

# Horn & Co.

Group

*Strength through diversity!*



Code of Conduct

## Preamble

Dear Colleagues,

Responsible and sustainable corporate governance and respectful interaction with one another are the basis of our joint success. Our Horn & Co. Code of Conduct is the ethical basis for all employees and managers and extends beyond compliance with legal requirements. We are committed to integrity, mutual respect and the values set out in the Code.

  
Argjend Kameraj  
(CEO)



  
Dr. Lars  
Füchtjohann  
(CTO)



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# Code of Conduct



## 1. Introduction / document purpose

We expect respectful dealings with each other at and between all levels and also actively demand this in customer and supplier relationships. The Horn & Co. Group is committed to equal opportunities, respect, trust and performance. We promote a culture of mutual trust, respect and open dialogue.



## 2. Obligation for all employees

Every employee is required to follow this Code of Conduct and cooperate in implementing, enforcing and further developing it. Our managers shall make this Code understandable to the employees and create opportunities to talk to the employees about this Code and communicate its meaning to them.



## 3. Law, society and the environment

*As part of our social responsibility, we comply with legal requirements and also honour our responsibility to the law, society and the environment.*

**a) Equality / anti-discrimination**

We respect the Universal Declaration of Human Rights and act accordingly. Furthermore, we do not violate any rights established by law of our employees or any other persons with whom we deal in the course of our business.

We do not discriminate on the basis of race, colour, gender, religion, political affiliation, country of origin, social background, disability or sexual orientation etc. in the hiring and treatment of employees or in any potential business activities such as commercial transactions etc.

We do not condone child or forced labour in any aspect of our business. Furthermore, we do not do business with persons who engage in child or forced labour.

Our actions are based on the General Equal Treatment Act.

**b) Complying with statutory provisions**

To meet the expectations of society and as a fundamental basis of trust, all executives and employees of the Horn & Co... Group do not regard this aspect simply as compliance with the rules. Rather, we understand this as our social responsibility to be followed and act within the framework of everyday business activities in a manner that complies with the legal provisions and social ethics. Individual companies are free to adopt stricter internal regulations within the framework of the applicable legal provisions. Employees undertake to comply with such stricter internal regulations.

**c) Deliberate action / responsibility with regard to quality, the environment and safety**

Each employee should be aware of the responsibility and effect and significance of his or her personal actions with regard to

- The quality of our products and services
- The impact on the environment and nature
- Safety for themselves and others, and
- The effect on colleagues or business partners.

The Horn & Co. Group is committed to a responsible approach to the environment and natural resources. This also applies in the sense of sustainable corporate management. Every employee should be aware of his or her responsibility with regard to sustainability and resource conservation. Beyond the legal requirements, we strive for a continuous reduction of negative environmental im-

pacts insofar as these can be influenced by the company.

**d) Promotion of charitable activities**

The Horn & Co. Group promotes charitable activities directly and indirectly via the corresponding support of employees.

**e) No political donations**

The Horn & Co. Group does not give political donations or other types of donations to any other political organisations. If a donation or the like is made, prior consent must be obtained in accordance with the company's internal regulations.



**4. Customers and business partners**

*We conduct honest and fair business with our customers and stakeholders and are committed to fair competition. Corruption is not tolerated in any form.*

Our guiding principle: customer orientation

Real service	Most sustainable manufacturer of refractories in Europe	We have the right chemistry
<b>Horn &amp; Co.</b> Industrial Services	<b>Horn &amp; Co.</b> Minerals Recovery	<b>Horn &amp; Co.</b> Products
<ul style="list-style-type: none"> <li> Reliable processes</li> <li> Conservation of resources</li> <li> Optimised processes</li> </ul>	<ul style="list-style-type: none"> <li> Reduced CO<sub>2</sub></li> <li> Expert and legally secure waste disposal</li> <li> Conservation of resources</li> </ul>	<ul style="list-style-type: none"> <li> Independent material supply (local supplier)</li> <li> Individual products</li> <li> Constant quality</li> </ul>
<ul style="list-style-type: none"> <li> Wide range of analyses</li> <li> Speed</li> <li> Service and consulting beyond the results</li> </ul>		

**a) Safety of products and services**

We comply with legal requirements relating to product safety in the course of our business. We actively provide information about products and services, prevent product accidents in advance and maintain/reinforce a relationship characterised by trust with our customers.

**b) Honest and fair business dealings**

We engage in honest and free competition to earn the trust of our customers, business partners and society, and do not engage in actions that violate competition and antitrust laws in various countries and regions.

We do not, in particular, engage in anti-competitive price and condition fixing, market sharing, bid rigging or boycotting.

As part of our business activities, we ensure that we comply with all competition laws and regulations relating to our business.

If we become aware of contractual conditions or forms of business that restrict fair competition, or if we become aware that such a situation may exist, we shall in any case contact a superior to seek advice/assurance and act in an appropriate manner.

<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li style="color: green;">●</li> </ul>	Professional exchanges with business partners and stakeholders.
<ul style="list-style-type: none"> <li>●</li> <li style="color: yellow;">●</li> <li>●</li> </ul>	Participation and involvement in working groups or lobby groups. Great sensitivity is required here with regard to the various factors mentioned in the Code. Participation must be transparent and at all times in agreement with the management.

**c) Entertaining and exchanging gifts**

We do not give money gifts to business partners or their executives to receive favourable treatment in the course of business relations.

If we entertain guests or exchange gifts, we do so in an appropriate manner within the prevailing corporate views and in compliance with the internal regulations established by the individual companies with regard to entertainment, the exchange of gifts, the granting of favours and other economic advantages.

Insofar as the acceptance of a gift is in accordance with the customs and practices of a country and such a gift cannot be refused for cultural reasons, accepting such a gift is permissible. The person giving the gift must be made aware of this regulation and the person receiving the gift must be informed of this procedure.

The acceptance of money or other benefits of monetary value from third parties such as loans, securities or commissions is strictly prohibited for all employees.

We do not accept any entertainment or gifts that are intended to or could influence the business decisions of the Horn & Co. Group's business decisions.

<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>Gifts of a symbolic or appreciative nature that are clearly not intended to influence the business relationship in a covert manner, e.g. promotional items such as pens, calendars, other office supplies, wine/spirits, biscuits, cakes, coffee, books, flowers, canteen hospitality, lunches or meals in a customary restaurant.</p>
<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>Invitations and gifts that extend beyond a token value (electronic devices such as mobile phones, tablets, notebooks or provision of luxury goods), as well as invitations to events with a non-professional social programme (sporting events, trips, hotel stays). These cases MUST be reported to the superior manager and evaluated.</p>
<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>As a matter of principle, invitations and gifts are not permitted if it is known that this contradicts the Code of Conduct of the business partner or fundamental customs (in particular, for example, also in dealings with authorities or public officials). Similarly, gifts of money/vouchers, discriminatory articles, or things that are ethically/morally questionable in any way are not permitted.</p>

**d) Corruption**

All forms of corruption, such as bribery or the granting or acceptance of other advantages, are prohibited regardless of whether they are given directly, via intermediaries, to private individuals or public officials. The giving (active bribery, granting of advantages) and acceptance (passive bribery, acceptance of advantages) of benefits which have the purpose of obtaining an unlawful advantage are, in particular, prohibited.

**e) Import and export**

To avoid situations or actions that threaten international peace or security, we conduct the import/export of products, technologies and services in an appropriate manner while complying with legal requirements and restrictions on imports/exports in line with foreign exchange and foreign trade laws etc.



Governments and international bodies occasionally impose trade restrictions or boycotts on certain products on countries or individuals. Horn & Co. recognises the relevant rules of the international community. We conduct our business activities exclusively in accordance with international regulations and do not export any goods or technologies affected by trade restrictions.

All products produced are designed for peaceful use. Exceptionally, individual products could also be used for the production of goods for military purposes (so-called dual-use goods). The relevant export control regulations must be observed for such products. In the case of doubt, the control authorities in the individual countries or the legal department should be contacted.



## 5. Employees

*We expect respectful interaction, respect and a culture of open dialogue. We attach prime importance to safety and occupational health.*

Guiding principle: employee orientation



**a) Executive responsibility**

We expect our executives to show leadership, determination, a sense of responsibility, the courage to innovate and to act as role models.

Our executives should make this Code understandable to employees.

Our executives shall create opportunities to talk to employees about this Code and communicate its meaning to them. Our executives shall not issue instructions or imply that employees should take action that violates social ethics, legal or company policies, including if this would serve to achieve performance goals.

Our executives shall create an open work environment where employees can confidently report problems with the Code of Conduct.

Our executives shall not ignore Code of Conduct compliance issues, but shall take prompt and appropriate corrective action when problems arise.

**b) Respectful treatment of each other**

We expect respectful dealings with each other at and between all levels and also actively demand this in customer and supplier relationships. The Horn & Co. Group is committed to equal opportunities, appreciation, trust and performance. We offer our employees a challenging working environment and challenge them to realise their potential by setting demanding goals. We promote a culture of mutual trust, respect and open dialogue. Every employee has the right to an individual performance review.

We foster a culture in which people can develop their talents and ideas and are encouraged to perform at a high level. We support the development of our employees, set challenging goals and reward good performance.

We encourage each employee to act responsibly and work as part of a team. Every employee is required to act according to his or her best knowledge and belief and generally accepted ethical principles and point out problems to superiors.



Discriminatory and disrespectful statements, exclusionary behaviour, insults or hostility, dissemination of anti-constitutional content, dissemination of religious views.

**c) Occupational health and safety**

At the Horn & Co. Group, we attach prime importance to safety in the workplace. Every accident is one too many. Every employee is called upon to identify accident risks at his or her personal workplace and either eliminate them himself or herself or report them to the respective supervisor. All employees, contractors and suppliers undertake to comply with the occupational safety regulations at our locations.

We are committed to promoting the health of our employees and encourage them to lead healthy lifestyles.

**d) Respectful treatment of company property**

The equipment in the offices and on the premises is used for the performance of daily work and must be treated with care by the employees.

Employees are prohibited from misusing, wilfully damaging or destroying company property for personal purposes.

Certain company property, such as laptops and mobile phones, may also be used by employees for private purposes in accordance with company regulations. In the case of mobile phones, private use during working hours must be limited to a necessary minimum. Special regulations apply to the private use of company vehicles.

**e) Information, confidentiality and data protection**

All employees must keep confidential company-related information safe and only make it accessible to colleagues to the extent necessary to achieve the respective business purpose. By the same token this applies to confidential information entrusted to us by third parties.

Confidential information includes, in particular, technical data about products or processes, marketing or sales strategies, internal purchase price lists, customer data, non-public financial information, information about transactions, civil or criminal proceedings and all personal data.

The Horn & Co. Group guarantees the protection of employees' personal data. In accordance with local data protection laws, employees' personal data are processed only to the extent necessary in the context of the employment relationship. The internal guidelines about information protection and internet use apply.

It is imperative that all employees handle all information and IT systems conscientiously and with due care to ensure compliance with the GDPR legal requirements.

Careless handling can cause considerable damage to our company, our employees or third parties.

We respect and protect intellectual property and copyrights. This also applies to information from customers, suppliers and business partners. Such protection must be respected and maintained in all work areas.

<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>Communicating with or passing on company information or details about colleagues by telephone to third parties who are not clearly identifiable; Participation in telephone surveys</p>
<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>Disclosure of personal data of colleagues to third parties without an operational and legally secured purpose; Participation in telephone competitions</p>

**f) Loyalty and conflicts of interest**

We do not engage in any transactions where private interests (including family interests) and company interests conflict with each other or where there is a risk of this occurring.

If private interests (including family interests) and the interests of the company are in conflict, or if this is feared, we shall, in any case, contact a supervisor for advice/assurance and act in an appropriate manner.

<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>Secondary employment of any kind; operating a business; assuming a position in a business; using business relationships for one's own business; Hiring family members or acquaintances.</p>
<ul style="list-style-type: none"> <li>●</li> <li>●</li> <li>●</li> </ul>	<p>Activities for competitors; direct or indirect passing on of company information to competitors; obvious negative influence of the employee by the secondary activity; use of company-provided work equipment for private economic purposes.</p>

**6. Contact details**

Employees can contact their executives if they have any questions about the Code of Conduct or the confidential reporting of incidents. The CSR Circle is also available as a point of contact.

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