

# **Ethics Policy**

#### **Preamble**

The following Ethics Policy applies to all employees of the Halfar System GmbH. The Code of Ethics and all related regulations document Halfar's guiding principles and values. They serve as a guide for legally correct and responsible behaviour. They can be supplemented and expanded by detailed company regulations and instructions, provided that their objectives correspond to the principles set out here. In the event of any difficulties with interpretation, or any deviations or contradictions, the stricter requirements will apply.

#### **Guidelines**

The following principles apply to Halfar:

- <u>Independence</u>: We work non-partisan, non-denominational and free from any discrimination.
- Responsibility: We take responsibility for our actions and encourage others to do the same.
- <u>Clarity</u>: Our actions are based on clear responsibilities, expertise, and mutual respect.
- Reliability: We are open, fair and trustworthy in all our dealings with each other and our partners.
- <u>Innovation</u>: We are constantly seeking new, creative and pragmatic ways to fulfil our tasks even more effectively.
- Responsibility: We use the available resources in a professional, careful, effective and responsible manner.
- Honesty: Our public relations work aims to present content correctly and take people seriously.
- <u>Transparency</u>: We provide clear and transparent information about our work and how we use resources.

### **Rules of conduct**

Working at Halfar is characterised by fair and cooperative collaboration. Respect for the personality and dignity of each individual, tolerance, and trust are fundamental to the way the management and employees interact with each other every day. This includes promoting the inclusion of disabled people and creating and maintaining non-discriminatory workplaces. All employees are committed to behaviour characterised by responsibility, integrity, and mutual respect.



In particular, this means that

- conflicts and problems are addressed proactively and solved together,
- an ongoing dialogue and open exchange are cultivated,
- collegial advice and support as well as mutual consideration are the norm,
- · relevant information, ideas and knowledge are exchanged and
- · responsibility for one's own actions is taken.

## Violations of laws and regulations

Employees or third parties can report violations of laws or regulations - by name or anonymously - via the following channels:

- 1. To the supervisor
- 2. To the management
- 3. Via the internal anonymous reporting centre
- 4. Via the Halfar Integrity Line application
- 5. To the data protection officer

Depending on the individual case, violations of laws, this Code of Ethics or other Halfar System GmbH regulations may result in labour and legal consequences. Supervisors are responsible for ensuring compliance with these requirements and for supporting their teams accordingly.