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CODE OF CONDUCT

Corporate Principles – Ethics – Code of Conduct

Objective of the Code of Conduct

These principles of conduct within the framework of the „Code of Conduct“ represent a uniform framework for all employees of Hönigsberg & Düvel Datentechnik GmbH and its affiliated companies (hereinafter referred to as „H&D“) to support our employees in coping with legal and ethical challenges in their daily work.

This regulation is binding for all employees with regard to fundamental questions of conduct. H&D stands for respectable, honest and compliant conduct in day-to-day business and is committed to the following principles of conduct.



*Bernhard Hönigsberg
Managing director
and spokesperson*



*Anita Hönigsberg
Managing director*



*Andreas Lehmann
Managing director*



*Claudia Raabe
Managing director*



*Shiv Walia
Managing director*

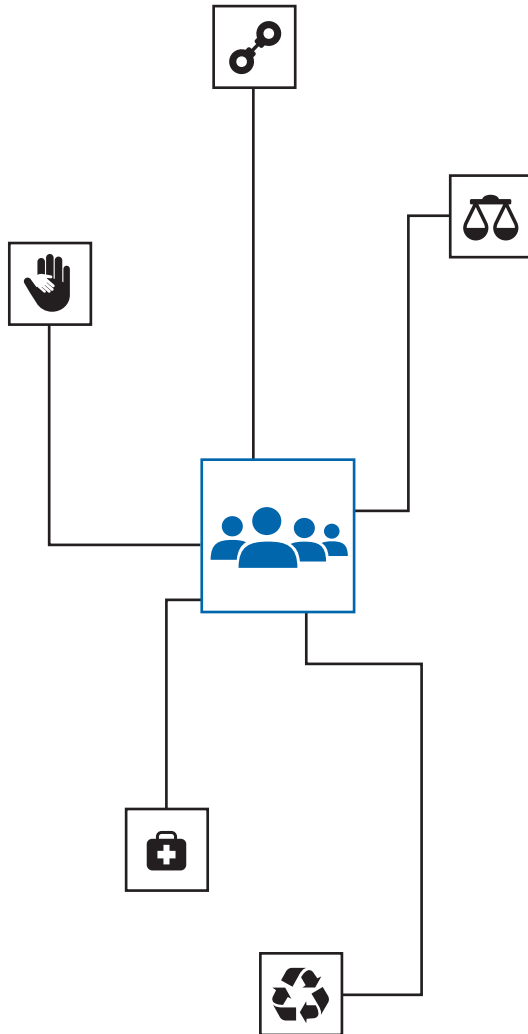


*Alok Roy
Managing director*

>>H&D STANDS
FOR RESPECTABLE,
HONEST AND
COMPLIANT
CONDUCT<<



RESPONSIBILITY TOWARDS SOCIETY AND EMPLOYEES



Human rights

H&D respects and respects recognized human rights and will not tolerate conduct that disregards them.

Equal opportunity

H&D does not tolerate any discrimination against persons, in particular on the grounds of their descent, religion, sexual orientation, nationality, origin, political or trade union activity or on the grounds of age, gender or disability. H&D promotes the diversity of society, language, cultures and lifestyles.

Child labour and forced labour

H&D despises all forms of child labour and forced labour.

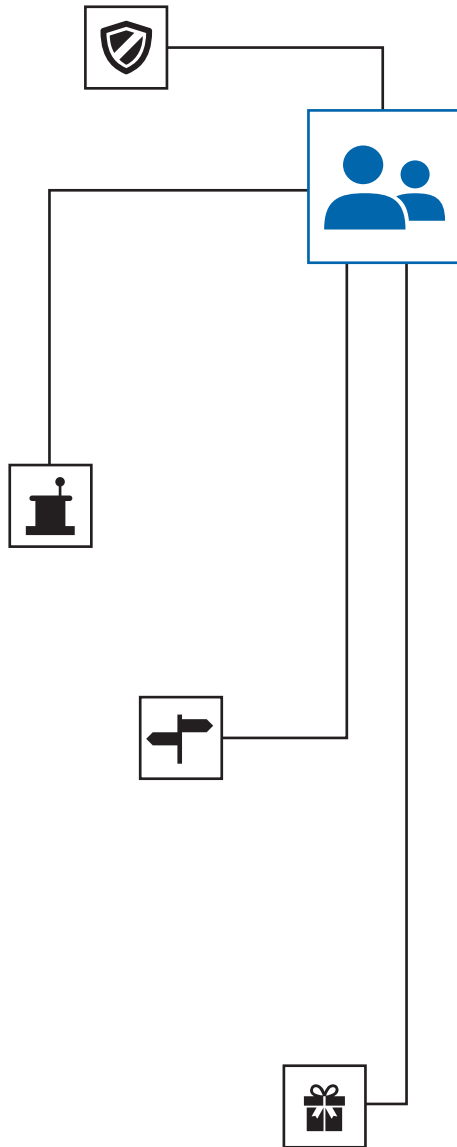
Occupational health and safety

The safety of our employees is a central requirement of our entrepreneurial actions. We avert hazards with preventive occupational safety for people and support the health of our employees through good working conditions.

Occupational safety is part of the personal responsibility of each employee. Risks are to be avoided by foresighted, prudent and safety-conscious behaviour. Hazards or defects must be reported immediately to the responsible manager.

Environmental Protection/Sustainability

H&D has a company-wide ISO-compliant environmental and energy management system. H&D has comprehensively defined and published an environmental and energy policy. This policy is a practical orientation for the company's various environmental protection measures and includes, among other things, sharpening the environmental awareness of employees, business partners and suppliers, promoting the gentle extraction of raw materials, the use of economical technologies and materials in all areas of the company and compliance with legal requirements. Our goal is to protect the environment sustainably with our business partners.



RESPONSIBILITY OF OUR EMPLOYEES

Privacy

All information that has not been published and is not generally known will be treated confidentially. This also applies to information from third parties, such as business partners, which we receive as a result of our activities at H&D. As a matter of principle, we prohibit the use of knowledge resulting from our internal business processes for private purposes.

Communication with the public

H&D ensure a uniform and professional external appearance of the company. All press questions are basically coordinated by Communication and Public Relations. Requests from media representatives and the press must therefore always be forwarded to or referred to Communication and Public Relations. The statutory employee representatives remain unaffected by this.

Avoidance of conflicts of interest

In our day-to-day business, we can be confronted with decision-making situations where the interests of the company conflict with our personal interests. Conflicts of interest can lead to decisions no longer being taken impartially in the interests of the company. Employees who are affected by a possible or actual conflict of interest are obliged to inform the manager or management of this quickly in order to bring about a rapid clarification.

Invitations and gifts and other benefits

Acceptance or granting of gifts, invitations, gratuities or benefits of any kind in connection with our activities may be accepted or given under internal rules if they are reasonable and are not made in anticipation of consideration or other preferences. Concrete instructions are defined in the eGuideline „Avoidance of conflicts of interest“.

RESPONSIBILITY TOWARDS COMPETITORS, PUBLIC OFFICIALS AND BUSINESS PARTNERS

Corruption

H&D does not tolerate corruption or other unlawful business practices on the part of its employees or third parties commissioned by us.

We will not offer, demand or accept, directly or indirectly through third parties, any benefits or other advantages that may impair our ability to make objective business decisions.

Benefits to public officials, suppliers, employees, representatives of state institutions, politicians as well as to elected officials and candidates for political office are generally prohibited.

Competition and antitrust law

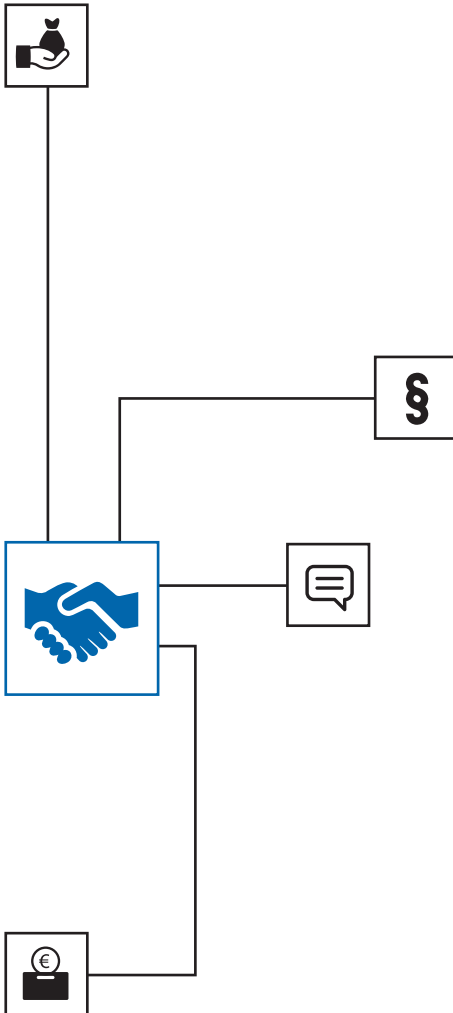
H&D complies with competition laws and regulations and does not enter into any agreements or understandings that affect the terms or otherwise unduly restrict fair competition.

Consultants/Agents/Intermediaries

Consultants, agents or intermediaries are selected and commissioned according to specifications such as qualifications and suitability criteria. The remuneration of consultants, agents or intermediaries must be commensurate with the services provided and must not be used to grant undue advantages to business partners or third parties.

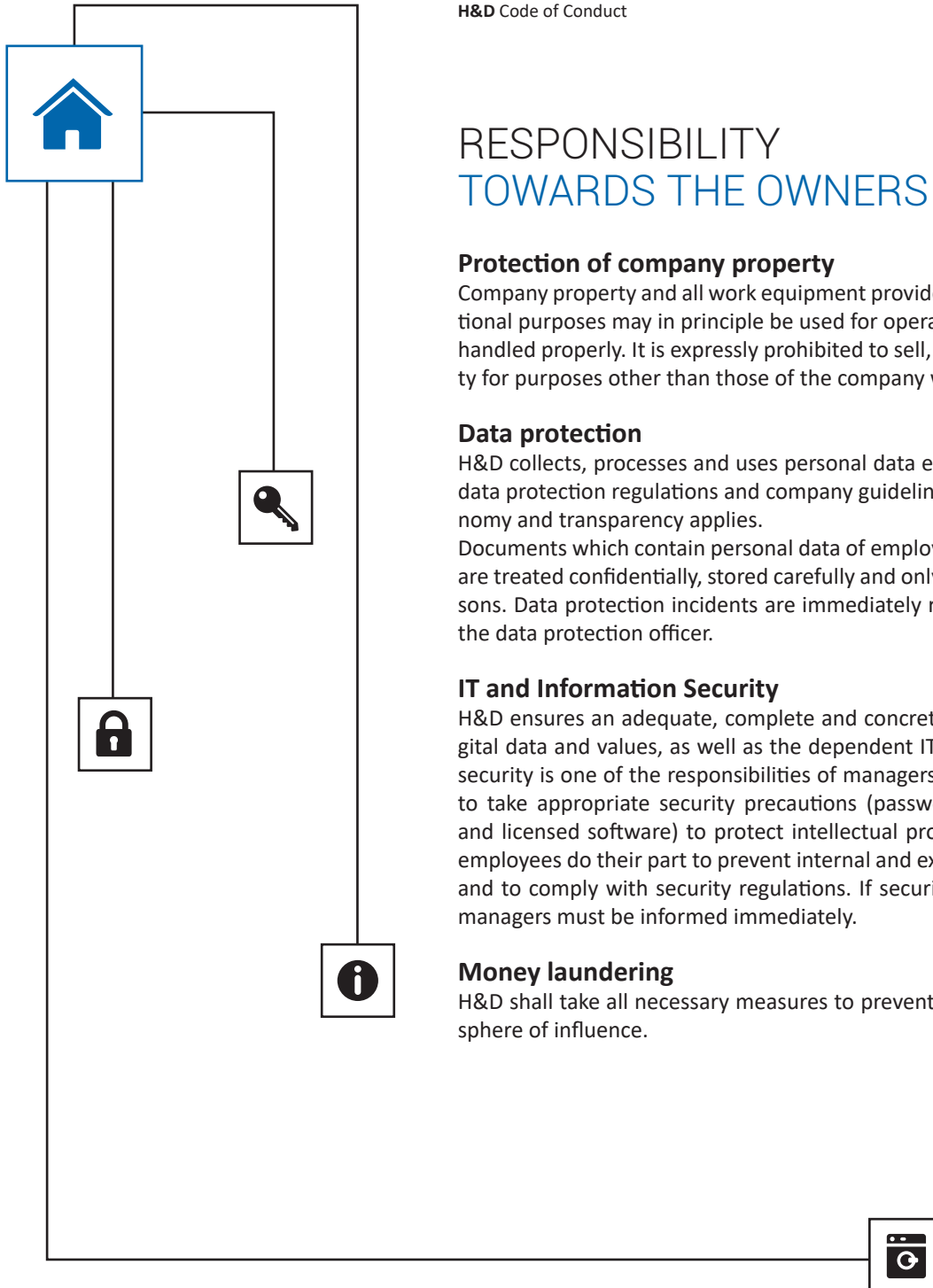
Donations/Sponsoring

All donations may only be made on a voluntary basis, without expecting any consideration. The allocation of a donation must always be transparent and documented. In sponsoring, H&D receives a return service, for example in the form of communication or marketing activities.



>>THE SAFETY
OF OUR EMPLOYEES
IS A CENTRAL
REQUIREMENT OF OUR
ENTREPRENEURIAL
ACTIONS<<





RESPONSIBILITY TOWARDS THE OWNERS

Protection of company property

Company property and all work equipment provided by the company for operational purposes may in principle be used for operational purposes and must be handled properly. It is expressly prohibited to sell, lend or use company property for purposes other than those of the company without permission.

Data protection

H&D collects, processes and uses personal data exclusively in accordance with data protection regulations and company guidelines. The principle of data economy and transparency applies.

Documents which contain personal data of employees, partners and customers are treated confidentially, stored carefully and only disclosed to authorized persons. Data protection incidents are immediately reported to the manager and the data protection officer.

IT and Information Security

H&D ensures an adequate, complete and concrete level of security for the digital data and values, as well as the dependent IT systems. IT and information security is one of the responsibilities of managers. They encourage employees to take appropriate security precautions (passwords, approved technologies and licensed software) to protect intellectual property and personal data. All employees do their part to prevent internal and external misuse of IT resources and to comply with security regulations. If security breaches become known, managers must be informed immediately.

Money laundering

H&D shall take all necessary measures to prevent money laundering within its sphere of influence.

COMPLIANCE WITH THE CODE OF CONDUCT

All managing directors, executives and employees of H&D are obliged to comply with the Code of Conduct.

In the event of non-compliance, appropriate consequences, including labour law and disciplinary measures, are to be expected. Serious infringements can also result in criminal and liability consequences.

ENACTMENT

Entry into force on 2017/05



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