

# Compliance Management System

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## Definition of „Compliance“

For us, compliance means rule-consistent behaviour

- of the entire HUESKER Group
- its organs,
- all employees and
- our business partners,
- with regard to compliance with all statutory decrees and prohibitions,
- as well as the code of conduct

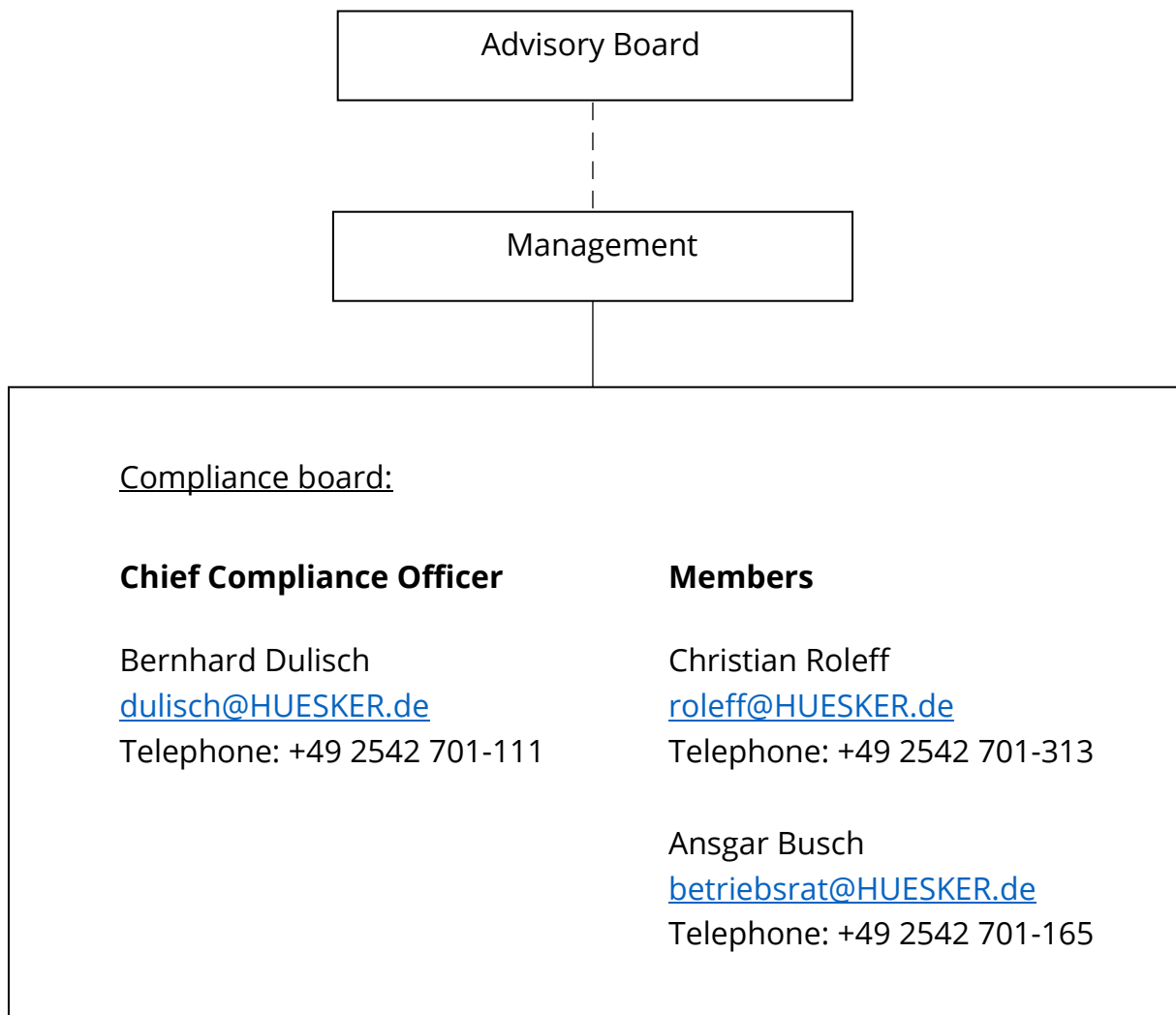
## Compliance Objectives

- Ensuring compliant behavior of the company, its organs, managers and employees within a corporate culture that is based on trust and integrity
- Identification and reduction of risks due to compliance violations, by means of prevention
- Earliest possible identification of potential and actually incurred compliance violations
- Damage mitigation with actually incurred compliance violations by the introduction of appropriate measures
- Competitive advantage by means of compliant corporate management

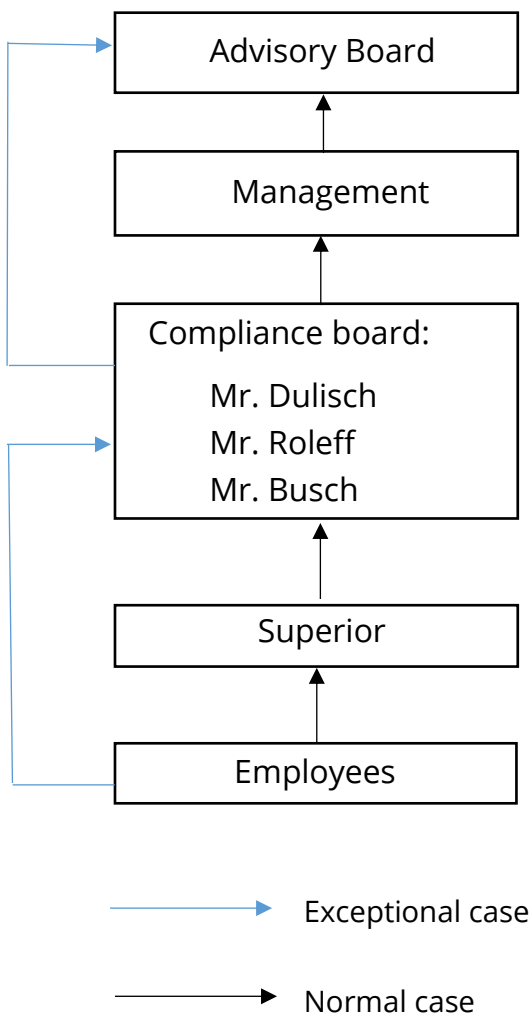
## „Tone at the Top“

- HUESKER stands for Innovation, customer focus and motivated, responsible employees.
- Anticompetitive violations, corruption and other non-compliant conduct will not be tolerated.
- Contraventions will be sanctioned

## Compliance Organisation



## Reporting procedure



If an employee (both genders included, hereinafter referred to as he) is uncertain about how to conduct himself with regard to a certain procedure, he shall contact his manager. If this is necessary, the manager shall turn to the compliance board or to a member of the compliance board. If the employee has concerns regarding the superior's involvement, he shall turn directly to compliance board.

The board reports directly to management regarding all compliance matters and the Code of Conduct. What is more, the board also has access to the advisory board chairman of the HUESKER Group.

## Compliance Trainings

### Communication Trainings

To convey a clear code of behavior to our employees and, in particular, to avoid the occurrence of a conflict of interests in day-to-day work in the first place, we set great store by regular training and communication measures. In so doing, we respond to the individual requirements of the respective business divisions.