



HEINZGLAS
family-owned since 1622

CODE OF CONDUCT

for employees of the
HEINZ-GLAS Group

www.heinz-glas.com



FOREWORD

Dear readers,

Our Code of Conduct is based on our corporate values and our strategy and sets out binding behavioral guidelines for day-to-day business practice.

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

Everyone is obliged act in accordance with the corporate values and this Code of Conduct of the HEINZ-GLAS Group.

In addition to and independently of this Code of Conduct, applicable laws apply. Compliance must be monitored regularly through appropriate audits. We also encourage and require all suppliers and subcontractors to comply with these principles.

Specific guidelines for subsidiaries located outside Germany can be used to substantiate the Code and, if necessary, adapt it to the social and legal characteristics of the respective country. We expect the Code of Conduct set out here to be widely accepted worldwide!

Carletta Heinz
Owner & CEO

Frank Martin
CFO

Virginia Elliott
CSO

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1. HUMAN AND LABOR RIGHTS

Putting people first.

The actions of all persons within the HEINZ-GLAS Group are guided by generally accepted ethical values and principles. In particular, integrity, honesty, respect for human dignity, openness and non-discrimination of religion, ideology, gender and ethnicity. This is an important part of our corporate culture.

The HEINZ-GLAS Group and all its subsidiaries in Germany and abroad comply with the applicable rights and laws in the respective countries. Every employee must observe this in their daily actions and comply with applicable legal regulations. We promote moral courage and ethical behavior among all employees. Employees make their decisions towards all persons, both internally and externally, on the basis of appropriate and objective considerations, common sense and a sense of responsibility.

The well-being of every person within our company's sphere of influence is important to us. We expect the same from our business partners. Respect for internationally recognized human rights is the basis of all our business relationships. In addition to the applicable legal systems and laws of the individual countries, we adhere in particular to the Universal Declaration of Human Rights (UN 1948). The fundamental principles and rights at work set out in the ILO Declaration of 1998 (prohibition of child labor, forced labor, discrimination and freedom of association and the right to collective bargaining) are also our top priority.

1.1. Discrimination

We value every single employee as an individual personality. This appreciation goes far beyond the economic benefits for the company. We treat our employees and business partners with fairness and tolerance. Any kind of discrimination, sexual harassment or personal attacks are contrary to our corporate principles and will not be tolerated. Equal treatment is a firm principle - regardless of ethnic or social origin, skin color, gender, religion, nationality, sexual orientation, age, disability, health status, pregnancy or political views. The personal dignity, privacy and personal rights of each individual are respected.

1.2. Child labor

The HEINZ-GLAS Group does not use child labor anywhere in the company. It is prohibited to employ a child under the

age at which compulsory schooling ends according to the law of the place of employment, whereby the age of employment may not be less than 15 years. This does not apply if the applicable law of the place of employment deviates from this in accordance with No. 138 of the International Labor Organization on the minimum age for admission to employment. Employees under the age of 18 may not perform hazardous work and are excluded from night work. The prohibition of the worst forms of child labor in accordance with Convention No. 182 of the International Labor Organization must be observed.

1.3. Forced labor and human trafficking

Our employees are selected, hired and promoted on the basis of their qualifications, skills and abilities. Any form of forced labor, slavery, servitude or similar practices are not permitted in any way. Work must be voluntary, without threat of punishment, and employees must be able to terminate employment at any time. Unacceptable treatment in the workplace, including economic or sexual exploitation and humiliation, is prohibited.

1.4. Working hours and remuneration

In the HEINZ-GLAS Group, working time regulations, overtime, remuneration, vacation entitlement or fringe benefits are defined at least in accordance with applicable law and regulations or as a benefit beyond that for the employee. The remuneration granted for full employment must be sufficient to ensure the basic provision of the employee. Overtime shall be voluntary and limited in accordance with the law of the place of employment. Illegal and unjustified deductions from wages in the form of direct or indirect disciplinary measures are prohibited.

1.5. Health protection and occupational safety

Occupational safety and health protection have the highest priority at the HEINZ-GLAS Group. In order to avoid health hazards, the occupational health and safety regulations applicable at the respective place of work must be observed at all times. Occupational health and safety is not a minor matter, but an obligatory task for each individual. Managers have an important and necessary role model and directive function. We ensure safe conditions in the working environment and regularly inform every employee about compliance with these regulations in order to eliminate or minimize health risks.

1.6. Employee development

The know-how, skills and commitment of our employees are the basic prerequisites for the success of our group of companies. We want to qualify and develop our employees personally and professionally, taking into account the economic possibilities. Our personnel development is geared towards the long term. The aim here is to reconcile the preservation of jobs, the promotion of young specialists, employee needs and economic conditions. We expect unreserved loyalty from our employees and at the same time are aware of the need to treat human resources responsibly. Every single employee has the opportunity for further development and targeted support. Individual needs and general conditions are taken into account in the best possible way.

1.7. Duty of care and role model function of managers

Every manager of the HEINZ-GLAS Group has a special personal responsibility for the employees entrusted to them. They must fulfil their supervisory duties and ensure that no violations of applicable laws and regulations or of this Code of Conduct occur in their area of responsibility that could have been prevented by better supervision or organization. They behave in an exemplary manner in all situations and are always available to answer employees' questions and

concerns. Employees must be assigned tasks and objectives in a clear, precise and binding manner. Managers act as role models in all matters.

1.8. Employee representation and complaints management

The right of all employees to form and join trade unions and to engage in collective bargaining is expressly recognized. Where this is restricted by local laws, alternative possibilities for independent employee associations are made possible. Employee representatives must not be subject to discrimination and should be given access to all workplaces required to carry out their representative function. We are fundamentally open to the activities of trade unions.



An aerial photograph of a vast, forested valley at sunset. The sky is a mix of orange, yellow, and blue, with soft clouds. The valley floor is covered in dense green and yellow trees, with a winding road visible. In the distance, rolling hills and mountains are visible under the twilight sky.

2. ECOLOGY

We leave smaller footprints.

We are aware of our responsibility towards the environment and future generations. Within the scope of our influence, we strive to support the natural environment and conserve its resources in the long term.

2.1. Dealing with natural resources

The HEINZ-GLAS Group uses the best possible, environmentally friendly practices, which are continuously improved. The regulations and standards for environmental protection must be met at all operating sites, and we also use natural resources in a very responsible and forward-looking manner.

2.2. Conservation of resources and emissions

Consumption of energy (electricity and gas) and water is determined on an ongoing basis and reduced or offset in a targeted manner in continuous processes. This also applies to CO₂ and VOC emissions. We are actively committed to environmental protection through the conscious use of natural resources.

2.3. Preserving the natural basis of life

Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be avoided if they are detrimental to human health, significantly impair natural resources for food production or impede or destroy access to clean drinking water or sanitary facilities.

2.4. Waste and recycling

Production waste is optimally reused or passed on to recycling programs. Other waste is separated, recycled or reused in order to continuously increase recycling rates. In addition, the amount of waste is systematically reduced and environmentally harmful materials are disposed of responsibly.

2.5. Dealing with conflict materials

Processes in accordance with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Conflict Minerals such as tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt, are in place.

2.6. Certifications and ratings

Certifications and assessments by accredited and independent companies serve to ensure continuous monitoring and transparency within the framework of globally applicable standards. They are a sign of quality and sustainable structures, procedures and processes. This is why we pay particular attention to the relevant certificates and certifications when selecting our suppliers and partners



3. ECONOMY

We think and act in terms of generations.

The responsible use of money as a resource is the basis for maintaining the independence of our company.

3.1. Fair dealings with business partners

We maintain fair dealings with all business partners and third parties and support respectful cooperation.

3.2. Competition and antitrust law

All business activities comply with the applicable competition regulations, laws and rules. Anti-competitive agreements between competitors are not permitted. Every single employee is obliged to follow these regulations, because only fair competition enjoys the right to develop freely.

3.3. Corruption and conflicts of interest

We strictly reject corruption, bribery, extortion and embezzlement! On the other hand, we promote transparency and responsible management and control. Employees may not offer, promise, grant or approve any benefits (such as money, gifts, gratuities or other benefits) in direct or indirect connection with their business activities, or accept or demand such benefits from others. Gifts of any kind must not be given to civil servants or other public officials. All contracts must be awarded on the basis of merit and objective evaluation standards. Any personal interest must be excluded in every business transaction.

3.4. Assets of the company

Every employee helps to maintain the assets and work equipment of the HEINZ-GLAS Group in the long term by handling them with care. Use, trade or exchange for personal benefit is prohibited. This applies equally to a pencil, a tool or a company car.

3.5. Dealing with finances

The HEINZ-GLAS Group has set itself the goal of maintaining the company as an independent family business and develop it further. To this end, it is very important to us to handle money as a resource in a sustainable manner. In particular, HEINZ-GLAS Group managers and all employees in the Finance and Controlling departments worldwide must handle financial matters responsibly, carefully, competently, prudently and honestly. All statutory provisions and regulations must be complied with. The above-mentioned persons must ensure that all assets and resources of the company are handled in a responsible and controlled manner.

3.6. Intellectual property

The intellectual property rights of others, including confidentiality, must be respected and complied with. Technology and know-how must be transferred in such a way that the intellectual property rights and confidential information of business partners are protected.



4. COMMUNICATION

Trust is a valuable gift.

We not only look after each other, but also your data.

4.1. Data protection and defense against external threats

Within the scope of their duties and beyond, all employees are obliged to comply with data protection regulations and the statutory and company regulations on information security. The misuse of confidential data is strictly prohibited. Clear regulations ensure an internationally uniform high level of data protection. We are aware of the high sensitivity of the personal data of our customers, employees and suppliers as well as the company's own data and protect it by handling it carefully and confidentially. The data is used exclusively within the authorized framework. When passing on information, it must be checked whether the recipient is authorized to receive it. This applies both within and outside the company. Every employee is responsible for preventing external threats such as general crime, kidnappings, terrorist attacks or industrial espionage within their own sphere of influence.

4.2. Confidentiality

All business and operational information obtained from the cooperation with the HEINZ-GLAS Group that has not been lawfully made publicly accessible is subject to confidentiality (non-disclosure) and may not be disclosed to unauthorized third parties. This also applies to the period after termination of the employment relationship.

4.3. Communication

Good cooperation includes honest, open and yet polite communication at all levels of the company. We take this into account both internally and externally with business partners, authorities, government agencies and the public.

4.4. Information policy and support

The managers of the HEINZ-GLAS Group and the site managers of the subsidiaries are responsible for communicating the requirements set out here to all employees, suppliers and business partners and for ensuring that the Code of Conduct is implemented and practiced. Trust is an important component of good teamwork. In order to achieve this at all levels of the company, we rely on honesty and respectful interaction with one another. The HEINZ-GLAS Group does not tolerate deliberate misinformation or the deliberate or careless dissemination of untrue statements about colleagues or facts



5. CULTURE AND LIFE

We preserve our origins and shape our future!

For the HEINZ-GLAS Group, as a family business with a long history, the preservation of company locations and the promotion of the regions have the highest priority. By thinking and acting sustainably, we are taking decisive action to counteract demographic change.

5.1. Promotion and support of existing associations and organizations

We are particularly keen to support and promote local associations and social organizations. These create quality of life and are an important part of social life. Charitable commitment in the regions in which we operate is a matter of course for us as a company, ethically and morally.

5.2. Own projects

Our aim is to promote the attractiveness of our companies' locations with our own projects. Internal and external cultural, sporting, educational and leisure activities make the regions more attractive. In this way, we create a „sense of unity“ within the company and the immediate surroundings. We are also committed to expanding the local infrastructure through targeted activities.

5.3. Donations

We award donations, i.e. grants, on a voluntary basis, without expecting anything in return. The allocation of sponsorship funds is based on the framework of the respective legal system and the applicable regulations. In the case of monetary donations and donations in kind for science and education, for culture and sport and for social causes, donations are only made to institutions that are recognized as charitable or are authorized to accept donations under special regulations. Donations to individuals are generally rejected. All donation transactions are transparent. The recipient and the intended use must be known.



6. CONTACT AND WHISTLEBLOWER SYSTEM

Contact:

Address: HEINZ-GLAS GmbH & Co KGaA | Glashüttenplatz 1-7 | 96355 Kleintettau

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

Whistleblower system

Internal reporting offices:

Written notification by post to:
HEINZ- GLAS GmbH & Co. KGaA
Compliance
Glashüttenplatz 1-7
96355 Kleintettau

By e-mail to:

compliance@heinz-glas.com

Via a digital whistleblower portal with contact form:

<https://heinz-glas.integrityline.app/>

The HEINZ-GLAS Group's whistleblower system can be used to anonymously report grievances, in particular violations of applicable law, human rights and environmental violations as well as violations of internal guidelines and processes.

External reporting offices

Germany:

You can also report an infringement within Germany to the Federal Office of Justice (BfJ), the Federal Financial Supervisory Authority (BaFin), the Federal Cartel Office (BKartA) and at EU level to the European Commission (COM), the European Anti-Fraud Office (OLAF), the European Maritime Safety Agency (EMSA), the European Aviation Safety Agency (EASA), the European Securities and Markets Authority (ESMA) and the European Medicines Agency (EMA).

Czech Republic:

You can also report a violation within the Czech Republic to the Ministry of Justice and at EU level to the European Commission (COM), the European Anti-Fraud Office (OLAF), the European Maritime Safety Agency (EMSA), the European Aviation Safety Agency (EASA), the European Securities and Markets Authority (ESMA) and the European Medicines Agency (EMA).

Poland:

You can also report an infringement within Poland to the Ombudsman and at EU level to the European Commission (COM), the European Anti-Fraud Office (OLAF), the European Maritime Safety Agency (EMSA), the European Aviation Safety Agency (EASA), the European Securities and Markets Authority (ESMA) and the European Medicines Agency (EMA).

EXPLANATION

„I have read and understood the Code of Conduct for Employees of the HEINZ-GLAS Group.
I take this into account and behave accordingly at all times.“

Date Place	Surname First name Position	Signature
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