

Principle

Code of Conduct for Employees

Legal, Intellectual Property & Compliance - Compliance

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1 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 (hereafter also "Heidelberg") has therefore adopted the following Code of Conduct for Employees ("Code of Conduct") as a guideline for employees, superiors and executive bodies of Heidelberg for interaction with customers, suppliers and business partners.

This Code of Conduct is based on the values of Heidelberg.

The integrity of our employees, superiors and executive bodies shapes our public image and reputation 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. Heidelberg takes all necessary measures to ensure this integrity.

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

2 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.

To this end, we are guided by ethical values and principles, in particular integrity and fairness as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

The Code of Conduct sets behavior requirements for all Heidelberg employees, superiors and executive bodies. Everyone shall be able to check on their own responsibility whether their behavior is compatible with the values and this Code of Conduct of Heidelberg. To this extent, they are responsible for compliance with this Code of Conduct. Heidelberg's superiors and executive bodies are called upon to act as role models here 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.

3 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 behavior 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.

4 Rules of Conduct

4.1 Integrity and compliance

Heidelberg complies with all laws, regulations and guidelines as well as with the generally acknowledged moral, ethical and social principles to which we have subjected ourselves and to which we are committed. In this context, Heidelberg pays particular attention to the various local laws, regulations and guidelines of those countries in which we operate. Heidelberg 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 worldwide. Therefore, it is essential for all employees to be aware of the legal obligations affecting them and to ensure their compliance. Heidelberg's superiors and executive bodies 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. Information on the Heidelberg Group's compliance organization and corresponding contact details can be found on the Heidelberg Group intranet under the heading "Compliance".

4.2 Free and fair competition

Heidelberg 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 Heidelberg 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.

Our business activities and decisions are decided independently and without the exchange of sensitive 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.

4.3 Prevention of corruption

Heidelberg is firmly committed to opposing bribery and corruption of any kind. This means that all employees 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.

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.

4.4 Prevention of conflicts of interest

At Heidelberg, 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 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.

4.5 Prevention of money laundering

Heidelberg only conducts business with reputable customers, suppliers and business partners. We have hence implemented suitable and appropriate measures to verify 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. Thus, we do not engage in transactions that serve to veil or integrate criminal or illegally acquired assets. We also expect this from our customers, suppliers and business partners.

4.6 Compliance with foreign trade and customs law

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 - in particular authorization requirements, export and support bans.

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.

4.7 Dealing with customers, suppliers and business partners

The business relationships with our customers, suppliers and business partners form the basis for the long-term success of Heidelberg. 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.

4.8 Handling data

4.8.1 Data protection and information security

Data protection and information security are of fundamental importance to Heidelberg.

Therefore, we ensure that we handle information and data with care. In particular, we ensure that personal data is collected, processed, stored and protected confidentially and only for legitimate, previously defined purposes and in a transparent manner. We ensure that personal data is deleted or destroyed in accordance with legal requirements. In addition, we have implemented effective and appropriate technical and organizational measures to prevent unauthorized access, unauthorized or improper usage, loss and premature destruction of such information and data.

4.8.2 Confidentiality of information

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.

4.8.3 Insider information

We protect confidential information and respect intellectual property; technology and know-how transfer shall be carried out in such a way as to protect intellectual property rights and customer information, trade secrets and non-public information. We comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

4.9 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.

Every employee is obliged to use confidential information and data of the Heidelberg Group or of third parties of which they gain knowledge of due to their daily business activities exclusively within the limits permitted. They are 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.

5 Health and Safety

The health of its employees and their occupational safety have the highest priority for Heidelberg.

Therefore, we ensure that effective and appropriate health and occupational safety measures are implemented and observed worldwide, particularly at our production sites. Every employee is obliged to work towards compliance with occupational safety regulations. The superiors and executive bodies of Heidelberg are called upon to act as role models and support their employees in ensuring this compliance. In particular, the superiors and executive bodies of Heidelberg ensure that the employees are carefully selected and instructed.

6 Compliance with human rights and labor practices

Heidelberg respects and supports compliance with internationally recognized human rights and avoids the causation of, as well as participation in, human rights violations.

6.1 Compensation and working hours

Heidelberg complies with the applicable laws and (international) labor standards with regard to the maximum permissible working hours and, likewise for remuneration, is guided by the applicable laws and any existing, binding collective wage agreements and is supplemented by the relevant, national minimum wage laws.

6.2 Freedom of collective bargaining and association

Heidelberg recognizes the right of workers to freedom of association, freedom of assembly, and to form or join existing trade unions and to engage in collective bargaining. Members of employee organizations or trade unions are neither given preferential treatment, nor are they disadvantaged. Cooperation with employees of Heidelberg, employee organizations or trade unions will be constructive.

In the event of disputes, it is Heidelberg's goal to maintain long-term constructive cooperation and to strive for solutions that reflect both the business interests of Heidelberg and the interests of its employees.

6.3 Promotion of Diversity, Inclusion and Equal Opportunities

Heidelberg 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.

The principles of equal opportunity and equal treatment regardless of gender, skin color, ethnic or social origin, religion, ideology, age, disability or sexual identity and orientation or other personal characteristics are guaranteed and protected. Discrimination and sexual harassment are prohibited within the Heidelberg Group, as are other forms of harassment in the workplace.

The superiors and executive bodies of Heidelberg are called upon to act as role models through their own integrity and ensure a non-discriminatory and harassment-free working environment.

6.4 Prohibition of forced labor

Forced labor, modern slavery, or comparable measures that deprive people of their freedom are neither used nor contributed to by the Heidelberg Group. They are therefore considered to be prohibited. In particular, we promote and grant the free choice of employment.

We therefore ensure that no employee is employed or forced to work against his or her will. We also expect this from our customers, suppliers, and business partners.

6.5 Prohibition of child labor

Heidelberg does not tolerate child labor.

We do not employ any employees who cannot prove that they are at least 15 years old, and we ask for proof of age. In countries that fall under the exception for developing countries according to ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not employ people for hazardous work who cannot demonstrate a minimum age of 18 years in accordance with ILO Convention No. 182.

7 Environment, energy and climate protection

Heidelberg takes on stewardship for the environment and has included this in its environmental policy. We act in accordance with applicable laws and are guided by international standards to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection. To this extent, we promote and support the sustainable development, manufacture and production of our products and services.

Every employee is obliged to comply with the relevant environmental laws, regulations and guidelines. To this extent, every employee has to be aware of their responsibility for improving environmental performance.

8 Dealing with conflict minerals

Heidelberg is committed to avoiding minerals from conflict or high-risk areas as defined in Annex 2 of the OECD Due Diligence Guidance in order to prevent human rights violations, corruption, and the financing of armed groups or similar.

9 Miscellaneous

9.1 Quality management

Heidelberg 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 Heidelberg 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.

9.2 Taxes

Heidelberg 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.

Every employee is obliged to comply with tax laws, regulations and guidelines.

9.3 Transparent financial reporting

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, 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.

9.4 Corporate Citizenship

As a corporation operating internationally and globally, Heidelberg promotes and supports the communities and societies in which it operates. We support social and cultural community at our

sites. In particular, we support various social projects and fulfil our social responsibility on the basis of a comprehensive education and further training program at our sites.

10 Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are sensitized to the contents of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labor law.

10.1 Communication

We communicate openly and in a dialog-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interests and stakeholders.

10.2 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 Heidelberg are obliged to ensure that this Code of Conduct is complied with in their field of responsibility. To this extent, they 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 Heidelberg are role models for compliance with this Code of Conduct.

10.3 Sanctions

In the event of a breach of this Code of Conduct, relevant laws, regulations and/or guidelines may also be violated. In this case, both the person acting, and the Heidelberg Group may be subject to criminal prosecution in Germany and abroad and/or criminal sanctions and fines as well as claims for damages under civil law.

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

You will not be subject to disciplinary action if you oppose unlawful conduct. This also applies if the Heidelberg Group loses business or business prospects as a result.

11 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 organization of the Heidelberg Group as well as contact details can be found on Heidelberg's Intranet under the keyword "Compliance".

If you become aware of any violation of this Code of Conduct, you should report this to your superior as well as to your Local Compliance Officer, your Regional Compliance Officer or the Compliance Office. Information about a possible violation can also be submitted confidentially and, if desired, anonymously to the Heidelberg Ombudsperson. It is advisable to document the incident.

Our internal whistleblowers are protected by Heidelberg, as the confidential and, if desired, anonymous reporting of information is guaranteed and the sanctioning of reports made in good faith is prohibited.

12 Board Resolution

Resolved at the Board meeting on October 10, 2022.

Signed by Ludwin Monz

Chief Executive Officer

Signed by Marcus A. Wassenberg

Member of the Management Board