

# **Code of Conduct**



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### Introduction

Dear Colleagues

Since its founding in 1584, Hahnemühle FineArt's name has been synonymous with great papers. It is because of the experience and consistency of our employees, that we can be proud of a long and uninterrupted tradition.

Every day we strive with our passion, ambition, and experience to achieve this, to combine the best raw materials, purest spring water and craftsmanship to constantly develop the excellent quality of our products.

The result of our tradition- and quality-conscious work inspires Hahnemühle fans worldwide. Whether they creatively use our artist papers, use fine watermark papers for writing, or use special technical papers for complex research and industrial applications.

Our know-how, our tradition and our innovative strength form the foundation of our success. Respectful treatment of our environment, our employees and suppliers, and a partnership-based relationship with our customers in more than 130 countries around the world form our DNA.

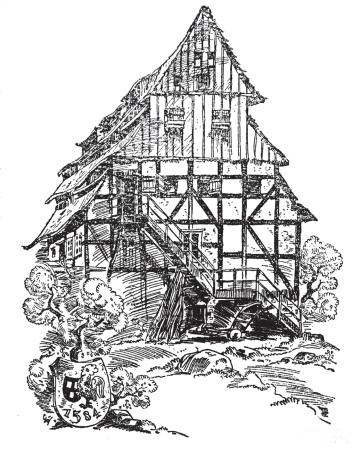
This Hahnemühle FineArt Code of Conduct contains a set of standards for our corporate

actions, our social conduct, a guide for making difficult decisions and an overview of contacts available for questions and concerns.

For any concerns, suggestions, or other matters, we can be reached via the following email addresses:

corporate.compliance@hahnemuehle.com or whistleblower@hahnemuehle.com in accordance with the EU Whistleblower Directive and the German Whistleblower Protection Act to safeguard persons who have obtained information about violations in the course of their professional activities and report these.

All of us at Hahnemühle - are committed to upholding the principles set out in this Code.



Dassel-Relliehausen, July 2023

# **Our Values, Mission, and Vision**



Our values, mission and vision are guiding principles for our company directions and decisions. They were updated in 2019 and are an important part of our communication and leadership since then. The basilines for these values, mission and vision are the locally specific country and state laws as well as local trade union agreements, where applicable.

# **Community**

#### **Human Rights**

In the United Nations Universal Declaration and the European Convention for the Protection of Human Rights and Fundamental Freedoms, the international community of nations has laid down its expectations and requirements regarding the observance of and respect for human rights. Furthermore, the globally recognized standards of the International Labour Organization (ILO) guide our actions.

We are committed to respecting, protecting, and promoting the globally applicable regulations for the protection of human and children's rights as fundamental and universally applicable requirements. We reject any use of forced, child and compulsory labor as well as any form of slavery, oppression, exploitation, and human trafficking. We do not tolerate any kind of harassment or physical or psychological abuse.

This applies to the cooperation within Hahnemühle as well as to the behavior of and towards our customers, suppliers, and business partners. We recognize the fundamental right of all employees to form trade unions and employee representatives.

#### Equal opportunities and equal rights

Hahnemühle supports and promotes people regardless of their origin, sexual orientation, religion, nationality, gender, physical disabilities, or other legally protected characteristics.

We see equal opportunities as the cornerstone of balanced cooperation and do not tolerate discrimination in equality-oriented personnel recruitment. Recruitment and development are based only on the skills, qualifications, and track record of applicants.

In addition, Hahnemühle is supporting the career goals of each employee. Constant talent management efforts and employee discussion about potential and performance in current and future roles are an important aspect of our employee retention and satisfaction effort. Job rotations, even internationally and in horizontal functions as well as educational efforts on the job are implemented regularly in conjunction with workers council validation where applicable.

#### **Products**

As we produce our papers according to the highest quality standards, we check them against these characteristics, which distinguish between raw materials and manufacturing methods. Each of our papers is thoroughly tested in the quality assurance department to guarantee the value of our products to our customers.

Hahnemühle stands for sustainability, as well as aging resistance and light fastness of our papers, which is why we are certified according to the ISO 14001 guideline for environmental management and comply with the requirements of ISO 16245. Additionally, in 2022 the international EcoVadis certification and Sedex validation was successfully achieved.

### Environmental protection

To produce our papers, we use the purest spring water. In our manufacturing process we do not use chemical cleaning agents, biocides or preservatives. After paper production, we are able to return the spring water to nature in highest purity. We use primary pulps and celluloses from sustainable and certified plantations to produce our paper. The cotton fibers are by-products of the textile and oil industries. Since 2008, we have also been producing artists' papers from rapidly renewable plant fibers, which do not require pesticides and use less water in cultivation. Our papers have high aging resistance, light fastness, they are vegan and acid free.

The electricity demand for our paper production is covered by wind, water and solar energy without exception and is continuously reduced. Production waste and offcuts are returned to the production cycle, and in the case of papers where this is no longer possible, we pass the waste on to other processors.

Packaging materials as well as transport cartons are made of recycled paper or corn chips. Furthermore, Hahnemühle uses adhesive tapes and delivery note sleeves made of paper to reduce plastic packaging.

Our shipments in more than 130 countries are bundled to make optimum use of the means of transport. We rely on climate-friendly transport processes by ship or rail.

With our Green Rooster initiative, we as a company promote national and international environmental protection projects, thus actively contributing to environmental and climate protection.

#### Donations and sponsoring

Hahnemühle supports projects of artists, photographers, pupils, students and non-profit organizations that are in line with our corporate values. We do not support projects in monetary form, only with papers primarily from our sponsorship inventory.

To be supported as a project, the Sponsorship Checklist must be completed and signed by both parties. Only projects that represent the guidelines in the checklist and our values can be supported by us.

The entire process must be in writing and attached to the sponsorship agreement so that the decision and funding can be tracked transparently.

#### Communication and marketing

As a globally operating company, we are constantly in contact and exchange with business partners and followers on various platforms. To ensure a coherent and professional appearance, all employees must adhere to the valid Social Media guidelines and follow them on personal company accounts.

In accordance with Hahnemühle's Mission, Vision and Values, we also act in the digital world in such a way that internal and external interests and values are always respected.

# **Business partners**

#### Conflict of interests

A conflict of interest exists as soon as the private interests of an employee collide with the interests of Hahnemühle. If the employee puts his or her interests above those of the company, this will in most cases be detrimental to the company. Hahnemühle respects the personal interests of each employee, but requires that conflicts between private and business interests, or even the appearance of such, be avoided. For this reason, we make our decisions based on purely objective criteria and do not allow ourselves to be influenced by private relationships and personal interests.

### Fair and free competition

Agreements and relationships with competitors, suppliers and customers that harm fair competition is prohibited by law in almost all countries. These measures ensure a market in which there is no distortion of competition. Hahnemühle adheres to this fair competition. For this reason, we are required by law to comply with the rules of fair competition in the countries in which we operate.

In any contact with competitors, we take care not to pass on or accept any information relevant to competitive activities. This includes, but is not limited to, prices, pricing, delivery schedules, production plans and business planning. Violations will be stopped immediately.

#### Procurement

Our suppliers are selected with integrity and based on objective criteria. These criteria include price, quality, reliability, and service. Particular attention is also paid to energy and resource efficiency, respect for human rights, and environmental compatibility. We do not procure any products or services without informing ourselves in advance about alternative suppliers.

# Workplace

#### Interaction

Every Hahnemühle employee pays attention to fair, respectful, and friendly behavior. As a medium-sized company that combines traditional values and modern visions, we expect respect and tolerance in the workplace, as well as appreciation among each other. Helpfulness and loyalty are essential for the Hahnemühle team.

We are committed to the apprenticeship of our trainees and focus on the personal as well as professional goals of each employee. Discrimination and harassment of any kind are prohibited in the workplace and in dealings with each other and will not be tolerated, especially based on origin, sexual orientation, religion, nationality, gender and physical disabilities.

### Occupational safety and health

The safety and health of employees at Hahnemühle is high priority. The health of employees is protected and promoted through active improvement of working conditions and preventive and health promotion measures. As an employee, everyone, as the first instance of occupational safety, has the obligation to comply with occupational health and safety regulations. In addition, everyone must ensure that their own workplace enables them to work safely and complies with all statutory regulations.

### Data protection, IT security and Information protection

We protect our intellectual property against unauthorized access by third parties by developing and applying various IT security precautions such as passwords, anti-virus software or access concepts. We keep confidential information concerning the company secret and do not disclose it to unauthorized persons (this includes family and friends).

We collect, gather, process and use personal data from employees, former colleagues, customers, suppliers and others only in accordance with legal requirements or with the consent of the persons concerned.

# Address concerns and report violations

All employees are encouraged to report concerns in good faith, in confidence and without fear of retaliation. Hahnemühle will not tolerate retaliation, discrimination or disciplinary action against anyone who, in good faith, has raised reasonable concerns about an attempted, actual or suspected misconduct or violation of any provision of the Hahnemühle Code of Conduct.

Violations of the Code of Conduct can be reported to the respective supervisor or the works council, which is exclusively responsible for GmbH. In the subsidiaries we work with external Legal & Compliance and HR Consultants. Hahnemühle takes all reports seriously. These must be presented with verifiable, law-proof evidence to avoid unjustified accusations (blackmailing, etc.). We will protect the identity of individuals who wish to remain anonymous. We deal with all submissions and will review them comprehensively. Appropriate action will be taken in the event of proven violations or blackmailing.

For any concerns, suggestions, or other matters, we can be reached via the following email address:

<u>corporate.compliance@hahnemuehle.com</u> or <u>whistleblower@hahnemuehle.com</u> in accordance with the EU Whistleblower Directive and the German Whistleblower Protection Act to safeguard persons who have obtained information about violations in the course of their professional activities and report these.