

**Corporate Code
of Conduct
(CCC)**Corporate Code of
Conduct of

HÜBERS Verfahrenstechnik Maschinenbau GmbH

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1 Preamble

Every company has the fundamental obligation to adapt to the framework conditions of the country and the social environment where it operates. In a rapidly changing world and with ever-increasing competitive pressure, it is becoming increasingly difficult for companies to find clear points of reference for themselves and for the employees entrusted to their care. This is why we want to draw up and apply binding general guidelines for the conduct of employees and managers based on laws, ethical principles and standards (i.e. this "CCC").

These guidelines also document our fundamental approach and provide us with a generally binding guideline for setting out our business goals and putting them into practice.

These principles should form the basis of our work routine.

2 Scope

This CCC applies to all employees of HÜBERS Verfahrenstechnik Maschinenbau GmbH (hereinafter referred to as HÜBERS). It is a special, binding obligation for executive employees. The executive employees must set an example by following, communicating and complying with the CCC.

Young employees, in particular, should be supported in the topics dealt with here to help them understand fair cooperation and sustainability.

Compliance with the CCC is also promoted within the scope of the respective possibilities and scope of action also at the suppliers and in the value creation chain.

3 Corporate principles

An essential goal of our actions is to guarantee secure and good jobs with a reasonable income for as many people as possible. Therefore, securing and promoting the existence, wellbeing and success of the company is a benchmark for all our corporate activities.

We are aware of the resulting financial responsibility and we comply with the legal requirements of proper accounting and disclosure. This also includes the proper and responsible collection and evaluation of all of the data needed for this purpose. These are the basis of our corporate decisions.

We want to observe the socio-political obligations towards the people of our economic region, the communities and states concerned and the countries where we operate. We pursue clean and recognised business practices and fair competition. We reject corruption and bribery as well as the unfair taking of personal advantage by exploiting the operational position.

In addition to the requirements of legal norms and standards, the expectations and wishes of our customers are both objectives and guidelines alike. As a matter of course, occupational safety and health, data privacy and environmental protection as well as the quality of our products and services have priority in the practical implementation of our corporate philosophy.

4 At the service of each employee

4.1 Human rights

Motivated employees at all levels are the basis of our successful products. It is natural for us to respect human rights i.e. we are committed to observing human rights in all of our business activities and we will not tolerate neither passive nor active violations. In specific terms, this means respecting due diligence in all situations, avoiding complicity, actively eliminating abuses and prohibiting discrimination based on sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation.

This includes, in particular:

- prohibition of forced, compulsory and child labour and human trafficking
- a reasonable level of remuneration in accordance with applicable tariffs, laws and regulations, and the related social security benefits
- protection of employees against physical, psychological and sexual harassment and violence
- protection against retaliation and safeguarding identity
- non-discriminatory treatment of all employees
- respect for employees' rights
- right to freedom of association

4.2 Labour practices/working conditions

We define economic and social organisational policy guidelines for compliance with all national and international social standards for our own or commissioned work.

This also includes:

- secure and decent jobs or employment relationships
- compliance with statutory working hours and break times
- vacations
- disciplinary and dismissal practices
- maternity leave
- occupational health and safety
- human development and training in accordance with national legislation
- open communication and transparency

- promotion, training and further education of young employees in order to facilitate their start into working life and to generate career advancement opportunities in the company through further education.

This also includes the prohibition of alcohol and drug consumption as well as active advocacy and appropriate disciplinary procedures against harassment and abuse.

4.3 Health and safety at work

We attach great importance to the occupational health and safety of our employees. We shall implement suitable measures to ensure that these are in place.

These also include:

- safety in the workplace by eliminating sources of danger and complying with specific accident prevention regulations.
- compliance with established and recurring procedures
- regular training/briefing of employees on accident-safe working and behaviour
- compliance with the labour standard as regards the maximum authorised working time.
- risk assessments for the workplace and the resulting safety devices
- compulsory occupational health care and optional provision of medical services

5 Customer service

5.1 General information

The investment and purchase decisions made by our Customers makes our economic actions possible in the first place. We will only be able to deliver our products and services to our Customers as long as we meet their needs. This requires that we recognise the satisfaction of our Customers as our quality standard and that we match the products and services we create with the requirements/expectations of Customers.

5.2 Service

This also includes after-sales service. Our aim is to help and support our Customers as quickly as possible and in the best possible way over the entire lifecycle.

5.3 Development

We want to promote the development of new products and services. This applies to HÜBERS' own products on the one hand and to supporting Customers in the development of their products on the other. Close cooperation with the Customers and the material suppliers is an important requirement for us.

6 Fair operating and business practices

6.1 General information

Fair and honest operating and business practices are an important aspect of ethical conduct. This includes combat against bribery and corruption, responsible political participation, fair competition and the promotion of social responsibility in the supply chain, as well as respect for all property rights.

6.2 Corruption/bribery/competition

We do not tolerate any form of corruption, bribery, venality or any other illegal granting or acceptance of advantages. Violation will result in termination of employment and criminal prosecution.

We comply with the applicable antitrust laws. These laws promote and protect free and fair competition worldwide and prohibit any anti-competitive conduct. In this context, no employee is permitted to participate in illegal anti-competitive activities.

We undertake not to accept or offer - either in our own name or on behalf of third parties - any favours in the form of monetary or material benefits and services from persons or companies, with whom HÜBERS has a business relationship or who are interested in entering into a business relationship.

This excludes low-value gifts and occasional invitations (e.g. lunch/dinner during a seminar or meeting, a reception or dinner after an event), which are in keeping with social conventions and do not have an unreasonably high value. This applies, provided that no legal or statutory provisions are violated and that any influence on the decision by the employee, business partner or an authority is excluded from the outset.

An invitation to attend sports events, shows or other events from the same business partner must be approved by the supervisor and, irrespective of this, is generally only permitted twice a year. The presence of a representative of the host company is assumed.

6.3 Conflicts of interest

We want to avoid situations, in which personal interests, even if only apparent, come into conflict with us as a company, our customers or business partners and suppliers. Business decisions must not be guided by private interests and relationships. Potential conflicts must therefore be identified as early as possible.

7 Quality

7.1 General information

Nothing should be left to chance in the quest for quality. For this reason, the design of our products and our work processes must always be in line with the current state-of-the-art and our focus must be on the cutting-edge technologies to ensure integration of the quality concept in practice from the product idea and development to product implementation and monitoring.

7.2 Standards and continual improvement

We want to consistently meet the requirements of the DIN EN ISO 9001 standard, environmental guidelines as well as specially defined quality standards and technical standards for product and process safety. Continual improvement lets us work towards becoming better and more efficient.

7.3 Quality assurance

At HÜBERS, we ensure the quality of every machine by setting up our machines and putting them into operation under realistic conditions. Pre-acceptance together with our Customer is an integral part of a new machine. In this way, we ensure complete compliance with the requirements of our customers.

8 Commitment to the environment

We take our environmental and social responsibilities seriously. We avoid environmental pollution as far as possible with regard to:

- emissions to air and water
- disposal
- hazardous substances

we use resources sustainably by means of, for instance:

- energy and material efficiency
- careful water handling
- minimum resource consumption of the

products.

- That is why we want to pay attention to the responsible use and conservation of (natural) resources in the manufacturing of our products as well as in our work routine and to continuously improve in this respect. These include, for example:
 - energy consumption and greenhouse gas emissions
 - water consumption
 - no pollution of groundwater and air
 - avoidance of unnecessary waste
- ensuring proper waste disposal
- observing the relevant guidelines for use and disposal of used chemicals.
- focus on maximum energy efficiency in the development of our products
- doing our utmost as early as the planning and concept phase to maintain a clean and unpolluted environment and continuously reduce the number of hazardous substances used.
- understanding and adopting regulations governing occupational safety and health, environmental protection as well as quality management as a management task and obligation.

9 Communications and data privacy

We strive for open and cooperative communications both internally with employees and supervisors as well as externally with customers, suppliers or authorities. Nevertheless, we maintain strict confidentiality when it comes to trade secrets and business information from our partners. Documents and data shall be properly stored.

The information and experience gathered within the company may not be exploited in a manner contrary to the interests of the company or made available to any competitor, either directly or via third parties.

The following applies, in general: We protect our own secrets and respect the intellectual property rights of third parties. Employees are required to maintain the confidentiality of trade secrets and data, including those of our customers and business partners. The information and data remain the property of HÜBERS, our customers and business partners even after the possible exit of an employee and such information may not be copied or retained.

We also want to ensure that no counterfeit products are used by any contractor, thereby avoiding any conflicts of interest.

Obligations under the applicable data protection regulations are respected, with the prohibition to disclose, make accessible or otherwise use protected personal data without authorisation, unless this is part of the respective lawful fulfilment of tasks.

Furthermore, we comply with the relevant commercial law regulations and the laws on import and export control in all countries, where we operate. We expect the same from our business partners.

10 Implementation and enforcement

With the approval of this guideline by the management, all employees of HÜBERS are required to make all suitable and reasonable efforts to continuously implement and apply the principles and values described in this CCC. If there is a legitimate interest, third parties may be informed about the essential measures to make their compliance comprehensible.

In particular, managers are responsible for communicating this and ensuring compliance. Our weekly meetings with all department heads and sales act as a good communication platform within the company. Open communications is an integral part of this. All company-relevant topics will be dealt with in addition to discussions about the individual orders.