

1. The credibility and success of our enterprise rest on the personal integrity and honesty of all of our staff. Maximum transparency in our dealings with clients, suppliers and official bodies is one important aspect of this.
2. Transparent quality and performance criteria shall form the sole basis for reaching business decisions and concluding agreements. Any attempts to engage in corrupt practices must be nipped in the bud immediately by all responsible. That is the objective of this policy, which is directed especially at staff in our purchasing and sales departments.
3. No employee is permitted to accept, solicit or demand gifts or gratuities from suppliers, potential suppliers or other persons or enterprises that may wish to influence business decisions.
4. Nor may employees accept gifts or gratuities from customers if such gifts are intended as rewards for work carried out in the context of their employment relationship.
5. Offering gifts or gratuities of any kind to persons or enterprises our Company conducts or strives for a business relationship with is also prohibited.
6. Offering or accepting gifts or gratuities of any other kind within the meaning of the above rules is not prohibited in those cases in which the gift or gratuity remains within the limits of what is considered customary and ethically tenable in the context of local business practices.

This includes, in particular, gifts of a small value (up to €30.00) that the recipient does not have to maintain secrecy about and that do not create dependency, invitations to meals forming an expected part of normal social relations between business associates, and the acceptance or giving of locally customary tips.

7. Employees at Häfner & Krullmann GmbH who have doubts about whether the above rule governing exceptions is applicable must request a decision from management as to whether a gift or gratuity may be offered or accepted.

If you do not wish to do this, or if doing so is not possible for any other reason, the prohibitions stated above continue to apply.

Jan Häfner

Geschäftsführung

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