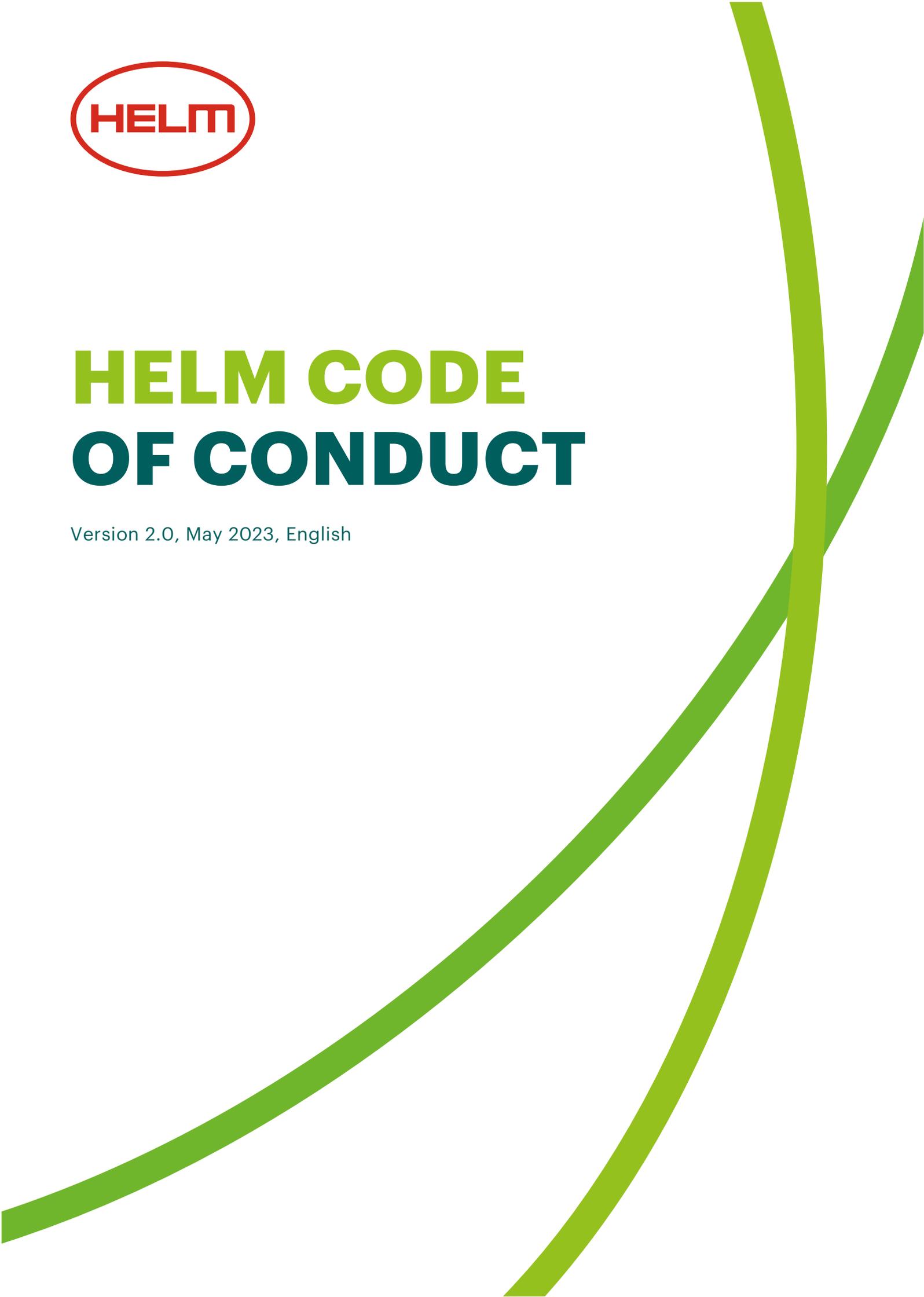




# HELM CODE OF CONDUCT

Version 2.0, May 2023, English



# Preamble

Dear employees,

HELM's success is based on two pillars.

One pillar is our products and services. Those who do business with us experience HELM as a reliable and competent partner. And to make sure it stays that way; we are constantly developing based on our experience.

The second main pillar is compliance, i.e., adherence to laws and regulations as well as internal guidelines and rules. We are jointly responsible for ensuring that everyone knows the rules and can follow them.

The rules set out in this HELM Code of Conduct are aimed at integrity, mutual respect, and transparency. What exactly is meant by this?

In the business environment, we demonstrate **integrity** when we behave like honorable businesspeople. People with integrity cannot be accused of bad intentions, especially of breaking the law. On the other hand, anyone suspected of not behaving with integrity risks his or her good reputation. This is a danger to our business that is at least as great as lawsuits, fines or claims for damages if we break rules. We want to safeguard and strengthen our good reputation. And we can only do that if everyone at HELM does the right thing.

Respectful treatment of our fellow human beings, both within HELM and with business partners, customers, and suppliers, represents a high value for us. We communicate openly and honestly with each other and are jointly responsible for creating an atmosphere of **mutual respect**. Discriminatory and derogatory behavior will not be tolerated at HELM.

Careful accounting and complete documentation of all business transactions ensure **transparency**. We also create transparency by communicating openly and honestly with each other.

From integrity, respect, transparency arises **trust**, and for good cooperation we need trusting relationships: within the workforce, with our customers and business partners, with authorities and government institutions. Trust is the basis for our long-term **success**.

Stephan Schnabel

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# 1 TAKING RESPONSIBILITY

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## 1.1 SCOPE OF APPLICATION

The HELM Code of Conduct applies to all employees of HELM AG and its worldwide subsidiaries – hereinafter referred to as HELM – as well as all joint ventures and participations in which HELM has management authority. This includes managing directors and board members and the members of our supervisory bodies.

If an employee does not comply with the applicable regulations, this may – depending on the type and severity and irrespective of the position in the company – have consequences under labor law, in individual cases up to and including dismissal, or lead to claims for damages. Regulatory and criminal consequences are also possible.

## 1.2 COMPLIANCE WITH APPLICABLE LAW

At HELM, we comply with all applicable local, national, and international laws and regulations wherever we do business worldwide.

German law applies to HELM AG because we are a German company. At the same time, the respective national laws of the countries in which we operate also apply. This means that legal requirements of the respective country and German law may contradict each other. We therefore must check exactly which law is to be observed in each individual case.

If you are unsure which regulations apply, contact the Compliance Department.

In case of doubt, we refrain from achieving a goal in order not to violate the law, regardless of any direct economic disadvantages this may cause. We expect the same from our business partners.

This approach serves to protect and promote HELM's reputation and values and is a prerequisite for ensuring our sustainable corporate success. Violations of existing laws and regulations can result in serious consequences for our company, such as criminal convictions, fines and/or reputational damage.

## 1.3 THE SIGNIFICANCE OF COMPLIANCE

In your work, you are faced with minor and major decisions every day. But you do not decide for yourself personally, but on behalf of the company.

### **Compliance provides protection**

If you do not know what is legally required and decide according to your gut feeling, it is possible that you will make wrong decisions. To prevent such mistakes, HELM has established compliance rules. These translate laws and other regulations into concrete procedures and decision-making aids. These rules protect us. But they also protect you from unpleasant consequences.

### **Compliance provides opportunities**

Where people work together openly and trustingly according to clear rules, the chance of developing innovative products or services is higher. And it serves quality. A company in which work is done correctly and lawfully is an attractive partner for customers, suppliers, and all other business partners. High quality and a good reputation lead directly to better market opportunities.

Competition for new employees has changed. It is becoming increasingly important to stand out positively from the competition as an employer. Continuous ethical behavior and a company's good reputation play just as important a role as its position on human rights and environmental protection issues.

## 1.4 COMPLIANCE WITH INTERNATIONAL STANDARDS AND HUMAN RIGHTS

Respect for human rights is a matter of principle for us. As a globally active company, we are committed to complying with the following international and national standards:

- the International Bill of Human Rights
- the ten principles of the UN Global Compact
- the OECD Guidelines for Multinational Enterprises
- the labor and social standards of the International Labor Organization (ILO)
- the principle of social partnership

## 1.5 HANDLING CONFLICTS OF INTEREST

We expect our employees to act solely in the interests of HELM in the course of their employment with the company. Their own private or economic interests must not influence or impair the economic interests of HELM.

Such a conflict of interest exists when actions or private interests collide in any way with the interests of our company or can even merely give the appearance of doing so. This is in particular the case if there is a personal interest in a business partner or competitor of HELM, for example through personal involvement, family relationships or even one's own secondary employment.

Disclose any conflict of interest to HELM immediately.

## 1.6 SAFEGUARDING COMPANY ASSETS

We exercise the utmost care in handling our corporate property, including all tangible and intangible assets.

Material assets and resources of the company such as machines, vehicles, equipment, computers, inventories, or office supplies serve our business objectives. Therefore, they may also be used exclusively to achieve these goals. This means that it is not permitted to use company property for private purposes.

We use not only financial resources but also all other corporate assets sparingly and responsibly.

We also carefully protect our intangible corporate property, i.e., our company-relevant knowledge. We also pay the utmost attention to ensuring that our brand image, as one of the foundations of our business activities, does not suffer any damage.

## 2 INTEGRITY IN BUSINESS CONDUCT

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We do our part to maintain HELM's good reputation worldwide and to meet the high standards we have set for ourselves. This includes full compliance with existing laws.

Laws protect the possibility that we participate in free and fair competition. They ensure reliable conditions that are the same for everyone. Where laws are absent or regularly flouted, the law of the strongest applies. If corruption and distortion of competition are not combated decisively, they spread and worsen business opportunities for legitimately operating companies.

We only conduct business activities with business partners who comply with applicable law.

### 2.1 FAIR COMPETITION

Ensuring fair competition in open and transparent markets is our maxim, so that our customers always have access to a wide range of products and services at fair market prices.

### 2.2 COMPETITION AND ANTI-TRUST LAW

Almost all countries have laws and regulations that prohibit relationships or agreements between competitors, suppliers, distributors, or dealers that could have a distorting effect on competition.

We observe and comply with the competition and antitrust regulations of the markets in which HELM operates.

We do not enter into any agreements that distort or influence competition.

The following applies: It is not the appearance of the agreement that is important, but its content. Even the exchange of information with competitors can constitute a violation of competition law.

### 2.3 PREVENTING CORRUPTION

We are against all forms of corruption and bribery.

We do not offer or accept bribes and are committed to ensuring that all our employees and representatives acting on behalf of HELM also prevent bribery.

Offering or accepting a benefit in any form of gratuity for the purpose of influencing any person in the public or private sector is prohibited.

To be economically successful, we maintain contact with our business partners and customers. For this purpose, you as a HELM employee may invite business partners and customers to business meals to an appropriate extent.

However, the giving and receiving of gifts, invitations or any other form of gratuity may influence the independence of our judgment or the judgment of our business partners. However, the giving of gifts is permissible for advertising purposes and as part of customer loyalty measures, as well as on certain occasions (e.g., birthdays, anniversaries, etc.) if it is socially appropriate. To assess appropriateness, the limit of the value must be judged, on the one hand, according to customary business practice and, on the other hand, according to the circumstances of the individual case. If the value exceeds the limit of appropriateness, you must refrain from granting or accepting it.

## 2.4 DONATIONS AND SPONSORING

We are aware of our social responsibility.

Donations support charitable activities.

Sponsorship activities are used to make a lasting positive impact on the public's reputation and perception of HELM, as well as to positively influence society.

However, donations and sponsoring are also contributions to third parties. To avoid any suspicion of corruption, it is important to comply with some rules.

## 2.5 PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

Our company complies with its legal obligations to combat money laundering and terrorist financing. We neither participate in nor enable or tolerate activities related to money laundering and terrorist financing.

To protect our reputation and avoid any criminal liability, our employees are required to carefully review of potential business partners and their activities, and to report any discrepancies that could give rise to suspicion of money laundering and / or terrorist financing to the Global Compliance Officer without delay.

## 2.6 FOREIGN TRADE LAW

As a global company, HELM is active across national borders.

Our goal is to ensure that our products are supplied only to business partners of integrity and are used only for their rightful purpose.

Trade control regulations are a highly sensitive issue. We have appropriate procedures to ensure that transactions with third parties comply with national and international trade control laws that regulate the import, export or domestic trade of goods, technology, services, and the handling of certain products. We also ensure that these transactions do not violate economic embargoes, trade regulations, import and export control requirements, or requirements to prevent terrorist financing.

All our employees involved in the import, export or domestic trade of goods, technology, services, and the handling of certain products are therefore continuously trained to comply with the relevant laws and regulations.

In the international movement of goods, we comply with all applicable customs regulations.

## 3 FINANCIAL PROCESSES

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### 3.1 ACCOUNTING AND FINANCIAL REPORTING

We comply with all legal requirements and tax laws and regulations to ensure proper accounting and financial reporting.

We attach the highest importance to ensuring that our books, records, and documentation are truthful, accurate, complete, and up to date in accordance with the transparency requirement.

Within HELM, we have established an internal control system to ensure that all information and disclosures, as well as related documentation, comply with legal requirements.

### 3.2 TAXES AND LEVIES

We comply with all applicable tax laws and relevant legal requirements.

We are aware of our social responsibility as a global company and of the need for appropriate public financing. It is therefore a matter of course for us, based on HELM's profits, to make the legally stipulated contribution to tax revenue in the domestic and foreign markets.

## 4 PROTECTION OF DATA AND INFORMATION

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### 4.1 IT SECURITY

We are responsible for the safety of our employees and our sites and facilities, as well as for protecting the company's know-how against attacks by third parties. To this end, the latest security standards are applied, and appropriate protective measures are taken on this basis.

Information and cyber security in particular have high priority at HELM. To reliably ensure the integrity of our data, constant improvement measures are necessary to protect it.

We are constantly developing our capabilities for preventing, detecting, and responding to security incidents through various measures and training programs.

We promote awareness among our employees worldwide for the protection of information and know-how.

### 4.2 PROTECTION OF PERSONAL DATA

We attribute a high priority to the protection of personal data of our employees and business partners. We handle personal data in accordance with the applicable data protection regulations.

We are all responsible for protecting the personal data entrusted to us by our business partners, customers, employees or other third parties. When processing their data, we do so with great care and sensitivity.

The basic principles of data privacy apply:

**No data processing without a legal basis:** Personal data may only be collected, processed, and stored if expressly permitted by law.

**Purpose limitation:** Personal data may only be used for the purpose for which it was originally collected.

**Data economy and data avoidance:** Only the exact data required for the purpose may be collected and stored. Data that are no longer required must be deleted immediately.

**Transparency and data subjects' rights:** Everyone must know which of their data are available to whom and for what purpose and based on which law they are used. Data subjects must be informed in advance about the storage and processing of their data and about their associated rights.

### 4.3 KNOW-HOW AND INTELLECTUAL PROPERTY

Our knowledge and know-how are valuable assets and form the basis for the company's success. It is therefore important that we all protect our intellectual property and maintain confidentiality.

We ensure that we and our service providers implement appropriate technical and organizational security measures to prevent unauthorized access and disclosure and to safeguard the availability, trustworthiness, and reliability of data. We use adequate processes to protect company-relevant information from misuse, loss, destruction, and manipulation.

We protect not only our own corporate information, but also all other confidential information entrusted to HELM by business partners during our business activities.

#### 4.4 INSIDER INFORMATION

Insider information is defined as specific information about a company that is not publicly known and which, when it becomes known, may significantly influence the stock exchange or market price of the securities issued by the company. This is deemed to be the case if a reasonable investor would take the information into account when making an investment decision.

The use and disclosure of insider information is prohibited by law.

If you have inside information regarding another publicly traded company, such as a business partner or joint venture partner, you must comply with the following prohibitions:

- The purchase or sale of shares in the relevant company, both for the company's own account and for the account of a third party, is prohibited.
- It is prohibited to propose or recommend to a third party the purchase or sale of shares in the relevant company.
- Any unauthorized disclosure of insider information about the relevant company to a third party is prohibited.

## 5 LABOR CONDITIONS AND WORKING ENVIRONMENT

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### 5.1 FAIR LABOR CONDITIONS

We guarantee that the wages or salaries paid to employees are at least equal to the statutory minimum or the applicable industry-specific minimum wage or salary.

Where neither statutory nor industry-specific minimum rates of pay exist, we want to ensure that fair wages or salaries are paid that cover basic needs while taking individual circumstances into account.

We comply with the applicable labor regulations at every location worldwide.

### 5.2 DIVERSITY AND THE PRINCIPLE OF EQUAL TREATMENT

As an employer, HELM attaches great importance to equality, diversity and fair and respectful treatment of each other.

We therefore expect our employees to conduct themselves accordingly in every type of business activity.

We consistently pursue the goal of providing workplaces that are free from discrimination and harassment based on skin color, gender, age, religious beliefs, physical or mental disabilities, ethnic, national or social origin, sexual orientation, or other personal characteristics.

We respect the rights of others as well as country-specific and cultural differences in our business dealings.

We promote and respect this diversity. Employees in HELM's corporate world respect their fellow human beings without exception.

### 5.3 COMPATABILITY OF WORK AND FAMILY LIFE

As a family-owned company, we want to use family-friendly agreements to help increase the satisfaction and motivation of our employees and thus also the performance of our company.

We strive to balance the economic interests of the company on the one hand and the interests of our employees on the other.

## 6 SUSTAINABILITY, ENVIRONMENT, HEALTH, AND SAFETY

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### 6.1 TAKING RESPONSIBILITY

We want to contribute to sustainable development and the careful use of resources and are therefore involved in the global Responsible Care initiative.

Responsible Care stands for the will to strive for continuous improvement in the areas of environment, safety, and health, independent of legal requirements, and to publicly demonstrate this progress on a regular basis. HELM's position on Responsible Care is binding for all business units and service areas.

We have established a comprehensive management system in the area of Health, Safety and Environment, which is applied within HELM at all operating and production sites worldwide. The objective is to design and operate our processes, procedures, and production facilities in such a safe manner that no unacceptable risks arise for employees, other external workers, the environment, and the neighborhood.

### 6.2 HEALTH PROTECTION AND OCCUPATIONAL SAFETY

We provide a safe working environment for our employees by complying with the relevant legal requirements, regulations or company policies regarding occupational safety and active health protection.

We ensure occupational safety and the protection of both the physical and mental health of our employees and the employees of contractors working under direct HELM supervision. This includes the prevention of occupational accidents and diseases, the assessment of potential hazards, and comprehensive risk management. We also ensure that our employees can work safely and without fear and travel internationally on business without risk.

In particular, our managers are responsible for ensuring that appropriate health and safety precautions and measures are in place to meet the relevant requirements within HELM.

Special attention is needed with juvenile employees to protect them from work that may be detrimental to their health or safety.

### 6.3 PLANT AND PROCESS SAFETY

Safety management and its continuous development are important foundations of our global corporate responsibility. Preventing accidents and incidents during the operation of production facilities and on transport routes that could harm people and the environment is a top priority for us.

Our equipment, production lines, processes and materials are valuable assets. HELM's responsibility is to treat them with care and protect them from damage, improper use, and misuse.

### 6.4 ENVIRONMENTAL AND CLIMATE PROTECTION

In the spirit of sustainability, protecting the environment is an integral part of our corporate strategy.

We attach importance to compliance with local environmental protection laws as well as cross-site international requirements. We work with our business partners to ensure that they, too, recognize and embrace their responsibility for the environment.

This applies to the entire industrial manufacturing process as well as to operations before, during and up to the completion of transport, disposal, and recycling.

To comply with environmental standards, we have implemented systems within HELM that ensure safety through measurability and constant monitoring.

Our employees share responsibility in all their activities, for example in reducing waste as well as energy and water consumption and greenhouse gas emissions.

The principle of the circular economy is the basis of our actions, from the design of the products, through their production and the extension of their service life, to material recycling.

## **6.5 ACTIVE EMERGENCY AND CRISIS PREPAREDNESS**

HELM's focus in emergency management is on prevention. The prevention of accidents and incidents has our highest attention and is expressed in the initiative "Goal ZERO".

Exceptional events are recorded in the HELM Incident Reporting System according to a globally applicable standard procedure, which ensures that further steps for management and effective information control are initiated without delay.

Our sites each have processes in place to manage incidents. A company-wide Emergency Response Management System is currently being set up.

## 7 QUESTIONS & CONCERNS

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### 7.1 THE HELM CODE OF CONDUCT AS A COMMITMENT

The HELM Code of Conduct combines applicable legal regulations and internal corporate guidelines.

Employees are obliged to comply with the principles listed here. This obligation arises either directly from applicable laws or from company regulations as a secondary obligation under the employment contract.

This includes: In the event of suspected or actual violations of our Code of Conduct, company policies or applicable law, employees are required to address concerns or observations promptly.

We encourage employees to always speak out freely and without fear and ensure that whistleblowers are protected from disadvantage. All tips are always treated confidentially.

### 7.2 WE ARE HERE FOR YOU!

The following channels are available to employees and third parties to clarify questions relating to the Code of Conduct or to report possible misconduct:

- The immediate supervisor
- Any other manager

At HELM, each manager is personally responsible for creating an environment where questions, concerns and uncertainties can be addressed openly at any time.

- The Human Resources Department and ombudspersons / shop stewards
- Internal Audit

### 7.3 CORPORATE COMPLIANCE

Corporate Compliance is the publisher of the HELM Code of Conduct and the associated guidelines. It advises all HELM functions and businesses on establishing legally compliant procedures and conducts the respective training.

All employees can contact Corporate Compliance at any time with questions and information about possible violations.

You can best reach us at the following e-mail address: [compliance@helmag.com](mailto:compliance@helmag.com)

Or during office hours at the following telephone number: +49 40 2375 1111

## 7.4 WHISTLEBLOWER SYSTEM

A so-called whistleblower system is currently being set up at HELM. This is a protected IT environment. Employees, but also outsiders, who want to report a possible violation can reach the system through various channels and submit a report there, for example via the Internet or via a free telephone call in their national language. These notices can also be submitted anonymously if desired. More details about the system and its implementation at the various sites will be posted on the HELM intranet.