

## Code of Conduct

Our policy sets out our shared values and how we would like to collaborate - today and in the future. It gives us a clear picture of the target, which we have to achieve, in order to secure our company success sustainably. Based on the core idea "WE are Heidolph" we can achieve this target only together.

In this regard, it is especially our values such as personal responsibility, sincerity and transparency that play an important role, as well as a behavior that is ethically correct and within the law.

The present Code of Conduct brings together for the first time in one document the basic rules and principles that are important to us and that will continue to be binding for us in the future.

It provides guidance and applies equally to every single member of our company – to the company management, the management staff and every single employee.

It is a claim to us internally and how we act in the company and at the same time an external promise for a responsible behavior against our business partners and the public but also in the interaction with each other within the company.

Together we bear the responsibility for the reputation of our company. The misconduct of any individual person can cause immense harm to all of us. Therefore, we ask you dear colleagues to read this code of conduct carefully and to use it together with us as a guideline for our daily behavior.



Andreas Hahn

CEO



Jürgen Pirthauer

CFO

Schwabach, 01.Dec.2023

## **Compliance with law and order**

The compliance with laws and regulations is an essential basic principle of our economically responsible actions. We always comply with the applicable legal prohibitions and obligations, even if this may cause short-term economic disadvantages or difficulties for the company or individual persons. If national laws have more restrictive provisions than the current regulations of Heidolph Instruments, the national laws will have precedence.

## **Fair competition**

Heidolph Instruments commits itself to fair competition in all business relationships. Heidolph Instruments ensures that no agreements are concluded with competitors, customers or suppliers which restrict competition on prices or by division of product or geographic markets. This applies, in particular, to tenders. Business decisions are made independently and without the exchange of sensitive information with competitors. Heidolph Instruments neither disseminates false information about competitors' products or services nor attempts to undertake any other unfair means to gain a competitive advantage.

## **Mutual respect and trust**

A culture of equality, trust and mutual respect is very important to us. We promote equal opportunities and do not tolerate discrimination. We treat all employees equally and attach great importance to equal opportunity and equal treatment regardless of ethnic or social origin, age, gender, skin color, sexual identity, disability, religious beliefs or worldview.

## **Human and labor rights**

We support the compliance with internationally recognized human rights and act in accordance with them. We strictly reject any form of forced labor or child labor. The right to equitable remuneration is recognized for all employees. Pay and other benefits comply at least with the respective national or local legal standards or the standards in the national economic sectors/industries and regions.

## **Occupational health and safety**

We see protecting the safety and health of our employees as an equally important corporate objective, besides the quality of our products and the business success. From the beginning, occupational health and safety are integral aspects of all operational processes and are factored into the technical, economic and social considerations starting at the planning phase.

Each of our employees promotes safety and health protection in his working environment and complies with the regulations regarding occupational health and safety. Every manager has a duty to exemplify and promote the commitment of this responsibility.

## Supplier and customer relationships

Agreements with our business partners are made thoroughly and unambiguously and are documented including retroactive changes and additions. This also applies to regulations such as the payment of bonuses, advertising or sales promotion grants. We adhere strictly to the internal regulations regarding the application of the double-checking system (“four-eyes-principle”) as well as regarding the separation of action and review function. Suppliers are selected purely on a competitive basis, taking quality, performance, suitability and the price of the products or services on offer into account.

- We carefully study the identity and integrity of potential business partners.
- We make our decisions fairly and with integrity based on objective criteria, taking into account quality, price, service, reliability, availability, technical performance, contract performance, resource and energy efficiency as well as environmental compatibility.
- We make sure through appropriate measures that, by transaction with third parties, applicable economic embargoes, sanction lists or regulations of the trade, import and export control or regulations against terrorist financing are not violated.
- We fulfill our commitment to prevent money laundering and minimize the general money laundering risk by careful examinations of third parties.

## Products

Our duty is to offer our customers safe and high-quality products of impeccable quality.

Products may not contain defects or unsafe features that could lead to the endangerment of people or to damage to property.

Excellent quality is our strength. We deliver products of best quality and reliability. In this way, we meet our customers' wishes and expectations. The benchmark for our actions when developing and producing our products and when providing services is always the principle of legality and our mission “Research made easy”. Our products reflect at least the current state of technology. If trade-offs appear in the practical implementation of these requirements, we express them openly. They are resolved in accordance with the principle of legality, the principles of responsible and fair business actions and the other Heidolph values.

## **Intellectual property of third parties**

We respect the intellectual property rights of third parties (industrial property rights (e.g. patents, brands, registered design) as well as copyrighted works (e.g. software, image rights)) and only use it if appropriate rights of use were granted to us. Third-party know-how that is not protected by an intellectual property right is used and shared as far as no legal regulations conflict with it. Third-party know-how that was communicated under a nondisclosure agreement may only be used and shared in compliance with the provisions of this nondisclosure agreement. This includes in particular production documents of third-parties as well as single data, dimensions and tolerances received by third-parties. Third-party software including open source software and firmware is only used in the context of the rights coverage granted and in compliance with the relevant license conditions.

## **Sustainable environmental and climate protection**

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. During the development of new products and services as well as during the operation of production plants, we ensure that all impacts on environment and climate protection are minimized as much as possible and that our products contribute positively to the environmental and climate protection for our customers.

Every employee bears responsibility for conserving natural resources and helping protect the environment and climate through their individual behavior.

## **Data protection and information security**

In all of our business processes, we ensure the protection of privacy, the protection of personal data as well as the security of all business information in compliance with the legal regulations. Regarding the organizational and technical protection of personal data, especially the protection from unauthorized access and loss, we follow an adequate standard taking duly into account the state of the art and the corresponding risk. Within the development of Heidolph products and new business models, we ensure an early implementation of the requirements of the data protection law and the information security. The data protection officer is at our disposal as contact person for questions about the correct handling of data.

## **Corruption**

We do not tolerate any form of corruption. Corrupt behavior of employees or business partners is punishable by law and leads to distortion of competition as well as to financial and reputational damages to Heidolph. We treat donations to public officers or comparable persons with extreme caution. We would like to avoid the mere appearance of a manipulation. This is why we do not accept donations of public officers. We do not offer advantages for the acceleration of certain official actions to public officers or grant such advantages. We take this into account regardless of whether there is a right for carrying out the official action or the public officer breaches his official duties during his action.

- We do not tolerate any form of bribery and corruption whether on behalf of public officers or in dealing with business partners.
- Donations in terms of invitations or presents are allowed in accordance with certain legal provisions if they are associated with advertising measures or if they serve the purpose to promote business relations or to present products or services.
- Such donations may only be accepted or granted if they have a legitimate business purpose and if they do not represent a consideration for an undue advantage. The donation may not have an unreasonably high value and may not transcend excessively the boundaries of the business norms or the normal living standard of the receiving person. When accepting or granting presents or invitations, the internal rules and especially the official permits have to be respected.

### **Business property**

We use the property and the resources of the company properly and carefully and protect it against loss, theft and misuse. The intellectual property of our company represents a competitive advantage

and thus an asset which deserves protection and which we defend against every unauthorized access by third parties.

We only use tangible and intangible property of the company for business purposes and not for personal purposes unless expressly allowed.

- We are responsible with corporate assets of any kind such as products, work equipment, IT equipment or intellectual property.
- Corporate assets are used for the intended business purposes and not for personal purposes that are inappropriate or inadmissible.
- Every form of fraud, infidelity, theft, embezzlement and tax evasion is prohibited, regardless of whether corporate assets or the assets of third parties are damaged.