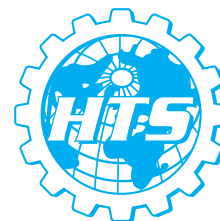


# HTS

Hamburger Technik Service GmbH



## Code of Conduct of HTS Hamburger Technik Service GmbH

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*Es gelten die allgemeinen Geschäfts-, Liefer-  
sowie Zahlungsbedingungen unserer AGB.*



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## I. Preamble

We, HTS Hamburger Technik Service GmbH (hereinafter referred to as "**HTS**"), are committed to the protection and observance of human rights, sustainable action, protection of the environment and fair working conditions.

In order to meet these long-term goals, we always reflect on our actions in terms of ecologically and socially responsible corporate governance in accordance with the provisions of this Code of Conduct (hereinafter referred to as "**CoC**")

The provisions of this CoC also apply without restriction to our employees. It is part of HTS's corporate culture that we also require our employees to comply with the principles of ecological, social and ethical conduct. It is understood that they must comply with all relevant laws and official regulations as well as internal instructions and guidelines in their working environment.

This CoC is based on the content and requirements of the relevant national laws and regulations, in particular the Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz, LkSG*), as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Principles on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization and the United Nations Global Compact.

In addition, we strive to constantly optimize our business activities and our services in terms of sustainability.

## II. Requirements for our subcontractors and suppliers

We also expect full compliance with the requirements of this CoC from the subcontractors and suppliers we engage.

With this in mind, we require our subcontractors to also comply with the principles and requirements of this CoC and to contractually oblige any subcontractors they use to comply with the principles and requirements set out in this CoC

We carry out regular general and ad hoc risk analyses of our subcontractors and suppliers, in which appropriate compliance with the principles set out in this CoC is also verified and evaluated.



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A breach of the provisions of the CoC may give HTS justification to take appropriate legal action, including the termination of all business relationships with the contractual partner in breach of this CoC.

### III. **Our principles of corporate responsibility**

HTS is committed to its social, ecological and ethical responsibility.

#### 1. **Social responsibility**

HTS is committed to its social responsibility both inside and outside the company.

HTS is firmly committed to its social responsibility. In particular, this includes outlawing all forms of forced labor, human trafficking and child labor, ensuring the best possible working conditions and unconditional compliance with occupational health and safety laws and regulations.

Our success is based on socially responsible business behavior, which is why it is essential for us as a company that every employee adheres to the social principles set out in this section.

##### a) **Forced labor and child labor**

We support and promote the prohibition of all forms of forced labor, human trafficking and child labor. In particular, we are guided by the principles of Section 2 (2) No. 1 LkSG with regard to the minimum age for taking up employment or work and Section 2 (2) No. 2 LkSG, according to which all employees should perform their work voluntarily and not under threat of punishment

##### b) **Prohibition of slavery**

We are committed to ensuring that all forms of slavery, slavery-like acts and other forms of domination or oppression, including economic or sexual exploitation, are excluded.

##### c) **Working conditions**

We also comply with the applicable statutory labor law regulations, in particular with regard to working hours and remuneration. Employment relationships are concluded exclusively on the basis of legally valid and written employment contracts. Social security contributions, wages and salaries as well as contractually agreed additional benefits are paid to employees in full and on time. All applicable regulations regarding



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working hours, overtime and vacation entitlements are complied with. The remuneration for regular working hours and overtime unconditionally corresponds to the corresponding national statutory minimum wage.

## **d) Occupational safety**

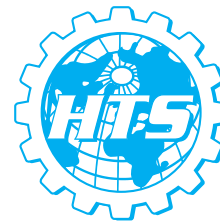
We ensure a safe and healthy working environment and comply with the applicable laws and regulations on occupational health and safety. We work in close coordination with the relevant employers' liability insurance association (*Berufsgenossenschaft*) to ensure that we always comply with their requirements and successfully pass the regular inspections.

We are constantly working to improve our risk management process, in particular to identify and monitor existing and future risks, and have taken appropriate precautions to prevent accidents and damage to health that may arise in connection with the respective activity in accordance with the regulation in Section 2 (2) No. 5 LkSG. In addition, we are guided by the requirements of ISO 45001 as the standard for occupational health and safety at HTS and thus ensure continuous improvement of our occupational health and safety.

As part of this, our managers in particular ensure an environment in which accidents and damage to health are prevented as far as possible by strictly adhering to safety standards in the provision and maintenance of the workplace, the workplace and work equipment, as well as by taking measures to prevent excessive physical and mental fatigue through appropriate work organization with regard to working hours and rest breaks.

We strive to continuously optimize our business activities and our services in terms of occupational health and safety. In addition to the criteria mentioned above, we are planning to introduce a tool for self-monitoring and optimizing the standards practiced by HTS in the area of occupational health and safety. As part of this, key performance indicators (KPIs) are to be defined based on the requirements of the LkSG and ISO 45001, followed by the development and implementation of a system for monitoring and evaluation. It is planned that, among other things, sick days, accidents at work and employee satisfaction will be recorded and measured in compliance with data protection principles. In addition, mandatory training will be offered on the topics of cleanliness and office organization as well as occupational health and safety issues





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## e) **Freedom of association and collective bargaining**

We support and promote the right of our employees or their respective organizations to negotiate and conclude collective agreements at the appropriate levels, as enshrined in Section 2 (2) No. 6 LkSG. In addition, we take collective action to defend the interests of our employees in the event of conflicts of interest, including strikes and collective bargaining. Under no circumstances will our employees be discriminated against on the basis of their founding, joining or membership of such an organization.

## f) **Prohibition of discrimination and equal opportunities**

We offer all employees a working environment in which any form of discrimination is prohibited. The regulations on equal rights and the prohibition of discrimination are complied with in their entirety. In accordance with Section 2 (2) No. 7 LkSG, discrimination based on national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology or other factors in any form is prohibited. This includes, in particular, the payment of unequal pay for work of equal value. In addition, the provisions of the General Equal Treatment Act (*Allgemeines Gleichbehandlungsgesetz, AGG*) are complied with.

## g) **Support for local companies**

We are committed to ensuring that HTS more than lives up to its social responsibility outside the company. For this reason, HTS specifically supports cooperation with small and medium-sized local companies.

## 2. **Ecological responsibility**

HTS is committed to its ecological responsibility, both inside and outside the company.

HTS is firmly committed to its ecological principles. In particular, this includes voluntary compliance with the requirements of ISO 14001, adherence to national and international laws and the continuous reduction of pollution, waste and CO2 emissions

Our success is based on ecologically responsible business behavior, which is why it is essential for us as a company that every employee adheres to the ecological principles set out in this section.

## a) **Compliance with the requirements of ISO 14001**

In addition to social responsibility, we as a company are aware of the ecological





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responsibility that goes hand in hand with our activities in order to ensure a healthy livelihood for future generations. In order to do justice to this, we will apply for ISO 14001 environmental certification in the coming years. ISO 14001 is an internationally recognized basis for environmental management systems and covers all aspects of continuous improvement in environmental performance. In this respect, ISO 14001 defines the establishment, implementation, maintenance and continuous improvement of an environmental management system.

We already comply with the requirements set out in ISO 14001, in particular:

- Environmental permits

We ensure that all necessary environmental permits and approvals are obtained, kept up to date and complied with.

- Climate protection

We strive to reduce our carbon footprint and thus contribute to achieving the targets agreed at the climate conference in Paris, in particular the 1.5-degree scenario presented by the IPCC in November 2018. We regularly examine new economic solutions to improve energy efficiency at HTS and minimize energy consumption and greenhouse gas emissions. In doing so, we strive to reduce greenhouse gas emissions as far as possible and subsequently offset residual emissions through an avoidance and reduction strategy that is in line with the requirements of the Science Based Target Initiative.

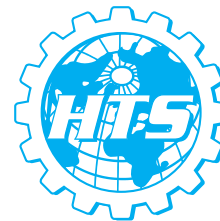
- Hazardous substances and product safety

We label hazardous materials, chemicals and substances and ensure their safe handling, movement, storage, recycling, reuse and disposal.

All applicable laws and regulations regarding hazardous materials, chemicals and substances are strictly followed. We comply with restrictions and product safety requirements established by applicable laws and regulations. All key employees are informed of product safety practices via notices and receive appropriate training.

HTS plans to develop and implement a procedure for dealing with end-life or recycled products, in particular with regard to toxic (by-)products, paper waste, batteries and other products, and supports the development of carbon-neutral





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and waste-free recycling processes.

- More environmentally friendly packaging

HTS uses "more environmentally friendly packaging" wherever possible. The aim is to avoid, reduce or improve the environmental impact of packaging wherever possible. These principles are to be applied in the order of priority indicated here - the best packaging in environmental terms is the one that can be completely avoided.

Packaging is considered environmentally friendly if it is reusable, uses as little material as possible, is recyclable and is made from secondary raw materials or alternative materials or certified paper.

HTS regularly trains its employees on the disposal of used packaging material that cannot be recycled.

In addition, we also oblige the subcontractors we use to take appropriate account of the requirements set out in ISO 14001.

## **b) Compliance with national and international laws**

In addition, we comply with all national and international laws and regulations, including recognized standards such as EMAS, to protect the environment.

## **c) Monitoring system**

Potential environmental risks are identified and minimized by an efficient system.

When selecting external services, we pay particular attention to environmental and social criteria - in addition to economic criteria - and have developed a procedure to ensure that suppliers and subcontractors participate in reducing environmentally harmful influences.

HTS carries out periodic reviews of the environmental management system both internally and externally.

Over the next two years, HTS will also develop and implement a process to prevent environmental risks. The concept will be developed by agile teams that meet regularly and inform the management of their progress. The aim is to develop a procedure that - based on the criteria set out in the LkSG and ISO 14001 - summarizes certain





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environmental risks and measurable KPIs in order to make them available for regular evaluation.

## d) **Continuous reduction of pollution, waste and CO2 emissions**

HTS monitors its waste volumes, energy consumption and CO2 emissions and we are constantly striving to reduce waste volumes, improve energy efficiency and minimize energy consumption.

HTS also separates its waste in accordance with strict legal requirements, in particular the requirements of the [Hamburg Waste Management Act](#).

HTS's environmental protection concept also includes the careful use of natural resources and the minimization of pollution and waste. Hazardous substances are properly labeled, used and disposed of.

## e) **Improving internal and external communication on environmental issues**

HTS is developing a process to improve the efficiency of internal and external communication regarding ecological aspects and environmental management. To this end, agile teams were set up to develop improvements in regular meetings and propose them to the management.

## 3. **Ethical business conduct**

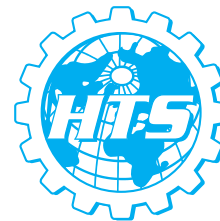
Our entrepreneurial approach is based on compliance with and observance of basic ethical principles.

HTS is firmly committed to its moral and ethical principles. This includes in particular the prohibition of child labor and any kind of coercion as well as the fight against discrimination on the basis of origin, gender, religion or any other grounds.

Our success is based on ethical business behavior and the principle of performance, which is why it is essential for us as a company that every employee adheres to the principles set out in this section.

## a) **Fair competition**

We behave ethically, honestly and fairly and comply with the provisions of applicable antitrust and competition law



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Agreements and other activities that could restrict or prevent competition, as well as misleading or aggressive business practices, are refrained from.

Furthermore, we adhere to the OECD guidelines, the BSCI Code of Conduct and the Global Compact.

## **b) Confidentiality and data protection**

When processing personal data, we strictly adhere to the requirements of the General Data Protection Regulation (GDPR) and all applicable laws and regulations on data protection and information security and maintain the confidentiality of information. No direct or indirect use of confidential business information takes place at any time.

## **c) Intellectual property**

To ensure innovation, we protect all forms of intellectual property that are protected by patents, trademarks, copyrights and trade secrets. No protected content is used or passed on to third parties without the owner's authorization.

## **d) Corruption prevention**

We are fully committed to the prevention of corruption, bribery and money laundering. With this in mind, we strive for sustainable business relationships with our customers and business partners for the benefit of both parties. To this end, all business activities must be based on the highest standards of integrity and we therefore pursue a zero-tolerance strategy when it comes to prohibiting all forms of corruption, bribery, money laundering, extortion and embezzlement.

For these purposes, we have established a system to prevent and monitor compliance with anti-corruption laws and ensure compliance.

In particular, our managers and employees are strictly prohibited from demanding, being promised or accepting money, valuables or other benefits in return for the purchase of products or other services.

Conversely, the granting of benefits of any kind is strictly prohibited if they could give the impression of undue influence or even obligation. This also applies to hospitality or invitations to events that go beyond customary and legally permitted behavior. All business relationships are conducted exclusively on the basis of objective criteria.





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**e) Conflicts of interest**

Our managers and employees do not carry out any activities or perform any tasks that run counter to the corporate interests of HTS. They must refrain from any situations that could lead to personal conflicts of interest. In this sense, HTS expects dutiful behavior in the sense of strict separation of private and company interests. Preferential treatment of certain business partners, in particular preferential treatment of family members, is prohibited. The appearance of such preferential treatment for private interests must also be avoided.

Secondary employment for companies of a competitor, a customer or a business partner is only permitted with the express written consent of the management.

**IV. General compliance measures**

This CoC defines the internal requirements that HTS undertakes to comply with.

HTS ensures that these internal requirements are adhered to and continuously updated. Furthermore, HTS ensures that all legal requirements are complied with in addition to the internal requirements.

To this end, HTS is endeavoring to develop and introduce a system with which the causes of possible non-compliance with legal and internal regulations can be even better identified and avoided.

In addition, in cooperation with an external law firm, regular specialist training courses are held on the topics presented in this CoC as well as on other relevant areas of law in order to create lasting awareness at HTS and thus achieve a high level of prevention.

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