

# Principle

# Code of Conduct for Business Partners

**Legal, Intellectual Property & Compliance – Compliance**

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# Contents

1	Preamble.....	3
2	Purpose.....	3
3	Scope .....	4
4	Rules of Conduct.....	4
4.1	Integrity and compliance .....	4
4.2	Free and fair competition .....	4
4.3	Prevention of corruption .....	5
4.4	Prevention of conflicts of interest .....	5
4.5	Prevention of money laundering.....	5
4.6	Compliance with foreign trade and customs law.....	5
4.7	Data Protection .....	6
4.8	Protection of Information and Intellectual Property .....	6
5	Health and Safety .....	6
6	Compliance with human rights and labor practices .....	6
6.1	Compensation and working hours .....	6
6.2	Freedom of collective bargaining and association.....	7
6.3	Promotion of Diversity, Inclusion, and Equal Opportunities .....	7
6.4	Prohibition of forced labor .....	7
6.5	Prohibition of child labor .....	7
7	Environment, energy and climate protection .....	7
8	Dealing with conflict minerals .....	8
9	Supply chain.....	8
10	Compliance with the Code of Conduct .....	8
11	Right of information and inspection .....	8

<b>12 Sanctions .....</b>	<b>8</b>
<b>13 Consultation and reporting of violations .....</b>	<b>9</b>
<b>14 Board Resolution .....</b>	<b>9</b>

## 1 Preamble

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

In this regard, we are guided by ethical values and principles, in particular integrity and probity, 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.

In order to fulfil this responsibility and obligation in its entirety, we also expect the same basic understanding from our suppliers and business partners, who are required to comply with all applicable laws, regulations and guidelines, as well as international and industry standards, and to acknowledge and observe the principles described in this Heidelberg Group Code of Conduct 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.

Heidelberg 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.

## 2 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 Heidelberg 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 Heidelberg's suppliers and/or business partners 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.

### 3 Scope

This Code of Conduct for Suppliers and Business Partners applies to Heidelberg's suppliers and business partners worldwide.

Business partners are all natural persons and/or legal entities not belonging to the Heidelberg Group from whom Heidelberg 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.

### 4 Rules of Conduct

#### 4.1 Integrity and compliance

Heidelberg expects its business partners to comply with applicable laws, regulations and guidelines as well as internationally and industry recognized 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.

If local laws and regulations are less restrictive, conduct will be oriented to the principles contained in this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail.

Heidelberg expects its business partners to take appropriate measures so that the following issues are adequately addressed.

#### 4.2 Free and fair competition

Heidelberg 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.

### 4.3 Prevention of corruption

Heidelberg's business partners 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 immediately to their contact person or to the other reporting bodies of Heidelberg (see "Consultation and reporting of violations").

### 4.4 Prevention of conflicts of interest

Heidelberg's business partners avoid conflicts of interest internally and vis-à-vis Heidelberg that could illegitimately influence business relationships and thus do not allow personal interests or private contacts or relationships to influence their business decisions. In particular, they ensure that potential conflicts of interest relating to Heidelberg are disclosed immediately to their contact person or to Heidelberg's other reporting bodies (see "Consultation and reporting of violations").

### 4.5 Prevention of money laundering

Heidelberg 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 and to refrain from participating in transactions that serve to conceal or integrate criminal or illegally acquired assets into the economic cycle.

### 4.6 Compliance with foreign trade and customs law

Heidelberg's business partners 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 bans, and support bans. 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.

## 4.7 Data Protection

Heidelberg 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 ensure that they have taken effective and appropriate measures to guarantee the data protection requirements relating to the protection of personal data of customers or other personal data of the Heidelberg Group.

The business partners are obliged to use confidential information and data of Heidelberg 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 Heidelberg, whether the recipient is entitled to receive the confidential information or data.

## 4.8 Protection of Information and Intellectual Property

Heidelberg expects its business partners to protect confidential information and respect intellectual property. Technology and know-how transfer shall be carried out in such a way that intellectual property rights and customer information, trade secrets, and non-public information are protected. Heidelberg expects its business partners to comply with the applicable laws on the protection of trade secrets and to treat confidential information accordingly.

## 5 Health and Safety

Heidelberg'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 health and occupational safety measures to prevent or minimize risks and to prevent accidents and occupational illnesses.

Heidelberg expects its business partners to maintain and further develop an appropriate health and safety management system. In particular, Heidelberg expects its business partners to provide their employees with regular training on topics concerning occupational health and safety.

## 6 Compliance with human rights and labor practices

Heidelberg expects its business partners to commit to internationally recognized human rights and to support and promote their observance so as to avoid causation of or participation in human rights violations.

### 6.1 Compensation and working hours

Heidelberg expects its business partners to comply with the applicable laws and (international) labor standards with regard to the maximum permissible working hours and, with regard to

remuneration, to comply with the applicable laws, any existing binding collective wage agreements, and the relevant, national minimum wage laws.

## 6.2 Freedom of collective bargaining and association

Heidelberg expects of its business partners that they recognize the legal rights of employees to freedom of association, freedom of assembly, and to form or join existing trade unions and to engage in collective bargaining. In particular, the business partners shall ensure that members of employee organizations or trade unions are neither favored nor disadvantaged.

## 6.3 Promotion of Diversity, Inclusion, and Equal Opportunities

Heidelberg expects of its business partners to ensure and protect 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.

Heidelberg's business partners prohibit sexual harassment, as well as any other form of harassment and discrimination in the workplace.

## 6.4 Prohibition of forced labor

Heidelberg's business partners are obligated neither to use nor to contribute to forced labor, modern slavery, or comparable measures that deprive people of their freedom.

## 6.5 Prohibition of child labor

Heidelberg expects its business partners not to tolerate child labor.

In particular, no employees should be hired who cannot demonstrate a minimum age of 15. 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. No employees shall be hired 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'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. Heidelberg's business partners are committed to reducing environmental pollution and working continuously to improve environmental and climate protection.



## 8 Dealing with conflict minerals

Heidelberg expects its business partners to take measures with due diligence to avoid the use of conflict minerals in products in order to prevent human rights violations, corruption, and financing of armed groups or similar.

## 9 Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains.

We reserve the right to review the application of this Code of Conduct by our suppliers systematically and on an *ad hoc* basis. This can be done through questionnaires, assessments or audits. If there are still doubts regarding compliance with this Code of Conduct, the supplier will be asked to take appropriate countermeasures and report the matter to his responsible contact in our company. If necessary, the cooperation will be terminated.

## 10 Compliance with the Code of Conduct

Compliance with this Code of Conduct is the corporate responsibility of our business partners. Heidelberg expects its suppliers to comply with the principles described in this Code of Conduct or to apply equivalent Code of Conducts.

Business partners shall communicate and promote compliance with this Code of Conduct or regulations and principles contained herein among their own subcontractors, suppliers and business partners and shall regularly review compliance.

## 11 Right of information and inspection

Heidelberg reserves the right to check the business partner's compliance with the requirements of this Code of Conduct in the event of relevant compliance misconduct or violations, or to have this checked by third parties, after prior written notification. Heidelberg's business partners are obliged to immediately and completely provide the necessary information and documents and to provide disclosure upon request.

## 12 Sanctions

Heidelberg intends to ensure compliance with this Code of Conduct within the framework of a constructive dialogue and cooperation with its business partners.

In the event of minor violations of this Code of Conduct, Heidelberg 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, Heidelberg reserves the right to take further steps.

In the event of serious violations of this Code of Conduct, in particular the commission of criminal acts, Heidelberg 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.

### **13 Consultation and reporting of violations**

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.

If you become aware of any violation of the provisions in this Code of Conduct, you should promptly report it to your contact person in the Heidelberg Group as well as to the Local Compliance Officer, the Regional Compliance Officer or the Compliance Office. You may also submit this information confidentially and, if desired, anonymously to the Ombudsman of the Heidelberg Group.

Further information can be found under the heading “Compliance” at [www.heidelberg.com](http://www.heidelberg.com).

### **14 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