

**Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH**  
Bontkirchener Straße 1  
D - 59929 Brilon - Hoppecke

# Code of Conduct

of Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH  
and all its German and foreign affiliates

March 2018



## **1. Preamble**

We as the HOPPECKE staff wish to manage and operate our business in a sustainable, transparent manner that comes up to our values and moral concept and satisfies the specific requirements of the company's stakeholders<sup>1</sup> by an adequate and well-balanced approach.

The present Code of Conduct of Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH and all its German and foreign affiliates ("HOPPECKE Group Code of Conduct" or "Code of Conduct") which is based on the HOPPECKE Corporate Principles constitutes the basis for our entrepreneurial policy and approach and contributes to a considerable extent to the sustainability of our business. It is intended to demonstrate to both our staff on the internal level and our business partners and the public on the external level that responsible handling of resources and compliant and sustained conduct are among our priorities.

It is the responsibility of every single member of the HOPPECKE staff to make themselves familiar with the Code of Conduct and stick to the principles fixed therein in their everyday work.

## **2. Scope of application**

The Code of Conduct is binding for Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH and its German and foreign affiliates ("HOPPECKE" or "we").

## **3. Corporate Principles**

The Code of Conduct is based on the essences of our Corporate Principles which are still valid and are described in the following:

### **Company**

The primary objective of our company is to maintain its economic and legal independence so that we may shape our corporate policy according to these principles. Sustained business development requires adequate business results.

### **Market**

The purpose of our company is to develop, manufacture and sell energy storage products, together with their associated power supply systems and related services; we aim to be market leader in selected regions and market segments.

### **People**

We regard the people working in our company as the most valuable resource for ensuring its future; that is why we strive to qualify for our business tasks by systematic personnel development. Moreover, we offer our employees the opportunity to participate in the company success by employee-shareholder scheme.

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<sup>1</sup> Stakeholders are all internal and external persons and institutions (e.g. employees, shareholders, customers, suppliers, public institutions etc.) that are interested in the economic development of the company.

## **Society**

We see our company as part of a free society with a democratic basis and social market principles. We are responsible for the careful management of the resources entrusted to us – people, capital, time, environment and raw materials – with consideration for social aspects and encouragement of environmentally friendly processes, techniques and products.

## **Tomorrow**

We see HOOPECKE as a company which, by its active basic attitude and approach, strengthens its own market position in an ever-changing environment. HOPPECKE wish to play a part in the shaping of selected market segments in the energy technology field, at both national and international level.

## **4. Compliance**

For us, the term “Compliance” implies compliant conduct by which we ensure that our entrepreneurial behavior and approach is in line with the applicable statutory regulations and internal company rules.

The entrepreneurial decisions must be implemented in a way compliant with the applicable rules and must also come up to the prevailing social values and concepts. All our employees are requested to observe and comply with the principles of this Code of Conduct, with the statutory regulations applicable in the respective country concerned as well as with the even more extensive internal policies and guidelines. The employees are also obliged to inform and make themselves familiar with the statutory regulations to be observed by them in the respective country concerned and the internal policies and guidelines which are relevant for them.

## **Company**

The preservation of our environment is one of our utmost priorities. HOPPECKE develops products that set new benchmarks, and HOPPECKE is an innovator in the field of sustainable and environment-friendly technology developments. That is why we carefully monitor the environmental impact of our products, especially regarding the use of our products and their service life and durability. We use our products as an interim storage for renewable forms of energy and thus considerably contribute to sustainable energy consumption.

We comply with the environment law requirements applicable in the respective country concerned which we consider as the minimum standards to be observed by our environment protection management. With our certified energy management system, we endeavour to use energy-saving techniques and processes and reduce the emission of greenhouse gases. We carefully handle and exploit the natural resources (water, raw materials, energy) which we use in our production process and we take measures for optimized waste reduction.

## **Market**

HOPPECKE does not tolerate any influence on, or distortion of, the market, especially by bribery, fraud, industrial espionage, money laundering, theft, embezzlement, misappropriation or coercion.

We do not participate in any cartel agreements. Our employees are strictly instructed to omit any acts that are targeted at such a participation as well as any other acts that might cause distortion of competition. In particular, those activities are forbidden which might be deemed to constitute agreements with competitors or exchange of information with competitors regarding prices, price elements, market allocation, allocation of customers or production capacities.

Our employees are not allowed to offer, pay, demand or accept bribe money or other illegal payments. Any conflict of interest must be prevented and, where insufficient transparency might cause such a conflict, the required transparency must be procured.

All employees are forbidden to initiate or enter into business relations with persons or organizations that are related to terrorist networks or involved in other criminal or illegal activities.

## **People**

We strictly reject any kind of discrimination, violence and harassment as well as any form of forced labour, child labour or other forms of exploitation in our company or the companies of our business partners. The HOPPECKE jobs are thus free of violence, harassment and discrimination due to sex, skin colour, religion, age, national origin, disablement, handicap or other aspects. All employees of our company are paid fair compensation and deserve mutual respect.

We safeguard the employees' right to collective bargaining, we recognize the core labour standards of the International Labour Organization (ILO) and consider the labour law requirements applicable in the respective country concerned as minimum standards to be observed.

Via our own internal "HOPPECKE Academy", we offer every employee the possibility to continuously qualify and further train themselves to cope with their current and future tasks.

We use our best endeavours to protect our employees from accidents. To ensure this, the working conditions at our workplaces are audited at regular intervals and the staff is also trained regularly.

## **Society**

HOPPECKE observes and respects the human rights set out in the "Universal Declaration of Human Rights" of the United Nations and undertakes to stand up for compliance with this UDHR within its area of control. When procuring resources and raw materials, we make sure that they come from regions or sources where compliance with human rights is ensured and where the profit earned by their extraction or production is not used to finance armed conflicts. This applies in particular in the case of so-called "conflict minerals"<sup>2</sup>.

We observe the applicable data protection and privacy regulations and treat the confidential information with which our business partners provide us in accordance with those regulations.

We fulfil our social commitment and obligations as a company and contribute to the support and maintenance of public systems and structures.

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<sup>2</sup> "Conflict minerals", from today's perspective, are tin, tantalum, wolframite and gold which come from the Democratic Republic of the Congo or its neighbouring countries. For more detailed information on "conflict minerals", please go to the Purchasing Policy of HOPPECKE Group ("Einkaufspolitik der HOPPECKE-Gruppe").

## **Tomorrow**

Compliance with the statutory regulations is also of utmost importance for HOPPECKE where it is about guaranteeing the future of our company. All research and development activities must be carried out in conformity with the applicable statutory regulations and requirements including but not limited to compliance with the regulations for the protection of intellectual property.

## **5. Information and reporting system**

The Code of Conduct is effective as of the day of its announcement and supersedes the Corporate Code of HOPPECKE Group dated March 2011.

All further internal rules and policies of HOPPECKE as well as further information on the "Compliance" issue are available at HOPP.NET under the department "Compliance".

To prevent breaches of the Code of Conduct to the largest possible extent and ensure effective implementation of the Code of Conduct, HOPPECKE continuously provides training measures regarding particularly important Compliance areas.

For more detailed or additional information, the Compliance Officer designated by the Executive Board is available to whom the employees may also report any indications of a possible breach of the Code of Conduct. Moreover, the employees may also report to an independent external body that is the Ombudsman. The Ombudsman (counsel of trust) treats all reports confidentially and, if requested, even anonymously. The name and contact data of the Compliance Officer as well as the contact data and further information regarding the Ombudsman are available at HOPP.NET under the department "Compliance" or at the Human Resources department or in appropriate notices or announcements displayed in the HOPPECKE company concerned.

The written declaration attached hereto as Annex 1 confirming awareness of and compliance with the Code of Conduct must be signed by all employees and returned to the Human Resources department. For foreign subsidiaries, where no Human Resources department is present, the signed declaration must be returned to the Managing Director of the foreign subsidiary concerned and kept by him. The declarations must be renewed at regular intervals.

March 2018

Manfred Barfuß  
CPO

Heinrich Becker  
CFO

Dr. Marc Zoellner  
CEO

Annex 1

**Declaration confirming awareness of and compliance with the  
HOPPECKE Group Code of Conduct**

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Name

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Department

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HOPPECKE company

I hereby declare and confirm that I have taken knowledge of the provisions of the *HOPPECKE Group Code of Conduct* as amended in March 2018 and that I will comply with the provisions set out therein.

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Place

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Date

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Signature of employee