



# CODE OF CONDUCT

**NOBEREIT**  
**HOLDING**

Nobereit Holding GmbH & Co. KG  
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## FOREWORD



A handwritten signature in blue ink, appearing to read 'Nick Nobereit', with a long horizontal stroke extending to the left.

Nick Nobereit,

CEO HaLog MCI GmbH & Co.KG

Dear Colleagues,

The Code of Conduct is the basis for our working together in a constructive and respectful manner. It contains our values and principles for ethical business practices and social entrepreneurial behavior. This has been communicated and explained to all employees.

Our goal is to act together as a team and to convey this to our business partners. This objective is built on the four pillars of commitment, environmental awareness, competence and social interaction.

Our values such as trust, respect, responsibility and transparency play an important role. Business success and business targets are very closely linked and so form the framework for the Code of Conduct.

It is a promise of trustful behavior towards our business partners. At the same time it is a mission statement for us as a team.

The Code of Conduct is thus binding and to be adopted by everyone - the Management Board, the Managing Directors and the employees.

Kind regards,

# C O D E O F C O N D U C T



## WE ARE HALOG MCI

All applicable local, national and international laws and standards are very important for our company HaLog MCI GmbH & Co. KG, so we take special care to comply with them in all of our business operations. Furthermore, we make sure that everybody in our company is familiar with the basic laws.

Every employee of HaLog MCI GmbH & Co. KG is treated with dignity and respect. Equal opportunities and respectful behavior towards each other are our top priorities. Discrimination and harassment for whatever reason will not be tolerated and are strictly prohibited. Each employee is urged to create and maintain a working atmosphere promoting diversity and integration. All corresponding laws forbidding discrimination on grounds of age, gender, religion or ethnic background are fully adhered to by us.

Our employees are required to follow the principles of loyalty and respect. We act as a team, in which every employee is equal and discrimination is not allowed to take place, thus creating a culture of respect in the workplace.

We use our products, working materials, IT equipment and intellectual property responsibly and look after them carefully. Behavioral requirements, legal regulations and internal guidelines must be complied with.

## WE ARE COMMITTED TO FAIR COMPETITION

This means we ensure that no anti-competitive agreements on prices, markets or other matters are made with competitors, customers and suppliers. Business decisions are made without sharing sensitive information with competitors.

Our business partners, such as suppliers, customers and retailers are to be treated fairly. We ensure this by giving special attention to reliability, quality, competitive prices and our principles. HaLog MCI employees are strictly prohibited from influencing business decisions by means of material benefits. We attach much importance to trusting and fair business relationships.

Corruption of any form is not tolerated. Our business relationships may not result from personal dependence, influence or obligation. We expect fair conduct, which is based on compliance with the respective norms and values.

## SAFETY AT WORK IS PARAMOUNT

The health of all employees is another top priority. Everyone is responsible for working safely and complying with all laws and regulations. The employees involved in construction work are explicitly trained to carry out all safety measures in order to be able to prevent accidents at work from happening. It is our duty to provide a safe and healthy work environment. All necessary measures must be taken to avoid accidents and damage to health. A violation of internal safety regulations may have consequences.



## WE ARE COMMITTED TO NATURAL RESOURCES RESPONSIBLY

Our aim is to optimize our business activities so that the environment is not disadvantaged and health risks are avoided. We are all responsible for using natural resources carefully and protecting and respecting the environment in our business operations.

We focus on eco-friendly strategies like recycling, saving energy, reducing waste and using water in an environmentally friendly way. In doing so we can save resources in a variety of ways and at the same time increase work efficiency.

We work to avoid and reduce environmental impact. In particular we want to protect and take care of our natural resources.

## WE TREAT INFORMATION CONFIDENTIALLY

Maintaining our reputation and acting in the interest of the company is a top priority. Confidential information may not be made accessible outside the relevant business units nor may it be passed on to third parties.

Confidence counts at HaLog MCI, however the gaining of personal advantage will not be tolerated. In-house information is subject to regulations and a violation can have serious consequences.

In cases of uncertainty regarding data or information transfer issues the executives are always available for assistance.

## WE RESPECT LAWS AND REGULATIONS

All employees are expressly instructed to comply with money laundering laws. Suspicious transactions have to be reviewed by the management. Only then may the transaction be completed.

## WE ARE AGAINST CHILD LABOR

The legally required minimum working age must be adhered to. The minimum age for admission to employment may in no case be lower than 15 nor may it be below the school leaving age.

Young workers must be protected against economic exploitation and against any work that may be dangerous, damaging to health or to their physical, mental, spiritual or social development.

We are thus obliged to take the necessary measures in advance.



HaLog MCI is a wholly owned subsidiary of the Nobereit Holding GmbH & Co. KG.

You will find further information on:

[www.nobereit-holding.de](http://www.nobereit-holding.de)

[www.halog-mci.de](http://www.halog-mci.de)