



MEMBER OF  
ELEVION GROUP



# CODE OF CONDUCT

Rules of conduct and corporate values

## 1. objective/scope of application

An important concern of HERMOS is to develop and shape the business activities of the company in a long-term and sustainable manner.

A very good business result of HERMOS is not the only goal here. Rather, we consider it indispensable - also to achieve a positive business result - to develop and establish HERMOS as a respected and trustworthy automation technology company. For this purpose, we must conduct our business in a responsible and ethical manner. We must fully take into account the legitimate expectations and interests of customers and suppliers, our own employees and other stakeholders in this regard when pursuing our business objectives.

The HERMOS Code of Conduct will support and ensure that all employees of the HERMOS Group act and cooperate in accordance with the defined values and standards. We see the adherence to these values and standards as a basis or basic prerequisite to achieve and ensure the targeted high performance and readiness of HERMOS. The Code of Conduct provides common working principles for all employees and defines our way of working.

This Code of Conduct applies to all our activities and to the actions of all HERMOS Group employees. We have the expectation that these principles will always be observed and complied with by all employees.

## 2. Entrepreneurial values

The companies of the HERMOS Group are committed to managing their business in an ethical manner, with integrity and in compliance with the law, and conduct their business on the basis of the corporate values and rules of conduct set forth in this Code. Members of management and all employees act in the company's best interests when they comply with applicable laws, even if doing so may appear to be economically unfavorable or inappropriate from the perspective of the individual or the company. Ethically sound conduct, the principles of which are set forth by this Code, is therefore binding on all HERMOS employees.

We expect integrity, loyalty and critical thinking from every employee as a basic prerequisite for successful work. We expect our employees to uphold and observe these virtues within the framework - of the principles described below - of their activities.

Every employee has a right to competent, open and trustworthy leadership. Open communication with and between employees is an essential part of our personnel management. Employees are encouraged to behave in a courageous and exemplary manner, both internally and externally. Setting challenging and achievable goals for employees is of high importance. The personal and professional development of our employees is fully and optimally supported by HERMOS. Innovative approaches of our employees are supported.

### **3. Rules of conduct**

This Code contains the corporate values of the HERMOS Group and their translation into general rules of conduct. The Code contains the most important rules and principles of conduct that apply to all employees, executives and members of the management boards - hereinafter summarized as employees - of the entire HERMOS Group. The purpose of the Code is to make employees transparent and aware of the fundamental legal requirements to which they are subject in the course of their work for HERMOS, and to provide them with guidance in this regard.

The respective managements of the subsidiaries and business units of the HERMOS Group shall ensure that the Code of Conduct (and all related documents and company agreements) is announced and implemented in the companies they manage. Insofar as rules of conduct for individual areas or companies are laid down in special guidelines or regulations are laid down for individual areas or companies, these apply without restriction and in addition to this Code, insofar as they do not contradict it. It is the responsibility of each employee to ensure that the rules of conduct are applied and observed.

### **4. General principles**

An essential basic rule of our actions is compliance with the law in the respective jurisdiction. All employees are obliged to comply with the statutory and regulatory provisions applicable to us. The same applies to the internal instructions and guidelines communicated to you as well as company agreements, collective bargaining agreements and occupational health and safety regulations. This includes also to avoid any involvement in transactions that are recognizably aimed at circumventing these regulations.

Failure to comply with legal and regulatory requirements and violations of this Code may harm HERMOS and its businesses. In addition, they may lead to government sanctions (penalty notices, interference with business operations). An intentional or grossly negligent violation of the Code may constitute a breach of employment contract obligations for the respective employee and may therefore lead to disciplinary consequences, if applicable. The requirement of proportionality and equal treatment must be observed in all sanction measures.

## **4.1 Employees**

### **a) Safety and health**

Every employee has the right to a safe working environment. The highest possible level of occupational safety for all employees is therefore an important concern for us. Our goal is to prevent accidents in the workplace. To this end, processes, facilities and operating resources must comply with applicable legal and internal health and safety regulations and fire protection. Every employee always shares responsibility for their own and other employees' safety in the workplace. We also encourage subcontractors to adopt our safety principles.

### **b) Correct accounting**

Correct accounting as well as - if necessary - correct and comprehensible disclosure of financial information about itself and its activities represents for HERMOS the basis of its successful participation in economic transactions. The basis for this is a precise accounting system and the authorization of all business transactions in the HERMOS accounting system. All information is provided in a timely, reliably and factually recorded on the basis of legal regulations and laws by transparent and consistent ERP systems. Decisions regarding any business transactions are to be properly documented.

### **c) Respect and equal treatment**

HERMOS does not tolerate discrimination of any kind, whether based on age, gender, nationality or social origin, religion, physical or mental disability, political or other opinion or sexual orientation. Nor do we tolerate any form of harassment or bossing or bullying in the workplace.

It is especially important for HERMOS to be an honest and trustworthy employer that strives to maintain fair employment practices. In addition to providing the right work tools, resources and training, we especially encourage respectful interactions with one another so that our employees can successfully and enjoyably perform their jobs.

## **4.2 Business partners, subcontractors and suppliers**

Reliable and dependable suppliers and subcontractors are crucial for the entrepreneurial activities of HERMOS. Therefore, we strive for long-term and mutually successful business relationships with suppliers and subcontractors. Good and reliable business practices are of paramount importance to us. We therefore strive to develop these business relationships in particular in a sustainable manner and on a sound ethical basis.

Our relationships with our suppliers, subcontractors and other business partners are guided by the following principles:

- a) Suppliers, subcontractors and other business partners are all treated equally, without discrimination and exclusively in accordance with the applicable laws and regulations. Any unobjective preference or hindrance of suppliers, in particular for private reasons, is prohibited as a matter of principle.
- b) HERMOS does not tolerate bribery or other illegal acts in its relations with suppliers, subcontractors and other business partners. HERMOS takes action against bribery, corruption and economic crimes/offenses with all means at our disposal.
- c) all employees are required to ensure that companies of the HERMOS Group cannot be misused for money laundering or other illegal purposes (in particular the financing of terrorism).
- d) HERMOS does not tolerate child or forced labor of any kind.
- e) HERMOS expects its suppliers, subcontractors and other business partners to comply with internationally recognized human rights and working conditions, social responsibility and impeccable ethical behavior.
- f) Business information is treated confidentially as part of our most important assets. Employees of HERMOS employees are prohibited from disclosing confidential business, financial, personnel or technology information, plans or data to unauthorized persons.
- g) Performance-related commissions and bonuses are only granted in accordance with relevant standards and, in particular, if they are granted to third parties (consultants, sales representatives, etc.), they are commensurate with their activities and are fully documented.

#### 4.2.1 Competition

HERMOS supports a free market and free and fair competition between companies. We compete with other companies in the building services industry in a professional, honest and ethical manner. Violations of antitrust and competition laws will not be tolerated. All situations in which there is a risk that a competition law could be violated are to be avoided. There shall be no discussion with competitors of HERMOS about prices or pricing, possible participation in tender procedures, costs and cost structures, strategic decisions or any other information that is not generally known and of which competitors should not become aware.

#### 4.2.2 Protection of corporate assets

The assets of HERMOS include not only tangible assets/property, but also intangible assets (intellectual property) acquired in the course of business. Intellectual property (such as, in particular, patents, industrial property rights, etc.) may not be shared with or transferred to third parties.

Each employee is responsible for protecting these corporate assets. Company assets may only be used for permissible business purposes, and under no circumstances for illegal business purposes. When using company equipment and resources (including telephone, computer, Internet and other information technologies), the company's internal guidelines and other regulations must be observed.

#### 4.2.3 Confidentiality

Employees are bound to secrecy regarding all internal confidential matters of HERMOS as well as regarding all confidential information about customers/business partners. Without adequate operational reason and sufficient authorization, HERMOS Group employees shall not use, modify, disclose or release any information about customers or business partners.

Confidential information is all information that is marked as such or where it is readily apparent that it contains business and trade secrets. Typically, business and trade secrets as well as non-published reporting and accounting figures and data are considered confidential information. Confidential information must be protected from inspection by third parties. Also in internal company dealings and before passing on within the HERMOS Group, general care must be taken to ensure that confidential information is only passed on to those employees who require it for the performance of their official duties.

Employees are obliged to comply with the provisions of data protection law and to safeguard company and business secrets. Employees must actively contribute to ensuring that confidential data, in particular personal data (such as health data), is reliably secured against unauthorized access by third parties. Personal data may only be collected, processed and used insofar as this is permitted, in particular in accordance with the General Data Protection Regulation, the Federal Data Protection Act (abroad in accordance with the respective legal system) and other legal provisions and the existing company agreements. In cases of doubt, the company data protection officers must be consulted.

#### 4.2.4 Purchasing

HERMOS pursues an active procurement strategy aimed at cost savings, sustainability and innovation through collaboration with suppliers. Procurement personnel, as well as other HERMOS Group employees who may influence the selection of suppliers and ongoing relationships with them, must be particularly prudent to ensure that situations resulting in a conflict of interest are avoided.

### 4.3 Data protection according to the General Data Protection Regulation 25.05.2018

In order to be able to offer our customers the best possible project handling, quality and service, the use of modern information technology is required in almost all areas. This goes hand in hand with the storage of data, both from our customers, subcontractors and business partners as well as data from our employees. HERMOS is committed to complying with the strict regulations of the Basic Data Protection Regulation and the Federal Data Protection Act as well as other national regulations. This corresponds to our self-image and is regularly checked. HERMOS guarantees to protect individuals against any impairment of their personal rights resulting from the processing of their personal data. In the course of our activities, both in the HERMOS companies and in the head office, data are collected, processed and used in a variety of ways. In particular, this includes project and order-related data, but also data of our employees. Each employee of HERMOS is responsible for ensuring that all personal data is treated confidentially and in accordance with the law. In doing so, the data categories provided for by law are also observed.

#### Basically:

- Personal data may only be collected, processed and used to fulfill the tasks assigned to HERMOS.
- Data of business partners and employees will only be disclosed in cases expressly permitted.
- Business partners or employees may at any time request information about the personal data stored about them. Inaccurate data must be corrected, data that has been stored inadmissibly or is no longer required must be deleted or blocked.

#### Further company-specific regulations are set out in the following documents:

- Corporate Privacy Policy ( 2.1.2-Corporate-Privacy-Policy-With-Merkblatt)
- E-mail and Internet Policy and Consent Form ( 2.4.3.1-Use-Internet-Mail)
- Employee Commitment to Data Secrecy ( 2.4.2-Employee Commitment-Data Secrecy)

Compliance with data protection regulations is a matter of course for us in the HERMOS Group. The secrecy of correspondence must be maintained for all personally addressed items. The exchange of information is vital for the success of the company. This must be done with care and within an appropriate framework. Care must be taken to ensure that information can only be read by the intended recipients. The data protection officers are available to clarify individual questions.

### 4.4 Environmental protection

HERMOS is committed to the responsibility for environmental and climate protection. Applicable environmental protection regulations as well as existing environmental guidelines are to be observed by the employees. HERMOS and its employees are therefore obliged to consider the effects on the environment in their decisions and actions and to avoid or reduce environmental pollution as far as possible.

#### 4.5 Donations/Sponsoring

When HERMOS makes donations and sponsorships, care must be taken to ensure that the provisions of the relevant legal system and the internal regulations applicable to this are observed. Donations to political parties shall only be made to the extent permitted by law and require the prior consent of the management of the respective company. Otherwise, donations by HERMOS shall only be made to non-profit institutions. Other voluntary payments and donations by HERMOS which are not matched by any consideration in return must be refrained from.

#### 4.6 Implementation

The Elevion Group's compliance contact, Mr. Hans-Joachim Wedeking, attorney-at-law, is available to answer questions relating to this Code. If an employee becomes aware of significant violations of this Code, he or she should inform his or her supervisor or Mr. Hans-Joachim Wedeking, attorney-at-law. Any information received will be treated in strict confidence and with the necessary care. If there is a reasonable suspicion of a violation, the Compliance Contact may, while maintaining the confidentiality of the information received, involve the relevant departments for further clarification. The employee concerned can only suffer disadvantages as a result of his or her information if he or she knew from the outset that his or her information was incorrect or could have easily recognized this.

Mistelgau, 10.10.2022



Harald Köhler  
Management Board HERMOS AG



Florian Schwarz  
Management Board HERMOS AG



Frank Wiche  
Management Board HERMOS AG  
Managing Director  
HERMOS Schaltanlagen GmbH



Uwe Herrmannsdörfer  
Managing Director  
HERMOS Schaltanlagen GmbH



Michael Hohlweg  
Managing Director  
HERMOS Schaltanlagen GmbH