

Principle

Code of Conduct for Business Partners

Scope Group-wide
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Preamble

The Heidelberg Group stands for integrity, reliability and fairness. An integral element of the Heidelberg Group's corporate identity is to comply with applicable legal and other regulations, and to adhere to generally accepted moral, ethical, and social principles.

In order to ensure this responsibility and obligation in its entirety, we also expect our suppliers and business partners to comply with all applicable laws, regulations and guidelines, as well as international and industry standards, and to acknowledge the principles described in this Heidelberg Group Code of Conduct and to observe them in the course of their business activities. We only maintain business relationships with reputable suppliers and business partners who comply with applicable laws, regulations and guidelines.

We expect our suppliers and business partners to pass on the principles specified in this Code of Conduct to their employees, subcontractors, suppliers and business partners and to make their best effort to commit them accordingly to the Code of Conduct or to the rules and principles contained therein and to regularly monitor compliance with these obligations.

We seek to hereby strengthen and further expand our continuous, long-term and integrity-based partnership with our suppliers and business partners.

The Heidelberg Group reserves the right to amend or supplement the requirements of this Code of Conduct for Suppliers and Business Partners in case of modifications to the Heidelberg Compliance Management System.

Purpose

The objective of this Code of Conduct for Suppliers and Business Partners is to specify the requirements and principles of integrity-based cooperation between the Heidelberg Group and its suppliers and business partners, in particular compliance with applicable laws, regulations and guidelines as well as moral, ethical and social principles and standards.

This Code of Conduct is not intended to replace applicable local and/or country-specific laws, regulations and guidelines to which the suppliers and/or business partners of the Heidelberg Group are subject. Rather, it promotes compliance with these applicable local and/or country-specific laws, regulations and guidelines by setting minimum requirements for the conduct of suppliers and business partners.

Scope

This Code of Conduct for Suppliers and Business Partners applies worldwide to suppliers and business partners of the Heidelberg Group (hereinafter referred to as “business partners”). Business partners are all natural persons and/or legal entities not belonging to the Heidelberg Group from whom the Heidelberg Group sources goods and services, including capital contributions (e.g. suppliers, sales representatives, agents, consultants, joint venture partners, etc.).

This Code of Conduct replaces, inter alia, all existing guidelines and work instructions regarding the subject of the Code of Conduct within its scope.

Guidance

Legal Compliance

The Heidelberg Group expects its business partners to comply with applicable laws, regulations and guidelines as well as internationally and industry recognised standards. The business partners comply, in particular, with the various local and country-specific laws, regulations and guidelines of the countries in which they operate.

Our business partners undertake to ensure that they have implemented suitable and appropriate measures to guarantee the relevant principles of this Code of Conduct and, in particular, the legal conformity of their conduct and their employees.

Free and fair competition

The Heidelberg Group expects its business partners to commit to free and fair competition in all business relationships with its customers, suppliers, business partners and/or competitors and to comply with the applicable laws, regulations and guidelines of competition and antitrust law. Our business partners ensure that no restrictive agreements are made concerning prices, markets or territorial divisions.

Prevention of corruption

The business partners of the Heidelberg Group are resolutely opposed to corruption of any kind. This means that they have implemented appropriate and necessary measures for combating corruption. Our business partners ensure that their employees will not promise or grant any inappropriate benefits, nor will they demand or accept such inappropriate benefits in both the private and the public sector. To this extent, they ensure that benefits in the form of gifts, hospitality or invitations are appropriate and are not used inappropriately to unfairly induce or influence any official duties or business actions or decisions or to obtain any otherwise inappropriate benefit.

Our business partners are obliged to report potential violations of anti-corruption principles in relation to Heidelberg Group immediately to their contact person or to the other reporting bodies of the Heidelberg Group (see “Consultation and reporting of violations”).

Prevention of conflicts of interest

The business partners of the Heidelberg Group are not influenced in their business decisions by personal interests or private contacts or relationships. In particular, they shall undertake to ensure that potential conflicts of interest relating to the Heidelberg Group will be disclosed without delay to their

Prevention of money laundering	contact person or to the other reporting bodies of the Heidelberg Group (see “Consultation and reporting of violations”).
Compliance with foreign trade and customs law	The Heidelberg Group expects of its business partners to have implemented effective and appropriate measures to ensure the identity and integrity of their customers, suppliers and business partners. Our business partners are obliged to comply with the legal requirements concerning money laundering and terrorist financing.
Data protection	<p>The business partners of the Heidelberg Group comply with the laws, regulations and guidelines applicable to national and international trade in the field of export controls and customs. Our business partners ensure that they do not maintain business relationships with customers, suppliers or business partners that are connected with nuclear, chemical or biological weapons, terrorism or drug trafficking or other prohibited activities.</p> <p>The Heidelberg Group expects of its business partners that they comply with applicable laws, regulations and guidelines on data protection and information security. In particular, the business partners must undertake to ensure that they have taken effective and appropriate measures to guarantee the data protection of personal data of customers or other personal data of the Heidelberg Group.</p> <p>The business partners are obliged to use confidential information and data of the Heidelberg Group or third parties, which they receive knowledge of within the business relationship, exclusively within the limits permitted. The business partners are obliged to verify, in cases of publication or disclosure within or outside the Heidelberg Group, whether the recipient is entitled to receive the confidential information or data.</p>
Occupational health and safety	The Heidelberg Group's business partners comply with the applicable laws, regulations and guidelines on occupational health and safety. Our business partners are obliged to implement effective and appropriate measures to prevent or minimise risks and to prevent accidents and occupational illnesses. The Heidelberg Group expects its business partners to maintain and further develop an appropriate health and safety management system. In particular, the Heidelberg Group expects its business partners to provide their employees with regular training on topics concerning occupational health and safety.
Prohibition of discrimination	The Heidelberg Group expects of its business partners that they guarantee and protect the principles of equal opportunity and equal treatment, regardless of colour, ethnic or social origin, religion, ideology, age, disability or sexual identity and orientation.
Prohibition of child and forced labour	The Heidelberg Group expects of its business partners that they respect internationally recognised human rights and support und promote compliance with these rights. In particular, our business partners are obliged to refrain from any kind of forced labour, in particular child labour.
Freedom of association and collective bargaining	The Heidelberg Group expects of its business partners that they recognise the legal rights of workers to form or join existing trade unions and to engage in collective bargaining. In particular, the business partners shall ensure that

	<p>members of employee organisations or trade unions are neither favoured nor disadvantaged.</p>
<p>Environmental protection</p>	<p>The Heidelberg Group's business partners support and promote the sustainable manufacture and production of their products and services. In particular, they shall promote their environmentally friendly development and distribution. Our business partners are obliged to comply with the laws, regulations and guidelines that apply to them, as well as with normal industry standards for environmental protection.</p>
<p>Consultation and reporting of violations</p>	<p>In cases of doubt and/or questions concerning interpretation, please ask your contact at the Heidelberg Group for advice. You may also consult the Local Compliance Officer, the relevant Regional Compliance Officer or the Compliance Office.</p> <p>You should promptly report any violation of the provisions in this Code of Conduct to your contact at the Heidelberg Group as well as to the Local Compliance Officer, the Regional Compliance Officer or the Compliance Office. You may also report this information confidentially and, if desired, anonymously to the Ombudsman of the Heidelberg Group.</p> <p>Further information can be found under the heading “Compliance” at www.heidelberg.com.</p>
<p>Right of information and inspection</p>	<p>The Heidelberg Group reserves the right to verify, or have third parties verify, the business partner's compliance with the requirements of this Code of Conduct in the event of relevant compliance misconduct or violations after prior written notice. The business partners of the Heidelberg Group are obliged to provide the necessary information and documents and to respond to questions without delay and in full upon request.</p>
<p>Sanctions</p>	<p>The Heidelberg Group intends compliance with this Code of Conduct within the framework of a constructive dialogue and cooperation with its business partners.</p> <p>In the event of minor violations of this Code of Conduct, the Heidelberg Group may grant the business partner the opportunity to implement effective and appropriate remedial measures within a reasonable period, provided that the business partner is prepared to remedy and improve the situation. If the business partner fails to remedy or improve the situation, the Heidelberg Group reserves the right to take further steps.</p> <p>In the event of serious violations of this Code of Conduct, in particular the commission of criminal acts, the Heidelberg Group reserves the right to impose appropriate sanctions on its business partners. This may include the immediate termination of the business relationship and the assertion of claims for damages and/or other rights.</p>
<p>Compliance with the Code of Conduct</p>	<p>Compliance with this Code of Conduct is the corporate responsibility of our business partners. They are obliged to comply with the principles described in this Heidelberg Group Code of Conduct. Business partners shall communicate and promote compliance with this Code of Conduct or any rules and principles</p>

contained herein among their own subcontractors, suppliers and business partners and shall regularly review compliance.

Board Resolution

Resolved at the Board meeting on December 6, 2021.

Signed by Rainer Hundsdörfer
Chief Executive Officer

Signed by Marcus A. Wassenberg
Member of the Management Board