

Code of Conduct

Häfele has a reputation as a down-to-earth, reliable and fair partner. Pursuant to our corporate values, this requires not only trusting, considerate dealings with all of our colleagues and business partners, but also compliance with the applicable law. Häfele's employees are down-to-earth, honest and law-abiding. The following ten principles provide details of these requirements.

1. We comply with the applicable law and prevent violations

Häfele employees observe applicable law – without question. They keep abreast of the applicable legal requirements and take the measures necessary to prevent violations. Häfele will not accept violations of the law, nor excuses for the commission of the same. Every Häfele employee must keep informed as to the laws, regulations and internal rules applicable to his/her sphere of responsibility. In the event of any doubt as to whether specific actions are lawful, the employee must always seek advance clarification from Häfele's legal department.

2. We are transparent

We disclose internally and to our business partners any instances in which personal connections could give rise to even the appearance of a conflict of interest. Häfele's actions are guided exclusively by the performance principle. Personal gain, financial or political links are not permitted to play any role in the selection of Häfele's business partners. We review in advance whether our business partners are reputable and keep documentary evidence of such review. We never work with business partners that break the law or use illegal funds.

3. We are incorruptible

Häfele's employees cannot be bought; nor do they buy benefits in the course of their business dealings. Häfele strictly forbids any form of payment by business partners to employees made in return for business opportunities or contracts. The same applies to dealings with public officials – Häfele never buys decisions by official bodies.

4. We are independent

Häfele is independent from its competitors and never enters into any concerted practices with other companies that could result in a restraint on competition. Price-fixing, allocation of customers, the prohibited exchange of information relevant to competition, as well as other actions that could restrict competition, are a taboo for us. We know that, in a competitive market, everyone acts for themselves. This applies to Häfele in the same way as to our business partners.

5. We are fair

There is no place for discrimination or offensive remarks at Häfele. All instances of unequal treatment based on ethnicity, gender, skin colour, age, religious beliefs, political views, sexual orientation or other personal attributes have no place at Häfele.

6. We are vigilant and sustainable

We ensure that our products undergo careful quality controls and that all reasonable measures have been taken to protect the environment. We pay attention to health and safety of our customers and employees. We take care to ensure our employees have a safe working environment. We ensure that our products and services are sustainable and have the lowest possible environmental impact. Nevertheless, any hazards must be reported immediately to Häfele's central compliance contact.

7. We are honest

We never make promises to customers that we are unable to keep. We never mislead or use dirty tricks. Even "white lies" will not be tolerated. We protect our company assets, as well as the assets of our suppliers and take all necessary protective measures to prevent theft and misappropriation.

8. We are ethical

Häfele ensures good working conditions and takes care to ensure that the working conditions at its suppliers are always in line with human rights requirements. Any form of child labour, forced labour, the use or threat of force, intimidation, illegal overtime or suppression will be severely penalised.

9. We protect our data

We take care to ensure that the personal information of our employees is processed only within the scope of the legal boundaries and that confidential information is kept confidential. We protect business and trade secrets, as well as the intellectual property of Häfele and our business partners. We prevent data loss by means of technical and electronic preventative measures.

10. We take this Code of Conduct seriously

Each Häfele employee is required to take this Code of Conduct seriously. Häfele communicates these principles internally, so that all employees can familiarise themselves with them. Employees in the relevant positions will receive appropriate training to help them understand the content or and the background to this Code of Conduct and to be able to remember them at all times. Häfele also requires its suppliers and sub-contractors to comply with principles equivalent to those set forth in this Code of Conduct.

Should there nevertheless be a breach, each Häfele employee is called upon immediately to report breaches to their superior or directly to the central compliance contact. Häfele reserves the right to proactively monitor compliance with this Code of Conduct. Any violations will be strictly penalised.

Each and every Häfele employee is under an obligation to take appropriate measures to prevent violations of the law. In the event of doubt, matters should always be clarified in advance with Häfele's legal department.



We have set up internal contacts with the following contact details as well as an external reporting office - do not hesitate to contact them immediately in the event of legal doubts or reporting violations:

Internally:

Häfele SE & Co KG
Central Contact for Compliance Issues
Mr Michael Distl
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Häfele SE & Co KG
Legal Department
Dr. Carmen Mutz
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External:

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