

Code of Conduct of HLaSh & Rainer GmbH

valid as of 01.01.2021

| Version | CREATED BY | APPROVED BY | APPROVED ON |
|---------|---------------|----------------|-------------|
| 01 | Sandra Sallat | Andreas Rainer | 14.01.2021 |
| 02 | Sandra Sallat | Andreas Rainer | 01.09.2022 |

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.

We are aware of our corporate responsibility in the areas of human rights and the environment, among others. It is the basis of our actions.

Our company thrives on and with great diversity. Our eighteen employees are ambassadors for five nationalities, different religions and various professional expertise united under one roof.

This diversity and our intensive contact with our customers and suppliers worldwide are important prerequisites for achieving our corporate goals:

- together
- long-term
- sustainable
- successful
- for the benefit of our customers!

Our Code of Conduct sets clear ethical standards for us as employees of HLaSh & Rainer. From our demands on the quality of our products and services, our collegial interaction, our relationship with customers / suppliers / business partners to corporate responsibility in general and towards our environment in particular.

As an integral part of our corporate culture, our Code of Conduct serves as a basis for us to behave with consistency, integrity and ethics, not only among ourselves but also toward third parties and our environment. At any time, in any place.

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. Legislation and Human Rights

- **Legislation**

We act righteously and comply with the legal regulations and standards applicable to our business activities worldwide.

- **Human Rights**

We are guided by the principles of the UN Global Compact and respect the Declaration on Fundamental Principles and Rights at Work adopted by the ILO (International Labour Organization) (in accordance with national laws).

We respect human rights within our sphere of influence and expect the same from our stakeholders and business partners in the broader sense.

We are expressly committed to the abolition of all forms of forced, slave and child labor.

3. Work Environment = Teamwork

- **Personal Responsibility**

We see ourselves as a team. Each colleague enriches the teamwork with his skills. Our flat hierarchy offers and demands a high degree of personal responsibility regardless of the field of activity. The satisfaction of our customers and the well-being of our company are of equal importance in all our decisions.

- **Mutual Respect**

Mutual respect, openness, honesty and trust form the basis of our teamwork. We help each other (also across divisions), regardless of our position and live the open door policy. In projects, we count on brainstorming with all participants. We respect different opinions and deal with them constructively.

Company concerns are communicated to all employees in a timely and open manner.

In all our actions, compliance with laws, ethical standards and our Code of Conduct are a prerequisite and indispensable.

We oppose all forms of violence, assault and harassment in the workplace.

- **Diversity**

We are 'diversity'! This diversity is our strength.

The essential criteria in the selection and development of our employees are qualifications and skills.

We do not discriminate against anyone on the basis of gender, ethnic origin, nationality, religion, age, disability and other legally protected characteristics.

We support the **Charta der Vielfalt** and signed it.

- **Health and occupational safety**

Our safety and well-being are essential to our economic success. Compliance with our health and occupational safety guidelines is therefore essential in our day-to-day work.

4. Our Business Ethics

- **Quality**

We are committed to the highest possible quality in our products and our support of interested parties / customers. The requirements of laws and standards such as the CTU Code of Practice are authoritative in this respect. In order to achieve the highest quality standards, we are constantly working to improve our products and methods of operation for the benefit of our customers and our environment.

- **Customer Satisfaction**

The satisfaction of our customers is our top priority. Therefore, our products are "tailor-made".

In addition to the satisfaction of our customers, their trust is also important to us. We know that next to our product quality, we are also measured by our ethical and ecological behavior. This is our incentive to keep our performance constantly at a high level in all areas mentioned in order to live up to the trust placed in us.

- **Transparency**

We are committed to honest and open interaction with our employees, customers, suppliers and other business partners. Our internal and external communications focus on openness and transparency. Upon request, we provide information in compliance with internationally recognized standards for corporate compliance.

- **Stakeholder and Business Partners**

We are committed to fair dialog with our stakeholders and business partners around the world.

We share the basic principles for ethical behavior and environmentally responsible action with our employees, customers, suppliers and dealers. We communicate our Guiding Principles to our stakeholders and business partners and motivate them to act according to the same standards.

- **Fair Competition**

We are committed to the principles of a social market economy and fair competition.

Our suppliers are selected only after a careful and fair performance evaluation.

We are legally required to make business decisions in the best interests of the company and independent of any arrangements or agreements with

competitors. We comply with antitrust laws.

- **Bribery and Corruption**

We take a ZERO tolerance approach to bribery and corruption.

Benefits of any kind are prohibited worldwide if they are intended to improperly influence the decision of a public official. All benefits that are intended to buy the decision of a customer, a supplier or a government authority are prohibited. This includes bribes.

We comply with international anti-corruption standards (see e. g. UN Global Compact) and applicable anti-corruption and bribery laws. Details on this are specified in our Anti-Corruption Policy.

- **Gifts and Hospitality**

Our employees may only give or receive gifts or provide or accept hospitality that are reasonable, proportionate and justified and in compliance with applicable local gift and/or hospitality policies or laws.

Modest, reasonable and appropriate hospitality to or from third parties is permitted if its purpose is to enhance our company's image, showcase our products and services, or establish or maintain business relationships.

Providing a gift or hospitality with the expectation that a business benefit will result or to reward a business advantage given is prohibited. We may not solicit gifts. Gifts may only be accepted if they are given infrequently, for the sole purpose of maintaining or strengthening a business relationship. Details on this are specified in our Anti-Corruption Policy.

- **Data Protection**

We do not disclose information, unless it is already known to the public, for personal gain or for the use of third parties. This includes, but is not limited to, technical data, financial data, operational data, customer information and other information resulting from the business relationship with customers / suppliers / business partners.

We comply with applicable laws and company policies regarding personal information, particularly that of customers, suppliers and employees. Personal data may only be collected, processed and used in accordance with the respective requirements. Details on data protection are governed by our privacy policy.

5. Our Corporate Responsibility

- **Society and Environment**

We know that our actions have an impact on the society in which we work and on the environment in which we live. Together we share the resulting responsibility.

To express our understanding of this responsibility, we have, among other things, applied for membership of the 'UN Global Compact' and signed the 'Diversity Charter'.

Our environment is close to all our hearts. Within the scope of our possibilities, we pay attention to the use of ecological technologies and the resource-saving use of environmentally friendly materials in the company. We regularly undergo an environmental audit.

- **Staff**

We bear particular responsibility for the well-being of our employees. It is our task to create an appropriate working environment in which we can all carry out our respective functions safely and without restriction. In addition to occupational safety, this also includes personal safety from discrimination, violence or assault in the workplace.

We are all required to report violations of our Code of Conduct. Notifications will be treated confidentially. Employees who report violations in good faith will not be disadvantaged.

- **Compliance-Contact**

Contact for questions about the Code of Conduct:

Department Unternehmenskommunikation
mail@hslash-rainer.de

In the event of compliance violations, please contact our external Compliance Officer Ms. Prof. Dr. A. Funke:

email: info@olg-anwaelte.de
phone: +49 221 7 20 06 94

Our Compliance Officer is at the service of all HSlash & Rainer employees to report possible violations of the law or this policy. All reports will be promptly investigated and reviewed.

6. Supplementary Policies and Statements

- **Code of Conduct for Suppliers**
- **Anti-Corruption Guideline**
- **Privacy Policy**
- **Environmental Declaration**
- **Occupational Health and Safety Directive**

Imprint:

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