



CODE OF CONDUCT

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Dear business partners, dear employees,

the essential principles and basic rules of the CFH Group's actions and our conduct towards business partners and the public are defined in a binding manner in this Code of Conduct.

Respectful and cooperative collaboration as well as the conscious perception of social responsibility form the basis for the long-term, contemporary and sustainable corporate success of the CFH Group, a medium-sized family business.

This commitment has a long tradition in the CFH Group. We consider equal opportunities and fair remuneration in line with local standards to be a matter of course. Remuneration and social benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors.

The CFH Group Code of Conduct is binding for all employees of the participating companies. Furthermore, it also applies to all other service providers, consultants, representatives and agents acting on behalf of the CFH Group companies. The Code of Conduct applies to all business activities of the company and equally provides a framework of orientation on the following topics.

Gladbeck, 28. April 2021

Dr Reinhold Both

Managing Partner

Corinna Both-Kreiser

Junior Partner

Compliance with law and order

Compliance with laws and regulations is an essential basic principle of our actions. We always observe the applicable legal prohibitions and obligations, and with international companies the local laws, as well as the licensing requirements in the area of customs and export control.

The CFH Group rejects business with sanctioned companies, countries or persons. All companies of the CFH Group also observe the applicable international sanctions lists.

Before entering a business relationship, all customers, suppliers and business partners are checked by the compliance specialists within the CFH companies.

Avoiding conflicts of interest

All companies and employees of the CFH Group avoid conflicts of interest. A conflict of interest exists when personal, private and professional interests overlap unfairly. Employees of the CFH Group are prohibited from offering or accepting sums of money of any amount, gifts, loans, discounts or items of value.

Any remuneration or benefits from third parties to employees or their relatives or their environment are unacceptable. Any secondary employment of an employee must be approved by the management before it is commenced.

Private benefits from business transactions may not be used. Minor gifts and invitations that are within the framework of business hospitality, custom and courtesy are excepted. Gifts received shall be given to the secretariat for the annual staff raffle.

In case of doubt, the compliance officer must be consulted on how to deal with the situation.

Fair competition

The companies of the CFH Group are committed to fair business conduct in compliance with all applicable competition and antitrust legislation. Corruption and price-fixing with competitors will not be tolerated (zero tolerance) and will result in sanctions against the persons concerned.

Prevention of money laundering

The companies of the CFH Group comply with their legal obligations to prevent money laundering and refrain from any money laundering activities. Every employee is required to report unusual financial transactions to his or her superior without delay.

Internal equal treatment and non-discrimination

A culture of equal opportunities, mutual trust and respect is of great importance to the employees of the CFH Group. We promote equal opportunities and prevent discrimination in the engagement of employees as well as in the promotion or granting of training and further education measures.

The companies of the CFH Group respect the dignity of every human being. We also expect this behaviour from all our employees, and we consistently enforce this claim.

Human and employment rights

We respect internationally agreed human rights and support their observance. The CFH Group rejects any form of child or forced labour and is committed to the Universal Declaration of Human Rights of the United Nations (ILO). Any form of discrimination as well as any kind of harassment and disadvantage for reasons of ethnic origin, gender, religion or world view, disability, age, sexual identity or family relationships will not be tolerated at the companies of the CFH Group.

Cooperation with the workers' representatives

We respect the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations.

For the CFH Group, a trustful and close cooperation with employee representatives is a relevant component and a proven cornerstone of our business policy. The basis is an open and constructive dialogue characterised by mutual respect.

Health and safety at work

The safety and health of all employees in our companies is a business objective of equal importance to the quality of our products and our economic success. Work safety and health protection are an integral part of all operational processes and are taken into account in all technical, economic and social considerations of the companies already in the planning phase.

Every employee promotes the safety and health protection in his or her working environment and is obliged to comply with the regulations regarding health and safety at work.

Sustainable environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are priority business objectives. We ensure, both in the development of new products and services and in the operation of our production facilities, that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection.

Each employee has a personal responsibility to treat natural resources with care in order to protect the environment.

Representation and communication in public

The CFH Group respects the right to freedom of expression and the protection of personal rights and privacy.

Every employee is aware that he or she can also be regarded as a part and representative of the CFH Group in private and is therefore required to maintain the reputation of the CFH Group through his or her behaviour and appearance in public, especially towards the media.

Privacy and confidentiality

The CFH Group respects privacy and confidentiality. Confidential business information or company secrets may not be disclosed to unauthorised persons either during or after termination of the employment relationship.

At the same time, we respect the confidentiality of information from our customers and suppliers and treat it with the same confidentiality with which we protect our information.

Protection of company property

We use the company's property and resources properly and carefully and protect them from loss, theft or misuse. This also concerns the intellectual property of our company, which is particularly subject to protection.

In cooperation with their superiors, our employees are responsible for ensuring that the nature and extent of business trips are always in proportion to the purpose of the trip and that they are planned and carried out economically, considering time and cost aspects.