

# **CODE OF CONDUCT**

## **(Code of Conduct)**

Simon Hegele Group GmbH and Group companies

Issued: December 2023

### **1. Preamble**

Simon Hegele Group GmbH is aware of its role in society and its responsibility towards business partners and employees. The company is therefore committed to clear principles with regard to value-oriented, ethical and law-abiding corporate governance, which form the framework for our entrepreneurial and social actions.

This Code of Conduct contains fundamental principles and rules for implementing these principles, which we apply both within our entire group of companies and in relation to our business partners and the public.

All managers act as role models and bear a special responsibility for the active implementation of this Code of Conduct. Simon Hegele Group GmbH supports the work of employee representatives - where applicable - and encourages them through open interaction and cooperation in a spirit of partnership. All employees are informed about the provisions of this Code of Conduct and their actions are bound by it. It sets out the values, principles and practices that govern the business activities of all companies in which Simon Hegele Group GmbH holds a majority stake.

Violations of this Code of Conduct are actively pursued, documented and appropriate measures are taken for immediate clarification and remedial action. Violations of this Code of Conduct may result in labor law or disciplinary measures.

Exceptions to compliance with the Code of Conduct are not permitted at any time without legitimate justification. Corresponding exceptions can only be approved by the management of Simon Hegele Group GmbH together with the Chief Compliance Officer.

The management of Simon Hegele Group GmbH undertakes to review and update this Code of Conduct at regular intervals.

This Code of Conduct has been approved by the management of Simon Hegele Group GmbH and comes into force upon approval and publication.

In the following text, Simon Hegele Group GmbH is abbreviated to Simon Hegele.

The term employee is used to refer to all employees. This refers to all persons employed by Simon Hegele and the Group companies. This applies accordingly to other gender-specific terms or designations.

# Code of Conduct

## Simon Hegele Group GmbH and Group companies

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### 2. Basic requirements

#### **Compliance with laws and other regulations**

For us, compliance with laws and regulations is a fundamental principle of our economically responsible actions at home and abroad. We observe and comply with the applicable legal requirements and obligations at all times, even if this may entail short-term economic disadvantages or difficulties for the company or individuals.

Every manager is responsible for ensuring that no violations of the law occur in their respective area of responsibility that could have been prevented through appropriate supervision and organization. They also retain responsibility when delegating individual tasks.

#### **Open debate**

Open communication can make a decisive contribution to avoiding undesirable developments in the company or correcting them at an early stage, as well as to immediately absorbing valuable innovation impulses. This is why we value a corporate culture in which individual employees can approach their superiors in confidence, even with critical issues.

We therefore encourage our employees to raise issues openly and without fear of reprisals or other disadvantages. Employees who in good faith raise concerns or make suggestions for improvement in relation to processes within the company must not suffer any disadvantages as a result, but should in fact be encouraged to do so.

#### **Trust and respect**

A culture of equal opportunities, mutual trust and mutual respect is of great importance to us. We promote a working environment that is characterized by respect and tolerance and in which the dignity of each individual is recognized and protected. We strongly condemn harassment, bullying or intimidation of employees and punish such incidents.

We prohibit any form of discrimination in personnel-related decisions, such as hiring, promotions or disciplinary measures. We treat all employees equally, regardless of gender, age, marital status, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

#### **Avoidance of conflicts of interest**

Simon Hegele expects its employees to act ethically in connection with conflicts of interest. The superior office must generally be informed about relationships with persons or companies with whom Simon Hegele has business contacts and which could lead to conflicts of interest. In particular, family relationships, business partnerships or shareholdings are to be addressed here.

An actual or potential conflict of interest must be reported and discussed with the responsible line manager. In particular, it is forbidden for anyone to become involved with competitors, service providers, suppliers or customers or to enter into business relationships with them in a private context if this could lead to a conflict of interest. In principle, any competitive situation and any conflict of interest with the company must be avoided.

#### **Protection of company assets**

All Simon Hegele employees are responsible for the protection and proper and careful handling of the company's property. Every employee is also obliged to protect the company's property against loss, damage, misuse, theft, embezzlement or destruction.

Private use of company property is prohibited unless expressly permitted by separate agreements.

## Code of Conduct

### Simon Hegele Group GmbH and Group companies

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#### 3. Behavior in the business environment

##### **Fair competition**

It is one of Simon Hegele's fundamental principles that all employees act in accordance with applicable competition law. Fair competition is a prerequisite for free market development for the benefit of the common good. Every manager is obliged to comply with the rules of fair competition.

##### **Prohibition of corruption**

The key to our success is the quality of our services, which is why we maintain close contact with our customers and suppliers to define requirements. We therefore maintain open communication with our business partners and authorities and ensure the necessary transparency in our mutual dealings. Our business practices comply with international anti-corruption standards.

##### **Donations and sponsoring**

Simon Hegele does not make donations to political parties, individuals, profit-oriented organizations or organizations whose objectives contradict the principles of our corporate governance.

As a responsible member of society, Simon Hegele makes donations in cash and in kind in certain cases for education and science, sport, art and culture and for social and humanitarian projects. The type and scope of donations are determined jointly by the management of Simon Hegele and are made within the scope of our economic possibilities.

All donations are treated transparently, i.e. the identity of the recipient and the planned use of the donation are known. Remuneration similar to donations, i.e. benefits that appear to be granted as remuneration for a service but significantly exceed the value of the actual service, violate the transparency requirement and are prohibited.

Any sponsorship must be transparent and only take place on the basis of contracts approved in advance by the management of Simon Hegele and agreed in writing, which are based on a serious business purpose. It must be in reasonable proportion to the value of what the organizer is offering.

##### **Money laundering**

Simon Hegele expects all employees to comply with all anti-money laundering laws and regulations at all times. Every employee is requested to have unusual financial transactions, in particular transactions involving cash, checked by the responsible finance or legal department in case of doubt, or alternatively to involve the Compliance Officer.

##### **Antitrust law**

Antitrust violations are not tolerated. We are guided by the following principles when assessing antitrust issues:

- No agreements or concerted practices with competitors on prices, price increases, terms or capacities, including profits, profit margins, costs, sales and marketing methods or other factors relevant to competition that determine or influence our behavior with the aim or effect of preventing, restricting or distorting competition.
- No agreements with competitors to refrain from competition, to restrict business relationships with suppliers, to submit sham bids for tenders or to divide up customers, markets, territories or the product portfolio.
- No unauthorized exchange of other competition-sensitive information with competitors

## Code of Conduct

### Simon Hegele Group GmbH and Group companies

---

- No industrial espionage, bribery, theft or dissemination of knowingly false information about our competitors, their products or services.

#### Supplier relationships

Simon Hegele is committed to ethical and law-abiding corporate governance and expects the same from its suppliers. Our suppliers must comply with the following basic principles:

- Compliance with applicable laws
- Renunciation of corruption
- Respect for human rights
- Ban on child labor
- Ensuring the health and safety of employees
- Promotion of environmental protection

Detailed requirements are set out in the Supplier Code of Conduct and apply in addition.

## 4. People and the environment

### Environment

Responsible use of natural resources is an important goal for our group of companies. Both in the development of new services and in the operation of facilities and plants, we take care to minimize any impact on our environment and our climate. Every employee is responsible for supporting this corporate goal in the best possible way through their individual behavior.

### Fair working conditions

All Simon Hegele employees are committed to a safe and healthy working environment. Therefore, safety regulations and practices must be strictly adhered to by everyone.

As a socially responsible employer, Simon Hegele regards its employees as an essential component of the company's success. He demands great commitment from his employees and attaches great importance to compliance with health and safety guidelines. The health and safety policy also includes a ban on drugs in the workplace.

Simon Hegele's personnel policy contributes to offering every employee the opportunity for professional and personal development. An open exchange of opinions, criticism and ideas are taken seriously and encouraged.

Simon Hegele condemns all forms of discrimination, all forms of violence and assault in the workplace and harassment of any kind. This also includes any form of intimidation or threats. All employees are obliged to treat each other with respect, so that any kind of personal harassment is excluded. This includes workplace harassment, sexual advances, unwanted physical contact, indecent propositions, insulting and humiliating remarks in the workplace. Information that supports or incites racial hatred, glorification of violence or other criminal acts or sexually offensive content may not be accessed or disseminated in our company.

## 5. Communication and information

### Confidentiality and data protection

The majority of Simon Hegele's business information is confidential or legally protected, so that there is a duty of confidentiality. This includes information on technical data, financial data, operating data and customers.

## Code of Conduct

### Simon Hegele Group GmbH and Group companies

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The duty of confidentiality relates in particular to intellectual property. This includes business secrets, patents, trademarks and copyrights, but also business and marketing plans, designs, business papers, salary data and all other unpublished financial data and reports.

The only deviation from this is if publication of the information has been approved by Simon Hegele or is mandatory due to laws or regulations.

All personal information about employees, customers, business partners and suppliers as well as other third parties is used carefully at Simon Hegele and treated confidentially in full compliance with data protection laws. The utmost care must be taken to protect this information.

#### Prohibition of insider trading

All Simon Hegele employees are obliged to comply with all (legal) prohibitions on insider trading. It is prohibited to acquire, have acquired or sell insider securities using insider information. Insider information may not be disclosed to third parties without authorization or made accessible to unauthorized third parties.

## 6. Implementation and monitoring

#### Compliance with the Code of Conduct

The rules and regulations contained in this Code of Conduct form a core part of Simon Hegele's corporate culture. Uniform and permanent compliance with these principles is essential. Every employee is responsible for this in their daily actions.

Compliance with the Code of Conduct is monitored through regular internal audits by the Chief Compliance Officer together with an approved compliance auditor.

#### Reporting channels for violations

Any employee who becomes aware of a (possible) violation of this Code of Conduct is required to report it immediately to their line manager.

The internal reporting office (in accordance with the Whistleblower Protection Act) can also be used for reporting violations via three different channels (email, telephone, post):

Mail: [meldestelle@hegele.de](mailto:meldestelle@hegele.de)

Phone: +49 172 7256 820 (answering machine)

Post: Simon Hegele Gesellschaft für Logistik und Service mbH  
z.Hd. Meldestelle  
Haid-und-Neu-Str. 13-15  
76131 Karlsruhe

## Code of Conduct

### Simon Hegele Group GmbH and Group companies

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Original signed on December 14, 2023 in Karlsruhe:

**Stefan Ulrich**

Managing Director  
Simon Hegele Group GmbH