

EHG code of conduct

For fair cooperation.



» Introduction

Valued employees of EHG.

This code of conduct defines the basic principles for our conduct and correct corporate behaviour within the EHG Group. It is an expression of our company values, and at the same time this code of conduct is the basis for relationships with our partners and the public.

The principles in this code are based on the UN Global Compact, a worldwide initiative for responsible business management. The ten guiding principles listed below apply for all managers, staff and workers of the EHG Group at all sites, who will be referred to below as “employees”.

In particular, when working with our customers and suppliers this code of conduct is intended to provide a key foundation for ensuring humane living and working conditions and protecting our environment for future generations.

Our code of conduct does not exempt anyone from their personal responsibility. We expect our employees to make decisions in a responsible and considerate manner. Honesty, reliability and integrity are essential cornerstones of our conduct.

Every employee must comply with all valid laws, regulations and internal instructions that are applicable to their area of work and fulfil all resulting obligations.

No employee may use their position to gain personal advantages. In addition, no conduct which contradicts the principles of this code of conduct may be promoted or tolerated.

We expect our suppliers and other people who work for EHG to also apply the principles of this code of conduct in their operations.



Stefan Girardi



Arno Rüd

Human rights

Principle 1:

Protection of international human rights

The international human rights laid down by the UN in 1948 are a key foundation for interpersonal relationships in all areas. They therefore also provide the basis that we must use to guide our actions in our daily work and cooperation with our customers and suppliers.

In order to protect this code of values, our employees must therefore ensure compliance with international human rights in all direct and indirect relationships.

This code of conduct is intended to express this appreciation and commitment to comprehensive compliance with human rights by the management of EHG in a manner which can be understood by and is binding for everyone.

Principle 2:

Compliance with international human rights in the supply chain

EHG is committed to dealing with its customers and suppliers correctly and with integrity. Customers and suppliers are selected solely based on objective and transparent criteria. We require our suppliers from non-EU countries to confirm our EHG supplier code of conduct or to apply their own equivalent code of conduct documented in writing.

Active relationship management is part of our success as a business. However, this is neither carried out in legal grey areas nor do we use improper means for this purpose. We achieve our economic targets exclusively thanks to the quality and performance of our employees and services.

When selecting our suppliers, we place importance on long-term, collaborative cooperation and also take into account the working conditions of both the supplier and the manufacturer. In particular, during this process we also carefully consider the general production conditions and environmental aspects in the relevant countries. EHG endeavours to avoid products and raw materials from war zones or conflict regions in which human rights are known to be violated and to ensure this by means of appropriate monitoring measures in the supply chain.

If employees have justified suspicions that our suppliers or customers are infringing international human rights, legal requirements or one of the described principles, they must report these suspicions to the management immediately.

Working standards

Principle 3:

Freedom of association and recognition of the right to collective bargaining

The collective bargaining agreements and laws applicable for the relevant location are valid for the EHG Group. In the company we allow the formation of interest groups of all kinds within the statutory guidelines and also expect our business partners to do the same.

Going beyond these legal guidelines, it is important to us to promote an environment of trust and open communication between each other.

Principle 4:

Elimination of all forms of forced labour

When selecting business partners, in addition to thinking about purely economic aspects, we also consider ecological and social criteria. We will not accept anyone who infringes environmental regulations, exploits employees, permits inhumane working conditions or child labour, or operates in legal grey areas as a business partner.

Principle 5:

Abolition of child labour

In European countries, child labour is usually banned by law and is socially unacceptable, but this is not the case in all countries around the world. In addition to unconditional compliance with legal requirements, within the EHG Group particular attention must therefore be paid to the working conditions at our suppliers and in the countries of origin of our products – in particular in the case of third countries.

We expect our business partners to adhere to the recommendation from the ILO conventions concerning the minimum age for the employment of children. According to this, the age should not be lower than the age at which compulsory education ends and under no circumstances below 15 years of age.

Principle 6:

Elimination of discrimination in employment and occupation

Our employees are the foundation of our success. In order to allow their strengths to develop, we create a working environment that embodies this appreciation and promotes integrity.

We respect the privacy of our employees.

Cooperation with superiors, colleagues and employees is characterised by fairness, respect, team spirit and openness. Neither discrimination nor harassment are tolerated. Our employees are selected, assessed and supported irrespective of their age, origin, gender, race, religion, physical constitution, sexual identity or political involvement.

These principles also apply for conduct in relation to external partners, and we also expect the same from these partners.

EHG complies with occupational health and safety laws and works with all employees to ensure a healthy, safe working environment that is as accessible as possible. Necessary precautionary measures to prevent accident and harm to health which may result in connection with the work are taken by establishing and applying appropriate occupational health and safety systems.

Occupational health and safety regulations must be complied with. As part of this, every employee also has a shared responsibility for safety in their area of work and the safety of their colleagues.

Documents and communication will use gender-neutral language throughout. Clearly, such references should be taken to mean persons of any gender. This also applies in particular to this code of conduct.

Environmental protection

Principle 7:

Precautionary approach when dealing with environmental challenges

EHG sets up and operates production facilities exclusively within the legally required guidelines. Attention must be paid to the safety of employees and the environment at all times, and facilities and equipment must be checked regularly to this effect.

In addition to disposing of waste correctly and in an environmentally responsible manner, above all, steps should be taken to ensure that all types of waste and harmful emissions (including water, air and energy) are avoided and reduced as far as possible, before they are even produced. In the case of unavoidable waste or hazardous substances, checks must be carried out at the procurement stage to see if there are more environmentally friendly alternatives.

Energy consumption is monitored and regularly assessed to improve energy efficiency and minimise energy consumption.

Principle 8:

Promote greater environmental responsibility

Our employees are required to consider environmentally friendly use of resources within and outside of the company, and to actively make suggestions about how we as a company can protect our environment in an even more sustainable way and avoid possible pollution.

Our employees must actively inform our suppliers and customers of potential ways to avoid or reduce negative environmental impacts. By reducing deliveries/collections and avoiding packaging waste in particular, there is considerable potential to protect the environment whilst reducing costs at the same time.

Principle 9:

Development and propagation of environmentally friendly technologies

Natural resources must be protected. Where there are opportunities to reduce the use of raw materials and energy, or to reduce emissions, we use or promote these opportunities. The use of renewable energies should be preferred and promoted if possible.

Our vehicle fleet is replaced on an ongoing basis in order to use state-of-the-art technology to reduce harmful environmental emissions to a minimum.

Fighting corruption

Principle 10:

Fighting any form of corruption, including extortion and bribery

EHG is committed to fair and free competition. We make our decisions freely and independently, without allowing any relationships of dependence to arise.

We comply with anti-trust and commercial laws, competition law and laws relating to consumer protection. The conclusion of illegal agreements with competitors and infringements against competition laws are unacceptable to EHG.

We only issue invitations to or accept invitations from business partners to events or business dinners if there is a business purpose for doing so. The invitation must be appropriate in relation to this business partner and may not go beyond normal hospitality. Gifts from business partners must fall within legal regulations, and must be appropriate in nature and size.

Sales are not promoted with gifts, donations, bribery or corruption. Bribery is a crime both in business transactions and in relation to public officials. We do not give or accept gifts that are intended to influence specific commissioning processes. The same also applies even if they could only give the impression of an exercise of influence.

EHG employees avoid any conflict between their private interests and those of the company. Accordingly, situations in which private interests or personal relationships contradict the interests of EHG must be avoided. If, in spite of this, an actual or potential conflict of interests arises, the employee must inform their supervisor of this immediately.

In particular, employees must not have their own delivery or service relationships with competitors, suppliers or customers, irrespective of whether these are direct or via third parties. Even the intention to undertake additional employment or active involvement in a company is only permitted following agreement with the employee's supervisor or management.

Decisions on donations and sponsorship that goes beyond local and short-term activities and in excess of small donations will be made exclusively by the management of EHG.

Customers, business partners, banks, financial authorities, employees and our shareholders trust that our accounting and financial reporting is carried out correctly.

As a result, it is a matter of course for us that all transactions and business operations are handled correctly by EHG and presented in EHG accounts according to valid laws and accounting standards. The complete, clear and comprehensible accounting and record keeping must be carried out with an appropriate level of detail and in line with the internal financial controlling system of EHG.

Records and files must be managed so that auditors and financial authorities can understand the contents at any time if necessary.

EHG provides employees with all the resources that they need to complete their work.

These material and intellectual resources (such as buildings, facilities, systems, vehicles, stock, financial resources, software and expertise) are the property of EHG.

This property must be treated respectfully by all employees and protected against loss, theft and misuse. All employees must protect databases and business documents against unauthorised access by third parties. IT security, data security and data protection are extremely important to us.

As a basic principle, EHG property may only be used for business purposes. Private use of EHG property without the consent of supervisors is prohibited.

Every employee commits to maintain confidentiality in relation to all business information of EHG or a business partner of EHG that is not public knowledge, and to ensure that any such information is not made accessible to third parties under any circumstances, even accidentally.

We commit to respect and protect the material and intellectual property of third parties to the same extent as EHG property.

The EHG Group maintains a legally compliant reporting system for complaints from individual persons, communities and business partners affected by negative impacts or who want to report breaches of this code of conduct or legal requirements. Responsible whistleblowers are protected against retaliatory measures, sanctions and other reprisals as per applicable EU directives and national laws.

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EHG. **Strength as a group.**

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