



HEIDELBERG GRAPHIC EQUIPMENT LIMITED SUPPLIER CODE OF ETHICS

SUPPLIER EXPECTATIONS

We expect our Suppliers to be focused on assisting Heidelberg Graphic Equipment Limited in achieving exceptional quality and service.

INTRODUCTION

Heidelberg Graphic Equipment Limited conducts its business at all times in accordance with its core values: Listen, Inspire and Deliver, Continuous Improvement, Customer Focus, and Innovation. As a result, we expect that our Suppliers operate in a manner that is consistent with these values.

Even though Suppliers are not under the direct control of Heidelberg Graphic Equipment Limited, the business practices and actions of a Supplier may significantly impact and/or reflect upon our company. The Supplier Code of Ethics [The Code] outlines the minimum standards that we expect our Suppliers to uphold.

LOCAL LAW ADHERENCE

Suppliers must operate in full compliance with all applicable laws, rules, and regulations of the countries, states, and municipalities in which they operate. In addition, this Code encourages Suppliers to go beyond legal compliance in order to advance social and environmental responsibility.

BIAS FOR QUALITY

All products and services delivered by Suppliers must meet the quality and safety standards required by national laws. When conducting business with or on behalf of Heidelberg Graphic Equipment Limited, Suppliers must comply with all Heidelberg quality requirements.

ETHICS

BUSINESS INTEGRITY

Corruption, extortion, and embezzlement in any form, are strictly prohibited. In all its activities, a Supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must the Supplier accept any such advantage in return for any preferential treatment of a third party. Records prepared for Heidelberg shall be accurate, truthful, and complete, and shall meet applicable standards and requirements.

CONFLICT OF INTEREST

Suppliers acting on Heidelberg Graphic Equipment Limited's behalf should be free from conflicts of interest that could adversely influence their judgement, objectivity, or loyalty in conducting Heidelberg business activities and assignments. Any potential conflict of interest should be proactively disclosed.

CONFLICT MINERALS AND CHEMISTRY

Heidelberg Graphic Equipment Limited expects its Suppliers to only source materials from environmentally and socially responsible sources.

UNFAIR BUSINESS PRACTICES

Standard of fair business, advertising and competition are to be upheld. Suppliers of Heidelberg Graphic Equipment Limited shall not engage in collusive bidding, price fixing price, discrimination or other unfair trade practices in violation of any applicable antitrust laws.

MARKETING AND ADVERTISING

Suppliers must not engage in advertising, marketing, or promotional activities that reference or implicate Heidelberg Graphic Equipment Limited, its name, logo, or services without prior written consent.

ID PROTECTION

Suppliers must respect intellectual property rights and safeguard customer information.

LABOUR AND HUMAN RIGHTS

ANTI-DISCRIMINATION

Suppliers shall not discriminate against any worker based on race, ethnicity, creed, colour, religion, sex (including pregnancy), age, national origin or ancestry, disability, genetic information, veteran/military status, sexual orientation, gender identity, or other protected characteristic under applicable law.

Workers with disabilities will be provided a reasonable working environment as needed to perform their job function.

FAIR TREATMENT

Suppliers shall commit to a workplace free of harassment. Suppliers shall prohibit harassment and unlawful discrimination in the workplace.

PREVENTION OF UNDERAGE LABOUR

The use of child labour by Suppliers is strictly prohibited. Child labour refers to work that is mentally, physically, socially, morally dangerous or harmful for children, or improperly interferes with their schooling needs. The use of legitimate workplace apprenticeship programs, which comply with all applicable laws and regulations, is supported.

WORKING HOURS

Suppliers must ensure that their employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked. In the event of conflict between a statute and a mandatory industry standard, Suppliers must comply with the one taking precedence under national law.

WAGES AND BENEFITS

Suppliers shall provide all workers with wages and benefits that comply with all applicable laws and binding agreements, including those pertaining to overtime work and other premium pay arrangements.

ANTISLAVERY AND HUMAN TRAFFICKING

Suppliers shall not engage in human trafficking or the use of slave labour.

HEALTH AND SAFETY

Heidelberg's Health and Safety policy is available on request or found here on our website: www.uk.heidelberg.com

ENVIRONMENTAL IMPACT

ENVIRONMENT

Suppliers must:

- 1) obtain and comply with all required environmental permits and regulations;
- 2) reduce, control, and/or eliminate wastewater, waste, and pollution at source;
- 3) reduce, control, and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols, and combustion products;
- 4) conform to applicable labelling and warning requirements; and
- 5) identify, manage, and handle regulated substances in accordance with law.

Heidelberg's environmental policy is available on request or can be found here on our website: www.uk.heidelberg.com

COMPLIANCE WITH CODE

If a Supplier becomes aware of any violation of these guidelines by any of its employees, officers, or representatives or any employee, officer, or representative of Heidelberg, the Supplier should report such violation to Heidelberg Graphic Equipment Limited at: webinfo@heidelberg.com

Alternatively, address letters to:

Heidelberg Graphic Equipment Limited, 69-76 High Street, Brentford, Middlesex TW8 0AA

Heidelberg reserves the right to verify by audit or other means each Supplier's compliance with the Code. In cases where Heidelberg becomes aware of any actions or conditions not in compliance with the Code, Heidelberg reserves the right to demand corrective measures or terminate an agreement with any Supplier that does not comply with the Code.

This Code also applies to any sub-contractor(s) to the Supplier providing goods or services to the Supplier. The Supplier is fully responsible for ensuring compliance by any such sub-contractor(s) as if it were the Supplier itself. Heidelberg reserves the right to audit the Supplier's sub-contractors for compliance to the Code.