

# heroal

simply better *spaces for life*

## The heroal Code of Conduct



March 1<sup>st</sup>, 2026

## Foreword by the Management

Economic success and social responsibility go hand in hand. Our company thrives on the trust of our stakeholders – a trust that we have built up over decades and want to continuously strengthen. Integrity, respect, and transparency are the foundations of our actions.

Law-abiding and ethical behavior towards employees, business partners, society, and the environment is essential for us. Violations of laws or values not only damage our reputation, but also jeopardize our economic success. Therefore, the following applies to all of us: We are responsible for our actions and rely on personal integrity and good judgment.

Our Code of Conduct serves as a guideline and defines binding standards for how we treat each other and our partners.

It helps to identify risks and avoid legal violations.

Our managers in particular have a responsibility to act as role models and to ensure a working environment in which problems can be addressed openly.

Ultimately, common sense and expertise are crucial to leading our company with integrity and foresight. We are all obliged to act accordingly and strengthen our shared values.



Dr. Max Schöne



Dr. Ramon Knollmann



## Reporting violations: the heroal whistleblower system

heroal is characterized by an open, fair corporate culture, which we promote and demand.

That is why we encourage all employees to openly report violations or justified concerns about the code or the law to their managers, Compliance or the management board.

We understand that this requires courage and offer the heroal whistleblower system as a confidential communication channel for reporting potential serious grievances and violations of laws or internal guidelines.

- Reports can be made verbally, in writing, and, if desired, in person.
- The system is **available in various languages at all times**.
- Whistleblowers **are fully protected and can report anonymously** if they wish.
- Receipt of the report must be confirmed within 7 days.
- All incoming reports are reviewed and treated **confidentially and in compliance with data protection regulations**.

The whistleblower system must not be used for false accusations.  
The reporting of knowingly false information is prohibited.

The screenshot displays the heroal whistleblower system interface. At the top, there is a navigation bar with the heroal logo, a language selector (en), a notification bell, a search icon, and a 'Log in' button. Below the navigation bar, the page title is 'heroal - Johann Henkenjohann GmbH & Co. KG'. The main content area features three columns of options:

- Report anonymously:** You do not disclose your identity. You communicate exclusively via the Smart Integrity Platform with those responsible from the company. Includes a 'Send a report' button.
- Report confidentially:** You disclose your identity confidentially to the responsible persons and discuss your case discreetly with the responsible persons. Includes a 'Send a report' button.
- Arrange a meeting:** You disclose your identity in order to arrange a confidential meeting with the responsible persons. Includes an 'Arrange a meeting' button.

Below these options, there is a section titled 'heroal takes reports seriously and processes them without delay and within the legal deadlines. After submitting the report, you will receive a message as soon as the report has been received and processed, but after a maximum of 7 days.' This is followed by a paragraph stating: 'You can check the status of your report online at any time and ask questions. This way, you can support the responsible persons in your company with the internal investigation. The more comprehensive and detailed you provide the necessary information, the more efficiently those responsible can clarify the facts.'

Next, it lists 'Violations of the following European and national regulations can be reported:' followed by a list of breaches: 'Breaches relating to bribery and corruption, competition law, fraud, financial crime, harassment or discrimination, international trade controls, the protection of personal data, rights and protection of persons, serious environmental damage or conflicts of interest.'

Finally, it states: 'The reporting channel fulfils all GDPR requirements as well as other national data protection regulations. Your data is stored securely heroal is responsible for data processing. After completion of the internal review, the responsible persons at heroal decide on the deletion of the data in accordance with the GDPR. heroal guarantees the protection of your identity. If you have any questions about data protection, please contact the heroal data protection officer directly. datenschutz@dhpj.de.'

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## 1 Scope

The heroal Code of Conduct and its current version are binding for the management, the executive team, and all employees of the heroal Group, regardless of their role or hierarchical position.

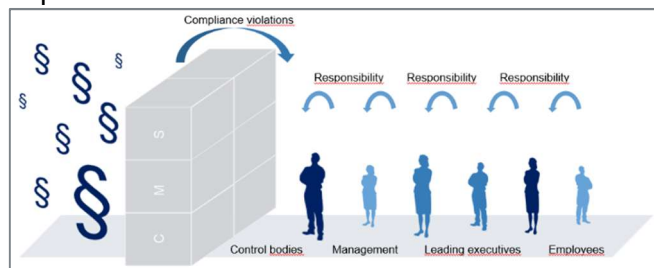
## 2 General principles of our actions

### 2.1 Compliance with laws and other binding regulations

The heroal Code of Conduct defines the basic legal rules that heroal is committed to complying with and applies worldwide to all employees, regardless of their role or hierarchical position.

Violations of the law can have serious consequences:

- Fines,
- orders,
- administrative sanctions,
- claims for damages,
- loss of reputation,
- personnel consequences, and
- criminal prosecution.



heroal therefore actively investigates indications of possible violations, involves the relevant authorities where necessary, and cooperates proactively with them.

### 2.2 Ethical behavior

The heroal Code of Conduct also defines our basic ethical rules, which we are committed to complying with. We expect our employees to behave ethically in all their business activities. This applies even if it puts us in a supposedly weaker competitive position in individual cases. However, compliance with our Code of Conduct has a greater long-term positive effect on our customers and colleagues than short-term profit-seeking at the expense of our integrity.

Compliance with our Code of Conduct is essential for all managers, especially in their dealings with their employees. Managers must live up to their role as role models. We expect them to provide their employees with clear guidance on ethical and honest behavior, especially in difficult situations, to demand and promote honest behavior, and to set a good example by consistently leading by example in order to encourage others to behave in the same way.

Anyone who represents heroal externally bears responsibility as a representative of the company.

## 2.3 Responsibility towards society

As a company, heroal benefits from favorable social conditions: a strong education system, stable political processes, a livable environment, and social balance. We are aware of the responsibility that comes with our business activities and strive to make a valuable contribution to society in addition to our commercial success. As a responsible company, we therefore take into account the short- and long-term effects of our business activities on our employees, customers, suppliers, subcontractors, other affected social groups, and the environment in which we operate.

## 2.4 Social behavior, equal opportunities, and mutual respect

### We expect

- respectful, fair, and loyal treatment of one another, regardless of task or hierarchical position,
- tolerant, polite, and considerate interaction with one another in order to promote a productive working environment.

### ***Any form of discrimination is prohibited.***

No one may be disadvantaged or harassed because of their origin or nationality, skin color, gender, sexual orientation, religion or worldview, disability, or age.

***Any form of insult, sexist remark, or harassment, whether through words, gestures, or actions, is prohibited.***

## 2.5 Fair employment

heroal combats all forms of illegal employment and exploitation of workers. Illegal employment undermines the labor market and the social security systems of our community.

Therefore, in accordance with the United Nations Global Compact initiative, we observe international employment standards (such as compliance with minimum wage and working hour requirements) and uphold human rights, regardless of where we operate or will operate. Part of our corporate responsibility is not only to ensure this standard within heroal, but also to take measures to minimize risks arising from cooperation with third parties, especially subcontractors and suppliers.

## 2.6 Safe and healthy working environment

heroal takes numerous measures to provide our employees with a safe and healthy working environment.

This includes not only the purely technical prevention of accidents, but also, among other things

- developing appropriate guidelines and processes,
- investing in workplace safety,
- regular training and instruction, and
- workplace inspections.

## 2.7 Responsible handling of company assets and confidential information

***heroal's company assets must be protected against misuse for personal or third-party purposes.***

We expect responsible and careful handling of the material and immaterial assets entrusted to us.

Intellectual property, innovative ideas, and confidential information that employees receive in the course of their work, regardless of whether this information concerns heroal, customers, or other business partners, must be protected against misuse for personal or third-party purposes.

## 2.8 Environmental protection and sustainability

heroal attaches great importance to sustainable environmental and climate protection as well as resource efficiency. Both in the development of new products and in the operation of production facilities, heroal takes care to minimize any impact on the environment and climate and to make a positive contribution to environmental and climate protection for customers with heroal products.

We demonstrate this with certificates such as A|U|F e.V., an initiative that promotes an environmentally friendly and resource-saving aluminum material cycle.

heroal invests sustainably in its employees and encourages them to use natural resources responsibly and to contribute to the protection of the environment and climate through their individual behavior.



## 2.9 Data protection and communication systems

heroal is highly aware of data protection issues and takes the requirements of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) seriously.

To ensure that all data protection-related processes and issues are handled optimally, a data protection team supports the management in performing its tasks and consists of the external data protection officer and an internal data protection team.



The data protection officer

- informs and advises the management and heroal employees on all applicable data protection regulations and, upon request, on data protection impact assessments.
- monitors compliance with data protection regulations and the strategy used to protect personal data.
- works with the supervisory authorities and is their point of contact within the company.

The heroal data protection manual contains the essential guidelines that apply to the handling of personal data and is binding for the management, the executive team, and all other employees of the heroal Group.

## 3 Rules of integrity

### 3.1 Permissibility of gifts

heroal attaches great importance to good relationships with customers, suppliers, subcontractors, and other business partners.

Good contacts with business partners are sometimes associated with gifts, invitations, and other benefits.

In order to rule out any suspicion of corruption and unlawful influence, it is important that the granting and acceptance of gifts are transparent and appropriate.

There are three categories to distinguish between:

**Gifts** are usually valuable items:  
a bottle of wine or box of chocolates, local specialties,  
promotional items, e.g., pens, calendars, printed mugs

**Benefits** are advantages that an employee receives or promises or enables for external third parties. They are often less concrete than gifts and can include preferential treatment, services, job offers, or invitations to events.

The **invitation** includes  
meals and drinks, travel and accommodation costs.  
Business meals, customer trips, plant tours, cultural and sporting events,  
or even vacation trips



If there are doubts about the appropriateness of a decision, Compliance must be consulted.

heroal employees may not accept discounts, special prices, and similar benefits that they receive because of their affiliation with the company if these benefits could influence their business decisions.

### 3.2 Cash and cash-like benefits

The granting and acceptance of cash and cash-like benefits, e.g., vouchers, are prohibited without exception. The value of the benefit is irrelevant.



### 3.3 Invitations and other gifts

The following information must be observed when granting and accepting invitations and other benefits, including delegation trips.

## General

Invitations to events without overnight stays should be primarily for professional reasons: this is not the case if the invitation also extends to partners or (other) family members or friends.

In the case of invitations to events with overnight stays, the professional reason must always be predominant. There must be a special reason if the partner is also invited.

The host should also attend the event.

When accepting invitations from our business partners, care must always be taken to ensure that travel and accommodation costs are covered by the recipient and not by the business partner.

Invitations and other gifts may not be sent to the recipient's private address or handed over in the recipient's private sphere.

Invitations and other gifts must comply with ethical principles and must not be offensive in nature.

All employees are required to comply with tax obligations that may arise from gifts. Any questions in this regard should be directed to the Accounting Department.

Seminars and training events do not constitute gifts if the clear focus is on imparting specialist knowledge.

## Reporting requirements

Invitations and other gifts whose value exceeds the value limit specified in the notification form (Appendix 1) must be reported to Compliance in good time.

In good time means that the notification must be received by Compliance no later than 3 days before the benefit is granted or 5 days after receipt of a benefit.

The notification enables Compliance to check the admissibility of invitations and other benefits and to document this transparently.

However, it is not equivalent to approval. Approval of gifts can be obtained from management at any time.

The recipients of the notifications and Compliance shall retain them for inspection for a period of 2 years.

## Special provisions for public officials

Particularly strict rules apply to public officials and persons of equivalent status, and gifts may be prohibited and punishable by law in some places, or only permitted within very narrow limits.

Under German law, a **public** official is anyone who holds a **public office**, regardless of whether this is done on a full-time or voluntary basis.

According to Section 11 No. 2 of the German Criminal Code (StGB), these may include: civil servants, judges, persons in public employment (e.g., notaries or state secretaries), and persons who perform public administration tasks in the public service, e.g., administrative employees or architects who are commissioned for public contracts. Trainee lawyers, trainees, or persons in the public service who are in their probationary period may also be granted the status of public officials under certain conditions.

### Examples:

An architect who, on the basis of a framework agreement with a municipality, is responsible for all construction matters relating to a specific property.

A civil engineer who is commissioned over a longer period of time to carry out tenders for a municipality, prepare contracts, or take over cost control for all municipal construction projects.

If you are unsure whether you are dealing with a public official, **ask your business partner** personally and inform the management.

Always obtain **written confirmation in advance** that the public official is not violating the regulations applicable to them by accepting the gift.

Invitations and other gifts to public officials must always be reported and are only permitted after review and approval by the responsible compliance officer or management.

## Special features of delegation trips

Travel expenses of (potential) business partners or their employees, especially (potential) customers, may only be covered if this is covered by a legitimate business purpose.

Under no circumstances may the costs be covered with the intention of influencing a decision by the (potential) business partner or obtaining an unjustified advantage for heroal.

Furthermore, the type and scope of the costs must be agreed in advance in writing and must not exceed a reasonable amount.

The recipient must also confirm in advance that the assumption of costs does not violate their employer's internal guidelines.

Payments of daily allowances and the assumption of costs by means of payments to the business partner's private accounts are prohibited.

Rather, if the costs are not covered by direct payment of hotel bills and the like, payments may only be made to predetermined accounts of the (potential) business partner.

The above conditions apply accordingly to heroal employees if they are invited on delegation trips, e.g., by (potential) customers or suppliers.

**Check the benefit carefully using this compliance checklist:**

	Not subject to reporting / Not critical	Reportable / Critical
Is the invited person a public official?	<b>No</b>	<b>Yes</b>
Is the gift being given shortly before the conclusion of a contract or other specific business decision?	<b>No</b>	<b>Yes</b>
Are invitations or gifts given regularly/frequently?	<b>No</b>	<b>Yes</b>
Is the value of the gift still appropriate/socially acceptable?	<b>Yes</b>	<b>No</b>
Does the value of the gift exceed the reportable value limit per person?	<b>No</b>	<b>Yes</b>
Does the value of the invitation exceed the reportable value limit per person?	<b>No</b>	<b>Yes</b>
Is the invitation (including any hotel and travel expenses) sent transparently and to the company address?	<b>Yes</b>	<b>No</b>
Is the professional reason predominant and are partners and other family members excluded?	<b>Yes</b>	<b>No</b>

### 3.4 Conduct in the event of demands and blackmail

heroal supports employees who are asked or blackmailed by third parties to make payments. Occasionally, third parties with decision-making authority – public officials or private business partners – demand special payments. In rare cases, the demand may even be accompanied by threats against the employee, people close to them, the company, or third parties. As a matter of principle, such requests must be rejected immediately and firmly. Furthermore, such cases must be reported immediately to the management. Only in cases of imminent danger, i.e., an acute threat to the employee, their family members, heroal, or third parties, should the employee immediately take the measures they deem necessary.

The employee must also report these cases to the management as soon as possible.

## 3.5 Donations and Sponsorship

heroal fulfills its social obligations through donations and sponsorship activities, among other things.

### *What needs to be considered in this regard?*

#### **Donations and sponsorship activities**

- must comply with ethical standards and be lawful.
- must not give rise to unlawful influence.
- must always be transparent, i.e., for each donation, the recipient must be known and traceable by means of a donation receipt and the specific use of the donation.
- must be suitable for promoting the reputation of heroal.
- are prohibited to politicians, political parties, and political organizations.

## 3.6 Conflicts of interest

At heroal, decisions are always made in the interests of the company and according to transparent criteria. Private interests – whether financial, social, or political – must not influence these decisions. Even if decisions affect the interests of related parties, a conflict of interest may arise.

Such conflicts can not only raise doubts about objectivity and integrity, but also entail financial and reputational risks for heroal and the person involved. Therefore, even the appearance of a conflict of interest must be avoided.

Potential conflicts of interest – including those that third parties might perceive as problematic – must be reported proactively and comprehensively to the relevant manager.

## 3.7 Money laundering

### **Prevention of money laundering**

heroal implements measures to prevent money laundering. All employees are obliged to comply with legal regulations and report suspicious transactions.

Money laundering means introducing illegally acquired funds or assets into the legal financial system. Even participation in transactions with a potentially criminal origin can be punishable by law – even in cases of mere suspicion or negligent ignorance.

Companies must identify business partners in certain cash transactions and determine beneficial owners. Cash transactions are particularly critical from a compliance perspective and require careful examination. However, cashless payments also carry risks.

## Warning signs for money laundering:

- Unclear identity of the payee (e.g., account discrepancy)
- Transactions via known offshore financial centers
- Reversals via other accounts or countries
- Unexpected currency changes or split payments
- Concealment or manipulation of transaction details

If there are doubts about the legality of a payment, management must be informed immediately in order to comply with legal reporting requirements.

## 3.8 Accounting and documentation

heroal attaches great importance to the correct accounting and documentation of business transactions in compliance with the respective accounting regulations, which require the truthful and period-based presentation and recording of all business transactions and the filing and archiving of all business-related documents.

Bribes or other illegal payments, for example to create so-called "slush funds," are regularly concealed. They are therefore not reported truthfully and transparently in the books and records.

With every such action, heroal runs the risk of also violating accounting regulations and tax laws.

Accordingly, this is strictly prohibited.

Payments without any recognizable legitimate consideration (in particular bribe payments) are subject to the tax deduction prohibition.

If a tax authority discovers such payments in the books, it regularly reports them to the law enforcement authorities.



## 4 Third-party rules

### 4.1 General standards for dealing with third parties

Third parties, such as suppliers, service providers, subcontractors, distributors, and partners, are essential to the success of our business.

When third parties act on our behalf, we may be exposed to risks and held liable for the misconduct of those third parties.

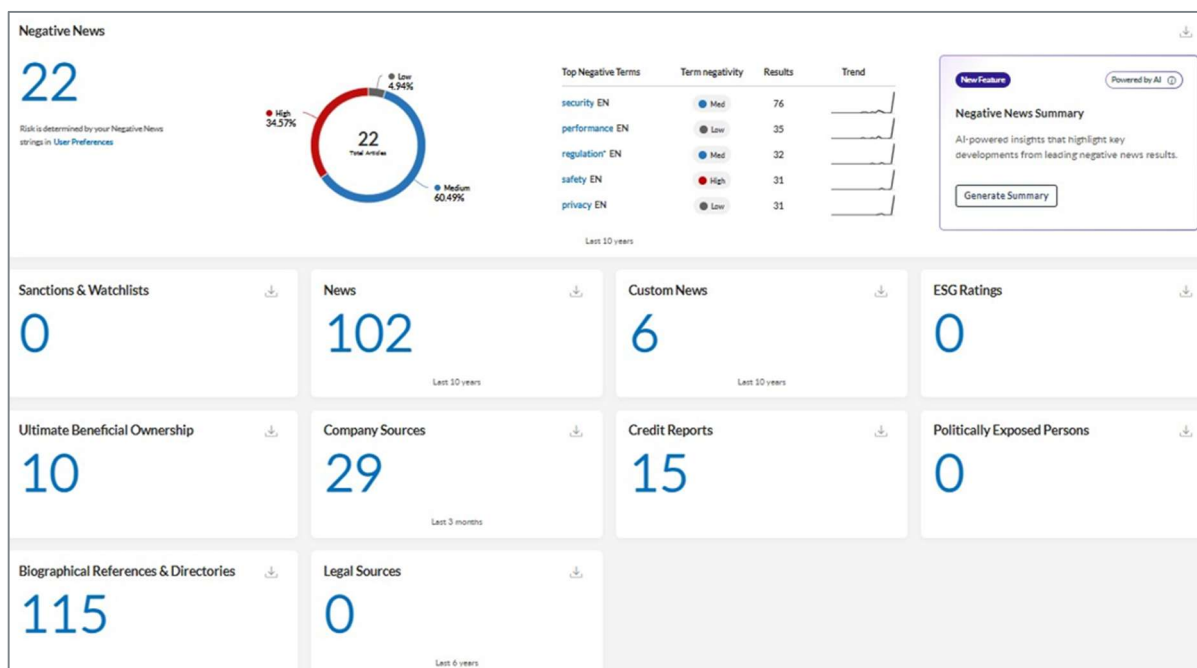
We are committed to ensuring that we only work with third parties who adhere to our values, principles, and standards, particularly with regard to applicable laws on anti-bribery and anti-corruption laws and related regulations.

We never instruct third parties to do things that we ourselves are not allowed to do, such as paying bribes.

It is therefore important to us that

1. our business partners within the supply and value chain are committed to the principles of the United Nations Global Compact and
2. we specify **binding minimum standards for an examination and monitoring procedure** in order to
  - safely,
  - and
  - monitor them regularly in a risk-aware manner.

Details of our **review and monitoring procedures** are explained in the internal "Third Party Policy".



## 5 Competition rules

### 5.1 Competition

heroal is committed to fair competition.

We win over our customers with the quality of our services and offer them at competitive prices.

Cartel agreements have serious consequences for employees and companies worldwide. They can lead to prison sentences for the individuals involved, high fines and other official sanctions, as well as claims for damages against the company and the employees involved. The resulting financial damage and loss of reputation can seriously and permanently jeopardize the success of the company. In addition, fines are imposed on the employees involved, which in practice often amount to a year's gross income.

### 5.2 Prohibited agreements on market or customer sharing

Any agreement between competitors to divide orders, territories, customers, or markets is prohibited. This also includes agreements on the mutual refraining from soliciting customers.

### 5.3 Prohibited price agreements

heroal sets its prices independently of its competitors on the basis of business calculations. Under no circumstances do we enter into agreements with competitors on prices. This general prohibition also applies to individual price-related components such as rebates or discounts. Agreements are understood to mean not only explicit verbal or written agreements, but also agreements based on so-called "concerted practices."

### 5.4 Exchange of competition-related information

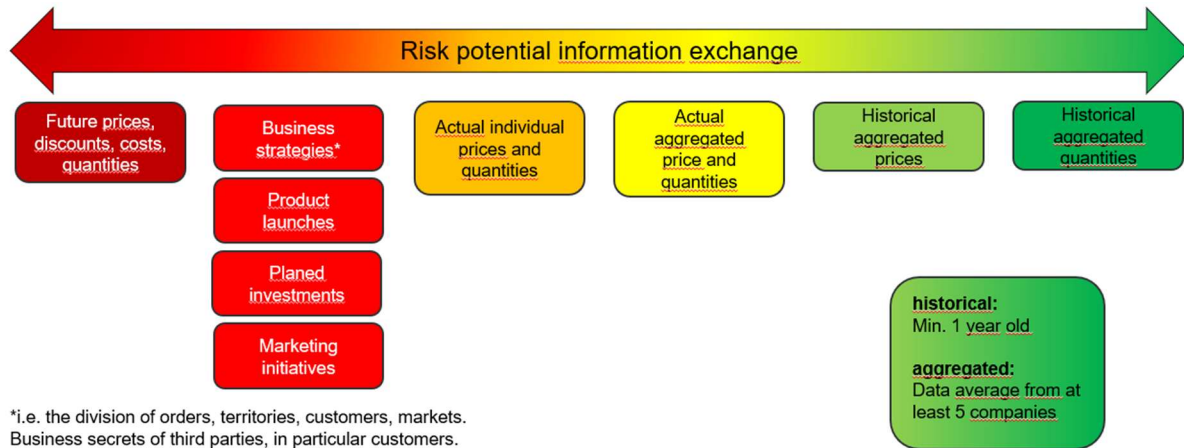
#### General rules

Even unilateral disclosure of information to competitors, for example about prices, can be considered by the antitrust authorities as an inadmissible restriction of competition and sanctioned accordingly. The authorities then assume that the disclosure of information has led to concerted action by competitors. In such cases, it is very difficult to prove the contrary. The decisive factor is whether the information disclosed was likely to reduce uncertainty about the specific market behavior of a competitor or to influence the specific market behavior of a competitor. The disclosure of such competition-related information to competitors is therefore prohibited, as is the receipt and use of such information from competitors.

Confidential, competition-relevant information includes, for example, specific details on prices, quantities, margins, strategic business planning, orders, deliveries, sales, and planned innovations or investments. The disclosure of publicly available or historical data is unobjectionable, provided that competitors cannot draw any conclusions about current or future market behavior from this data. Particular caution is required if competition is already

restricted due to the existing market structure (e.g., few suppliers, interchangeable products, regional limitations).

If a competitor voluntarily shares information that could influence competition, heroal employees must make it unmistakably clear that they do not wish to engage in such an exchange. In addition, the incident must be reported to management via Compliance.



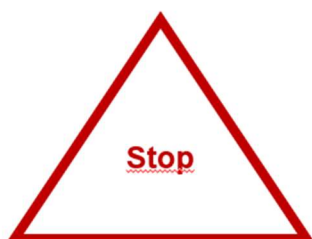
## Industry meetings and association meetings

The disclosure and exchange of information that could influence competition is also prohibited in the context of industry meetings or association meetings.

Before participating, carefully check

- the agenda: are there any critical or vague points ("miscellaneous")? If necessary, have a compliance check
- the website or invitation – what is the purpose of the meeting?
- Subsequent minutes: Are they accurate and complete, appropriate/critical?

If competition-sensitive topics are nevertheless addressed and discussed during a meeting, it is necessary to immediately distance yourself clearly and report the incident to management via Compliance without delay:



Protest against the handling of these subjects



Leave the meeting



Report the incident to your manager and Compliance

The responsible department or employees keep records of their association memberships and association mandates as well as, to the extent they participate in them, all meetings, sessions, and events, their agendas, participants, and the minutes taken. If these documents do not

reveal the existence of such a meeting, the participants, and the topics discussed, this must be noted in a separate memo.

## **Participation in market studies and statistics**

Market studies and statistics may contain inadmissible competition-related information under certain circumstances.

Before participating in association statistics and other market statistics, these must be checked for competition law information and, if necessary, the management must be consulted.

## **5.5 Cooperation agreements with competitors**

Cooperation with competitors is generally conceivable in various fields; for example, cooperation agreements can be concluded in purchasing or research in order to make optimum use of existing expertise and resources. The principle applies that the further away from the customer, the more likely it is that cooperation will be permissible. A research consortium is therefore much more likely to be permissible than a sales consortium. Partnerships are also a special form of cooperation.

From an antitrust perspective, cooperation agreements can lead to a concentration of market power and restrictions on competition. Agreements that contain restrictions on competition that are not directly related to the actual content of the cooperation or that lead to a significant restriction of competition are inadmissible under antitrust law.

Whether cooperation with competitors and the related exchange of information are permissible must be examined on a case-by-case basis, depending on the specific details of the agreement.

## **5.6 Special features of partnerships**

When forming a partnership, specific provisions of the respective tender and public procurement law must often be observed.

From a competition law perspective, the following applies:

Project-related cooperation within the framework of a partnership with companies that do not compete with heroal due to their business activities is permitted in all cases.

However, the formation of a partnership with competitors is only permissible under competition law if heroal would not be able to carry out the contract alone or would not bid for the contract alone for important economic reasons.

The following are examples of impermissible reasons for forming a partnership:

improving the competitive environment, balancing bidder interests, ensuring equal capacity utilization among market participants, or gaining insight into the competition's calculations.

## **Review and review documentation**

Before participating in a partnership, its admissibility under competition law must be reviewed based on the above criteria.

The implementation and results of this review must be documented by the responsible project employee before management decides on participation in a partnership on this basis. The documentation must specify in concrete and comprehensible terms why heroal cannot carry out the contract alone or would not bid for the contract alone for important economic reasons. If a permissible partnership exists, the exchange of competition-related information is permitted within this partnership to the extent necessary for the joint execution of an order. The exchange must be limited to what is necessary.

## **5.7 Vertical restrictions**

Agreements that are inadmissible under antitrust law are conceivable not only at the (same) level of companies competing in the market, but also in the relationship between a company and its suppliers, subcontractors, and customers (vertical agreements). Under certain circumstances, these can be, for example, exclusivity agreements with suppliers or other business partners.

Exclusivity clauses are permissible if they are directly related to and necessary for the main purpose of the contract, which does not restrict competition. They must not exceed what is necessary in geographical, material, and temporal terms.

## **5.8 Abuse of a dominant market position**

A dominant market position in the antitrust sense exists when a company's behavior is subject to little or no control by current or potential competition. A market share of approximately one-third or the dependence of smaller companies on a large company can already be relevant under antitrust law.

A strong market position or even a dominant market position does not in itself constitute a violation of antitrust law, but its abuse does.

## 6 Implementation of compliance rules

### 6.1 Responsibility of managers

Compliance is a task for the entire company organization, from management to the executive team to all other employees.

In addition to fulfilling their role model function, the management and executives in particular have the task, with the support of Compliance, of ensuring that the employees in their area of responsibility are aware of this Code of Conduct, remain conscious of it, and comply with it. This requires both personal discussions and organizational measures.

### 6.2 Responsibility of employees

Each employee is personally responsible for knowing and understanding the contents of the heroal Code of Conduct and for following its guidelines.

If any part of this code is unclear, it is the personal responsibility of all employees to ask for clarification until they fully understand the code.

Every employee is always responsible for their actions and omissions. The contact persons for explanations are the managers, Compliance, and the Executive Board.

### 6.3 Role of the compliance organization

The compliance organization consists of the compliance officer, the compliance committee, and the management.

The Compliance Officer is the contact person for all heroal employees for general compliance questions, supports the management and clarifies legal and organizational issues.

Other tasks include conducting and coordinating compliance training, supporting improvement measures after identified violations, and introducing and developing compliance controls.

The Compliance Committee advises the management on organizational measures, coordinates internal investigations, evaluates them, and derives necessary measures by exercising its right of proposal.

The management is responsible for the introduction and further development of the compliance management system.

The management is also responsible for supervisory duties, regularly monitoring the compliance system, and investigating and making decisions when following up on substantiated reports.

The Compliance Organization takes action when it receives a report or otherwise becomes aware of signs of a compliance issue.

All employees are called upon to support the work of the compliance organization.

## 6.4 Questions of doubt, consent

In the course of our business activities, employees are constantly confronted with obstacles, resistance, and difficult decisions. In such moments, the Code of Conduct should serve as a guide for good business practice.

If you are unsure whether an action (or omission) is acceptable, check whether it complies with our Code of Conduct and the underlying principles and values.

### Assess the situation using this compliance checklist:

- Does it seem right to you?
- Is it legal?
- Is it compliant with the Code?
- Compare the different options for action with our corporate values.
- Do you feel comfortable discussing the decision/action with your manager or colleagues?
- Is the decision/action permissible for your counterpart? If in doubt, talk to them about it.
- How would you react if you found out that your colleague had taken the action (instead of you)?

If you have any questions about the Code of Conduct, please contact your manager, the management team, or the Compliance department.

The honest approval of managers and the honest approval of management for a specific action preclude internal sanctions.

## 6.5 Investigation of suspected cases

heroal investigates suspected cases without prejudice and protects employees as best as possible from unjustified preconceptions. Suspension or temporary transfer during the investigation of a suspected case may occur in individual cases and does not imply any accusation of guilt. If employees are subjected to false suspicions, heroal stands by its employees and takes the necessary measures to protect them.

## 6.6 Compliance communication

Compliance training courses and information events impart the necessary knowledge about the content of the Code of Conduct, compliance topics, and projects, and are intended to provide support with appropriate behavioral instructions in critical situations.

In face-to-face and online training courses, all employees are trained according to their task and responsibility profile.

Compliance information is communicated on the intranet, via notices on the bulletin board, and via mailings.

The contact persons for questions regarding the Code of Conduct or other compliance issues are the managers, Compliance, and the Executive Board.