



We are  
the company

Hengst Code of Conduct –  
our guideline for  
value-oriented action

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The photos in this brochure show employees of the Hengst Group. We thank them for their commitment.

Dear Employees,

“We are the company” is the guiding concept of this Code of Conduct.

Mobility, health, technology, environmental protection, and sustainability – all of us work every day on the big issues of our time. Our products help in a million ways to make the world a cleaner place.

As Hengst, we convince not only with innovative technology, but also through trustworthy and cooperative relations with our business partners all over the world. We also strive to offer our employees meaningful work in a safe and sustainable workplace. Based on our value-oriented corporate culture, we embrace respectable, honest, and legally compliant conduct in relations with employees and third parties – for a culture in which everyone is on good terms. Compliance is a term that describes all of these aspects.

This Hengst Code of Conduct summarizes the basic principles of our actions, as well as important legislature and in-house policies. It should serve as a guide to provide orientation in meeting the diverse legal and ethical challenges in our daily work.

We are the ones who display and promote compliance in our everyday conduct, as an important contribution to the long-term success of our company.

We are the company! Thank you very much for your dedication and your loyalty!



*Jens Röttgering*

**Jens Röttgering**  
Proprietor and Chairman  
of the Supervisory Board



*Christopher Heine*

**Christopher Heine**  
Chairman of the  
Executive Board

## Management foreword

## »The Code of Conduct is binding for us!«



This Code of Conduct applies to all companies of the Hengst Group. It is a guideline for our relations with each other and with our business partners. Of course, it cannot cover every question and issue related to our internal and external actions, and it cannot describe every situation we will be confronted with. It cannot and should not be a substitute for common sense, in combination with a strong sense of responsibility and mutual respect.

- When we join the company, and at regular intervals, we attend training measures informing us of the content, fundamental principles, and purpose of this Code of Conduct.
- As Hengst employees, it is in our interest to be familiar with this Code of Conduct, to understand it and to apply it in our day-to-day work.
- We participate in required compliance training.

Compliance is intrinsic to our value culture and corporate culture. Every executive must ensure that no violations of laws, this Code of Conduct, or other company regulations occur within their area of responsibility that could have been prevented or hindered by proper supervision.

- In organizing and implementing our business processes, we take measures to separate incompatible activities (segregation of duties) and ensure compliance with internal company policies.

## Scope, fundamental principles and implementation of the Code of Conduct



# What is important for us at Hengst

## PETE: Our leading culture



### Be positively inspiring!

We rely on enthusiastic employees to achieve our goals. We strive for reciprocal positive inspiration, to motivate each other and approach our tasks with enthusiasm and enjoyment.

- We ignite passion and motivation.
- We show a positive attitude, also in difficult situations.
- We approach our work with enthusiasm and enjoyment.
- We establish contacts.
- We negotiate and mediate.
- We communicate clearly and inspiringly.

### Challenge and support!

To achieve the greatest possible success, we challenge and support each other. We take on and assign responsibility, always based on the strengths of the individual. We actively share information, acknowledge good achievements, and promote the development of individual employees.

- We delegate and assume responsibility.
- We actively share information.
- We set clear goals and use them to measure our performance.
- We reward good performance.
- We address weak performance in order to help each other to improve.
- We recognize and develop talents.



### Build mutual trust!

To maintain good relations with each other, we build mutual trust. We listen to each other actively, ask questions, and encourage each other to independently find solutions to challenges. Our focus at all times is on people. And it is not only our international orientation that has allowed us to recognize for decades the importance of diversity for teams to achieve success. By sharing across borders and cultures, we celebrate major successes.

- We build trust.
- We focus on people.
- We walk the talk.
- We build autonomy.
- We show respect and value diversity.
- We listen and ask questions.
- We provide feedback and also accept it.

### Act as you would in your own enterprise!

We conduct ourselves as if it were our own company. That is why we create a positive environment for innovation, creativity, and inquisitiveness. If we understand change as an opportunity, we can all actively push the transformation process.

- We think critically and question existing practices.
- We are open for innovation, creativity, and inquisitiveness.
- We actively strive for change.
- We reflect on our behavior.
- We accept mistakes, but learn from them.
- We align our actions with our vision of the future.



➔ Further information about our leading culture PETE can be found on the Hengst intranet under "Human Resources".



## »Enjoyment of work through respectful relations and a good working atmosphere!«

### 2.2 Compliance with law and order

In our daily work we are obligated to comply with regional, national and international laws.

- We do not tolerate any violations of the law. Violations of penal law can result in criminal penalties for the individual personally, in the form of fines and compensation for damages. However, such violations also jeopardize industrial peace at Hengst and the company's good reputation. They therefore also have consequences under labor law.

### 2.3 Equal opportunity and mutual respect

Our conduct as employees, with suppliers, customers, and other business partners is characterized by tolerance, courtesy, respect, and fairness, in accordance with our leading culture PETE.

- We do not tolerate any discrimination based on age, gender, skin color, ethnic or social background, nation of origin, nationality, health status, disability, religion, sexual orientation, ideology or political views, or any other types of discrimination under the laws of countries and locations where the company has operations.
- We are under obligation to ensure equal opportunities for our employees and to select them and promote their advancement based on their qualifications and skills.
- We promote diversity, equality of rights, and inclusion.
- We protect and respect the rights of minorities and indigenous peoples.



### 2.4 Responsibility for Hengst's reputation

Hengst's reputation is shaped by the personal behavior, appearance, and deportment of all employees. The violation of company policies and unlawful conduct of even a single employee can cause considerable damage to Hengst and especially the company's reputation.

- We are guided by our corporate culture in fulfilling our responsibilities, and the reputation of Hengst is shaped by our conduct in public and our relations with business partners.

### 2.5 Handling of company property

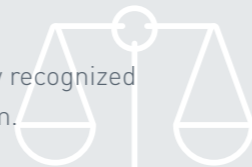
It is in our common interest to protect Hengst property and Hengst assets. Anyone who steals or misappropriates company property or with knowledge and intent damages company property entrusted to them is liable to prosecution and to pay compensation for damages.

- We handle the tools and equipment made available to us properly and with care, and protect them against damage or loss.
- We do not use these tools and equipment for private purposes, unless special provisions have been explicitly made to do so.

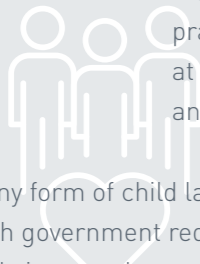
## Our social responsibility

Based on our corporate culture, the management and employees of Hengst stand up to their social and societal responsibility and the following principles:

We observe and respect the internationally recognized human rights and endeavor to uphold them.



We reject any use of forced labor or compulsory labor, all forms of slavery or practices similar to slavery, servitude, or other forms of domination and oppression at the workplace. We expressly condemn any type of physical punishment, threat, and harassment of employees.

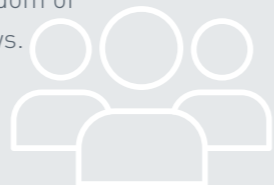


We condemn any form of child labor and observe the legal regulations on the minimum age for employees in accordance with government requirements. We do not hire employees under the age at which compulsory school attendance ends in accordance with applicable laws at the place of employment. In no case do we hire employees under the age of 15, unless expressly stipulated in international agreements and local legislation.

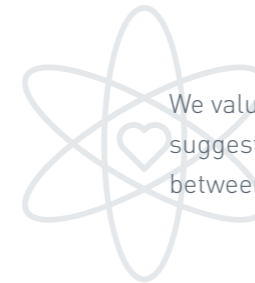
Salaries, fringe benefits, and work hours must conform to the applicable statutory standards. The remuneration must be appropriate, i.e., at least commensurate with the applicable local minimum wage regulations, and in any case must ensure a living wage. Unauthorized deductions from wages and the withholding of wages as a disciplinary measure are prohibited.



We respect the right of every individual to freedom of association, freedom of organization, and collective bargaining within the scope of national laws.



## »The focus is on people!«

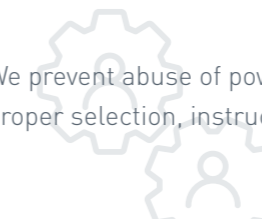


We value our employees and believe that the opportunity to voice concerns and suggestions is the basis for good cooperation. We encourage open communication between employees and management to solve problems and boost morale.

We protect our employees against dangers at the workplace and reduce safety and health risks with technical safety measures, safe work processes, preventive maintenance, occupational safety training, appropriate inspections, and suitable protective clothing. We support measures that promote health.



We prevent abuse of power by contracted private or public security personnel through proper selection, instruction and regular monitoring.



### These principles are based on the following publications:

- The Universal Declaration of Human Rights of the United Nations (UN) – version dated 12/10/1948;
- The Ten Principles of the Global Compact of the United Nations (UN) – version dated 9/25/2015;
- The Guiding Principles on Business and Human Rights of the United Nations (UN) – version dated 6/16/2011;
- The OECD Guidelines for Multinational Enterprises (OECD) – version dated 6/8/2023;
- The 10 core labor standards of the International Labor Organization (ILO) – Convention no. 87 (1948), no. 98 (1949), no. 29 (1930 + Protocol of 2014), no. 105 (1957), no. 100 (1951), no. 111 (1958), no. 138 (1973), no. 182 (1999), no. 155 (1981), no. 187 (2009);
- The International Covenant on Civil and Political Rights (UN) – version dated 12/19/1966;
- The International Covenant on Economic, Social and Cultural Rights (UN) – version dated 12/16/1966.

**»We are Hengst Filtration.  
Our vision: Purifying our planet.«**

Our products make a significant contribution to the sustainable use of resources, environmental protection, and above all climate protection. Our products, services, and processes are designed to be environmentally compatible. We are committed to the appropriate and sparing use of natural resources.

We comply with applicable national and international environmental standards and laws.

We monitor and reduce our energy consumption and implement measures to reduce CO<sub>2</sub> emissions. We support the economical procurement, use and further development of energy-efficient technologies. We are pushing the changeover to renewable energy sources.

**Our ecological  
responsibility**

We avoid environmental impact that impairs the basis for the preservation and production of food, prevents access to drinking water and sanitary facilities, or poses a health hazard, e.g., through harmful soil change, water or air pollution, noise emissions, and / or excessive water consumption.

We do not engage in land theft, and we abide by the prohibition of unlawful clearing of land, forests, and waters in the acquisition, development or other use of land, forests, and waters used by people for their livelihood.

In the handling of hazardous substances and waste, we are obligated to prevent, minimize or eliminate potential risks for employees and others.

We protect natural ecosystems, biodiversity, and soil quality.

**We observe the provisions of the following conventions:**

- the Minamata Convention on Mercury
- the Stockholm Convention on Persistent Organic Pollutants (POP)
- the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal



## »We do not engage in bribery or corruption!«

### 5.1 Anti-corruption: Dealing with gifts, invitations, and donations

Our behavior toward business partners is defined by integrity. Corrupt behavior distorts competition and is particularly damaging to Hengst's reputation. It results in fines or imprisonment for the individuals involved, and the confiscation of the assets thus obtained.

- The granting of undue advantages and bribing of public officials, as well as any corruptibility of our employees and bribing of employees of other companies, are punishable by law and will not be tolerated at Hengst.
- We never use our professional position to demand, accept, obtain, or accept the promise of benefits, whether in the form of gratuities or in the form of other services.
- We take decisive action against any misconduct, and sanction such misconduct.

Gifts and gratuities to customers or from suppliers are only allowed within the context of customary and appropriate cultivation of the business relationship. This includes gifts of low value or courtesy gifts, such as pens or calendars, in keeping with common business practices.

- We never offer or accept gifts or other tokens beyond a gesture of common courtesy.
- Gifts or similar favors to authorities and public officials are, in general, prohibited.

## Responsible business practices, relations with business partners and third parties



- We issue or accept invitations to business lunches or dinners only if they serve a legitimate business purpose and take place within an appropriate, socially adequate context. If in doubt, we obtain the approval of our supervisors.
- When concluding contracts with consultants, intermediaries, agents, or comparable third parties, we pay strict attention to that they do not offer, grant or demand any unjustified advantages.

Management alone decides on the granting of donations or any sponsoring activities.

- ➔ In case of any questions or uncertainties related to bribery or corruptibility, as well as the appropriateness of gifts or tokens by business partners, we turn to our supervisors, the legal department, or the internal control department.



»We play fair!«



## 5.2 Fair competition

Hengst respects and observes national and international regulations on fair competition, especially the applicable antitrust laws and other laws regulating competition. Violations of antitrust laws can result in high fines for Hengst, as well as fines or even imprisonment for individual employees.

- In dealing with our competitors, we make no written or oral agreements, nor do we undertake other activities that affect prices or terms of business, allocate sales territories or customers, or unduly hinder free and open competition.
- We refrain from unduly influencing the pricing policies or other business policies of our customers.
- With innovative products of excellent quality we conduct business in a respectable manner and in this spirit we face the free competition on the market.

## 5.3 Avoiding conflicts of interest

Conflicts can arise in the work and business environment between the employees' own personal or financial interests and the interests of the company. Such conflicts of interest can severely impair the judgment, impartiality, and loyalty of employees.

- We take every measure necessary to avoid such conflicts of interest. If such a conflict of interest is imminent, we deal with the situation openly and immediately contact our direct supervisor or the Internal Control department.
- We report to our superior or the Internal Control department any business we do with companies in which we ourselves, our spouse, a close relative or friend have a significant financial or business interest. A significant interest is such that we ourselves or our relative or friend are in a position to influence the relation between Hengst and this company (supplier, competitor, customer, etc.).
- As Hengst employees, our work effort is for the company, and we are obligated to carry out the assigned tasks assigned to the best of our knowledge and ability.

## »We do not launder money!«

### 5.4 Financial disclosure and compliance with tax laws

We comply with applicable accounting standards and disclose financial information in accordance with national and international regulations.

Hengst participates in obligatory public sector financing by paying taxes. The public sector in turn provides for a functioning infrastructure and education, which is absolutely necessary for Hengst to operate successfully.

In addition to this societal obligation, non-compliance with tax regulations can result in substantial financial damage to the Hengst Group, and can seriously damage the company's reputation.

- We are expressly committed to comply with all tax laws and regulations.
- We organize our internal structures, processes, and knowledge base so as to ensure that the taxes to be paid by the respective Group companies are calculated completely, correctly and on time, and paid to the responsible tax authorities.
- We are also under obligation to abide by all regulations on tax transparency in accordance with international standards.

### 5.5 Measures against money laundering

International supply and trading transactions entail the risk of being misused for money laundering or financing of terrorism. Money laundering is defined as putting criminally acquired assets and / or funds into circulation in the legal economic and financial system, in order to conceal their true origin. Money laundering is a criminal offense in accordance with both national and international criminal law.

Potential indications for the existence of money laundering can occur, for example, in the case of:

- Payments via accounts in third countries
- Payments made by a third party instead of the actual contracting party, if not so agreed
- Payments via letterbox companies
- Overpayments and redirected payments
- Payments from a private source for business deliveries
- Transactions or business models with no economic purpose
- Attempts at such procedures or queries whether such a procedure would be possible.

Prevention of money laundering is an important element in fighting organized crime and the financing of terrorism.

- We implement the necessary measures to conduct business with reputable partners who engage in legitimate activities with legally generated funds.
- We are under obligation to comply with all applicable anti-money laundering laws and regulations.

→ Questions regarding prevention of money laundering can be answered by the Internal Control and Finance departments.

→ More information and training documents on the issues discussed in chapter 5 are available in the Hengst intranet under "Compliance".





### 6.1 Data protection

We take the protection and confidentiality of personal data or information otherwise provided to us very seriously and comply with data protection laws, particularly the German Federal Data Protection Act (BDSG) and the European General Data Protection Regulation (GDPR).

- We collect and process personal data strictly in accordance with data protection regulations. It is especially important to us that we process data only if permissible by law. In addition, we ensure that the data is collected only for specified, legitimate purposes.
- We provide for transparency, so that data subjects can understand how their data is used. We process only data that we actually need, and store the data only as long as necessary. As soon as the data has fulfilled its purpose, it is deleted or anonymized.
- We protect the personal rights of all parties involved and safeguard personal data to prevent misuse and / or unauthorized access.
- Our processes and procedures safeguard the confidentiality of data and ensure that we act in accordance with data protection laws and our internal policies.

## Data protection and responsible handling of information

## »We treat private and secret matters confidentially!«

### 6.2 Confidential information

All of our knowledge, experience, and innovative ideas are the result of years of dedication and hard work. This safeguards our business and our competitive position.

- We use the data and information of which we gain knowledge within the scope of operations only to the extent allowed. Depending on the importance of the information, we take additional security measures, such as non-disclosure agreements.
- We do not pass on confidential information or confidential documents to third parties or make them available in any other way. This applies in particular to confidential, secret and personal data entrusted to us by our business partners. Confidential information and confidential documents include, but are not limited to, customer data and information related to product design, marketing, pricing, trade secrets, proprietary processes, production processes and / or company profits.
- We are also obligated to treat business and company secrets, internal matters, as well as sensitive information confidentially. This also applies beyond termination of the employment with Hengst.







### 6.3 Information security

Hengst employees can exchange information electronically worldwide through the use of PCs, laptops, and phones. However, the use of these means of communication also entails risks for the protection of both an individual's personal data and company data.

- We are obligated to comply with the data protection regulations and the statutory and company regulations on information security and the use of IT systems.
- We do not share personal passwords and access codes with third parties, and do not accept or use passwords and access codes from third parties.

The highest possible level of cybersecurity is vital for enterprises today. That is why Hengst invests heavily in technologies for protecting systems and data.

- We work together to ensure that these protective measures have a lasting effect by taking seriously all measures to boost security awareness, using the tools and training offered, and reporting any irregularities.
- Under no circumstances do we open and install email attachments, applications, or downloads from the Internet, or files from other sources, nor do we click suspicious links or enter our personal access data in unknown systems.
- We approach any unusual circumstance with common sense and caution, especially in regard to emails, USB flash drives, or other devices belonging to third parties.

→ In case of questions, we contact the data protection officer or IT security officer.

→ Further information is available on the Hengst intranet under "Information security".

## Property rights (patents, trademarks)

The “Hengst” brand represents our core corporate value. We are rightly proud of our products. Every one of our components therefore bears our brand.

Patent rights are monopoly rights. Others are prohibited from offering, manufacturing, or selling such a protected product. Failure to observe such rights can result in high claims for damages, recall actions, or even shutdown of series production for a component, and therefore represents a considerable economic risk for a company.

To safeguard the future of our enterprise, we invest substantially in the development of innovative products and filter systems. Our own property rights make it more difficult for competitors to copy our technologies,

therefore supporting our efforts to secure customer orders for Hengst products, especially service parts, in the long term.

We respect third-party intellectual property. This means that we carefully assess the possibilities and limits of our actions, in order not to violate third-party property rights. In return, we expect our competitors to acknowledge our property rights. We firmly enforce compliance with our property rights.

- We do not violate third-party rights (patents, trademarks, etc.).
- We protect our innovative developments with our own property rights.

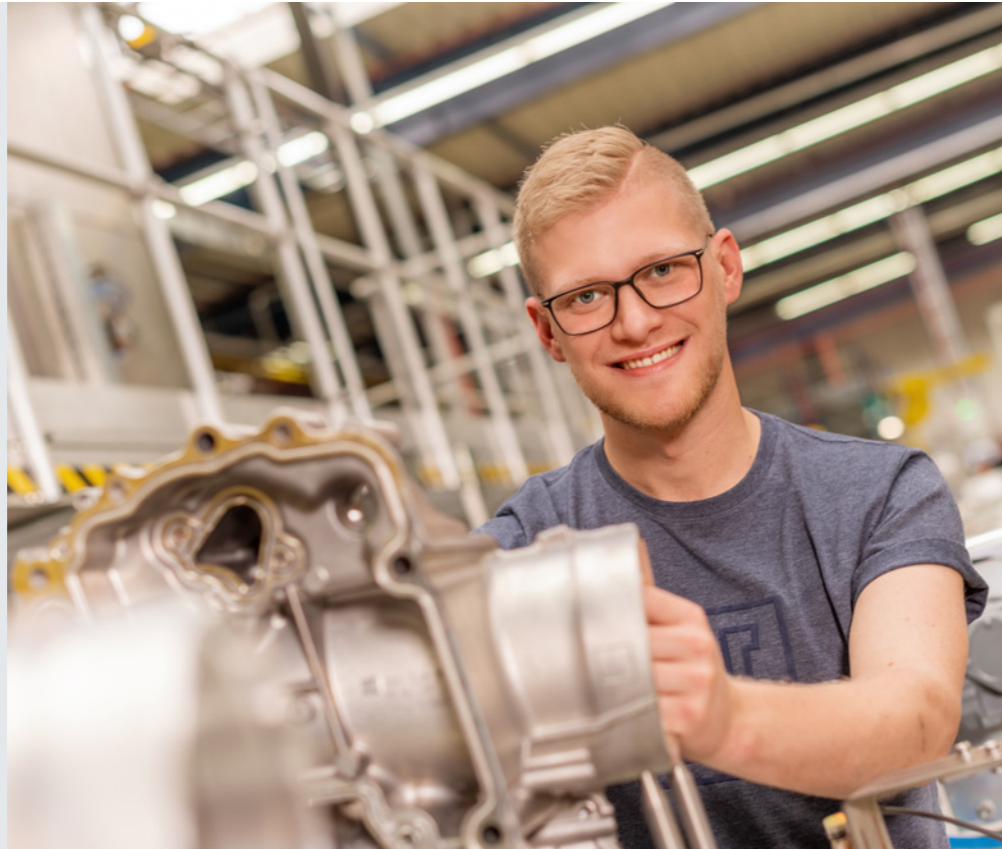
- The Intellectual Property department will answer any questions about the above issues.
- Further information is available on the Hengst intranet under “Intellectual Property”.

»We protect our developments!«





## »We operate internationally – in accordance with clearly defined rules!«



Hengst is a globally operating enterprise. Our international business activities make it necessary to observe national, European, and international customs and foreign trade laws. We are under obligation to comply with these laws and regulations.

All employees who are involved with the following issues in connection with their business activities:

- import and export of goods,
- cross-border transfer of services,
- cross-border transfer of hardware, software, and technologies (including technical data),
- cross-border capital transactions and payments,

are obligated to comply with economic sanctions, export control laws, export and import laws, as well as internal policies and procedures.

Violations of these laws and regulations – even if unintentional – can result in heavy fines and penalties, denial of export licenses, loss of export privileges and / or inspections and delays at customs. Since these laws and regulations are complex and can be applied differently in each country, we always determine what needs to be considered before starting a business project.

## Compliance with customs and foreign trade regulations

→ In case of questions or the need for training, we contact the Customs and Export Control Department at [customs@hengst.de](mailto:customs@hengst.de) or the local customs and export control contact person.

→ Further information is available on the Hengst intranet under “Customs”.

# Compliance organization and contact info

The compliance officer at Hengst is assigned to the Internal Control department and reports to the Executive Board.

In conducting compliance training and implementing measures, the compliance officer is supported by compliance contact persons at the respective German plants and central functions, as well as the international locations.

The following individuals can be contacted in case of questions about the Code of Conduct or notifications of misconduct or infringements – especially in the case of criminal conduct within the enterprise:

»We take compliance seriously!«



## Supervisors

In keeping with Hengst’s corporate culture, the line supervisors are generally the first point of contact in case of compliance concerns and questions. If this is not desired or not possible, the following individuals are available.

## Compliance contacts of the departments and locations

Names and contact data of the compliance contact persons can be found in the Hengst intranet under “Compliance” or via other information channels (info boards, internal memos, etc.).

## Compliance officer

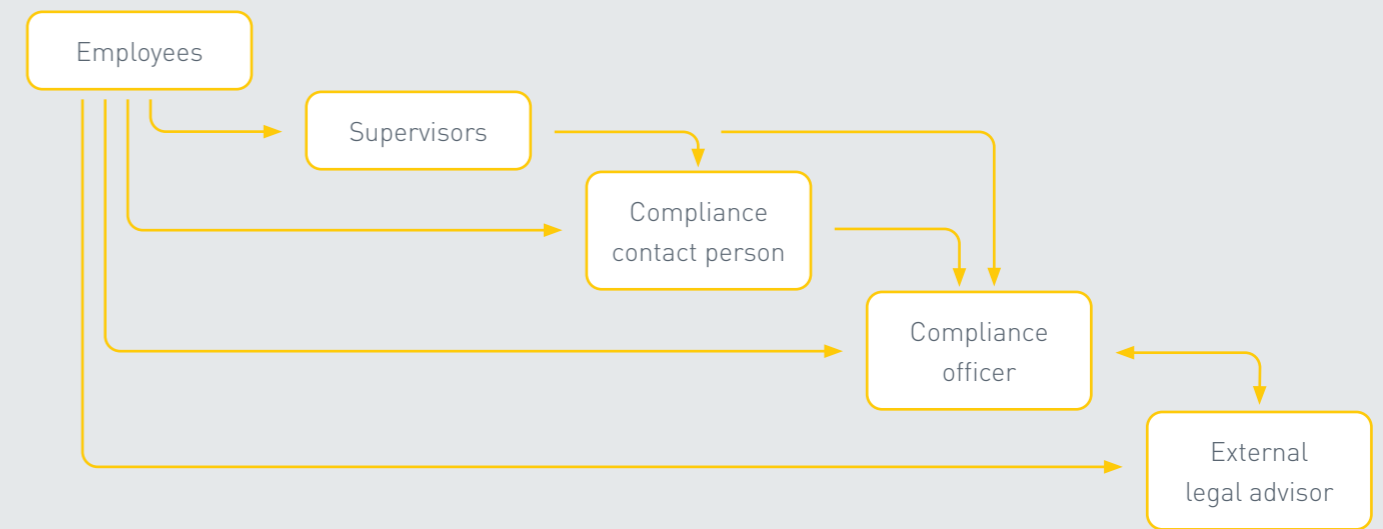
Internal Control department  
**T:** +49 251 20202 462    **M:** compliance@hengst.de

Substitute:  
 Legal Department / Group General Counsel  
**T:** +49 251 20202 332    **M:** compliance@hengst.de

## External legal advisor / ombudsperson

If necessary, external contacts in the various countries are also available as neutral mediators. They can be found in the Hengst intranet and on the Hengst website under “Compliance” or via the relevant information channels (info boards, internal memos).

## Contact person and information on compliance issues:





## Reporting of concerns and tip-offs

Ethical and legally compliant conduct is a top priority at Hengst, both in the company's own business operations and in relations with business partners. In addition to the contact persons for compliance issues stated in chapter 9, Hengst has set up an electronic reporting procedure that enables individuals from inside and outside the company to report violations of applicable laws, internal policies, business principles, in particular this Hengst Code of Conduct, or concerns regarding a potential or actual violation of these regulations.

If the electronic reporting procedure is used, the reporting individual is free to choose whether to remain anonymous or to communicate their contact data to Hengst.

### The reporting portal is available:



- on the Hengst website under: **Company → Compliance → Reporting portal**



- on the intranet under **“Compliance” → Reporting portal**

There you will find further information on the use of reporting portal in the “Rules of procedure for reporting complaints and tip-offs”.

## »Speak up! We display civil courage!«

On the basis of moral values and Hengst's corporate culture, we act responsibly and display civil courage when we address questions and concerns about compliance issues in good faith.

- We use our judgment wisely and are guided by honesty and integrity.
- Regardless of their position within the company, no one may order impermissible or unlawful conduct. Consequently, this means that we can never justify impermissible or unlawful conduct by claiming that we acted on the instructions of a higher-ranking staff member.
- If we suspect a violation of this Code of Conduct – especially criminal conduct – we act responsibly by immediately reporting the violation in order to prevent harm to the company, its employees, and other responsible individuals.

Information on actual or potential compliance violations is treated confidentially, unless mandatory legal provisions require disclosure. An objective investigation will be conducted, if necessary, in order to take appropriate countermeasures.

Hengst does not tolerate retaliatory actions against individuals who have addressed and reported compliance violations with courage and in good faith. On the other hand, tip-offs reported with dishonorable, malicious or otherwise abusive intentions (such as untrue personal attacks against a particular individual) themselves constitute a compliance violation. We do not condone such behavior and reserve the right to respond with disciplinary measures.



### **Compliance with the Code of Conduct:**

As a Hengst employee, I am aware that compliance with law and order, as well as the guidelines described in the Code of Conduct, are a prerequisite for my employment at Hengst. To the best of my knowledge and belief, I will not violate any of the guidelines described in this Code of Conduct.

This brochure can be requested from [compliance@hengst.de](mailto:compliance@hengst.de).

It is available in the following languages: German, English, French, Danish, Polish, Czech, Romanian, Portuguese, and Chinese.

→ The current version of the Code of Conduct, as well as updates and further information on compliance at Hengst, can be found in the intranet under “Compliance”.

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