

## Principle

## Code of Conduct

**Scope** Group-wide  
**Content Coordinator** Heeb, Oliver – LD  
**No. | Eff.** PR03

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## Purpose

For us, the staff and the managers of the Heidelberg Group (“**Heidelberg**”) as a global corporation, integrity and fairness are the fundamental principles upon which we base our actions.

Working in a respectful and cooperative manner and being aware of our social responsibility form the basis of our company’s success in the long term.

To ensure that our business and strategic goals are in keeping with our ethical, moral and social principles, we have prepared a set of binding rules aimed at providing guidance for our actions and decisions. In this context, we expect every individual to take responsibility and act in an entrepreneurial, reliable and customer-oriented way. The image and esteem of our company among customers, shareholders, business partners and the public are shaped by the attitude and behavior of each and every employee as a Heidelberg representative. Managers are asked to act as a role model here and support their staff by complying with our Code of Conduct.

The Code of Conduct describes the principles that we and our suppliers and service providers observe. It provides both a binding framework and guidance for our day-to-day actions and decisions.

## Rules of conduct

### Legal conformity and open-mindedness

Observing and complying with the applicable legislation, other legal requirements and guidelines, and moral and ethical principles as a basis for our actions are a matter of course for us. We act in an open-minded way and also take into account the guiding principles and standards of the countries and cultural groups in which we operate.

### Our corporate identity

Customers are at the heart of what we do. This is because customer satisfaction ensures success and jobs at our company in the long run. However, representing the interests of other stakeholders (shareholders, business partners, employees, the public and legislators) is also crucial in order to manage a company like Heidelberg successfully.

This is why our corporate identity involves the following:

With friendliness, openness and the ability to take criticism, we encourage one another to achieve common goals. Listening takes center stage here – we pay attention to one another and recognize the needs of other people. This allows us to encourage, motivate and inspire one another while remaining on the lookout for new solutions and meet the expectations that we have set ourselves.

By taking action, we are also taking on responsibility to achieve the targets we have set with our stakeholders and deliver on our promises, making us a

	<p>reliable partner as a result.</p> <p>Qualified and dedicated employees form the basis of our company's success and are supported accordingly.</p>
<b>Quality</b>	<p>Our aim is to continue setting standards for sophisticated services and to remain our customers' partner of choice in the future. The efficiency of our quality management is improved on an ongoing basis in order to continuously meet our high quality standards. This is based on reliability and expert advice. We also strive to maintain reliable and quality-oriented trade relations.</p> <p>Heidelberg's quality standards play a key role at our company, and our quality management system monitors the ongoing improvement and inspection of our products. In doing so, we are fulfilling our mission to further develop ourselves, our suppliers, our work processes and our collaborations in particular at all levels in a targeted manner.</p>
<b>Fair competition and antitrust law</b>	<p>We are committed to fair competition. Antitrust laws and other applicable competition laws are observed within this context. This particularly includes the ban on agreements on prices, conditions and production limits with competitors. We support free and open competition and firmly reject any agreements and discussions that may hamper the market. We do not tolerate the exchange of any sensitive information with competitors, the abuse of a dominant market position or other unlawful competition methods.</p>
<b>Corruption and manipulation</b>	<p>Heidelberg does not approve corruption or manipulation in any form. Granting or accepting additional advantages that are unjustified or any form of bribery or corruption vis-à-vis the authorities or business partners are not tolerated and are to be avoided at all costs.</p> <p>The applicable anti-corruption laws that exist worldwide play an important role for us. The place, reason or person these advantages are granted to are irrelevant. Accepting gifts, inappropriate invitations or other favors and benefits are prohibited unless these are insignificant; our internal guidelines provide further rules on this matter. Corporate hospitality must be organized appropriately in line with the company's legitimate business interests and intentions.</p> <p>In particular, reasonable judgment and personal integrity play a major role in this context. All action must be taken in keeping with our values at all times and may not be shaped by any threats or other external influences.</p>
<b>Conflicts of interest</b>	<p>Conflicts of interest must be disclosed. A conflict of interest exists if professional decisions are taken under the influence of private interests or circumstances. Situations entailing a risk of prejudice must be avoided.</p> <p>Any unilateral advantages or unjustified disadvantages for a business partner must be avoided. Transparent and complete, written evidence of business operations or transactions provide support within this context.</p>
<b>Entrepreneurial thinking and action</b>	<p>Handling all assets efficiently and responsibly is fundamental to our corporate identity. Assets include all types of corporate property, including operating facilities, tools, Heidelberg products, fleet vehicles, software, corporate data, brands and logos, and also working hours. These Heidelberg assets may be</p>

used for operational purposes only and not for private purposes. As a result of our economic responsibility, abusing or wasting corporate property must be avoided. Every employee makes a contribution to the company's success by handling corporate resources with care.

**Confidential information and intellectual property**

We handle confidential information with care. In the area of data protection, we protect documents and information that have been entrusted to us by third parties as agreed. This also means carefully handling information that has been entrusted to us by passing it on only to employees and managers that need this information in order to perform their work. Sensitive data is not forwarded to third parties and is protected against unauthorized access by third parties.

The protection of intellectual property, particularly developments, is important for our company. Absolute confidentiality and documentation are essential.

**Laws on insider trading**

We comply with statutory provisions on the improper use of insider information. Heidelberg combats the distribution of false information and ensures that insider information is disclosed to the Federal Financial Supervisory Authority in time. We refrain from any action that may lead to unlawful price manipulation.

**Employees: occupational health and safety**

We ensure occupational health and safety in the workplace. To avoid the risk of accidents, occupational illnesses and other health problems as far as possible, we comply with statutory requirements and national safety standards that are applicable at the company's locations. We regularly take part in occupational safety training programs, which allows us to take the necessary measures to minimize risks and take precautions. We adhere to safety and environmental guidelines and ensure that neither us or others are put at risk.

**Freedom of association**

We recognize freedom of association and collective bargaining rights. Members of workers' associations and trade unions are treated neither more nor less favorably at our company. We are confident that both parties and the company as a whole can benefit from a constructive exchange between Heidelberg and workers' associations and trade unions.

**People and the environment: human rights, prohibition of child and forced labor and discrimination**

We highly appreciate the individual diversity of employees at Heidelberg. We respect the different values and cultural backgrounds that exist and do not tolerate discrimination of any kind. In particular, any form of discrimination based on gender, race, disability, age, sexual orientation or religion is not tolerated. Promoting equality, especially when recruiting and employing staff, is important to us.

We respect and support compliance with internationally recognized human rights and are not involved in any violations thereof. We disapprove of child labor and make no use of illegal child labor as a result. Furthermore, we disapprove of forced labor in any shape or form.

**Environmental policy**

Heidelberg is an exemplary sustainable company in its industry and observes all environmental protection requirements stipulated by law and the authorities. We are continuously making improvements to protect the environment. To do this, we are gradually reducing emissions that have an impact on climate and health while ensuring that our production processes are optimized with regard to resource, material and energy efficiency. We are also

developing eco-friendly and reliable innovations for all product lifecycle stages. Whenever possible and where appropriate, we are increasing the energy efficiency of our products and reducing process emissions and waste during operations. Being able to offer our customers carbon-neutral products and services is also important to us.

**Social engagement**

We support the principle of sustainability and promote social and cultural activities at our company’s locations. We fulfill our social responsibility by making an active contribution to education and further training.

At the Heidelberg locations, we encourage an intercultural dialog and offer support for social projects aimed at helping others to help themselves.

**Transparency and conflict resolution**

In cases of doubt or interpretation issues, all Heidelberg employees and managers may contact their supervisors, the relevant employee representatives, the Compliance team or the company’s management. They are on their staff’s side and offer support at all times while engaging in an open dialog with them.

The company’s management may also take additional organizational measures or issue further requirements such as internal guidelines to implement the “Heidelberg Code of Conduct”.

**Implementing the Code of Conduct**

Complying with the Code of Conduct is important to us. We will take appropriate measures to support any affected employees or managers if the Code has been breached. Heidelberg expects all employees and managers to comply with this Code of Conduct. Breaches of the legislation in force can have a negative impact; for instance, this can damage the company’s reputation, which may affect the Group and its position in the market. We are directly calling on all employees and managers to comply with these requirements.

Violations shall be prosecuted consistently and resolved as soon as possible. Deliberate violations of the legislation in force, collective bargaining agreements, company agreements and individual contractual terms shall be penalized accordingly.

**Board Resolution**

Resolved at the Board meeting on March 20, 2017.



Rainer Hundsdörfer  
Chief Executive Officer



Dr. Ulrich Hermann  
Member of the Management Board



Dirk Kaliebe  
Member of the Management Board



Stephan Plenz  
Member of the Management Board