



**Höfer Metall Technik**  
Aluminium Strangpressprofile

# Code of Conduct for Business Partners

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# Introductory remarks

Höfer Metall Technik GmbH & Co. KG (referred to below as “HMT”) is committed to the highest standards with regard to ethics, integrity, and compliance with the law and internationally recognized standards.

HMT also places sustainability at the heart of its activities, with active compliance with environmental, occupational safety and social standards being our no. 1 objective.

Our standards require that we only do business with business partners who are able to consistently meet our standards and guidelines and who have committed to behavioral values that are compatible with our own.

We also strive to continuously optimize our business practices and our products and services in terms of their sustainability and call upon our business partners to promote this in terms of following a comprehensive approach that takes the whole picture into account.

In engaging in business with one another in the future, the contracting parties hereby agree that the following terms shall apply to a joint Code of Conduct. This agreement shall form the foundation for future deliveries. The contracting parties warrant that they will comply with the principles and requirements of the Code of Conduct and that they will contractually obligate their subcontractors to comply with the standards and rules & regulations set out in this document. This agreement shall enter into force upon being signed. Any breach of this Code of Conduct may ultimately be good cause for HMT terminating the business relationship, including any associated supply contracts.

This Code of Conduct is based on national law and regulations like the German Supply Chain Due Diligence Act (LkSG) and international treaties and conventions like the United Nations Universal Declaration of Human Rights, Children’s Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact.

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# HMT's expectations of its business partners

## 1. Respect for human rights and compliance with national laws:

All business partners must respect and uphold internationally recognized human rights as set out in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including the ILO Core Conventions, and the United Nations Declaration on the Rights of Indigenous Peoples. To ensure this, we expect our business partners to conduct a risk-based due diligence process to identify, prevent or remedy actual and potential impacts on human and workers' rights in their operations and value chains, as required by the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. HMT's commitment is anchored in its human rights policy: our business partners are to take cognizance of said policy and comply with it. Business partners must take specific actions to ensure the protection of marginalized groups in their operations and value chains, including, but not limited to, women, children, indigenous peoples, migrants, persons with disabilities and minorities.

Guidelines applicable to business partners:

- the United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- International Bill of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Core ILO conventions
- UN Declaration on the Rights of Indigenous Peoples
- Aluminum Stewardship Initiative

In this Code of Conduct for Business Partners, we attach considerable importance to the obligation to respect and uphold all internationally recognized human rights in all business relationships. The key human rights risks are outlined in the following list, however this list is not exhaustive. All business partners are expected to adhere to all international human rights conventions and to address in particular the risks set out below in order to ensure the highest level of responsible business practices.

### 1.1 Forced labor

Business partners may not engage in forced labor, indentured labor, human trafficking or modern slavery in any form whatsoever. Business partners may not tolerate any corporal punishment or physical abuse whatsoever or any form of abusive or inhuman treatment of workers. All workers who are hired must consent of their own volition and without coercion or threat of violence.

### 1.2 Child labor and young workers

Business partners must comply with all applicable laws relating to child labor and may not employ children below the legal minimum age. To ensure this, business partners must verify whether all workers are at least of the local legal minimum age. As to young workers (between the legal minimum working age and age 18), business partners must comply in full with local laws and regulations applicable to hiring young workers and ensure that they are not allowed to perform any hazardous work.

### 1.3 Fair working conditions

Business partners must offer their workers fair and suitable working conditions, including social insurance benefits and appropriate compensation that is paid on time and is fully documented. Working hours must comply at minimum with national standards or standards generally accepted in the industry. Where business partners provide their workers or those of suppliers or contractors accommodation, they must also ensure that said accommodation is appropriate, clean, safe and secure and satisfies the basic requirements of the workers and, as applicable, their families.

### 1.4 Freedom of assembly and of association, right to free collective bargaining

Business partners must respect the workers' right to peaceful assembly and to participate in collective bargaining and may not hinder or prohibit these activities, including joining labor unions.

### 1.5 Diversity and integration

Business partners must comply with all applicable employment and anti-discrimination laws and promote a fair, diverse and inclusive working climate, also with regard to the hiring, retention and promotion of employees. No discrimination, harassment or bullying will be tolerated.

### 1.6 Health and safety at work

Business partners must comply with all health and safety regulations and give priority to creating a safe and secure working environment for workers and all others who are affected by their work or are involved in it. All partners must take the requisite actions to prevent accidents and injuries in the workplace. If necessary, workers are to be provided suitable personal protective equipment (PPE) and be instructed on its use.

### 1.7 Protection against violence and harassment

Business partners must provide for protection against violence and harassment in the workplace. Any form of corporal punishment or mental, physical or sexual abuse or inhumane treatment of workers is prohibited. In addition, business partners operating in the mineral extraction industry must adhere to all international standards pertaining to safety measures and ensure that public or private security forces employed or engaged by them do not violate the rights of local communities and workers. This includes close cooperation with security service providers, assessing potential risks for rights holders and restricting the use of firearms.

### 1.8 Local communities

Business partners must respect the rights of local communities in which they operate by ensuring that their activities do not have any negative impact on rights holders. Business partners must strive for effective stakeholder engagement and make a positive contribution to the economic, social and cultural development of local communities.

### 1.9 Rights of indigenous peoples and land rights in mining

All business partners who operate in the mineral extraction industry must respect the rights of indigenous peoples, including respecting their land and resources and their cultural heritage. In this context, business partners must consult the indigenous peoples affected and obtain their voluntary, prior and informed consent before engaging in activities that might affect them.

## 2 Corporate ethics of HMT

We at HMT are committed to conducting our business in an ethical and transparent manner and we expect the same of our business partners.

### 2.1 Anti-corruption and bribery

Business partners must comply with all laws pertaining to the prevention of bribery, corruption, fraud and the like or associated activities. Giving, offering or receiving bribes in any form, including “facilitation payments”, is prohibited. Gifts, invitations, hospitality or travel may not be offered or accepted unless they are appropriate and proportionate, and never with the intention of influencing a decision or gaining an advantage.

### 2.2 Confidentiality and protection of data privacy

Business partners must respect the right to privacy and comply with all data protection laws and regulations. They must maintain the confidentiality of all company information and data and protect it against unauthorized access or disclosure.

### 2.3 Fair competition

Business partners must comply with the laws and principles relating to fair competition. This includes, but is not limited to, avoiding anticompetitive behavior such as price-fixing and market manipulation and avoiding any activities that might be detrimental to consumers or competitors.

### 2.4 Money laundering

Business partners must comply with all laws and regulations relating to combatting money laundering and may not engage in any illegal finance activities, including using the proceeds of illegal activities.

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### 3 Environmental compatibility

HMT is committed to minimizing its ecological footprint and to promoting environmentally sustainable practices in all its operations. We expect our business partners to share these values and make every effort to improve their environmental performance.

#### 3.1 Environmental pollution

Business partners are obligated to avoid environmental pollution of every type and to comply with all applicable environmental laws and regulations. This includes, but is not limited to, preventing the release of harmful chemicals and waste into the air, water and soil.

#### 3.2 Use of natural resources

Business partners are to give priority to the efficient use of energy and water resources and work to reduce their consumption. Consequently, business partners are expressly called upon to employ energy-efficient technologies and processes and to monitor and control their consumption of water.

#### 3.3 Reduction of emissions

Business partners are expected to reduce their greenhouse gas emissions and other air pollutants. This may include the use of renewable energies and monitoring and reporting emissions.

#### 3.4 Waste management

Business partners must deploy proper waste treatment processes and comply with all applicable regulations relating to the storage, transportation and disposal of hazardous and non-hazardous waste. Business partners are also called upon to work towards optimizing a closed-loop economy by supporting the recycling and reuse of materials and waste wherever possible.

### Reporting of complaints, resolution and review

Business partners are obligated to advise us of any violations of this Code and to take appropriate steps to remedy violations of this Code and to prevent any recurrence of same. Any violation is to be entered in HMT's whistleblower system. Reports are to be recorded anonymously, taken seriously, investigated promptly, discreetly and appropriately, and treated confidentially. We strictly reject any form of retaliation against individuals who report concerns or who participate in an investigation. Business partners should also have comparable reporting systems in place so that employees can raise any concerns or issues they may have.

We reserve the right to verify compliance with the above principles, including by way of audits and surveys, and expect our business partners to cooperate with us and provide the evidence to this end as requested by us.

### Breaches of the Code of Conduct for Business Partners and responsible conduct

Where business partners should breach this Code of Conduct for Business Partners, HMT will take appropriate action in keeping with the principles of finding a responsible resolution. This may extend to discussions with the offending business partner and seeking remedial action and agreeing binding

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steps to remedy the situation in a timely manner. In the event of serious or repeated breaches or where the business partner is not willing to remedy the issue and work with HMT in arriving at responsible business practices, HMT may consider terminating the business relationship. HMT will consider the severity of the breach, its impact on the company and stakeholders and the response of the business partner before taking any action. In any such event, we will consider the potential impact on local communities and the business partner's employees in order to minimize the damage that might result from terminating the business relationship.

## Declaration of Responsibility

\_\_\_\_\_  
(name of company), a company legally incorporated in

\_\_\_\_\_  
(name of country)

registration / license no. \_\_\_\_\_

hereby declares that it

- (a) understands and accepts the contents of this Code, attached to this Declaration of Responsibility;
- (b) will share these efforts, difficulties and achievements in the implementation of this Code in concert with HMT and, as applicable, HMT's own business partner network.

\_\_\_\_\_  
(town/city / date)

\_\_\_\_\_  
(name and function, signature, company stamp)

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