



# HEUFT SYSTEMTECHNIK GMBH (HEUFT group of companies)

## Code of Conduct

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## **PREAMBLE**

The values of the HEUFT group as a technological leader in quality assurance for the beverage, food and pharmaceutical industry is characterized by continuous innovation for product quality, consistent design and modularity of the machines and permanent availability for our customers through our global presence in the market.

We look far ahead regarding strategic decisions in order to ensure that this remains the case in the future and our target is to grow with our customers and employees sustainably and organically, to evolve consistently as a company, to develop our products continuously and to orientate ourselves towards the requirements of our customers.

To this end we expect all our employees to take over personal responsibility for our mutual success and to ensure maximum professionalism and integrity in all our activities.

We stand for credibility and therefore as a global company it is our benchmark to comply according to the law, to create our own guidelines valid worldwide and of course to keep them. This is an inherent part of our compliance programme with which we intend to strengthen and to expand our core values. By fulfilling our Code of Conduct through their daily actions our employees make a significant contribution to our compliance.

Employees who observe behaviour that is not in accordance with law, our regulations or this Code of Conduct may report their observation to the General Management without fear of disadvantages through this.

## **SCOPE OF THE CODE OF CONDUCT**

The following principles of the Code of Conduct apply to HEUFT SYSTEMTECHNIK GMBH and to all direct and indirect subsidiaries worldwide which together represent the HEUFT group.

Our suppliers as well as our customers are requested to follow the guidelines of our Code of Conduct too.



## **A GENERAL REQUIREMENTS**

### **1. Equal opportunities and mutual respect**

The HEUFT group does not accept discrimination in the workplace. Every employee has the fundamental right to respectful and fair treatment. No one will be discriminated, favoured or harassed because of his ethnic origin, skin colour, religion, sex, age, sexual identity, appearance or for any other reason.

The HEUFT group pursues a zero tolerance policy regarding mobbing or damaging a company's or person's image by emitting statements in internal or external networks. The applicable rules can be reviewed in the Social Media Guideline of the HEUFT group.

Our employees are hired because of their qualifications and skills and promoted according to their performance and potential.

The company grows because of its employees and their individuality and therefore we also respect their freedom of opinion. No one will have any disadvantages because of expressing his opinion, as long as this does not violate any rights of third parties.

### **2. Fundamental social rights and principles**

All employees have the right to set up or to associate themselves with an organization, a society for common purposes or to lead collective negotiations, as long as they do not violate national or international law.

Any form of child labour (according to the conventions of the United Nations and / or the national laws) is strictly prohibited. All types of forced or compulsory labour, like the employment of prison inmates are prohibited. According to that we take care in the selection of our suppliers.

### **3. Safety at work and security in the company**

The HEUFT group attaches great importance to a high occupational health and safety protection. Each employee pays attention to his and to his colleagues' health and to the prevention of accidents in the workplace. It is expected that all safety regulations are followed by the employees.



## **B AVOIDANCE OF CONFLICTS OF INTERESTS AND CORRUPTION**

### **1. Conflicts of interests**

To ensure impartiality and equal treatment in all business activities, suppliers and service providers are selected in accordance with objective criteria. Conflicts of interest or doubts on the objectivity of the placement of a contract have to be reported by the staff.

### **2. Fight against corruption**

Any form of corruption and acceptance of benefits and advantage-taking is strictly prohibited. This means that employees may not gain advantage for themselves or for another person's benefit or to the disadvantage of the company. In particular it is forbidden to accept gifts (except common freebies), invitations or other direct or indirect advantage grants. Furthermore no advantage may be granted by an employee.

The HEUFT group reserves the right to take steps to labour law measures against all employees behaving corruptly.

### **3. Sideline activities**

The work of the employees must not be interfered with by sideline activities. Furthermore activities with companies being in direct or indirect competition or in a business relationship with the HEUFT group are prohibited.

The voluntary activities of employees are encouraged and supported.



## **C DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES**

### **1. Competition law and antitrust law**

The HEUFT group states that it is strictly against practices and agreements which contradict the rules of competition law and antitrust law. We expect exactly the same from our customers and suppliers.

Our customers and suppliers as we ourselves do not enter into any agreements or arrangements that influence prices, conditions, strategies or customer relations, especially in tender procedures. The same applies to the exchange of competitively sensitive information or to any other conduct that unlawfully restricts or may restrict competition.

### **2. Grants and donations**

Donations, such as hospitality, gifts or other benefits must not be accepted and must not be offered or provided by employees in case it can be reasonably assumed that these are outside the scope of common business practices (normal business hospitality) and therefore further business decisions could be influenced.

Money donations and donations in kind given by the HEUFT group are only granted to non-profit institutions. The allocation of donations is transparent and is carried out without any expectation of service in return. In case of uncertainty the supervisor should be consulted.

### **3. Embargo and trade control and customs regulations**

The import and export of products is partially restricted or prohibited by national and international trade laws. Limitations may arise from the character, the origin or the destination country, or from the purchaser of the product. Employees being employed in these areas follow these regulations.



## **D HANDLING OF INFORMATION**

### **1. Data privacy and data security**

The HEUFT group attaches great importance to confidential handling of data and information. Any form of abuse must be avoided. All information from customers, suppliers, employees as well as from third parties must be protected according to the legal and contractual requirements and therefore must not be disclosed to third parties.

We protect the privacy of our employees, our customers, suppliers and their employees. We expect our employees, our customer, suppliers and their employees to treat and protect our privacy in the same way. In particular we ban acts or audits which have the possibility of gathering company or individual data.

### **2. Confidentiality**

All employees are expected to keep confidentiality at all times about all business and trade secrets even after termination of employment. Passing any kind of information to third parties is not allowed. Private or confidential as well as damaging information must not be used, posted, blogged or spread by email in internal or external social networks.

Photographs, film and audio recordings are strictly prohibited in all company areas. This includes recordings with photo and film cameras, mobile phones, smartphones, tablets, laptops and similar devices. For corporate purposes, exceptions may be granted by the head of department, as long as the recording devices and storage media are company property. The recordings are part of the existing employment confidentiality clauses.

External requests from third parties regarding our business activities, strategies, company figures or other statements may be disclosed only by the authorized individuals to third parties.



## **E PROPER ACCOUNTING AND BALANCING AND TAXATION**

All transactions must be documented and booked completely on time. Valuation and accounting regulations at the subsidiary of the respective country are met in accordance with the legal regulations and internal regulation rules. Open collaboration exists with the auditors relating to the preparation of the financial statements and the audit of the financial statements.

The HEUFT group as an international operating company complies with all tax laws and regulations at home and abroad. Any tax reductions by business partners are not supported. In transfer pricing, we adhere to the recognized OECD principles and therefore comply with the generally accepted arm's length principles.

## **F PROTECTION OF THE ENVIRONMENT**

We pay special attention to environmental friendliness and sustainability at all working stages during the production, the storage and the transport of our own products. In addition, each employee has a duty to handle resources economically and is responsible for the correct disposal of waste independently.

## **G PROTECTION OF THE PROPERTY**

All employees are obliged to use company property only for business purposes and to use it carefully and responsibly.



## **H HANDLING OF THE CODE OF CONDUCT**

### **1. Responsibility for adherence**

The management of the HEUFT group actively ensures the effective implementation of the Code of Conduct. Executive managers are responsible to ensure that all employees understand their responsibilities and follow the values, principles and guidelines as a part of their employee responsibilities. There is also the duty of compliance with the Code by all affiliated companies of the HEUFT group by taking into account the applicable laws in the various locations and cultural features.

### **2. Behaviour in case of violations**

Every employee is obliged to observe the rules of the Code of Conduct. Violations will be prosecuted, regardless of the person and the position. Violations against the Code of Conduct must be reported to the supervisor. Employees who report violations will not be disadvantaged.

### **3. Advice and assistance**

Employees can contact the respective supervisor, the Human Resources Department as well as the General Management for all questions regarding the Code of Conduct. All information will be kept strictly confidential.