

Code of Conduct for Häfele Suppliers and Subcontractors

This Code of Conduct defines ten fundamental principles and requirements that the goods suppliers and service providers as well as the subcontractors ("Suppliers") working for Häfele must fulfil.

The purpose of this Code of Conduct is to create the basis for a viable and long-term cooperation in mutual trust and an awareness of social and sustainable corporate responsibility.

Häfele itself acts according to high ethical, social, ecological and economic standards. Therefore, we also expect our suppliers to act according to the same standards and to comply with the law in every situation, as well as to follow internationally recognised environmental, social and corporate governance (ESG) standards. At the same time, we expect our suppliers to ensure that their suppliers comply with the law and the standards set out in this document.

As our supplier, you agree to recognise and implement the following Supplier Code of Conduct, which is based on applicable laws, international agreements and ESG standards. You can best implement these standards by also establishing an appropriate and effective risk management system, conducting ongoing rather than ad hoc risk assessments and implementing an appropriate internal grievance procedure.

The Supplier Code of Conduct is to be understood as the minimum standard we expect from our suppliers. It is not intended to reduce, replace or limit other legal or contractual obligations. Should national legislation provide for stricter regulations, these shall prevail.

1. Comply with the law and take appropriate action

Häfele suppliers must comply with all applicable laws, regulations and legal standards in the countries in which they operate and take appropriate measures to ensure compliance with these laws, regulations and legal standards. Häfele does not accept ignorance of laws or carelessness as an excuse for a violation of the law.

2. Be transparent

Avoid apparent or actual conflicts of interest. Suppliers must report any personal relationship or other actual or potential conflict of interest with Häfele's business interests to their Häfele contact immediately upon becoming aware of it. Suppliers must always act in Häfele's best interests. Private interests and personal concerns must not influence their decisions in the business relationship with Häfele or its customers.

3. Be ethical

Never attempt to offer bribes, kickbacks, gifts, favors, entertainment or personal benefits to an employee of a business partner in order to influence a business decision. Suppliers must reject any form of corruption, fraud, theft, embezzlement or extortion and must not tolerate any illegal payments (including, without limitation, payments to or other benefits to individuals or public officials) intended to influence decision-making processes, regardless of whether these processes take place are illegal or not. Do not offer Häfele employees any personal benefits. If a Häfele employee approaches you with such a request, you must immediately report this to Häfele management.

4. Be independent

Suppliers may not engage in anti-competitive conduct or cartel arrangements with competitors or third parties, including (but not limited to) price or market sharing agreements. The supplier must ensure that its business practices and organizational measures do not violate applicable antitrust or competition law. If the supplier's business relationship with Häfele is directly or indirectly related to an antitrust law or competition violation, the supplier must inform Häfele immediately.

5. Be fair

We expect our suppliers to act in accordance with Häfele's principles of diversity and equality - any form of discrimination in hiring and employment is prohibited. Specifically prohibited is any unequal treatment based on race, social class, colour, sex, age, religion, political opinion, belief, trade union membership, physical or mental disability, health status, ethnic, national or social origin, nationality, sexual orientation or other personal characteristics. Unequal treatment includes, in particular, the payment of unequal pay for work of equal value.

Our suppliers pay their employees fairly and appropriately. The remuneration must not be less than the statutory minimum wage, which depends on the employee's place of employment, and the employees must be granted all benefits to which they are entitled.

6. Be cautious

Häfele's suppliers must ensure that they act safely and do not cause any harm to Häfele or its customers. Suppliers must ensure and protect the health and safety of their employees and provide them with a safe workplace. For this purpose, the supplier shall take necessary precautionary measures against accidents and damage to health that may arise in connection with the activity. In particular, the supplier shall take appropriate protective measures to avoid exposure to chemical, physical or biological agents. Furthermore, excessive physical or mental fatigue shall be prevented by appropriate measures, such as by observing the applicable rest breaks and rest periods. In addition, employees shall be regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to drinking water in sufficient quantities and access to clean sanitary facilities..

Suppliers maintain a careful use of natural resources. They minimise all adverse environmental impacts of their operations and continuously strive to minimise these impacts even further. In their products and services, our suppliers take environmental concerns into account and, where possible, continuously improve resource efficiency, durability and recyclability in terms of services, products, components, spare parts, packaging and transport. They operate waste management and responsible handling of hazardous materials. In particular, we expect our suppliers to comply with the Minamata Convention and the Stockholm Convention, and therefore not to produce or use mercury, mercury compounds or persistent organic pollutants.

Our suppliers' employees are appropriately trained and educated. All malfunctions and near-collisions must be reported to Häfele immediately.

7. Be honest

Do not deceive Häfele and its customers and never make promises that you cannot keep in the context of the business relationship with Häfele. You may not use Häfele's name or trademarks without the written permission of Häfele's management.

8. Be human

Häfele expects suppliers to act in accordance with human rights regulations. This includes, in particular, the prohibition of all forms of slavery, forced or compulsory labour, threats of violence, harassment, intimidation, debt bondage, serfdom, unlawful overtime or child labour. This also includes the forced or compulsory recruitment of children for use in armed conflicts, the bringing in, procuring or offering of a child for prostitution or for the extraction and trafficking of drugs. With regard to the prohibition of child labour, our suppliers are requested to adhere to the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory education ends according to the law of the place of employment and in any case not less than 15 years. Young workers under the age of 18 shall not be employed in work which is harmful to the health, safety or morals of children.

9. Be reputable

Häfele's suppliers guarantee that they will treat Häfele's trade secrets, such as technical details of Häfele's or the supplier's products, purchase and sales prices and related conditions, as confidential. Suppliers are not authorised to disclose confidential information to third parties without Häfele's express written consent. Suppliers shall protect and responsibly use the tangible and intellectual assets of Häfele and its customers, including personal data, property, equipment, spare parts, information and any intellectual property right.

10. Observance of this Code of Conduct

The supplier agrees to recognise and comply with this Code of Conduct and will require its employees to comply with it in an appropriate manner.

We expect our suppliers to impose values on their own suppliers and contractors that are at least equivalent to this Code of Conduct.

By signing the Code of Conduct, the supplier confirms to establish and implement its own risk management system and complaint procedures that include and monitor these standards.

The supplier shall immediately inform Häfele of any identified violation of a law or the provisions in this Code of Conduct.

Häfele reserves the right to verify compliance with this Code of Conduct by means of individual questions or audits and to take appropriate measures if there is a suspicion of a violation of the above regulations and laws.

If a supplier of Häfele or one of its suppliers or subcontractors violates applicable law or this Code of Conduct, Häfele reserves the right to suspend or terminate the business relationship with the supplier, subject to applicable laws and current agreements.

Objections or notifications of violations of this Code of Conduct may be reported to Häfele at any time - also anonymously - to our reporting office or to our Compliance Officer:

External reporting centre

Dr. Jochen Bernhard
Menold Bezler Rechtsanwälte
Tel.: +49 711 860 40 611
ombudsmann-haefele@menoldbezler.de
Stresemannstraße 79
70191 Stuttgart
Germany

Compliance Officer

Dr. Carmen Mutz
Häfele SE & Co KG
Tel.: +49 7452 95 353
compliance@haefele.de
Adolf-Häfele-Straße 1
72202 Nagold
Germany

Confirmation

.....
Company name [full name in block letters]

We hereby confirm that we have received, completely read and understood the Häfele Code of Conduct for Suppliers and Subcontractors for the Häfele Group. We hereby agree to the content of Häfele's code of conduct for suppliers and subcontractors.

We confirm:

- to acknowledge, observe and implement Häfele's Code of Conduct for Suppliers and Subcontractors as well as all relevant laws and will commit our employees in this regard,
- not to induce any employee or representative of the Häfele Group to violate Häfele Group policies or instructions or any laws, and will require our employees to do so,
- to observe the guidelines and instructions of our own company and commit our employees in this respect.

We acknowledge that a breach of this agreement results in legal consequences.

.....
Location, Date

.....
Signature

.....
Name [in block letters]

.....
Job title