may be offered, given or accepted by HLash & Rainer employees in dealings with public officials or in business transactions.

The granting of personal benefits, in particular of a pecuniary nature, by HLash & Rainer employees to public officials (such as civil servants or employees in public service) with the aim of obtaining benefits for HLash & Rainer or themselves or third parties is not permitted.

Personal benefits to employees of other companies in return for preferential treatment in competition and business dealings may neither be offered, promised, granted nor approved. Likewise, personal benefits of value may neither be demanded nor accepted in dealings with business partners.

No HLash & Rainer employee may offer, promise, request, grant or accept any gift, payment, invitation, service or other benefit in the course of business that is given with the intent to unfairly influence a business relationship.

This is generally not the case for gifts and invitations that are within the scope of customary hospitality, custom and courtesy. This includes benefits that are of moderate value; e.g.:

- acceptable gifts usually have a value of max. € 10,00,
- hospitality should be within a normal range (+/- € 35.00 p. p.).

- **Antitrust Law**

HLash & Rainer respects fair competition. The applicable laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition, are adhered to.

Dealing with competitors, these regulations prohibit in particular agreements and other activities that improperly influence prices or conditions, allocate sales territories or customers or in any other way improperly impede free and open competition.

Examples of antitrust violations:

- anticompetitive price/quantity/condition agreements
- exchange of secret market information
- calls for boycotts against market participants

- **Significance for the Employee**

The Anti-Corruption Policy is of great concern to HLash & Rainer, which is why any failure to comply with the obligations is taken seriously and punished. Violations will result in measures under labor law. These depend on the severity of the violation and, in the most extreme case, can lead to termination (also extraordinary).

In order to implement this ethical and legal code of conduct, every employee of HLash & Rainer is required to familiarize himself with the standards described and to actively live these standards.

All HLash & Rainer employees are encouraged to report any indications of possible violations of this policy. Reports are accepted by the Compliance Office while maintaining confidentiality towards the whistleblower.

HLash & Rainer GmbH has zero tolerance for any form of discrimination against anyone who reports such a violation.

4. Compliance Contact

All questions regarding this policy as well as anti-bribery and anti-corruption laws should be directed to our compliance contact, Prof. Dr. A. Funke, at:

email: info@olg-anwaelte.de

phone: +49 221 7 20 06 94

Our Compliance Contact is available to all HLaash & Rainer employees to report possible violations of the law or this policy. All reports are promptly investigated and reviewed.

Imprint:

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