

# CODE OF CONDUCT

For Employees HEINZ-GLAS Group

ADDICTED TO GLASS



**HEINZGLAS**  
family-owned since 1622



# FOREWORD

Dear readers,

Our Code of Conduct is based on our corporate values and strategy and establishes the standards for our conduct in our everyday business practices.

Responsible and lawful conduct is an integral part of our corporate culture and forms the basis of the confidence our customers, business partners and the public have placed in us. This Code of Conduct applies worldwide to all employees, managers, trustees, other institutions and holders of all companies within the HEINZ-GLAS Group.

Every individual is obliged to align their conduct to comply with the HEINZ-GLAS Group's corporate values and the Code of Conduct. The applicable laws apply in addition to this Code

of Conduct and independently thereof. Compliance must be checked regularly through appropriate audits. Moreover, we support and encourage all of our business partners and suppliers to also take these principles into account. The Code can be substantiated through specific guidelines per subsidiary, and if necessary adapted to the social and legal particularities of each country.

We expect all employees to act in accordance with our ethical principles, applicable laws and internal guidelines. At the same time, we expect all managers to live and communicate these principles.

*Carletta Heinz*

Carletta Heinz  
Owner & CEO

*Virginia Elliott*

Virginia Elliott  
CSO

*Frank Martin*

Frank Martin  
CFO



# TABLE OF CONTENTS

1. Human and Labour Rights	6	4. Communications	14
1.1. Discrimination		4.1 Data protection and Safeguarding against External Threats	
1.2. Child Labor		4.2 Confidentiality	
1.3. Forced Labour and Human Trafficking		4.3 Documentation	
1.4. Working Times and Remuneration		4.4. Communication	
1.5. Occupational Health and Safety		4.5. Dealing with authorities	
1.6. Employee Development		4.6. Information Policy and Support	
1.7. Fiduciary Duty and Exemplary Role of Managers			
1.8. Employee Representation and Complaint Management			
2. Ecology	10	5. Culture and Life	18
2.1. Managing Natural Resources		5.1 Promoting/ Supporting existing Associations and Organizations	
2.2. Resource Conservation		5.2 Company Projects	
2.3. Recycling		5.3 Donations	
2.4. Certifications, assessments and management systems			
3. Economy	12	6. Business Conduct Hotline	20
3.1. Fair relationships with Business Partners			
3.2. Competition and Antitrust Law			
3.3. Corruption and Conflicts of Interest			
3.4. Company Assets			
3.5. Dealing with Financial Affairs			

All formulations relating to people apply to both male and female employees.

Source: ©HEINZ-GLAS Group

# HUMAN AND LABOUR RIGHTS



Putting people first.

*The actions of all individuals within the HEINZ-GLAS Group is geared towards universally applicable ethical values and principals. This especially applies when it comes to integrity, honesty, respect for human dignity, openness and non-discrimination between religions, ideologies, gender and ethnicity. This is an important part of our corporate culture.*

The HEINZ-GLAS Group, which includes all subsidiaries at home and abroad, shall observe the statutes and laws in their respective countries. All employees must observe the laws when conducting their daily business and must also comply with legal provisions as well as with this Code of Conduct. We promote moral courage and ethical conduct among all our employees. Our employees make their decisions after careful and objective consideration of the situation, using common sense and in a responsible manner regarding all parties concerned, both internally and externally.

The well-being of every individual within the company's sphere of influence is of the utmost importance. We expect the same from our suppliers and partners. Compliance with internationally recognized human rights is also at the heart of all of our business relations. In addition to the applicable jurisdiction and laws of each country, we also strongly adhere to the Universal Declaration of Human Rights (UNO 1948). The fundamental principles and rights at the workplace laid out in the ILO Declaration of 1998 (prohibition of child labor, forced labor, discrimination and freedom of association and right to collective bargaining) are considered paramount.

#### 1.1. Discrimination

We value each and every employee as an individual. Our appreciation goes far beyond the economic benefits for the company. We treat our employees and business partners with fairness

and tolerance. All types of discrimination, sexual harassment or personal attacks contradict our corporate principles and will not be tolerated. Equality is an integral principle – regardless of ethnic origin, color, sex, religion, nationality, sexual orientation, social origin, disability or political affiliation, to the extent that it is based on democratic principles and tolerance towards those with different views.

#### 1.2. Child labor

Child labor does not exist in any area of the HEINZ-GLAS Group. Where the local laws do not specify a higher age limit, no workers are employed who are of school age or younger than 15 years old. Workers under 18 are not allowed to carry out any dangerous activities and are excluded from working at night (taking into account the training requirements). The ILO Convention 138 is the standard used and establishes the minimum age for employment. The HEINZ-GLAS Group obliges its suppliers and partners to comply with this standard.

#### 1.3. Forced Labour and Human Trafficking

Our employees are selected, hired and promoted on the basis of their qualifications, skills and abilities. Any form of forced or bonded labor is in no way permitted.

#### 1.4. Working Times and Remuneration

Working hour agreements, overtime, remuneration, holiday entitlements or fringe benefits are established in accordance with the applicable laws and regulations (as the minimum standard) or serve as a benefit in favor of the employee. The remuneration paid for full-time employment must be enough to cover the employee's basic living costs. Illegal and unauthorized wage deductions in the form of direct or indirect disciplinary measures are forbidden.

#### 1.5. Occupational Health and Safety

Occupational health and safety management has the highest priority. In order to avoid health hazards, occupational health and safety regulations must be observed. Occupational health and safety is not a minor matter but an obligatory task of each individual. The managers have an important and necessary function as a role model and delegator. We work hard to establish safe conditions in the working environment and regularly inform each employee on how to comply with them to exclude hazardous risks to their health or to keep risks as low as possible.

#### 1.6. Employee Development

The expertise, skill and commitment of our employees is fundamental to the success of the HEINZ-GLAS Group. We want to specialize and develop our employees on a personal and profes-

sional level, based on the economic possibilities available. Our personnel development is geared for the long-term. Here, the aim is to agree on preserving jobs, promoting young professional talent, employee needs and the general business environment. We expect unconditional loyalty from our employees and are also aware of our responsibility in handling „people“ as a resource. Each individual employee has the opportunity for further development and targeted promotion. Individual needs and conditions are taken into account as much as possible. We think and act in terms of generations so that we remain a reliable employer and especially as a family-owned business.

#### 1.7. Fiduciary Duty and Exemplary Role of Managers

Every manager at HEINZ-GLAS Group is personally responsible for all employees entrusted to them. They are responsible for carrying out their supervisory duties and for ensuring that the applicable laws, including this Code of Conduct, are not violated in their area of responsibility that could have been prevented through better supervision or organization. They behave in an exemplary manner in all situations and are basically always available for the questions and concerns of their employees. The management team acts as a model in all respects

#### 1.8. Employee representation and complaint management

The interests of employees of the HEINZ-GLAS Group are taken seriously and dealt with confidentially in the framework of our



complaint management system. Employees can confidentially contact a member of the works council or an employee of the personnel department at any time. All indications and reports are taken into account and if necessary, the appropriate measures are taken. All complaints will be treated confidentially in accordance with the statutory framework. At the same time, ignoring the supervisor without a justifiable reason or intentional slander of other employees is not tolerated.

# ECOLOGY

A vertical wind turbine stands prominently in the center of the frame. The nacelle, the central housing for the generator, is clearly visible and bears the text "AN BONUS" in black capital letters. The turbine's three blades extend upwards and outwards, with the top blade pointing towards the top of the image. The background is a vibrant sunset or sunrise, with a gradient of colors from deep blue at the top to bright orange and yellow near the horizon. A thick layer of white clouds fills the lower half of the image, creating a "sea of clouds" effect. The overall mood is serene and hopeful, emphasizing clean energy and environmental stewardship.

**Our footprint is getting smaller and smaller.**

*We are aware of our responsibility towards the environment and future generations.  
We strive to sustainably support the natural environment and preserve its resources within  
our sphere of influence.*

### 2.1. Managing Natural Resources

The HEINZ-GLAS Group uses the best possible, environmentally friendly practices and constantly improves them. The regulations and standards on environmental protection must be fulfilled at all business locations; in addition, we proceed very responsibly and in a future-oriented manner regarding natural resources.

### 2.2. Resource Conservation

Energy (electricity and gas) and water consumption are constantly kept in check and reduced or compensated for in a targeted manner through continuous processes. This also applies to CO<sub>2</sub> and VOC emissions. We are actively involved in environmental protection through conscious consumption of natural resources.

### 2.3. Recycling

All waste and recyclable materials of the HEINZ-GLAS Group are sorted and, as far as possible, added to recycling processes. Rejects from production are reused in the best possible way in our own production.

### 2.4. Certifications, assessments and management systems

Certifications and evaluations by accredited and independent companies serve as a constant monitoring and transparency mechanism in the framework of globally applicable standards. They are a sign of quality and sustainable structures, procedures and processes. This is why we pay special attention to appropriate proofs and certifications when selecting our suppliers and partners.



# ECONOMY

**We have been a family business with heart and reason since 1622.**

*The HEINZ-GLAS Group strives to preserve its independence as a family business for the future. This is only possible with a solid economic foundation*

### 3.1. Fair relationships with business partners

Our cooperation with business partners is based on mutual respect, consideration, integrity and tolerance.

### 3.2. Competition and Antitrust Law

The entire business adheres to the relevant regulatory competition provisions, laws, regulations as well as our internal Compliance Anti-Trust Policy.

Anticompetitive agreements between competitors is not allowed. All HEINZ-GLAS Group employees are obligated to follow these rules, because only fair competition has earned the right to prosper.

### 3.3. Corruption and conflicts of interest

The HEINZ-GLAS Group is vehemently against bribery and corruption! We demand transparency, responsible management and control. All business relationships of the HEINZ-GLAS Group with suppliers and other business partners may only be established on the basis of such criteria as are objectively verifiable, e.g. performance, integrity or experience of the partner. Employees may not offer, promise, give, grant, accept or demand benefits (such as money, gifts, gratuities or other perks) from others which are directly or indirectly related to their daily business. Employees and managers are to refrain from giving gifts of any kind to civil servants or other government officials. Any other (potential) conflicts of interest must be reported to the respective superior. Our Compliance Corruption Policy de-

fines all relevant rules of conduct with regard to corruption and conflicts of interest, which must always be observed by all our employees. In addition, regular training courses are held to raise the awareness of our employees.

### 3.4. Company Assets

Every employee is responsible for helping to sustainably preserve the assets and working materials of the HEINZ-GLAS Group through careful treatment. The assets as well as the operating resources of the HEINZ-GLAS Group may only be used by employees for their respective business activities. They may not be used for any personal benefit or personal use of employees, persons close to them or third parties. Exceptions shall only apply if and insofar as personal use is expressly permitted by special regulations.

### 3.5. Dealing with Financial Affairs

The HEINZ-GLAS-Group is committed to continuing to develop the company as an independent family business. Therefore, it is very important to us to maintain a sustainable approach. Dealing with financial matters in a responsible, careful, knowledgeable, prudent and honest fashion is especially relevant for the managers of the HEINZ-GLAS Group and its employees in the areas of „Finance“ and „Controlling“ across the globe. It is imperative to comply with all legal provisions and regulations. The aforementioned group of persons are to ensure that all the company's assets and resources are responsibly dealt with and monitored.

# COMMUNICATIONS

A photograph of two men in a factory or industrial setting. They are both wearing dark blue t-shirts with a yellow logo that says "HIVE-LAB". The man on the right is holding a small, dark, rectangular device. They are looking at each other and smiling. In the foreground, there is a large stack of metal parts, possibly gears or bearings, arranged in rows. The background shows industrial equipment, including a blue pillar and overhead lights.

Trust is a valuable gift.

*We pay attention not only to each other, but also to your data.*

#### 4.1. Data Protection and Safeguarding against External Threats

Every employee is obliged to comply with the country specific data protection regulations as well as the statutory and company regulations on information security within the scope of their responsibilities and beyond. Mis-use of confidential information is strictly prohibited. Clear regulations ensure internationally uniform and high data protection standards. We are aware of the high level of sensitivity of the personal data of our customers, employees and suppliers as well as the company's own data and protect this data through a careful and trusting relationship. The data is used exclusively within the context of the legal framework. When disclosing such information, it is necessary to determine whether the recipient is entitled to receive it. This applies both internally and externally. In addition, the confidentiality requirement on not allowing internal information to reach the public also applies. It is the responsibility of every employee, and particularly the management, to prevent external risks such as crime, abductions, terrorist attacks or industrial espionage in their own spheres of influence.

#### 4.2. Confidentiality

All business and operational information obtained from the cooperation with the HEINZ-GLAS Group, which has not been lawfully made publicly accessible, is subject to secrecy (non-disclosure) and may not be disclosed to unauthorised third parties. Third parties are also close persons or employees who do

not need to have official knowledge of the project or transaction in question. Furthermore, internal company information may only be used for operational purposes.

This also applies to the time after the termination of the employment relationship.

#### 4.3. Documentation

Careful documentation of processes is essential to enable effective cooperation both internally and with authorities and other stakeholders.

Therefore, all records, data, reports and financial statements prepared must be complete, correct, accurate, on time, system-compatible and traceable.

Documents must be carefully stored for the duration of the statutory retention periods.

#### 4.4. Communication

Honest, open and yet polite communication is a part of good cooperation at all levels of the company. We take this into account both internally and for our external business partners, authorities, government agencies and the public sector. Electronic communication is of considerable importance in the business practice of the HEINZ-GLAS Group and facilitates general communication. This requires a special duty of care for all employees. Our employees are required to exercise the same sensitive care in e-mail correspondence as in regular mail

correspondence. In addition, all standards valid for face-to-face conversations shall be applied to telephone calls.

#### 4.5. Dealing with authorities

We strive for a cooperative and open relationship with all public authorities. We attach great importance to comply to all procedures laid down by law to ensure smooth processes. In case of receiving official enquiries from public authorities, the superior must be informed before replies are given. If necessary, the superior will discuss further action with the legal department and other managers.

#### 4.6. Information Policy and Support

The HEINZ-GLAS Group management and site managers of the subsidiaries are responsible for communicating the requirements set forth herein to all employees to ensure the Code of Conduct is implemented and practiced. If an employee has doubts as to whether his behavior or the behavior of a third party complies with the provisions of this Code of Conduct and the legal regulations, his respective manager is available to provide assistance. Trust is an important part of positive team work. We rely on honesty and respectful interaction to achieve this at all levels in the company. Deliberately providing incorrect information or intentionally or carelessly spreading untrue statements about colleagues or situations is not tolerated at the HEINZ-GLAS Group.



*Who knows his roots, knows  
about the power of the branches.*



# CULTURE AND LIFE



**We preserve our origin and shape the future.**

*The HEINZ-GLAS Group is a family business with a long history – maintaining the company's locations and promoting the regions is of the highest priority for us. We act resolutely against demographic change with our sustainable thinking and actions.*

#### 5.1. Promoting/ Supporting existing Associations and Organizations

We are particularly committed to supporting local associations and social organizations and promoting them. They provide quality of life and are an essential part of society. We believe that community involvement in the regions where we operate is a moral, entrepreneurial and ethical aspect of our business.

#### 5.2. Company Projects

Our goal is to promote the attractiveness of our company with our own projects. The region is made more attractive through internal and external offers for culture, sports, education and leisure activities. This allows us to create a sense of belonging, a “we feeling”, in the company and the immediate surroundings. We are committed to the development of local infrastructure through our targeted measures.

#### 5.3. Donations

We make donations on a voluntary basis without expecting anything in return. The allocation of sponsorship funds is based on the framework of the respective legal systems and the applicable agreements. Regarding monetary and material donations for science and education, culture and sports, and public welfare, grants are only given to facilities that are recognized as a non-profit organization or are authorized to accept donations through special regulations. Donations to individuals, politicians, political parties or lobby groups group contributions are unacceptable. All donation processes are carried out in a transparent manner. The recipient and the intended purpose must be stated.



# BUSINESS CONDUCT HOTLINE

**Responsible Office and Data Protection Officer**

*Address: HEINZ-GLAS GmbH & Co. KGaA | Glashuettenplatz 1-7 | 96355 Kleintettau*

*Contact Information: heinz-glas.com | +49 9269 77-100 | info@heinz-glas.com*

*Contact of the Data Protection Officer: data-protection@heinz-glas.com*

*You can report any misconduct, especially violations of applicable law and internal instructions and procedures via our reporting system anonymously.*

*<https://heinz-glas.integrityline.org/>*



*General Terms and Conditions of Business*

*Here you can download our current General Terms and Conditions:  
[www.heinz-glas.com/agb](http://www.heinz-glas.com/agb)*

The Code of Conduct for Employees applies to every employee of the HEINZ-GLAS Group. We oblige our employees to observe it and to act accordingly at all times.

HEINZ - GLAS GmbH & Co. KGaA  
Glashuettenplatz 1-7  
96355 Kleintettau | Germany

Phone: +49 9269 77- 0  
Fax: +49 269 77-333  
[www.heinz-glas.com](http://www.heinz-glas.com)

Editing department Thomas Eidloth | Elisa Trebes  
Design and Layout Lisa Lampert-Müller  
Current as of December 2020



**HEINZGLAS**  
family-owned since 1622