

**HOYER**

# Code of Conduct

Aware of the responsibility –  
committed to tradition.

**hoyer.de**

# Contents

## **3** Word from the family

## **4** Compliance with applicable laws and guideline

- Applicable laws
- Money laundering law and sanctions
- Antitrust law and fair competition
- Ban on corruption
- Fairness and conformity in terms of wages, working hours, and social benefits
- Questions and violations

## **7** Business practices

- Customer satisfaction
- Quality of goods and services offered
- Interactions with colleagues, customers, and business partners
- Conflicts of interest
- Data protection
- Foreign trade

## **9** Health and (occupational) safety

- Occupational safety
- Health

## **10** Corporate responsibility, sustainability, and environmental protection

- Motivating employees to behave sustainably
- Conservation of resources, CO2 reduction, and compliance with environmental standards
- Assumption of social responsibility
- Handling hazardous substances
- Ban on discrimination
- Working under coercion
- Freedom of association and expression

## Word from the family

In its daily actions, Hoyer depends on the trust of customers and the broader public as well as on the company's reputation. The name of the Hoyer family represents the company and its actions. It is therefore particularly important to us as a family that our values and the values of our company are upheld daily. Just as we do as a family, we expect the same from our employees and our national and international suppliers, in keeping with our motto: **Aware of the responsibility – committed to tradition.**

To manufacture our products, we source raw materials, goods, and services from various industries around the world. We expect the highest level of integrity and sustainability from our suppliers. This applies to the business activities of our direct suppliers as well as to all links in the product supply chain. Our focus is on continually improving working conditions, protecting human rights and the environment.

The minimum requirements arise from the current legal situation, but we attach great importance to always ensuring that our business partners also share and promote the broader values as hereby defined by us. Sustainability in the broader sense, but also legal compliance and

integrity, are not a necessary evil at Hoyer, but rather an important part of our corporate strategy and essentially reflect the family's values. We actively take responsibility for our environment, our region, our employees, and our society.

This Code of Conduct provides support to help ourselves and our employees live this corporate strategy and our values every day. We are aware that the world keeps evolving and that the company is constantly faced with new challenges and framework conditions, which will require continuous adaptations and additions to the code. We have made it a priority to monitor these changes and respond to them in a timely manner and adapt the Code of Conduct accordingly.

Our employees are a major pillar of the success of our company and the foundation for the direction of an equally successful future. So we would like to thank them for their support through their conformity to these values and guidelines.

The Hoyer family



Family Hoyer  
(v.l. Markus Hoyer,  
Stefan Hoyer ,  
Heinz-Wilhelm Hoyer  
Ulrike Hoyer and  
Thomas Hoyer)

# Compliance with applicable laws and guidelines

**»Our daily actions are consistent and without exception in conformity with the current applicable laws, including compliance with sanctions, trade restrictions and supply chain due diligence. We do not tolerate bribery, corruption or attempts to do so in our company and have processes and control mechanisms in place to prevent it.«**

### **Applicable laws**

The first prerequisite and basis of every action for Hoyer is absolute conformity with applicable laws, including applicable national and international trade regulations. Hoyer shows no tolerance for violations of applicable laws. Compliance with national laws and standards in countries other than Germany, in which suppliers are located, is a rudimentary requirement for a business relationship with Hoyer. The following fundamentals must be complied with:

#### Human Rights

- Universal Declaration of Human Rights (UN)
- UN Global Compact
- Declaration on Fundamental Principles and Rights at Work (ILO)

#### Environment

- Paris Agreement
- The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- The Stockholm Convention on Persistent Organic Pollutants
- The Minamata Convention on Mercury

Hoyer orientates its actions on the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Companies. Hoyer will not accept violations of these principles and will respond to possible incidents in accordance with applicable laws. For this purpose, Hoyer has implemented appropriate, effective, and robust processes.

### **Money laundering law and sanctions**

Money laundering is not practiced, supported, or ena-

bled at Hoyer. This applies to our own companies, but also to companies that have a business relationship with Hoyer or one of our subcontractors. For this reason, new and existing business partners are carefully and thoroughly examined before every transaction. This procedure also applies to existing sanctions and any other trade restrictions. The company complies with its obligations to prevent money laundering without exception. Direct and indirect support of terrorist organizations or companies by trading partners is also rejected. Any violations will be punished with the termination of the business relationship.

### **Antitrust law and fair competition**

We comply with laws that protect and promote competition, particularly antitrust laws. Antitrust law supports fair competition and free markets. Hoyer employees are therefore required to fully comply with these regulations. This means that employees do not agree on prices or other contractual conditions directly or indirectly with competitors at any time or in any form. Furthermore, it is strictly forbidden to divide markets with customers or suppliers in any way. Hoyer does not allow any agreements that violate antitrust law. Ultimately, no production adjustments (whether at our own company or at a customer or supplier) are discussed. Furthermore, Hoyer forcefully rejects involvement in anti-competitive business practices.

### **Ban on corruption**

Hoyer strictly rejects any form of corruption. The same applies to the offenses of theft, embezzlement, fraud, or blackmail. Any granting of benefits to private individuals, officials, companies, or groups of people with the aim of actively or passively influencing decision-making processes must also be rejected by suppliers.

**Fairness and conformity in terms of wages, working hours, and social benefits**

All compensations and social benefits strictly adhere to the basic principles regarding the minimum wage, applicable overtime regulations and statutory social benefits. Child labor is not tolerated in any phase of production or processing – compliance with the ban on child labor in accordance with the ILO core labor standards is also required of suppliers and business partners.

These include:

- all forms of slavery, child trafficking, serfdom and debt bondage, forced labor, forced recruitment of children for armed conflicts
- any direct or indirect involvement in child prostitution and pornography
- any direct or indirect participation in other unauthorized activities by children
- any working conditions that endanger the health, safety, or morality of children

In addition, Hoyer advocates compliance with national legal working hours and rest periods, compensation, minimum income, and social benefits. The withholding of an appropriate wage at the respective place of employment is strictly rejected.

The use of external personnel must generally be carried out in accordance with national legal regulations. Hoyer encourages its suppliers and international partners to monitor business areas, particularly considering human risks, e.g. occupational hazards, inhumane treatment, and the protection of life and limb.

Furthermore, Hoyer strictly rejects the use of private and public security forces if this leads to the curtailment of

freedom of association, injury to life and limb, as well as torture or other inappropriate treatment. Any violations will lead to a restriction or termination of business relationships with suppliers.

**Questions and violations**

If you have any questions regarding Hoyer's Code of Conduct or other internal policies and principles, please contact the Legal Department.

Hoyer encourages its employees to report any violations of the Code of Conduct, internal policies or applicable laws and regulations in accordance with the Hoyer Speak-up Policy.

The confidentiality of questions and any reports will be maintained. We will not accept any form of discrimination or retaliation against anyone who reports information in good faith. However, intentional false reports are not permitted.

# Business practices

**»The satisfaction of our customers is our priority. We achieve this by offering high quality products and a trusting, respectful approach of employees, which have the highest level of know-how through constant training and further education.«**

**Customer satisfaction**

Customer satisfaction is the basis of a successful business and therefore the foundation for Hoyer's further growth. Customers should not only identify with the company, but also place the highest level of trust in it. For this reason, it is important that employees treat them on an equal footing and maintain friendly, respectful, and sound interactions. Hoyer also focuses on continuous development of products to meet the constantly changing conditions.

**Quality of goods and services offered**

Hoyer stands for the highest quality of goods and services, regardless of whether it is the gas station attendant, the truck driver or diesel at the gas station. Quality inspections are therefore carried out in annual internal and external audits in accordance with DIN ISO 9001.

**Interactions with colleagues, customers, and business partners**

Reasonable, respectful interaction, both with internal and external contacts, is the basis of Hoyer's working environment. Every employee is therefore expected to have the highest level of integrity and decency. Gifts or invitations from/to customers or suppliers, if they are appropriate and agreed with the superior, are permitted at Hoyer. However, it must always be ensured that the recipient is not subject to any influence, regardless of whether it is intentionally or unintentionally. Under no circumstances may employees and business partners accept or give any donations to influence commercial decisions.

**Conflicts of interest**

Every employee in the company is required to check whether they or a person close to them has a connection to a company outside of Hoyer, that could cause a conflict for this employee. If potential conflicts exist, they

must be reported to the supervisor or the human resources department. The handling of such conflicts will be clarified individually.

The same applies to collaboration with suppliers. In the event of conflicts of interest that may arise from collaboration with business partners, Hoyer encourages suppliers to clarify these issues appropriately.

**Data protection**

At Hoyer, a large amount of personal data is processed every day. This data is primarily data that can be directly or indirectly assigned to a natural person. All employees are therefore required to protect the personal data of our customers, suppliers, colleagues, and other business partners from data misuse. This protection is based primarily on the General Data Protection Regulation and the Federal Data Protection Act. An external data protection officer acts as a monitoring but also advisory body for compliance with the regulation and law.

When dealing with suppliers, Hoyer pays particular attention to protecting all confidential data. It is therefore essential that they have appropriate management of their information systems and appropriate protection.

**Foreign trade**

In international trade, Hoyer encourages its suppliers to adhere to national and international foreign trade law regulations. A particular focus here is on export control and embargo regulations as well as on the control of unauthorized business activities with sanctioned individuals, companies, and organizations.



# Health and (occupational) safety

**»The safety and health of our employees, customers, and suppliers is our greatest asset. For this reason, without exception, we are vigilant to protect and continually improving them.«**

## **Occupational safety**

As a responsible employer, Hoyer sees the issue of safety as a fundamental pillar of the company. It is the employer's duty to protect all employees from potential hazards when carrying out their duties through appropriate safety standards and protective measures for the workplace and the work equipment. The implementation of the various areas of responsibility in the fields of occupational health and safety, such as carrying out risk assessments, maintaining accident statistics and implementing derived measures – such as occupational health prevention, operational integration management or instructions – are handled and further advanced by the respective department and supported by the occupational health and safety committee.

The members of the committee meet regularly to discuss current issues. Hoyer continually tries to help minimize accidents at work and ensure the safety of employees, customers, and business partners. For this reason, training and further education are offered continuously. Hoyer is guided by existing occupational safety stan-

dards, such as ISO 45001. These efforts include the identification, assessment, and reduction of potential accident risks, as well as appropriate health protection. Even when working with suppliers abroad, Hoyer attaches great importance to compliance with the right to occupational safety and its applicable obligations based on the respective national law.

## **Health**

Hoyer's employees are the company's greatest asset. The health of employees generally has the highest priority. Maintaining it is therefore a clearly defined goal of the company. Managers are required to always provide their employees with the best possible support and information in complying with occupational health and safety regulations. Hoyer adheres to the laws regarding breaks, rest periods and free time. Working hours must not exceed the legally prescribed maximum values. Employees are also asked to be aware of their responsibility towards their colleagues and to pay attention to their health within their sphere of influence.

# Corporate responsibility, sustainability, and environmental protection

**»As a family business, we have a special obligation towards employees, business partners and our environment. We are always aware of this civic responsibility. Sustainability is, for this reason, an integral part of our corporate policy in order to protect today's and future generations.«**

### **Motivating employees to behave sustainably**

At Hoyer, employees are motivated to adopt environmentally conscious and sustainable behavior. For this reason, employees are trained in operational environmental protection and encouraged to submit ideas and suggestions for improvement to continually improve processes and further strengthen sustainability.

### **Conservation of resources, CO2 reduction, and compliance with environmental standards**

Hoyer employees are required to use all resources sparingly and carefully. This also includes taking early measures to completely avoid or reduce environmental damage and to ensure the use of the best available technology. The entire Hoyer fleet (cars, trucks and fuel tank trucks) ensures compliance with current environmental standards by using the most modern vehicles, which contribute to reducing CO2 emissions by expanding and promoting the use of combined transport. At the same time, the staff is constantly trained in resource-saving driving.

To this end, Hoyer reduces direct and indirect emissions and continuously works to improve its energy balance against the background of renewable energies and alternative energy sources.

Our business activities are coordinated along the product life cycle and considers measures to conserve resources up to disposal. For example, Hoyer supplies packaging to professional repurposing so that they can be used again to avoid waste. Likewise, waste is only disposed of by certified specialist companies in accordance with the applicable legal regulations.

### **Assumption of social responsibility**

The Hoyer family sees itself as having a great social obligation. Hoyer is very open to promoting charitable and civic services and consistently and constantly supports numerous projects as well as sports clubs, kindergartens, non-profit organizations and many other. The company also provides in-kind and/or monetary donations for various purposes as it deems appropriate. However, the latter is limited to purely charitable institutions with regional connections, so that flows of money to political parties or individuals are excluded.

Hoyer is also aware of his responsibility in conflict materials and high-risk commodities. Therefore, fulfilling the duty of care is a top priority when it comes to dealing with commodity supply chains and the associated protection of human rights and the environment.

The same basic requirements apply to soil, water, environmental and health protection to preserve the natural habitat around the production facilities for all people living there.

In order to avoid a social imbalance in the regions of the production facilities and to secure the livelihoods of the local people, Hoyer rejects illegal forced eviction or the illegal deprivation of land, forests and water. This applies to acquisition, development, or other use of these goods. For the same reason, Hoyer does not participate in harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption. Since this could significantly impair natural livelihood, impede, or completely prevent access to safe drinking water or sanitary facilities, or risk health.

### **Handling hazardous substances**

Regarding hazardous substances such as mercury or persistent organic pollutants, Hoyer complies with applicable laws and regulations. Hoyer sources and uses these materials only to the extent permitted by law and stores, collects, transports, and disposes of these materials according to the highest safety standards. This applies accordingly to other hazardous waste.

### **Ban on discrimination**

Hoyer has been campaigning for jobs without discrimination for many years. Therefore, employees are not treated unequally based on national or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, or ideology. Hoyer also consistently rejects unequal pay for different genders for work of equal value. The same applies to any form of sexual harassment or sexual exploitation. These will not be tolerated in any way and Hoyer encourages all employees to immediately report any attempt at sexual harassment or exploitation to the legal department.

### **Working under coercion**

Hoyer advocates work performance without coercion or threat of punishment in accordance with the ILO core labor standards and the International Covenant on Civil and Political Rights. This means fundamental transparency for suppliers and business partners regarding forced labor and human trafficking and their rejection. Work performed that is based on serfdom, slavery or other forms of exploitation or humiliation also contradicts Hoyer's social self-image. Violations of this will be severely punished.

**Freedom of association and expression**

Of course, not all employees always agree. For this reason, Hoyer upholds the right to freedom of coalition, the free association and membership of unions, the right to strike and the right to collective bargaining. Unions may operate freely in accordance with the law of the place of employment. Hoyer rejects the restriction of these basic employee rights within the supply chain. Hoyer will not take any unjustified discriminatory or retaliatory measures against employees because of their founding, joining and membership. Hoyer also expects this from its suppliers.

The protection of freedom of expression, personal rights and privacy is particularly important to Hoyer. It serves as the basis for respectful communication within the company and for respectful interaction with one another. For Hoyer, it is therefore particularly important that suppliers can also identify with these principles.

**The Code of Conduct is binding for the following  
Hoyer subsidiaries:**

Wilhelm Hoyer B.V. & Co. KG

Finke Mineralölwerk GmbH

Hoyer G.m.b.H.

Kontor 53 GmbH

Hoyer Marine GmbH

Hoyer Trading & Supply GmbH

Hoyer Marine Trading GmbH

Sonnentau Erlebniscampus GmbH

Mycento GmbH

Hoppe Mineralölhandel GmbH

Hoppe Mineralöllogistik GmbH

Martin Knudsen Brennstoffe GmbH