

Code of Ethics

The ALTE LEIPZIGER – HALLESCHE group is convinced that integrity as well as ethical, social and governance aspects should be considered in everyday business. This includes a reliable and trustful relationship with our suppliers, consultants, agents and other providers of products and services (in the following “contracting party”).

The principles laid out in the Code of Ethics are the basis for a successful relationship with the contracting party as well as a self-commitment for the ALTE LEIPZIGER – HALLESCHE group, regarding a sustainable supply chain. The contracting party shall comply with the Code of Ethics in connection with its business activities and promote these principles along the supply chain.

Compliance with Laws and Regulations

The ALTE LEIPZIGER – HALLESCHE group complies with the respective legal system of each country in which it is operating. The participation of the contracting party in criminal organisations, fraud, bribery, terrorist offences or the financing of such, money laundering or human trafficking will not be accepted.

The [Code of Integrity](#) describes mandatory behaviour for the ALTE LEIPZIGER – HALLESCHE group for the following topics:

- Compliance with legal framework
- Fair, honest and reliable treatment of each other, clients and business partners
- Mutual loyalty during execution of the contract
- Rejection of any form of discrimination
- Avoidance of conflicts of interest

Employee Protection and Human Rights

The ALTE LEIPZIGER – HALLESCHE group treats everyone with respect and fairness and respects the human rights. All applicable national and international legal regulations, including the [ILO Core Conventions](#) and the [Universal Declaration of Human Rights](#), must be adhered to. In particular

- Prohibition of child and forced labour,
- Appropriate compensation and social benefits,
- Adherence to the statutory maximum working hours,
- Secure and healthy working environment,
- Appropriate training of employees and
- Guaranteeing freedom of association and assembly as well as the formation of trade unions.

Any form of discrimination, including such based upon national origin, gender, race, religion, participation in union activity, political opinion, age, health, disability or sexual orientation will not be accepted.

Environmental Protection

The ALTE LEIPZIGER – HALLESCHE group respects all national and international standards and legal regulations on climate and environmental protection. Furthermore the [Environmental Guidelines](#) of the ALTE LEIPZIGER – HALLESCHE group serve as guidance and self-commitment.

Transparency

Purchasing processes should be dealt with in a transparent and verifiable manner. The placing and the terms and conditions of contracts and orders have to be in compliance with the [Code of Integrity](#) and preclude any conflict of interest.

Antitrust Law

The ALTE LEIPZIGER – HALLESCHE group ensures that its business practices are following antitrust and competition law.

Therefore, the ALTE LEIPZIGER – HALLESCHE group has established an internal antitrust guideline. Agreements, decisions and concerted practices in the field of cooperation between enterprises, which have as their object or effect the prevention, restriction or distortion of competition, are prohibited.

Data Protection

The ALTE LEIPZIGER – HALLESCHE group complies with all applicable data protection laws and ensures the protection of company secrets and other information that is considered confidential, which is communicated during the contractual relationship. The adherence to the internal guideline “Data Protection” is mandatory for every employee of the ALTE LEIPZIGER – HALLESCHE group. Confidential information, especially of the ALTE LEIPZIGER – HALLESCHE group, its customers, business partners and employees, shall be used for contractual purposes only. They may not be made accessible to unauthorised third parties.

Compliance with the Code of Ethics

The contracting party shall comply with the Code of Ethics in connection with its business activities and promote these principles along the supply chain.

Indications of behaviour that violates any principle of the Code of Ethics, should be reported confidentially to our group compliance officer via our online portal at hinweisportal@hallesche.de or hinweisportal@alte-leipzig.de.

If the ALTE LEIPZIGER – HALLESCHE group gains knowledge of such behaviour or any infringement of the Code of Ethics, the group will enter a process of dialogue with the contracting party concerned.

In the case of violation of the Code of Ethics, the ALTE LEIPZIGER – HALLESCHE group reserves the right to end the contractual relationship with the contracting party concerned, in compliance with applicable laws and agreements, after examining the facts of the case.

Oberursel / Stuttgart, September 2018

The Board