

# Hansa Meyer Global



Hansa Meyer Global

## ***CODE OF CONDUCT***

for Business Partner  
11/2021

**Dear Business Partners,**  
**Dear Stakeholders,**

Hansa Meyer Global is a global player, strongly established on the international market. Since its foundation in 1986, our company has successfully grown from its core business in arranging worldwide shipments of capital goods in the field of machinery and energy into a leading internationally recognized transport architect.

We assume our corporate responsibility towards our customers, employees, shareholders and the public. Our corporate responsibility also includes compliance with the laws in force at any time and place, as well as respect of the fundamental ethical values and sustainable behaviour.

By participating in the UN Initiative - Global Compact in October 2012, we have committed ourselves to observe its ten principles in the areas of human rights, labour, environmental protection and anti-corruption.

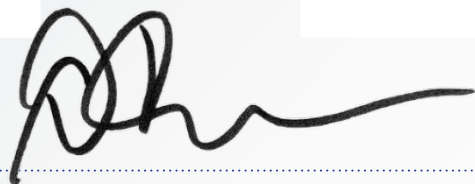
Our Corporate Governance is manifested in the corporate mission statement and thereby constitutes the ultimate basis for all our activities – without any exception!

The Code of Conduct provided us with the detailed and binding guidelines for our business relationships.

Based on our own corporate responsibility policy, we expect that our business partners will act responsibly and undertake to observe the basic principles outlined in this Code of Conduct.



**HENRIQUE WOHLTMANN**  
Managing Shareholder



**JAN-DIRK SCHUISDZIARA**  
Managing Shareholder

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# **1. CORPORATE RESPONSIBILITY**

Corporate responsibility results in a liability to comply with all rules and regulations of the law in force.

Hansa Meyer Global (hereinafter referred to as HMG) expects its business partners to observe the following principles:

## **1.1. HUMAN RIGHTS**

HMG expects its business partners to respect the globally applicable regulations for the protection of human rights. This includes, in particular, that HMG's business partners do not use or tolerate forced labor or child labor and comply with the regulations on the legal minimum age for the employment of children set out in ILO Conference 138.

## **1.2. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION**

HMG business partners do not discriminate anybody on grounds of national or ethnic origin, race, gender, religion, ideology, age, disability, sexual orientation, or any other characteristics protected by law, unless otherwise precluded by any mandatory law.

## **1.3. ENVIRONMENTAL PROTECTION**

HMG business partners assume the responsibility for environmental protection issues and comply with all applicable legislation relating to the environment and sustainability. They use natural resources sparingly and minimize harm to the environment.

## **1.4. OCCUPATIONAL SAFETY**

HMG business partners observe all applicable legal requirements concerning occupational health and safety. They foster any further development and improvement of working conditions.

## **1.5. MINIMUM WAGE**

HMG business partners ensure that their employees receive appropriate remuneration. Such remuneration will at least reflect legally guaranteed minimum wages and will be oriented to the specific labour market involved.

# **2. TRANSPARENT BUSINESS RELATIONSHIPS**

Openness and transparency are the keys to credibility and trust in our business relationships. HMG expects its business partners to observe the following principles:

## **2.1. AVOIDING CONFLICTS OF INTEREST**

HMG business partners make decisions based solely on objective criteria and do not allow themselves to be guided by personal interests or relationships.

## **2.2. PROHIBITION OF CORRUPTION**

HMG business partners do not tolerate corruption. They ensure that their employees, subcontractors or representatives do not pay, offer or receive any bribes, kickbacks, inadmissible donations, or other inadmissible payments, or benefits, in relation to customers, officials, or other third parties. This also applies to the so-called „facilitation payments“ (illegal payments to accelerate administration matters that are routinely encountered).

### **2.3. GIFTS, HOSPITALITY AND INVITATIONS**

HMG business partners do not offer HMG employees, or any third parties any improper benefits, either directly or indirectly, in the form of gifts, hospitality, or invitations, to influence them unduly. They shall neither ask for, nor receive any such benefits.

### **2.4. STATES AS CUSTOMERS AND DEALING WITH AUTHORITIES**

HMG business partners comply with the strict legal provisions when they deal with governments, authorities and public institutions. They shall comply with respective legal regulations and abide by the rules of free and fair competition when they take part in bidding for public contracts.

### **2.5. CONSULTANTS AND AGENTS**

HMG business partners engage consultants or agents only according to the laws in force. They particularly ensure that consultants or agents are remunerated only for consulting and intermediary services actually rendered, and that the payments are commensurate to the performance of such consultants or agents.

## **3. FAIR MARKET CONDUCT**

HMG is a fair and responsible market participant and it always adheres to its contractual obligations.

HMG expects the same from its business partners and expects them to observe the following principles:

### **3.1. FREE COMPETITION**

HMG business partners comply with the applicable anti-trust legislation. In particular, they do not enter into any anti-competitive agreements with competitors, suppliers, or customers. They do not abuse any potential market dominating position.

### **3.2. EXPORT CONTROL**

HMG business partners ensure compliance with all applicable legal provisions for importing and exporting the goods, services and information.

### **3.3. MONEY LAUNDERING**

HMG business partners conduct business relationships only with the business partners whose integrity they are convinced of. They ensure that the applicable legal money laundering provisions are not breached.

### **3.4. BUSINESS INFORMATION**

HMG business partners disclose any business information and report on their business relationships truthfully and in accordance with the applicable laws in force.

## **4. DATA PROTECTION, BUSINESS SECRETS AND CORPORATE ASSETS**

Confidential data, business secrets and company assets have to be protected. In particular, HMG expects its business partners to observe the following principles:

#### **4.1. DATA PROTECTION**

HMG business partners observe all applicable laws in force to protect personal data of the employees, customers, and other parties concerned.

#### **4.2. PROTECTION OF KNOW-HOW AND CONFIDENTIALITY**

HMG business partners respect know-how and business secrets of HMG and any third parties. They shall not disclose such information to third parties without any explicit prior written consent of HMG, or in an unauthorized way.

#### **4.3. HANDLING COMPANY ASSETS**

HMG business partners respect tangible and intangible assets of HMG and do not use them for unlawful purposes. They ensure that their employees, as well as any third parties they commission in relation to business operations (such as subcontractors or representatives), neither damage, nor misuse HMG assets and use these assets otherwise against the interests of HMG.

### **5. LEGAL CONSEQUENCES FOR BREACH OF THE HMG CODE OF CONDUCT FOR BUSINESS PARTNERS**

If a HMG business partner does not comply with the basic principles laid down in this Code of Conduct, HMG reserves the right for extraordinary termination of the business relationship with this business partner.

Furthermore, HMG reserves the right to take legal action against the business partner in the event of violations.