

Corporate Principles on Responsibility, Anti-Corruption, Conduct, and Ethics

Freedom of Association & Right to Collective Bargaining

As hapema GmbH, we respect the right of all employees to join or leave, to act for, and to form unions or organizations of their own choosing for the purpose of promoting and protecting the interests of employees, and adhere to the corresponding agreements with collective representatives of our employees in accordance with applicable local laws and regulations.

Disciplinary Measures

We strongly oppose the use of physical punishment, mental or physical coercion, and verbal abuse.

Employee Motivation & Development

We consider motivated employees and their identification with our company's goals to be a key success factor. The promotion of our employees is particularly emphasized. We focus on job-related training applicable within the company as well as the development and promotion of future management potential.

Health & Safety

The health and safety of our employees is protected to the highest degree by providing a healthy and safe working environment. By adhering to the safety regulations in place in our company, each individual contributes to a safe and healthy working environment.

Compliance with Antitrust & Competition Laws

With our high-quality products, innovative solutions, and reliability, we compete openly and fairly on the global markets. We do not engage in any unlawful or criminal practices, such as bid-rigging, which excludes, distorts, or restricts competition.

Conflicts of Interest & Bribery/Corruption

All our employees avoid situations in which their personal or financial interests conflict with those of the company. In particular, they are prohibited from participating in companies of competitors, customers, or suppliers or from entering into business relationships with them in a private setting if this gives rise to a conflict of interest. Such a conflict always exists if the nature and extent of a participation is likely to influence actions in the exercise of our company's activities in any way. Our employees unequivocally distance themselves from demanding, accepting, and receiving unjustified or unlawful benefits that could influence business decisions or transactions. Likewise, none of our employees will, in the course of any business activities, offer, procure, or attempt to offer or procure any undue advantages to business partners, their employees, or other third parties, or enter into any agreements to that effect.

Child Labor and Young Workers

Our company is committed to strictly prohibiting child labor and protecting young workers. We promote safe and fair working conditions for all, especially young workers. Hapema itself has been successfully training apprentices for many years and supports them. Child labor has no place with us. We verify this in audits of our suppliers.

Our company has a strict zero-tolerance policy towards modern slavery. We are committed to taking all necessary steps to ensure that no forms of forced labor, human trafficking, or exploitation occur in our business relationships. We expect our suppliers and business partners to also commit to these high standards.

Diversity, Equality, and Inclusion

hapema firmly believes that diversity, equality, and inclusion (DEI) are critical factors in our success. We value the unique perspectives, experiences, and talents of all employees. This policy sets out the principles and commitments of our company in the area of DEI.

We already pay attention to these characteristics during the application process and have installed internal reporting channels, such as the equal opportunities officer, to protect and promote these employees.

Protection of Assets & Confidentiality

Each individual is expected to protect the company's tangible and intangible assets, to treat company and business secrets and customer-related business information confidentially, and to comply with the applicable data protection principles.

Suppliers

We have high expectations of our suppliers and require them to adhere to the same strict principles in conducting their business, especially in the treatment of employees, as we apply ourselves. As an importer, we pay attention to the exact designation and classification of goods and raw materials, the exact specification of their value and country of origin. Local customs and import laws, regulations, and procedures of government authorities are expressly observed. We monitor hapema requirements through audits.

Environment & Recycling

As a company in the metal industry, we are committed to nature. With state-of-the-art equipment, we protect our environment. Every employee contributes to ensure that high-quality products are produced in environmentally friendly processes, which also includes the responsible handling of the resource energy.

Social Commitment

We expressly stand by our responsibility as citizens of the community in which we operate and we are committed to open communication with all authorities, as well as social and public interest groups.

Compliance

This code of ethics and conduct has been approved by the management and brought to the attention of all employees. Our employees adhere to this code without exception in the performance of their duties. For certain regions, countries, or functions, stricter or more detailed guidelines may apply, but these are generally in line with these corporate principles. Questions regarding application or interpretation, as well as reports of potential violations, should be addressed to the respective supervisor.

Measures in Case of Non-Compliance

Procedures, practices, or actions of employees that are contrary to this code must be corrected and will result in disciplinary action. Depending on the severity of the violation and history (e.g., repetition), this may result in a warning, reprimand, or even termination.

Should suppliers or other business partners fail to comply with the requirements, this would be discussed with the supplier and remedial action would be urged. Depending on the severity of the violation and history (e.g., repetition), it may also lead to the termination of the business relationship.

If hapema employees, suppliers, or other business partners identify violations of these ethical principles (or corporate guidelines), any manager, the owner, or the HR department can be contacted to initiate an escalation for the benefit of the company.