

Hauraton Conduct Guidelines

HAURATON GmbH & Co. KG and its subsidiaries

Dear members of the HAURATON family,

Given the dynamic changes in our existing business and the strategic transformation we are undergoing to become a leading provider of rainwater management solutions, it is increasingly important for us to apply the highest standards of behavior and responsibility. With this in mind, we are pleased to present our company's conduct guidelines.

This document not only provides a comprehensive framework that further strengthens our commitment to excellence and commercial success, but it also aligns our actions in the areas of environmental, social and governance (ESG) to secure the future of our organization. This code of conduct applies to everyone who works for HAURATON and shall serve as a binding orientation for their actions.

By adopting and adhering to the HAURATON Conduct Guidelines, we collectively help to building a sustainable and socially responsible future that also aligns seamlessly with our mission to provide sustainable rainwater management solutions. It symbolizes our commitment to ethical decision-making, responsible corporate citizenship and a focus on creating a positive environmental impact. Let's embrace this shared commitment as we move towards becoming a leader in rainwater management.

Please use this document as a guide if you are unsure what to do. If you still have questions, please contact your manager, the management board or you can report potential breaches via our whistleblower system on our webpage, which is open and available to our employees, business partners and third parties.

The Management Board
Rastatt, Germany; September 2024

Respecting human rights and integrity

We are committed to complying with the Universal Declaration of Human Rights (UDHR) and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO), which cover the five areas:

- Freedom of association and the right to collective bargaining
- Elimination of forced labor
- Abolition of child labor
- Prohibition of discrimination in respect of employment and occupation
- Occupational health and safety.

Further, we treat each other fair and respectful. We condemn any kind of misconduct, harassment, discrimination, or unjustified unequal treatment.

Compliance with laws

We take all steps that can be expected to ensure that all our operations comply with applicable laws, requirements, regulations and local ordinances.

As a globally active company, we comply with national and international economic sanctions. In our dealings with our business partners and competitors, we do not enter into agreements or engage in business practices that are in any way illegal.

Anti-Corruption and fair competition

We take all steps that can be expected of us to prevent corruption and to operate and promote fair competition. We expect our suppliers to apply the highest standards of moral and ethical behavior, to comply with local laws and not to engage in any form of corruption practices such as extortion, fraud or bribery. We have therefore introduced a code of conduct for suppliers and have obtained written confirmation of compliance with the requirements.

We are committed to ensuring fair competition on the markets and comply with the applicable antitrust and competition laws.

Conflict of interest

Business decisions must be based solely on the interests of the company. Personal or private financial interests must not influence these decisions.

We therefore avoid the emergence of such conflicts of interest in advance; if they already exist, we disclose them and seek a solution with the respective manager.

If an employee intends to take up another remunerated activity, this must be authorized by the superior in order to check the activity for possible conflicts of interest.

Public appearance and protection of our reputation

The right to freedom of speech applies to statements made by employees. However, when appearing in public, we make our personal views recognizable as such.

We do not tolerate any anti-constitutional, discriminatory, offensive, or hateful statements in public, including on social media. This also includes statements that damage our reputation internally and with our business partners and in society. In the interests of neutrality, the devices and system accesses provided by the company as well as the company user profiles on social media are not used for private expressions of opinion.

Fair remuneration, occupational health and safety

We are committed to offer all employees fair remuneration and just and equal working conditions. We also pay attention to the physical integrity, health and well-being of our employees. We comply with all national and European labor and social standards.

We adhere to the rules and other occupational safety regulations to prevent accidents at work and work-related illnesses.

Sustainable operations

We are facing up to the current and future ecological challenges for ourselves and our customers. As part of our sustainability management, we are therefore committed to producing and offering our products and services in a more sustainable and energy-efficient manner.

We strive for continuously improving environmental and energy values in our daily operations.

Third-party property rights

It is both obligatory and a matter of course for us to respect the property rights of third parties. This applies to physical property, land and intellectual property.

Proper reporting

All of HAURATON's financial and tax reporting is carried out properly, punctually and completely in accordance with the relevant regulatory requirements and accounting guidelines.

Data privacy and security

We respect data protection and data security legislation with regard to our employees and business partners. We protect our business secrets and those of our partners. We ensure that confidential information is not unlawfully disclosed to third parties or the public, and do not use it for personal gain.