

Code of Conduct

Corporate Code of
Conduct of

HÜBERS Verfahrenstechnik Maschinenbau GmbH for suppliers

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1 Preamble

HÜBERS Verfahrenstechnik Maschinenbau GmbH is committed to sustainable and responsible management – in the interest of the company, its employees, the environment and the general public. As a medium-sized, family-run business, we are a part of the society. Compliance with applicable laws and regulations is the basis of cooperation. We also respect the cultural, social, political and legal diversity of societies and nations. Our values are set out in our corporate culture, as described in our Corporate Code of Conduct (CCC). It is an obligation for all employees acting within the company and externally.

We also expect our suppliers to act in accordance with our principles. In all business activities within their own sphere of influence, suppliers should work to ensure that their business partners and sub-suppliers also recognise these principles.

Young employees, in particular, should also be supported in the topics dealt with here to help them understand fair cooperation and sustainability.

2 General information

An essential goal of the corporate activities is to guarantee secure and good jobs with a reasonable income for as many people as possible. Therefore, securing and promoting the existence, wellbeing and success of the company is a benchmark for all our corporate activities.

Financial responsibility and thus, compliance with the legal requirements of proper accounting and disclosure must be a matter of course for every supplier.

We expect compliance with the socio-political obligations towards the people of our economic region, the communities and states concerned and the countries where our suppliers operate. Clean and recognised business practices and fair competition must be pursued. Corruption and bribery as well as the unfair taking of personal advantage by exploiting the operational position must be rejected.

Occupational safety and health, data privacy and environmental protection as well as the quality of products and services should assume priority.

3 Services for each employee

3.1 Human rights

We expect our suppliers to comply with human rights and not to tolerate neither passive nor active violations. In specific terms, this means respecting due diligence in all situations, avoiding complicity, actively eliminating abuses and prohibiting discrimination based on sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation.

This includes, in particular:

- prohibition of forced, compulsory and child labour and human trafficking
- a reasonable level of remuneration in accordance with applicable laws and regulations, and the related social security benefits
- protecting employees against physical, psychological and sexual harassment and violence
- protection against retaliation and safeguarding identity
- non-discriminatory treatment of all employees
- respect for employees' rights
- right to freedom of association

3.2 Labour practices/working conditions

We expect our suppliers to comply with all national and international social standards in their companies in terms of economic and social organisational policy.

This also includes:

- secure and decent jobs or employment relationships
- compliance with statutory working hours and break times
- vacation
- disciplinary and dismissal practices
- maternity leave
- occupational health and safety
- human development and training in accordance with national legislation
- open communications and transparency
- promotion, training and further education of young employees in order to facilitate them with the start into working life and to generate career advancement opportunities in the company through further education.

This also includes the prohibition of alcohol and drug consumption as well as active advocacy and appropriate disciplinary procedures against harassment and abuse.

3.3 Health and safety at work

We expect our suppliers to attach great importance to the safety of their employees and to implement appropriate measures.

These also include:

- safety in the workplace by eliminating sources of danger and complying with specific accident prevention regulations.
- compliance with established procedures
- regular training/briefing of employees on accident-safe working and behaviour
- compliance with the labour standard as regards the maximum authorised working time.
- risk assessments for the workplace and the resulting safety devices
- compulsory occupational health care and optional provision of medical services

4 Fair operating and business practices

4.1 General information

Fair and honest operating and business practices are an important aspect of ethical conduct. This includes combat against bribery and corruption, responsible political participation, fair competition and the promotion of social responsibility in the supply chain, as well as respect for all property rights.

4.2 Corruption/bribery/competition

Our suppliers must not tolerate any form of corruption, bribery, venality or any other illegal granting or acceptance of advantages. This includes, among others, granting and accepting favours (e.g. gifts, invitations, or other gratuities) outside the legally permissible limits.

Our suppliers must comply with all applicable antitrust laws. These laws promote and protect free and fair competition worldwide and prohibit any anti-competitive conduct. We expect our suppliers to attach as much importance to fair competition as we do.

4.3 Conflicts of interest

Our suppliers must avoid situations, in which personal interests, even if only apparent come into conflict with us as a company, customers or business partners. Business decisions must not be guided by private interests and relationships. Potential conflicts must therefore be identified as early as possible. The concerned supervisor or the HR manager must be contacted in the event of any conflict.

5 Commitment to the environment

We expect our suppliers to assume their environmental and social responsibilities and to reduce their environmental impact as far as possible with regard to:

- emissions in air and water
- disposal
- hazardous substances

Resources must be used sustainably through:

- energy and material efficiency
- careful water handling
- minimum consumption of product resources.
- We expect our suppliers to pay attention to the responsible use and conservation of (natural) resources in the manufacturing of products as well as in their work routine in terms of:
 - energy consumption and greenhouse gas emissions
 - water consumption
 - no pollution of groundwater and air
 - avoidance of unnecessary waste
- ensuring proper waste disposal
- observing the relevant guidelines for use and disposal of used chemicals
- focus on maximum energy efficiency in the development of their products
- doing their utmost as early as the planning and concept phase to maintain a clean and unpolluted environment and continuously reduce the number of hazardous substances used.
- understanding and adopting regulations governing occupational safety and health, environmental protection as well as quality management as a management task and obligation.

6 Communications and data privacy

Our suppliers should strive for open and cooperative communications both internally with employees and superiors as well as externally with customers, suppliers or authorities, for instance. However, trade secrets and business information of all partners must be kept strictly confidential. Documents and data must be properly stored.

The information and experience gathered may not be exploited in a manner contrary to the interests of the partners or made available to third parties.

In principle, it is necessary to protect secrets and to respect the property rights of third parties. Employees of our suppliers must be obligated to maintain the confidentiality of trade secrets and data of customers and business partners. Even after an employee quits the company, it must be forbidden to use or copy the information and data of a customer or

business partner. It must be ensured that no counterfeit products are used by any partner, thereby avoiding any conflicts of interest.

We expect that obligations under the applicable data protection regulations are respected, with the prohibition to disclose, make accessible or otherwise use protected personal data without authorisation, unless this is part of the respective lawful fulfilment of tasks.

Furthermore, we expect our suppliers to comply with the relevant commercial law regulations and the import and export control laws in all countries where they operate.

7 Implementation and enforcement

Expectations are seen as the basis for the successful development of business relationships between us and our partners. We expect our suppliers to behave in accordance with national laws and in line with this CCC in terms of ethics.