

Huf Group



Huf Hülsbeck & Fürst GmbH & Co. KG
Huf Group Headquarters

Steeger Strasse 17
42551 Velbert
Germany
Tel.: +49 (0)2051 272-0
Fax: +49 (0)2051 272-207
E-mail: info@huf-group.com
www.huf-group.com

Code of Conduct

**Huf Code of Conduct
for Employees**

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... the **intelligent**
touch to cars.

Huf Code of Conduct for Employees – Short Version

I. Huf – the shared principles

The Huf Hülsebeck & Fürst GmbH & Co. KG as well as its affiliated companies Group (combined the “Huf Group”) produce and design mechanical and electronic locking systems, driver authorization systems, passive entry systems, car access authorization systems, door handle systems as well as power tailgate systems, tire pressure monitoring systems and telematics systems for the automotive industry and tire retailers across the world.

II. Frame conditions

The principles of the code of conduct are globally binding for all companies, managing bodies, operations and employees of the Huf Group and they shall set a consistent corporate minimum standard. They define the general frame and guiding principles, which are basic for Huf. All managers are requested to carry the code of conduct throughout the company and to monitor that the code of conduct is upheld.

1. Keeping of laws, accepted standards and guidelines:

All applicable national laws and acknowledged international standards, guidelines and principles will be upheld by the Huf employees.

2. Prevention against corruption:

All applicable regulations to fight corruption are to be upheld.

3. Antitrust and competition law:

A fair competition in regard to its competitors is ensured. The relevant and applicable national and international antitrust laws as well as laws governing unfair business practices are to be upheld.

Definition Huf employees:

All workers and employees working for Huf including managers, part-time employees, limited contract employees, apprentices and interns.

4. Confidentiality and data protection:

Within the frame of business-related confidentiality, a transparent communication is maintained. Company and business secrets are to be observed and all applicable laws concerning data protection are to be upheld.

5. Handling of property of the company:

Assets of the Huf Group are handled sensibly and with care.

6. Occupational health and safety:

A safe, healthy and hygienic work environment for all employees is ensured. Therefore all necessary steps to prevent accidents and health issues are taken. At the same time a self-responsible behavior from the employees is expected.

7. Working hours:

The applicable legal regulations and company agreements in regard to working hours as well as the relevant ILO conventions are to be upheld.

8. Remuneration and fringe benefits:

At Huf the financial compensation is based on the applicable legal and company regulations.

9. Conduct towards one another:

Huf employees have a fair and respectful attitude towards one another.

10. Freedom of association and right for collective bargaining:

The rights of the employees of freedom of association and collective bargaining is observed.

11. Handling of child labor and forced labor:

Any form of forced labor and child labor is rejected.

12. Handling of human trafficking:

All forms of illegal human trafficking are rejected.

13. Equal opportunity:

As a company with an international orientation the diversity in the staff is promoted and any form of discrimination is rejected.

14. Environmental and climate protection:

All applicable laws and minimum provisions in regard to environmental and climate protection are to be upheld. Resources are to be used in a sensible manner and waste will be avoided or reduced.

15. Product responsibility:

It is observed, that Huf products do not endanger the health and safety of the customers.

16. Information und communication:

All employees have access to the regulations of this code of conduct.

17. Handling of reports and questions:

Any justified violations against the code of conduct are to be reported.

18. Sanctions:

In case of violations, the right is reserved to pursue legal steps, by respecting to the severity of the violation.

I. Huf – The shared Principles

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The Huf Hülsbeck & Fürst GmbH & Co. KG as well as its affiliated companies (combined the “Huf Group”) produce and design mechanical and electronic locking systems, driver authorization systems, passive entry systems, car access authorization systems, door handle systems as well as power tailgate systems, tire pressure monitoring systems and telematics systems for the automotive industry and tire retailers across the world.

Based on the tradition of a family owned company the Huf Group has become one of the leading business partners of the automotive industry. The customers appreciate Huf for the high tech orientation, for the creative and competent solutions and because of the global presence. The know-how is used to unlock the automotive world for customers over and over. It is a commitment for the whole group of companies to further develop the successes of the past. For this the companies of the Huf Group use the opportunities of the group – as an advantage for the customers and to strengthen the company.

Huf Code of Conduct for Employees

The following corporate principles apply:

- We take responsibility for our actions
- We fulfil our customers' wishes
- We design our future by our innovations
- We live by our quality philosophy
- We work together
- We assume social responsibility
- We act cost-consciously

All employees work to ensure that also in future this specific head-start will be there, that enables to realize the vision

...the **intelligent touch** to cars.

every time.

Huf – the Shared Principles

Corresponding to the corporate principles as well as to the principles “customer satisfaction”, “cost effectiveness” und “environmental protection”, Huf has high expectations regarding a social, economic, ecologically balanced and future oriented way of working.

All employees are seen as representatives of the company while acting. All employees need to remind themselves about this fact every day again. By conducting the tasks in such a fashion that ensures a positive perception of the Huf Group, the employees support the economic success of the company at the same time.

II. Frame Conditions

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The subsequent code of conduct reflects the expectations for sustainability of the Huf Group and offers a frame of action to the employees with which economical, legal and moral challenges of everyday business matters can be met in a responsible manner and can be dealt with correctly.

Huf Code of Conduct for Employees

The Huf code of conduct cannot and should not provide detailed instructions for actions for all kinds of situations. It rather sets frame conditions, which can be firmed up by internal company agreements and instructions. Existing collective contracts, guidelines and company agreements are valid without limitations in conjunction with the code of conduct. In order to consider local specifics, complementary regulations can be defined, which however must not be contradictory to this code of conduct. If there are local habits, legal regulations or further rules, which differ from the provisions in this code of conduct, the stricter provisions apply.

Frame Conditions

The principles of the code of conduct are globally binding for all companies, managing bodies, operations and employees of the Huf Group and they shall set a consistent corporate minimum standard.

In addition to their function as a role model, all managers are requested to carry the code of conduct throughout the company and monitor that the code of conduct is upheld. In the sense of the principles of leadership at Huf, all managers have a specific and clearly defined responsibility.

II. Frame Conditions – Compliance

Compliance

1. Keeping of laws, accepted standards and guidelines

All applicable national laws and acknowledge international standards, guidelines and principles, especially the principles of the UN Global Compact, the core work standards of the International Labor Organization (ILO) and the OECD guidelines for multinational companies are to be upheld.

The subsequently named conventions of this code of conduct are to be observed and must not be circumvented by any contractual agreements or agreements of such kind.

2. Prevention against corruption

The applicable legal regulations to fight corruption are to be upheld. Dealings with customers, suppliers and service partners (subsequently referred to as “business partners”) and entities of the government have the sole purpose of increasing the customer benefits and to ensure a sustainable success for the company. Actions and decisions are made free from any outside considerations or personal interests.

An example:

Offering or accepting of incentives, gifts or favors can indeed be part of daily work life. Among the most common of this kind of gratuitous grants are invitations to dinner or events. The financial frame for a gratuitous grant has to be considered in such a manner that an acceptance of this will not place the recipient in a position of dependence and the non-cash benefit shall not exceed the taxation limits of the respective countries.

3. Antitrust and competition law

A fair competition in regard to competitors is ensured. It is expected from all employees that they uphold all relevant and applicable national and international antitrust laws as well as laws governing unfair business practices. Agreements or activities which influence prices and conditions, allocation of sales areas or customers or any obstruction of a free and open competition are forbidden. Furthermore it is not allowed to make any agreements between customers and suppliers with the intention to limit the freedom of customers to offer their prices or additional conditions in an un-influenced manner (price and condition provisions).

4. Confidentiality and data protection

A transparent communication within the frame of business-related confidentiality is maintained. Company and business secrets are to be observed and all applicable laws concerning data protection are to be upheld.

Confidential information as well as confidential documents must not be forwarded to third parties without consent nor it is allowed to store these on unencrypted data storage equipment or to forward these to private email-accounts, etc. or to make these public in any shape or form, unless an explicit authorization to do so has been granted. Confidential information shall only be revealed externally, when to do so becomes mandatory due to legal requirements or when necessitated by an order from a court of law or entities of the government. The commitment for secrecy continues, even after the contract with the Huf Group will be concluded.

At the Huf Group any personal data relating to employees or third parties are only collected, processed and/or used when the individuals have consented to this or where there is a legal basis for this.

5. Handling of property of the company

The assets of the Huf Group have to be handled sensibly, appropriate and with care. In addition, any property of the Huf Group must only be used for business purposes, i.e. only in connection with the job assigned. Assets of the company also include communication equipment and intangible assets like for example know-how and patents.

II. Frame Conditions

- Working Conditions
- Human Rights



Working Conditions

6. Occupational health and safety

It is the intention of Huf to prevent accidents and illnesses at the work place. Health protection / promotion is involved and a safe, healthy and hygienic work environment for the employees is created. To achieve this, suitable measures are provided and all the necessary steps are taken to prevent accidents and health issues that may arise from carrying out work activities. The work environment is continuously improved.

It is expected from the employees that they take on responsibility to maintain their health. Huf supports its employees to keep or to develop a healthy life style.

All employees are informed on a regular basis – in relation to their position – about current standards for health protection and safety as well as measures for security and they are requested to follow the specified protection measures.

7. Working hours

The applicable legal regulations and company agreements in regard to working hours, paid holidays and regular bank holidays and the relevant ILO conventions are upheld.

8. Remuneration and fringe benefits

The financial compensation including fringe benefits is based on the applicable legal and company regulations.

9. Conduct towards one another

Huf employees stand for a fair, respectful and cooperative conduct towards one another. Any form of bullying as well as any verbal, physical or sexual harassment, use of force and/or annoyance of any kind will not be tolerated.

Human rights

10. Freedom of association and right for collective bargaining

The basic right for freedom of association and the right for collective bargaining within the framework of national laws is observed. It is assured, that employees who will become active in this sense won't have to fear any negative consequences for this. To the elected representatives of the employees an open and truthful cooperation is offered and it is worked for a fair balance of interests.

11. Handling of child labor and forced labor

Huf rejects any form of forced labor and child labor.

The age limit for an allowable work contract is not below the age of compulsory education and will in no case be below 15 years of age (or 13 years of age if the national law in agreement with ILO convention 138 permits this).

Underage employees must not be brought into contact with any dangerous, unsafe or unhealthy situations.

The rights of children and young people are observed.

Any exploitation of children and young people will not be tolerated.

12. Handling of human trafficking

Huf rejects all forms of illegal human trafficking.

Human trafficking is illegal, when the recruitment, transportation, transfer, detention or receipt of persons comes off by improper means (e.g. force, deception, abduction).

13. Equal opportunity

As a company with an international orientation the diversity in its staff is promoted and any form of discrimination is rejected. Any form of differentiation, exclusion or preference will be stopped that is based on

- ethnic affiliation
 - national and social origin
 - color of skin
 - gender
 - age
 - religion and ideology
 - disabilities
 - sexual orientation
- or any other personal traits.

The respective legal regulations are applicable.

II. Frame Conditions

– Environmental and Climate Protection

Environmental and climate protection

14. Environmental and climate protection

The processes are created in an ecologically sensitive manner. Applicable laws and the minimum regulations for climate and environmental protection have to be followed. Specifically it is expected from the employees that they use resources sensibly (e.g. electrical power, heating, water as well as raw and auxiliary materials and consumables) while avoiding or reducing waste. It is expected from the employees that they suggest ideas for the improvement of environmental protection.

II. Frame Conditions – Product Responsibility

Product responsibility

15. Product responsibility

Huf considers during the product development process the highest degree of health and safety for the automotive end customers. The relevant national and international regulations of product responsibility (e.g. product liability) are complied.

To achieve this, the best available technology is considered. In the B2B area (business to business) a close coordination with the buyer is conducted. From the B2C area (business to consumer) further requirements arise (take-back obligations, product markings, warranty determinations).

II. Frame Conditions – Final Provisions

Final provisions

16. Information and communication

Every employee has access to the provisions of this code of conduct – the English version is binding. All Huf companies create a translation into the local language and make it available to their employees. Questions about the interpretation of the code of conduct are to be directed to the respective manager.

17. Handling of reports and questions

All employees act responsibly in the sense of the code of conduct. When in doubt or to report a reasonable suspicion of a violation, the respective Human Resources department of the site serves as an initial neutral and responsible contact person. Furthermore the following e-mail address was established:

corporate-responsibility@huf-group.com.

Employees must not be at a disadvantage, if they report an actual or assumed violation of the code of conduct in good faith. It is pointed out that in certain cases there could be legal requirement to inform a third

party about the information received which by its nature is confidential (e.g. in case of preliminary investigation by public prosecution). In some cases the person making the report may be called in as a witness.

For the purpose of validation and concretion of suspicions, and thereby no disadvantages could be the consequence for the whistleblower, Huf will request the disclosure of the identity in single cases.

18. Sanctions

In case of violations the right is reserved to pursue disciplinary and legal steps, in respect to the severity of the violation.



Ulrich Hülsbeck



Thomas Tomakidi



Dr. Florian Hesse



Johann Palluch

Appendix

Overview of the relevant ILO conventions and recommendations

The following overview serves for a better understanding of the relevant ILO conventions and recommendations.

No.	Title
1	Working hours (commercial)
14	Weekly recreational days
26	Procedure for the definition of minimum wages
29	Forced labor
79	Night shifts for young people (non-commercial activities)
87	Freedom of association and protection of the right of association
98	Right of association and right for collective bargaining
100	Equal pay
105	Abolition of forced labor
111	Discrimination (employment and job)
131	Definition of minimum wages
135	Representatives of employees
138	Minimum age
142	Promoting the potential of employees
143	Migrant workers (additional regulations)
154	Collective bargaining
158	Concluding employment
159	Vocational rehabilitation and employment of disabled personnel
182	Ban and immediate measures for the removal of the worst kinds of child labor
E 143	Recommendations for the protection and promotion of representatives of the employees in the company
E 146	Recommendations for the minimum age for the admission into employment

The exact wording of the conventions and recommendations can be found on the website of the ILO.

Texts / conventions in the English version:

<http://www.ilo.org/dyn/normlex/en/f?p=1000:12000:::NO::>