

# CODE OF CONDUCT



**For Business Partners**



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## I. Foreword

For our Company, HCS Group GmbH including all our affiliates worldwide ("HCS Group")<sup>1)</sup>, and its employees, it is expected standard practice to adhere to the law in the performance of our duties. To reinforce this and to further protect our employees and the Company we have drawn up an "HCS Group Code of Conduct". It is based on our corporate values and is aimed at all employees of the HCS Group. The Code of Conduct forms a binding guide for the conduct of all of us in our daily business.

Our business partners contribute significantly to our success and we see a common understanding of ethical and sustainable action as an essential basis for this. The "HCS Code of Conduct for Business Partners" is based on the HCS Group Code of Conduct and is founded on the principles of internationally recognised standards for responsible corporate management. For us, the requirements and principles of this Code of Conduct are an essential part of any relationship. We therefore expect our business partners to fully comply with applicable laws and directives and to recognize, support and comply with internationally recognized environmental, social and corporate governance standards.

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<sup>1)</sup> The list of affiliated companies is shown on the back page.

## II. Scope of application

Business partners are all third parties with whom HCS Group has a business relationship. These may be suppliers, customers, sales partners, consultants, brokers, subcontractors, commercial agents, freelancers and other providers of goods and services, etc.



# III. HCS Group Code of Conduct

## Responsibility for compliance

### 1. Compliance with the law

Our business partners comply with applicable local, national and international laws.

This includes the establishment of effective processes and internal controls for financial reporting and reporting systems. Relevant transactions and facts are recorded completely, transparently and traceably and presented accurately.

### 2. Responsibility

Our business partners guarantee the implementation of and compliance with the HCS Group Code of Conduct in their contractual relationship with the HCS Group.

Our business partners shall ensure that their own business partners who are employed for or on behalf of the HCS Group are also aware of and comply with the requirements of the HCS Group Code of Conduct.

## Responsibility as a member of society

### 3. Respecting human rights

Our business partners respect and support the observance of internationally recognized human rights and actively ensure that they are not complicit in human rights violations.

HCS Group believes that employee diversity, equality and inclusion offer great potential and expects the same from its business partners.

### 4. Rejection of forced labour, slavery, trafficking in human beings and child labour

Our business partners take action against forced labour, such as modern slavery and human trafficking, and child labour. HCS Group pays particular attention to the use of private or public security forces by all companies within our supply chains. All forms of forced and child labour are prohibited at our business partners.

### 5. Fair labour conditions, Remuneration and Working Hours

Our business partners comply with the legal regulations for fair labour conditions. This includes, in particular, fair remuneration and social benefits that meet national legal standards, such as the statutory minimum wage for example.

Our business partners comply with all applicable laws and regulations regarding the restriction of working hours and the granting of rest periods, breaks and vacations.

## **6. Freedom of association**

Our business partners respect the right of their employees to freedom of association, to form organizations and to bargain collectively without fear of repression, intimidation or punishment.

## **7. Bullying and harassment in the workplace**

Our business partners provide a working environment that is free from discrimination, violence and harassment. All business partners are expected to create and maintain an atmosphere of respectful cooperation, equality and inclusion. This applies in particular to the rights of women, minorities and indigenous peoples.

## **8. Environmental protection and sustainability**

Our business partners comply with all applicable environmental laws and standards and use natural resources responsibly. This includes, in particular, reducing energy consumption, noise emission and greenhouse gas emissions, keeping the air clean and thus increasing air quality, managing natural resources, avoiding waste, and maintaining water quality. Where possible, business partners should rely on renewable energies, promote the decarbonisation of their own activities and support the responsible use of resources through reuse and recycling. This includes, in particular, the economical use of water and responsible chemicals management.

## **9. Donations and Sponsoring**

Donations are made by our business partners only on a voluntary basis and without expectation of consideration. Sponsorship of individuals, groups or organizations is not used to gain unlawful business advantages.

# Responsibility as a business partner

## **10. Fair competition and compliance with competition and antitrust law**

Our business partners behave fairly in competition and comply with applicable antitrust and competition law.

Our business partners do not enter into discussions or agreements with competitors on pricing, market and customer allocation, bid rigging or other similar activities that could have anti-competitive effects.

## **11. Anti-Corruption and money laundering**

Our business partners condemn all forms of corruption and bribery and must not participate directly or indirectly in any form of corruption, extortion, embezzlement or bribery nor tolerate them.

Our business partners shall observe the relevant statutory provisions on money laundering prevention and comply with their reporting obligations hereunder.

## **12. Gifts and invitations**

Our business partners only accept or issue invitations in connection with their activities for the HCS Group if they are reasonable, are not made in anticipation of improper consideration or other preferential treatment and do not violate applicable law (in particular anti-corruption laws). The same applies to the acceptance or granting of gifts, other benefits or advantages of any kind.

## **13. Avoiding conflicts of interest**

Our business partners make decisions on the basis of factual considerations and do not allow themselves to be guided in an inadmissible manner by personal interests.

## **14. Regulations covering foreign trade, export control and customs duties**

Our business partners comply with national and international foreign trade requirements as well as export control and customs regulations. In particular, business partners must comply with economic and trade sanctions regulations, anti-terrorism laws against certain companies or persons as well as embargoes against certain countries and prohibitions on certain exports and imports.



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# Responsibility in the workplace

## **15. Occupational safety and health protection**

Our business partners ensure health and safety in the workplace. Legal and internal measures are implemented to avoid accidents, injuries and work-related illnesses.

## **16. Confidential Information**

Our business partners ensure that confidential information of the HCS Group is kept secret and that intellectual property is protected.

Each business partner shall ensure that HCS Group's intellectual property does not find its way into unauthorised third parties' hands or is not misused. As far as possible, each business partner shall protect new developments and ideas of HCS Group in a legally secure manner by registering patents, trademarks, brands or in another suitable form in favour of HCS Group.

This also applies after termination of the business relationship.

## **17. Data protection**

Our business partners observe the applicable laws and regulations. This applies in particular when personal data and information is collected, stored and processed. In the case of transfers of personal data and information, HCS Group must be contacted in advance and informed of the intended transfer.

## **18. Information security**

Our business partners receive partly confidential information from the HCS Group. This is to be used exclusively for the fulfilment of their tasks within the scope of the services for the HCS Group. Our business partners protect this information against internal and external misuse according to the state of the art. If such data and information is transferred, HCS Group must be contacted in advance and informed of the intended transfer.

## **19. Protection of property and ownership**

Our business partners condemn all forms of fraud and other property damaging behaviour towards the HCS Group and third parties. Corresponding rights are consistently respected and the creation or use of plagiarised material is not tolerated.



## IV. Implementation in the supply chain

HCS Group expects its business partners to comply with the principles of this Code of Conduct. Business partners are also expected to pass these on to their own business partners in the supply chain and to identify risks within the supply chains and take appropriate measures where necessary. If serious violations are identified in the supply chain of a business partner, HCS Group expects disclosure of the facts and information about the measures taken.

## V. Whistleblower system

HCS Group would like to be informed about any questionable or even illegal behaviour within its companies in order to clarify and, if necessary, eliminate such behaviour. Information about possible violations of laws, guidelines or this Code of Conduct can be reported either to the Legal & Compliance department of the HCS Group (compliance@h-c-s-group.com) or anonymously via the ► whistleblower system, which can be accessed via the HCS Group website (www.h-c-s-group.com). All reports will be treated confidentially.

HCS Group furthermore expects its business partners to have also implemented a process for reporting misconduct in their company and to inform HCS Group in case of violations of the contents of this Code of Conduct.

## VI. Compliance with the Code of Conduct, violations and consequences

The HCS Group reserves the right to check compliance with the standards and regulations listed in this Code of Conduct by means of a self-assessment questionnaire and audits.

In case of violations of laws, directives and the standards set forth herein, the HCS Group reserves the right to take appropriate measures against business partners who do not meet these requirements, which may ultimately lead to the suspension or termination of a business relationship.

Frankfurt a.M., Germany, May 1 2024

Management Board HCS Group

**Haltermann Carless  
UK Ltd.**

- Harwich
- Leatherhead
- Stanlow

**Haltermann Carless  
Deutschland GmbH**

- Frankfurt Headquarter
- Hamburg
- Speyer

**Electrical Oil Services  
GmbH**

- Hamburg
- Duisburg

**Haltermann Carless  
US, Inc.**

- Troy, Michigan

**Haltermann Carless  
Japan G.K.**

- Yokohama

**HC Manvel, Inc.**

- Manvel, Texas

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**PASSION PRAGMATISM PARTNERSHIP**