

## Code of Conduct for our Partners, Suppliers & Subcontractors

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We refer to our actual Code of Conduct of the Heberger Group Rev. 29.11.2023, which can be downloaded from our Website under Compliance. It is overall and generally valid and must be considered accordingly.

### **Preface of the Management**

We are operating in Germany and internationally and as family-owned company, we expect from all our partners, suppliers and subcontractors their full commitment to ethical, social and ecological responsibility. Consequently, we have drafted the following Code of Conduct for all our partners, suppliers and subcontractors, where the expected behaviour regarding Business Compliance, human rights, working conditions, social equity and environmental protection defined clearly. It is mandatory to be complied with by all our partners, suppliers and subcontractors.

We point out, that all employees, subcontractors and sub-suppliers must be informed accordingly and be obliged.

The German LkSG (Lieferkettensorgfaltspflichtengesetz), which was put into effect on 01. January 2023 must be considered accordingly.

In general, all valid and recognized national and international laws, regulations, norms, guidelines, codes, OECD-principles, etc. (Enumeration is without demand of completeness). In case of the existence of differences between this Code of Conduct and national / international laws, the partners, suppliers and subcontractors are obliged to fulfill the stronger demands. Conflicts shall be evaluated and shall be reported without delay to the Chief Compliance Officer of HEBERGER

The main principles and topics are shown as follows:

### **1 General Principles in Competition**

#### **1.1 Corruption**

All HEBERGER Partners, suppliers and subcontractors commit themselves to non-tolerance of corruption. All international and local Anti-Corruption laws and standards must be adhered to. Any donations that maybe offered to state authorities or being or offered paid to third parties in order to gain advantages fall under this.

#### **1.2 Cartel and Competition**

Free competition is always in our focus and must be supported by all involved. Compliance with competition rules as well as with all national and international cartel laws referring to unfair competition must be adhered to strictly. Anti-competitive Agreements and taking advantage of market ruling positions are forbidden.

#### **1.3 Money laundering**

All laws forbidding money laundering or financing of illegal or unlawful purposes must be followed and complied with in general. All businesses must be done with serious business partners only. Solely resources / Monies from legal origin are allowed to be used.

#### **1.4 Confidentiality and Data Protection**

All HEBERGER Partners, suppliers and subcontractors commit themselves to compliance with all valid data protection specifications, including the German DSGVO and further relevant rules. Data processing is allowed in a transparent way and within the necessary framework only. Rights referring to information and correction as well as eventually objection, blocking and deletion must be complied with.



### **1.5 Export and Import**

All HEBERGER Partners, suppliers and subcontractors must comply with all laws regarding Import- and Export-Control, in particular with all valid sanctions, embargos and other rules.

### **1.6 Rules regarding labour law**

The International Labour Organisation recommends the employment and working conditions, which are the basis of the operations of HEBERGER. All HEBERGER Partners, suppliers and subcontractors are expected to follow the valid rules of working conditions as recommended by the International Labour Organisation and follow the same rules as well for their own employees.

The employees of all HEBERGER Partners, suppliers and subcontractors have the right to found unions and employee representations and to join and recognize them. Mechanisms for notices and complaints shall be strived for.

## **2 Human Rights**

### **2.1 Children's Work**

All HEBERGER Partners, suppliers and subcontractors comply with the rules of the United Nations regarding human and children's rights and do not employ persons under 16 years of age. In case that national rules have stronger standards, then the stronger rules shall be followed with priority.

### **2.2 Forced Labour**

Any form of forced and compulsory work is forbidden strictly and will not be tolerated. Works that are being executed involuntarily under force or under threat of penalties, including forced overtime, debt-bondage, compulsory prison labour, slavery or serfdom must not be used. In addition, all commit themselves to implement suitable measures against forced and compulsory works.

Consequently, it is expected, that all HEBERGER Partners, suppliers and subcontractors treat their employees with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may be implemented in compliance with national and international norms and human rights only.

### **2.3 Discrimination and Harassment**

Equal opportunities and equal treatment must be guaranteed by all HEBERGER Partners, suppliers and subcontractors, regardless of ancestry, skin colour, gender, religion, political opinion, nationality, social origin or other distinctive features.

It must be made sure, that no employee will be subject to verbal, psychological, sexual and / or physically force. Any form of intimidation by the employer is forbidden strictly.

**Wages and social Benefits:**

It is mandatory to pay appropriate wages for the works of the employees, whereas these must be in compliance with the valid laws and tariffs in the respective region.

Working hours must be in adherence with the relevant valid legal and tariff regulations. Professional skills of the employees shall be supported by suitable training and continuing education measures through all levels.

## **3 Work Safety and Health Protection**

All HEBERGER Partners, suppliers and subcontractors must adhere to the valid regulations regarding work safety and health protection relevant for them.

It is expected that all measures necessary for a safe, healthy and hygienic work environment will be implemented. All necessary protection measures and relevant education measures are part of that. Internationally recognized work safety and social standards must be adhered to (including social rooms & installations and potable water).



## **4 Environmental Protection**

### **4.1 Pollution and Conservation of Resources**

The HEBERGER Group continuously strives for achieving the best in all parts of its products and services, without neglecting its ecological responsibility. The permanent conservation of the natural resources can be achieved by sustainable environmental and climatic protection only, abiding to national and international laws and regulations. Environmentally friendly and sustainable production is taken for granted in order to positively contribute to secure the future. Our environmental protection regulations are expected to be supported and put into force.

All HEBERGER Partners, suppliers and subcontractors must adhere to the safe and environmentally friendly development, production and processing of products as well as their packing and transport.

### **4.2 Waste and Emissions**

It is expected that all HEBERGER Partners, suppliers and subcontractors implement systems and procedures securing the safe handling, transport, storage, recycling, re-use and management of raw materials, materials and waste. Negative implications to human health or environment must be prohibited / minimized.

The HEBERGER Partners, suppliers and subcontractors must take all preventive measures within their production facilities in order to avoid incidents, like occurrence of leakage of chemicals and / or explosions.

### **4.3 Biodiversity and Species / Animal Protection**

The HEBERGER Partners, suppliers and subcontractors have a co-responsibility for the protection of the biological diversity and the preservation of natural habitats. Interventions to the environment must be reduced to the Minimum and negative implications to ecological systems, flora and fauna must be avoided or compensated by suitable measures.

Therefore, we expect that measures will be considered for the protection and support of biodiversity in the production processes as well as in the construction and delivery processes in order to protect sensitive ecosystems. The protection of endangered species is to be complied with according to national and international standards and animal welfare friendly practices must be introduced in all processes in order to guarantee the long-term preservation of the natural environment.

## **5 Product Responsibility**

### **5.1 Product Safety**

All HEBERGER Partners, suppliers and subcontractors commit themselves to offer solely harmless products for the intended use and in addition to provide all important relevant product-information timely prior to the delivery / service and in particular to composition, to use (Safety data Sheets, to processing instructions, to assembly instructions and work safety measures) and eventually to disposal of its materials.

### **5.2 Clinical Studies and Animal Protection**

It is expected that clinical studies and / or animal testing will be done in accordance with international guidelines and valid national regulations only and that these are limited to the absolute necessary.

### **5.3 Conflict Minerals**

All HEBERGER Partners, suppliers and subcontractors make sure, that no products will be delivered containing metals with base-minerals or derivatives from conflict and high-risk areas, where they can be subject to direct or indirect financing or support to weaponized groups. The actual EU-Regulation for determination of duties for the compliance with duties of care for supply chains applies.

## **6 Compliance with the Code of Conduct for HEBERGER Partners, Suppliers and Subcontractors**

The strict compliance with this Code of Conduct is expected.

Violations to the described behavioural requirements of this Code of Conduct by a HEBERGER Partner, supplier and subcontractor can jeopardize business relation and result in suspension of the business relation.

The Code of Conduct shall be communicated by all Partners, suppliers and subcontractors within their organizations for adherence.

## **7 Chief Compliance Officer (CCO)**

The Chief Compliance Officer (CCO) of the HEBERGER Group is as Compliance Representative your responsible partner with regard to all queries to this Code of Conduct and all topics regarding Compliance.

Violations against the Code of Conduct of the HEBERGER Group for their Partners, suppliers and subcontractors can be reported to the CCO. Confidential treatment is guaranteed.

The CCO / Compliance-Representative contact data:

Internal HEBERGER Reporting Office:

Dipl.-Ing. Thomas Schattenfroh, Chief Compliance Officer of HEBERGER GmbH,  
Waldspitzweg 3, 67105 Schifferstadt / Germany

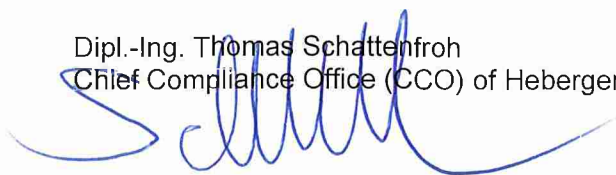
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Schifferstadt, 19.05.2025

Dipl.-Ing. Thomas Schattenfroh

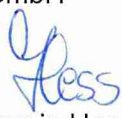
Chief Compliance Officer (CCO) of Heberger GmbH



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Michael Selinger



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Gregor Lelle