



Gebr. Heinemann
Gegründet 1879

Code of Ethics

Version 2



Dear Readers,

The Gebr. Heinemann Code of Ethics sets out core corporate values and rules of conduct, that also complement our mission statement. As a shop window to the world, serving different customers and cultures from all of its four corners, Gebr. Heinemann is duty-bound to comply with accepted international environmental, legal and social standards, in particular the ten principles of the United Nations Global Compact (UNGC).

The Code of Ethics applies to all employees and business partners directly or indirectly associated with Gebr. Heinemann. Managers have a particular responsibility to foster ethical behaviour within their departments. They serve as role models and help their team members adhere to the Code of Ethics in their daily activities. The purpose of the Code of Ethics is also to guide Gebr. Heinemann employees and business partners in dealing with other ecological, social and legal risks in their day-to-day business.

Each country has its own applicable laws, which naturally must be adhered to. These alone, however, do not always suffice, which is why Gebr. Heinemann has drawn up the follo-



wing minimum ethical requirements. If a country's national laws have stricter requirements than those outlined here, then the national laws will always take precedence. If a company within the Gebr. Heinemann group draws up its own Code of Ethics, then the rules laid out here will apply as a minimum standard, but can be supplemented by local amendments, which must be communicated to the Director Legal, Compliance & Sustainability.

Gebr. Heinemann also provides supplementary guidelines addressing specific themes in the Code of Ethics. These guidelines assist employees and business partners in implementing the Code of Ethics.



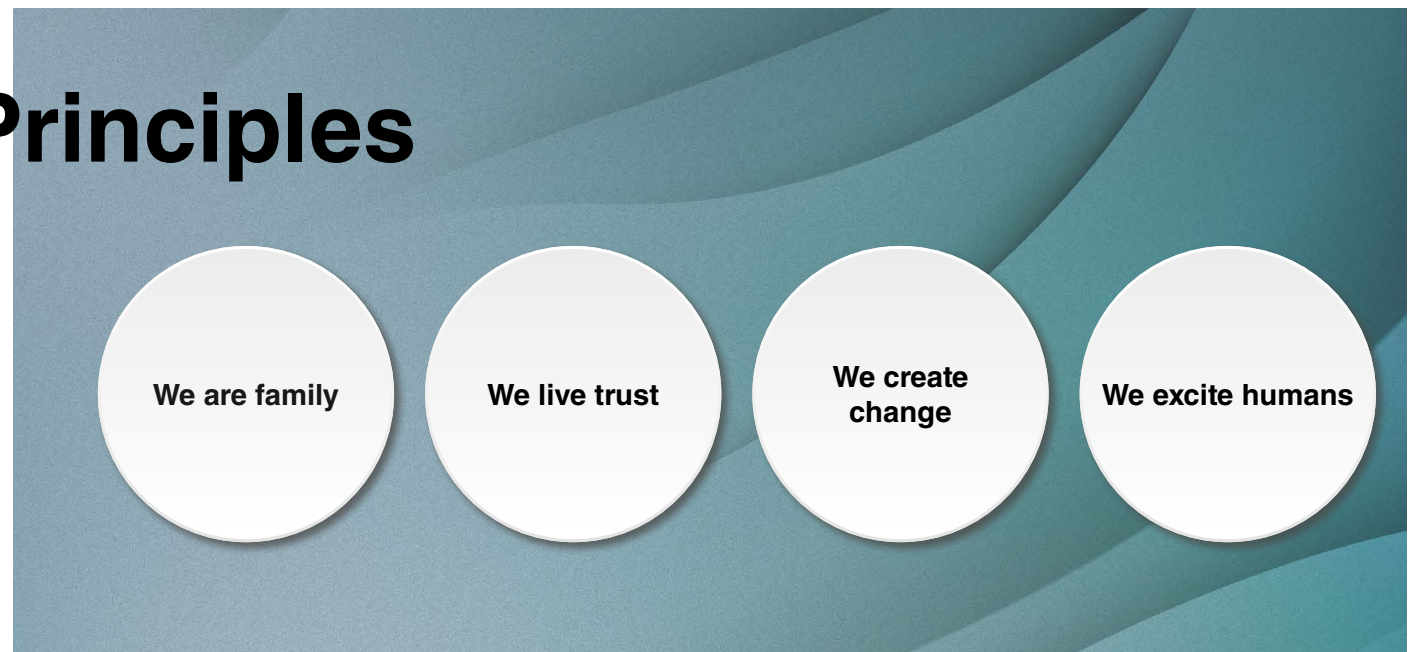
Gebr. Heinemann commits itself to being duty-bound to comply with accepted international environmental, legal and social standards, in particular the ten principles of the United Nations Global Compact (UNGC), to which the company is signatory since 2018. Together with our guiding principles, these standards are incorporated into the rules of conduct of this Code of Ethics.



Our Vision

The Heinemann Family. We turn travel time into valuable time as the most human-centric company in global Travel Retail.

Our Guiding Principles



The ten Principles of the United Nations Global Compact



1

Human Rights

Businesses should support and respect the protection of internationally proclaimed human rights.

2

Human Rights

Businesses should make sure that they are not complicit in human rights abuses.

3

Labour standards

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

4

Labour standards

Businesses should uphold the elimination of all forms of forced and compulsory labour.

5

Labour standards

Business should uphold the effective abolition of child labour.

6

Labour standards

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

7

Environment

Businesses should support a precautionary approach to environmental challenges.

8

Environment

Businesses should undertake initiatives to promote greater environmental responsibility.

9

Environment

Businesses should encourage the development and diffusion of environmentally friendly technologies.

10

Anti-Corruption

Businesses should work against corruption in all its forms, including extortion and bribery.

“We Live Trust”

That’s One of Our Guiding Principles

We therefore believe you already intuitively apply the principles of the Code of Ethics in your daily work. Nevertheless, in some cases there are different understandings of what is appropriate or allowed. In addition, Gebr. Heinemann is repositioning itself in the area of environmental, social and compliance standards, which is why this Code of Ethics is an important orientation for your everyday work.

Respect and Integrity

“Treating each other with respect strengthens our sense of community and encourages intercultural cooperation at Gebr. Heinemann.” Raoul Spanger, Co-CEO



- We always consider the impact that individual behaviour can have on the reputation of Gebr. Heinemann
- We actively promote equal opportunities
- We do not tolerate bullying or harassment in any form, including sexual harassment
- We do not discriminate against anybody on the basis of their ethnic origin, religion, nationality, skin colour, gender, sexual orientation, age or disability
- All communication must be truthful and factually correct. We will not knowingly produce materials containing false statements, presumptions or images

Human Rights and the Work Environment

“Promoting human rights and creating an appropriate work environment form the basis of our respectful approach towards our employees.” Max Heinemann, Co-CEO



- We firmly reject any form of child or forced labour
- We respect and promote freedom of association, freedom of opinion, and the right to collective bargaining. Any restrictions arise solely from our obligations concerning data protection and safeguarding commercial confidentiality, as well as the responsibility of every employee to protect the company's reputation
- We respect the existing legislation on minimum wages and remuneration, and working hours. We pay promptly and reject payroll deductions for disciplinary purposes
- We guarantee a safe and healthy work environment. Our general rule is to avoid security risks

Environmental Protection

“It is our duty to protect the natural environment and minimise the impact we have on the environment wherever possible.” Raoul Spanger, Co-CEO



- We take care to utilise resources efficiently and invest in protecting the environment through new technologies, processes and materials
- That includes prevention of harmful pollution as well as proper waste disposal
- We restrict our use of raw materials, energy, water, and other goods to that necessary for responsible corporate governance. We seek opportunities where Gebr. Heinemann can reuse or recycle resources, or reduce their use. We also encourage our business partners to reduce their negative impact on the environment, in particular through:
 - Reduction of packaging and processing materials
 - Reduction of plastics and micro-plastics
 - Reduction of greenhouse gas emissions
 - Increasing the use of recycled and recyclable materials
 - Pollution prevention and proper waste disposal
 - Protection and restoration of biodiversity and ecosystems

Fair Competition

“We are committed to fair competition and expect the same from our business partners.” Florian Seidel, CSO



- We act fairly with regard to competition and conduct our business in compliance with competition laws
- We do not tolerate money laundering and conduct all business in compliance with money laundering legislation
- We conduct all business in compliance with antitrust legislation
- We always treat our competitors with respect

Anti-Corruption and Conflicts of Interest

“Gebr. Heinemann condemns corruption and perceives doing so as part of its responsibility towards society.” Dr Kai Deneke, CFO



- We do not give, encourage or accept bribery in any form
- In the event of a potential conflict of interest, employees must inform their line manager and jointly develop a suitable and transparent solution
- When handling product samples, invitations, gifts, donations and other benefits we abide by the principles of legality, responsibility and propriety

Confidentiality and Data Protection

“We consider our company to be trustworthy, characterised by our efforts to respect the confidentiality of personal data and safeguard it.” Dr Kai Deneke, CFO



- We maintain the confidentiality of business transactions entrusted to us, both during as well as after completion of the business relationship
- We conduct all business in compliance with the applicable privacy policies. Personal data relating to employees and business partners - including but not limited to customers - is processed exclusively within the framework of the relevant policies and guidelines and is safeguarded against unauthorised access

A Responsible and Secure Supply Chain

“Gebr. Heinemann’s core business is in areas subject to strict security regulations. This requires particular safety measures for storage and transport.” Inken Callsen, CCO



- We have to ensure the integrity of all deliveries to areas subject to strict security regulations (e.g. airports or airlines). To this end we take particular care to prevent unauthorised third party access at all process stages (e.g. storage, handling, packaging, transport). Our main methods are implementing access and admission controls, employee background checks and staff training. Our transportation partners must adopt similar measures
- We expect our suppliers to contribute towards the highest level of security possible through implementing their own security measures

Animal Welfare

“Gebr. Heinemann supports animal welfare. All animal and animal-related products must conform to industry best practice.” Max Heinemann, Co-CEO



- All products must comply with local and national animal welfare legislation
- Gebr. Heinemann encourages its business partners to take all reasonable efforts to ensure that animal testing on consumer and industrial products is only used as a last resort to guarantee they are safe for consumption, or if it is legally required

Ethical Conduct of Employees and Business Partners

We expect our employees to observe and comply with this Code of Ethics at all times. If an employee's actions violate the Code of Ethics, there may be legal consequences.

Likewise, we expect our business partners to manufacture or provide all products and services in full compliance with the requirements set out in this Code of Ethics. Our business partners are responsible for strict compliance with all relevant national and international laws and regulations. They must take all necessary measures to ensure that the requirements of the Code of Ethics are met both by themselves and by their other business partners within their supply chain. In case of suspected violations of the Code of Ethics, the business partner is requested to support Gebr. Heinemann with all relevant information.

In the event of violations of this Code of Ethics, Gebr. Heinemann reserves the right to respond in an appropriate manner depending on the severity of the violation. This may range from demanding immediate correction of the violation to termination of the business relationship or employment. Gebr. Heinemann reserves the right to further develop this Code of Ethics and to publish updated versions.

Your Contact Persons

Employees who have questions, doubts or recommendations can contact their direct supervisors. For personnel questions, the respective HR department is a suitable point of contact. Business partners should first discuss this with their personal contact at Gebr. Heinemann. If you have any questions about this Code of Ethics or about compliance in general, our experts are at your disposal.



Saskia Möller,
Director Legal,
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Further concerns or breaches in relation to this Code of Ethics can also be reported to the following e-mail address: **ethics@gebr-heinemann.de**.

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