

Principle

Code of Conduct for Employees

Scope	Group-wide
Content Coordinator	Melters, Leslie – LD
No. Eff.	PR06

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Preamble

As a corporation operating internationally and globally, we are required to face a constantly growing number of various customer-specific, economic and legal challenges. We are aware that there is an increasing emergence of compliance risks due to the multitude and complexity of such challenges and, in particular, there is a heightened danger of potential compliance misconduct or violations. The Management Board of the Heidelberg Group has therefore adopted the following Code of Conduct for Employees (“**Code of Conduct**”) as a guideline for employees, superiors and executive bodies of the Heidelberg Group for interaction with customers, suppliers and business partners. This Code of Conduct is based on the values of the Heidelberg Group.

The integrity of our employees, superiors and executive bodies of the Heidelberg Group shapes the public image and reputation of the Heidelberg Group and in doing so, creates trust in our products, services and trademarks of the Heidelberg Group. This integrity is firmly embedded in our corporate culture and structure. It forms the basis for our continuous and long-term corporate success. The Heidelberg Group takes all necessary measures to ensure this integrity.

The Heidelberg Group will pursue and sanction any compliance misconduct or violations of this Code of Conduct.

Purpose

The objective of this Code of Conduct is to provide a necessary guideline for the employees, superiors and executive bodies of the Heidelberg Group regarding interaction with customers, suppliers and business partners. This Code of Conduct is both a binding framework and orientation for our daily business activities and decisions.

The Code of Conduct sets behaviour requirements for all employees, superiors and executive bodies of the Heidelberg Group. Employees, superiors and executive bodies shall be able to examine independently whether their actions and decisions are compatible with the values and this Code of Conduct of the Heidelberg Group. To this extent, they are solely responsible for compliance with this Code of Conduct. The superiors and executive bodies of the Heidelberg Group are called upon to act as role models and to support their employees complying with this Code of Conduct.

In case of any doubts regarding the appropriateness of a business activity or decision, please consult with your superior, Local Compliance Officer, Regional Compliance Officer or the Compliance Office.

Scope

This principle applies worldwide to all employees, superiors and executive bodies of the Heidelberg Group (hereinafter referred to as “employees”).

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

This principle defines the minimum requirements for the behaviour of employees. The Heidelberg Group operates worldwide, therefore the employees are obliged to comply with all relevant laws, regulations and guidelines. Wherever local laws, regulations or guidelines are stricter, they shall apply in each case.

The Code of Conduct is further specified and supplemented by, inter alia, our internal policies, guidelines and work instructions.

Guidance

Legal Compliance

The Heidelberg Group complies with all laws, regulations and guidelines as well as with the generally acknowledged moral, ethical and social principles to which it has submitted and is obliged by law. The Heidelberg Group complies, in particular, with the various local and country-specific laws, regulations and guidelines of those countries in which it operates. The Heidelberg Group takes on its environmental and social responsibility and is committed to the Ten Principles of the UN Global Compact.

The applicable laws, regulations, guidelines and principles constitute the binding framework for the various business activities and decisions of the Heidelberg Group worldwide. Therefore, it is necessary for all employees to be aware of their legal obligations and to ensure their compliance.

The superiors and executive bodies of the Heidelberg Group are called upon to act as role models and to support their employees with regard to compliance with this Code of Conduct.

If you are unaware or unsure which laws, regulations or guidelines and/or internal policies and/or guidelines apply to you and your field of activity, please consult with your Local Compliance Officer, Regional Compliance Officer or the Compliance Office. The compliance organisation of the Heidelberg Group as well as contact details can be found on the Heidelberg Group’s Intranet under the key word “Compliance”.

Quality Management

The Heidelberg Group has defined its high expectations of product and service quality in its quality standard. With our quality management system, we observe, improve and review the quality of our products and services. We ensure that our products and services always comply with applicable laws, regulations and/or guidelines and that they are observed by our employees. Further requirements for our quality management are stipulated in, inter alia, our principle as well as our internal policies, guidelines and work instructions.

To fulfil this quality standard, the superiors and executive bodies of the Heidelberg Group are obliged to define and implement effective and

appropriate measures, functions and processes in their field of activity and to monitor them. Every employee is obliged to work towards fulfilling our quality standard. To this extent, every employee has to be aware of his special responsibility for compliance with our quality standard. Our employees are supported in this regard by our internal Quality Management Function (QY).

Free and fair competition

The Heidelberg Group is committed to free and fair competition in all business relationships with customers, suppliers, business partners and/or competitors. Therefore, we ensure that we do not enter into anticompetitive agreements with competitors concerning prices, markets or territorial shares. We also ensure that we do not enter into agreements on price fixing with customers, suppliers or business partners or into exclusive resale contracts regarding certain customers. If the Heidelberg Group has a dominant market position with regard to a particular product or service, we ensure that this market position is not economically exploited or abused by the Heidelberg Group. We do not use confidential information or data about competitors and/or pass them on to third parties. This applies, in particular, to public tenders. Further requirements are stipulated in, inter alia, our internal guideline “Antitrust prevention”.

Our business activities and decisions are decided independently and without the exchange of sensitive¹ information and data with our customers, suppliers, business partners and competitors. We always act in accordance with the principles of a free market economy and fair competition. We also expect the same from our customers, suppliers, business partners and competitors.

Prevention of corruption

The Heidelberg Group is determined to combat bribery and corruption of any kind. This means that all employees of the Heidelberg Group are prohibited, both in public and private sector, to offer, promise or grant any inappropriate benefits or to demand or accept such inappropriate benefits. Therefore, we ensure that benefits such as gifts, hospitality or invitations to our customers, suppliers or business partners are appropriate and are not used inappropriately to initiate or influence any official duties or business activities or decisions or to obtain any other inappropriate benefit. This applies, in particular, to interaction with public officials and/or public authorities. Further requirements are stipulated in, inter alia, our internal guidelines “Handling Gifts, Hospitality and Invitations” or “Donations and Sponsorships”.

We do not tolerate any form of corruption in our business decisions. In particular, we ensure that we avoid the appearance that any business activities or decisions of the Heidelberg Group has been induced or influenced by any inappropriate benefits. We also expect the same from our customers, suppliers and business partners.

Prevention of conflicts of interest

At the Heidelberg Group, our business activities and decisions are not influenced by personal interests, private contacts or relationships. Therefore, we ensure that potential conflicts of interest are disclosed immediately to the superior, Local Compliance Officer, Regional Compliance Officer or the

¹Whether information is sensitive, or not, depends on the recipient of the information. Sensitive information with regard to competitors includes prices, price conditions, price components, capacity quotas, customer territories etc. Sensitive information with regard to suppliers and business partners includes resale prices etc.

<p>Prevention of money laundering</p>	<p>Compliance Office. In particular, we ensure that we avoid any appearance of such a conflict of interest. We also expect the same from our customers, suppliers and business partners.</p>
<p>Compliance with foreign trade and customs law</p>	<p>The Heidelberg Group only conducts business with reputable customers, suppliers and business partners. Therefore, we ensure that we have implemented effective and appropriate measures to ensure the identity and integrity of our customers, suppliers and business partners. In particular, we also ensure that the business activities of our customers, suppliers and business partners are in accordance with legal requirements, concerning prevention of money laundering and terrorist financing, and we verify whether their financial resources are of legitimate origin. We also expect the same from our customers, suppliers and business partners. Further requirements are stipulated in, inter alia, our guideline “Prevention of Money Laundering”.</p> <p>As a corporation operating internationally and globally, we comply with the laws, regulations and guidelines applicable to national and international trade in the field of export controls and customs. Therefore, we ensure that effective and appropriate measures have been implemented to prevent the usage of our products and services for improper purposes. In particular, we also ensure that we 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. We also expect the same from our customers, suppliers and business partners. Further requirements are stipulated in, inter alia, our internal guidelines and work instructions.</p>
<p>Interaction with customers, suppliers and business partners</p>	<p>The business relationships with our customers, suppliers and business partners form the basis for the long-term success of the Heidelberg Group. To this extent, we ensure that we carefully select our customers, suppliers and business partners. We tolerate and only maintain business relationships with reputable customers, suppliers and business partners who comply with applicable laws, regulations and guidelines. Further requirements are stipulated in, inter alia, our “Business Partner Code of Conduct”.</p>
<p>Data protection</p> <ul style="list-style-type: none"> • Data protection <ul style="list-style-type: none"> • Information security • Confidentiality of information <ul style="list-style-type: none"> • Insider information 	<p>Data protection and information security are of fundamental importance to the Heidelberg Group. Therefore, we ensure that we handle information and data with care. In particular, we ensure that personal data is collected and processed within the limits permitted, for predefined purposes and in a transparent manner. We guarantee that personal data will be deleted or destroyed. In addition, we have implemented effective and appropriate technical and organisational measures to prevent unauthorised access, unauthorised or improper usage, loss and premature destruction of such information and data. Further requirements are stipulated in, inter alia, our internal policies/guidelines “Data protection” and “Information Security” and work instructions.</p> <p>In order to protect the trust and interests of our shareholders and investors, we ensure in particular that our employees will comply with the obligations of confidentiality, the prohibition of recommendations on acquisition or divestment and the prohibition on insider trading. Further requirements are stipulated in, inter alia, our internal guidelines and work instructions.</p>

Every employee is obliged to use information and data of the Heidelberg Group or third parties which he gains knowledge of due to his daily business activities exclusively within the limits permitted. He is also obliged to verify, in cases of publication or disclosure within or outside the Heidelberg Group, whether his disclosure is permitted and the recipient is entitled to receive the confidential information or data. In case of doubt, the information or data shall not be published or disclosed. Furthermore, employees are obliged to comply with data protection laws, regulations and guidelines. To this extent, every employee has to be aware of his responsibility for compliance with data protection and information security. Our employees are supported in this by our internal Data Protection Team (CA-DP), Data Protection Officer and Information Security Team (IS).

Protection of corporate assets

The innovations and our comprehensive knowledge and experiences form the basis for manufacturing and production of our excellent products and services at the Heidelberg Group. Therefore, we ensure that our innovations, knowledge and skills are carefully protected. This also applies to the protection of patents and trademarks of the Heidelberg Group worldwide. Further requirements are stipulated in, inter alia, our internal guidelines and work instructions.

Every employee is obliged to use confidential information and data of the Heidelberg Group or of third parties of which he gains knowledge of due to his daily business activities exclusively within the limits permitted. He is also 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. In case of doubt, the confidential information or data shall not be published or disclosed.

Occupational health and safety

The health of its employees and their occupational safety have the highest priority for the Heidelberg Group. Therefore, we ensure that effective and appropriate occupational health and safety regulations are implemented and observed worldwide, particularly at our production sites. Further requirements are stipulated in, inter alia, our internal guidelines and work instructions.

Every employee is obliged to work towards compliance with occupational safety regulations. The superiors and executive bodies of the Heidelberg Group are called upon to act as role models and support their employees in ensuring this compliance. In particular, the superiors and executive bodies of the Heidelberg Group ensure that the employees are carefully selected and instructed.

Prohibition of discrimination

The Heidelberg Group encourages and promotes the individual diversity of its employees and supports equal rights within its workforce. We maintain fair and respectful cooperation with employees and employee representatives.

At the Heidelberg Group, the principles of equal opportunity and equal treatment are guaranteed and protected regardless of colour, ethnic or social origin, religion, ideology, age, disability or sexual identity and orientation. Sexual harassment, as well as other forms of harassment in the workplace, are prohibited within the Heidelberg Group.

<p>Prohibition of child and forced labour</p>	<p>The superiors and executive bodies of the Heidelberg Group are called upon to act as role models through their own integrity and ensure a non-discriminatory and harassment-free working environment.</p> <p>The Heidelberg Group respects and supports compliance with internationally recognised human rights. In particular, we encourage and promote the free choice of employment. We ensure that no employee is employed against his will or is forced to work. All forms of forced labour, in particular child labour, are prohibited within the Heidelberg Group. We also expect the same from our customers, suppliers and business partners.</p>
<p>Freedom of association and collective bargaining</p>	<p>The Heidelberg Group recognises the legal rights of workers to form or join existing trade unions and to engage in collective bargaining. Members of employee organisations or trade unions are neither given preferential treatment, nor are they disadvantaged. The Heidelberg Group constructively cooperates with employees, employee representatives, and trade unions.</p> <p>In the event of disputes, it is the Heidelberg Group's goal to maintain long-term constructive cooperation and to strive for solutions that reflect both the business interests of the Heidelberg Group and the interests of its employees.</p>
<p>Environmental protection</p>	<p>The Heidelberg Group takes on stewardship for the environment and has included this in its environmental policy. To this extent, we promote and support the sustainable development, manufacture and production of our products and services. Therefore, we ensure that we reduce harmful emissions that pose climate and health risks, and optimise our production processes as regards resources, material and energy efficiency. For this purpose, we develop environmentally friendly and operationally safe innovations for all phases of the product life cycle. We seek to offer our products and services to our customers, suppliers and business partners in a “carbon-neutral” manner. Further requirements are stipulated in, inter alia, our internal policies, guidelines, and work instructions.</p> <p>Every employee is obliged to comply with the relevant environmental laws, regulations and guidelines. To this extent, every employee has to be aware of his responsibility for improving environmental performance. Our employees are supported in this by our internal Environmental Team (FM-SO) and our internal Product Compliance Team (RD).</p>
<p>Taxes</p>	<p>The Heidelberg Group complies with the tax requirements of the countries in which it operates. To this extent, we ensure that we responsibly fulfil and comply with our tax obligations. We are determined to combat any form of tax evasion or other tax offences. Further requirements are stipulated in, inter alia, our internal guidelines and work instructions.</p> <p>Every employee is obliged to comply with tax laws, regulations and guidelines. Our employees are supported in this by our internal Tax Function (GT).</p>
<p>Transparent financial reporting</p>	<p>Transparent financial reporting and equal treatment of all capital market investors serve to safeguard the trust and interest of our shareholders, investors, employees, customers, suppliers, business partners, the public and public authorities. Therefore, we ensure that we provide comprehensible,</p>

trustworthy and complete information on our Group financial data and facts in all our financial reports as well as in all other events relevant to the capital market. We comply with applicable laws, regulations and/or guidelines for financial reporting, for accounting and normal industry standards.

Every employee is obliged to work towards ensuring that the Group's financial data and facts are complete and accurate.

**Corporate
Citizenship**

As a corporation operating internationally and globally, the Heidelberg Group promotes and supports the communities and societies in which it operates. We support social and cultural community at our Heidelberg Group sites. In particular, we support various social projects and fulfil our social responsibility on the basis of a comprehensive education and further training programme at our Heidelberg Group sites.

**Consultation and
reporting of
violations**

In cases of doubt and/or questions concerning interpretation, please contact your superior for advice. If you are unaware or unsure which laws or internal policies and/or guidelines apply to you and your field of activity, please consult with your Local Compliance Officer, Regional Compliance Officer or the Compliance Office. The compliance organisation of the Heidelberg Group as well as contact details can be found on the Heidelberg Group's Intranet under the key word "Compliance".

Should you have a reason to suspect any violation of this Code of Conduct, you are required to report this to your superior or to your Local Compliance Officer, 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. It is advisable to document the incident.

Our internal whistleblowers are especially protected by our internal policies of the Heidelberg Group (see Guideline "Protection of Internal Whistleblowers"), safeguarding the trust-based and, where desired, anonymous reporting of information and prohibiting the sanctioning of any reports that have been submitted in good faith.

Please note that the deliberate spreading of false information is also sanctionable by law in many countries.

Sanctions

If you violate this Code of Conduct, then you may also be in violation of relevant laws, regulations and/or guidelines. In which case both the Heidelberg Group and you may face criminal prosecution in Germany and abroad and/or criminal sanctions and fines and/or civil claims for damages.

The Heidelberg Group reserves the right to take disciplinary actions against employees of the Heidelberg Group who violate the provisions of this Code of Conduct.

If you resist unlawful behaviour, you needn't fear any disciplinary actions. This applies in particular in cases in which the Heidelberg Group misses out on business or business prospects as a result.

**Compliance with the
Code of Conduct**

Compliance with the Heidelberg Group's Code of Conduct is the personal responsibility of each employee. Every employee is obliged to comply with this Code of Conduct and to act in accordance with its principles and regulations in conducting daily business. In particular, employees are

obliged to keep informed of the applicable laws, regulations and guidelines and internal policies and/or guidelines and to participate in the compliance training courses offered.

The superiors and the executive bodies of the Heidelberg Group are obliged to ensure that this Code of Conduct is complied with in their field of responsibility. To this extent, the superiors and the executive bodies of the Heidelberg Group are obliged to inform and foster an awareness among their employees regarding the content, measures, principles and rules of this Code of Conduct. The superiors and executive bodies of the Heidelberg Group are role models for compliance with this Code of Conduct.

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