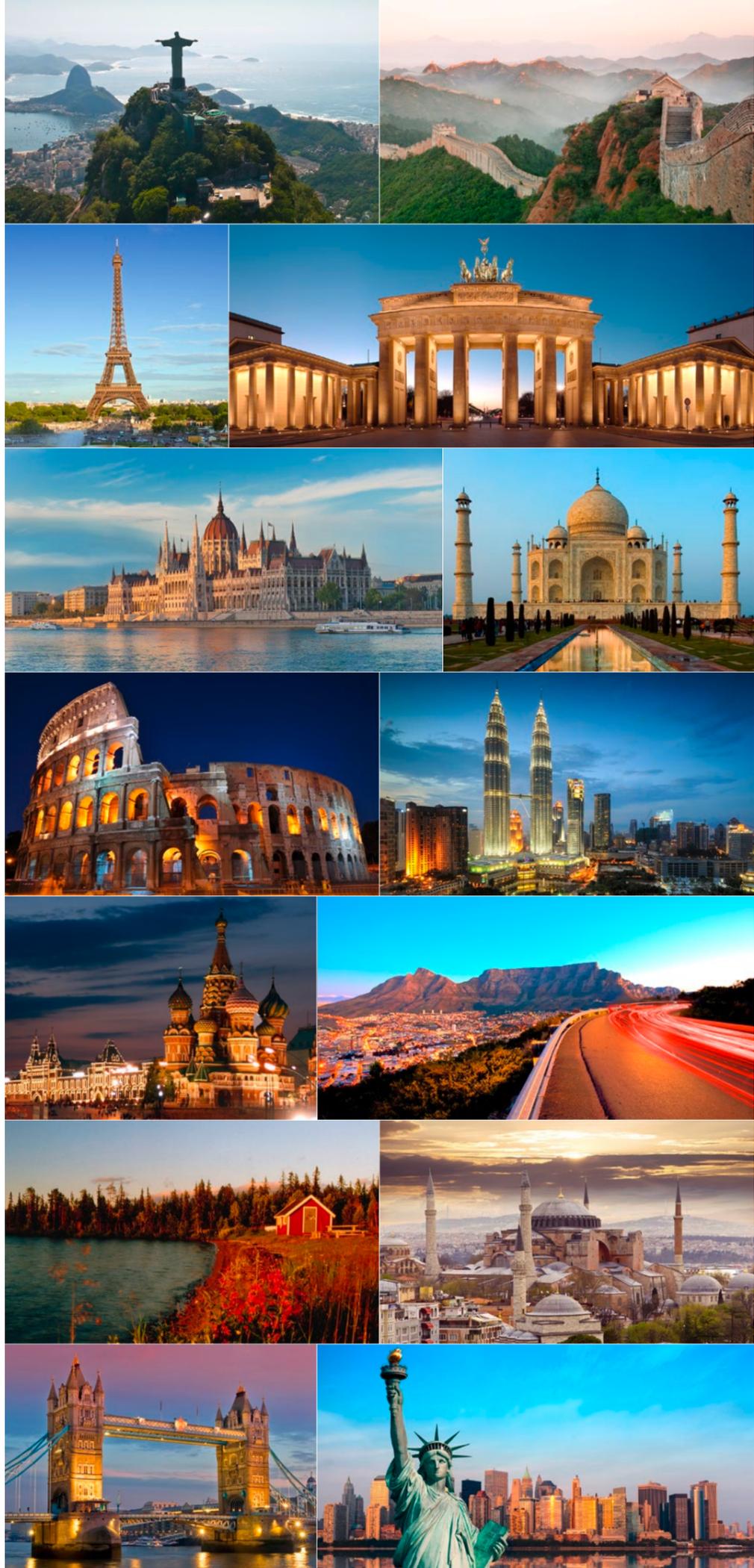




## CODE OF CONDUCT

Mobility. Materials. Photonics | united by passion.





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## 1. Foreword

When ever you travel by bus, train or car, there is a good chance you will encounter HÜBNER<sup>1</sup> products – worldwide.

As a systems provider, HÜBNER manufactures products for many different parts of the transportation industry, for medical technology applications and for new life-quality innovations.

The product range includes the design and production of folding bellows, vehicle articulation and gangway systems, window systems, PUR moulded foam components as well as rubber and plastic injection moulding products.

At the Company headquarters in Kassel and at various other international locations, several thousand employees work together to provide customers with custom-tailored solutions to their requirements -- from the initial development to the prototype to the product ready for general sale.

All of these activities are based on a socially responsible approach to Company management that takes economic, social and ecological factors into consideration in the decision-making process.

In this approach, HÜBNER is oriented to universal ethical values, in particular to the principles of the UN Global Compact and the General Declaration of Human Rights.

This Code of Conduct sets forth a binding policy for all companies that are part of the HÜBNER Group.

## 2. Basic rules of behaviour

### a) Law abidance

In connection with its worldwide business activities, HÜBNER is subject to different laws, ordinances, and official regulations. HÜBNER conforms to the particular provisions of the respective countries in which it is active and ensures this conformity through internal systems of control.

### b) Collegiality

For decades, HÜBNER's business activities have extended through various continents in the world. Reciprocal respect, openness and tolerance are always a basic prerequisite for constructive cooperation with persons of different ethnic origins, religions or cultures. HÜBNER supports the right of each employee to fair and respectful treatment by superiors and colleagues. Discrimination based on an employee's origin, gender, skin colour, disability, religion, basic convictions, age or sexual orientation will not be tolerated at HÜBNER

## 3. Dealing with business partners and third parties

### a) Corruption

HÜBNER is committed to fair competition. HÜBNER receives orders on the basis of the innovative and high-quality products that it offers. HÜBNER explicitly instructs its employees never to offer, promise, demand, grant or accept any payments, invitations or services that could influence business relations in a prohibited manner.

This does not apply to giving and receiving gifts of low value and making and accepting invitations for meals or events in appropriate circumstances.

The following gifts or invitations are never to be accepted or given by HÜBNER employees under any circumstances:

- Cash, loans, securities, checks
- Offensive, obscene or illegal products and / or services
- Gifts that have a direct relation to a business decision in favour of the person making the gift

### b) Obligation to observe fair competition laws

HÜBNER condemns any agreements or other arrangements with competitors, suppliers and customers that could limit, distort or prevent competition. This applies particularly to agreements concerning

- Prices, conditions, supply areas, capacities, distribution, tenders, profits, non-competition arrangements

### c) Supply chain

HÜBNER demands of its suppliers that they share the same fundamental values described here and implement these in their business practices.

### d) Handling of information

Company secrets and other information about the Company, its customers, suppliers and other business partners that are not intended for public distribution are handled with strict confidentiality by HÜBNER and are not transmitted to third parties.

<sup>1</sup> "HÜBNER" and the "Company" refer to the entire group, including all subsidiaries.



#### 4. Occupational safety, security and environmental protection

HÜBNER is aware of the fact that social justice is a basic prerequisite for lasting peace and therefore works against any abuse of labour in the following ways:

HÜBNER will accept no form of forced or compulsory labour and opposes all forms of child labour in agreement with the ILO Convention.

HÜBNER will accept no form of discrimination in the employer-employee relationship whether through active or passive behaviour.

Furthermore, HÜBNER supports the free exercise of the right of association among its employees and affirms the value of fair compensation.

HÜBNER is fully aware of its responsibility for the health and safety of its employees. As a responsible employer, it is an integral element of the long-term strategy of the Company to provide all employees with secure positions and to provide working conditions to employees that will not endanger their health. Protection of health and occupational safety are given high priority in all areas of the Company and in all of its processes.

HÜBNER assumes responsibility for the protection of our environment. Environmentally relevant matters are reviewed and taken into consideration in connection with all processes. HÜBNER limits environmentally adverse effects through preventive measures and conforms with all pertinent legal stipulations and public ordinances. In questions of environmental protection, HÜBNER works openly, actively and effectively with the public authorities, other companies and the general public.

HÜBNER sees it as part of its mission to continually improve environmental protection with the means and its disposal and to reduce any adverse impact the Company may have upon the environment.

#### 5. Avoidance of conflicts of interest

It is HÜBNER's policy to strictly separate personal interests and Company interests. Business decisions, in particular the selection of customers, suppliers and service providers, are made solely on the basis of objective criteria. Employees are not allowed to perform activities that could involve competition with HÜBNER or which from their extent could be expected to have an adverse effect on the contractually agreed employment responsibilities of the employee at HÜBNER.

#### 6. Data protection / Information security

For HÜBNER, data protection means the avoidance of any misuse of data in data processing, the protection of the right of informational self-determination, the protection of the general right of personality in connection with data processing, and the protection of privacy. HÜBNER respects the right of informational self-determination of all employees and business partners and collects personal data only when this is necessary for the execution of business processes or compliance with legal requirements.

HÜBNER adopts preventive measures to ensure that its systems for processing information guarantee the confidentiality, the availability and the integrity of the data that they handle.

#### 7. Fair taxation and transparency

The company management of HÜBNER places a high value on clear and transparent payment of taxes. HÜBNER practices efficient tax management and pays taxes in accordance with its activities in all states in which it has business operations. HÜBNER does not engage in aggressive tax avoidance strategies nor does it make use of tax havens as outlined in the OXFAM List 2016. With this approach, HÜBNER honors its social responsibilities. As a company acting in accordance with applicable laws, HÜBNER cooperates with all responsible national and international tax authorities on a basis of mutual trust and transparency. A member of the General Management of HÜBNER is explicitly responsible for the area of taxation.

#### 8. Observance of the Code of Conduct

HÜBNER expects to be informed by all employees regarding any behaviour that is contrary to the Code of Conduct or that could cause damage to the Company. Contact persons in this connection are always all management personnel, the works council representatives, the managing directors and the Compliance Officer of the Company. Confidential treatment of any information received is explicitly guaranteed. Information can also be provided anonymously.

HÜBNER ensures the effectiveness of the compliance management system through its integration in the existing system of management. Regular audits by the departments responsible for the system guarantee high standards and the identification of any weaknesses in the system as well as potential improvements.



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