

CODE OF CONDUCT

HEDELIUS Maschinenfabrik GmbH



INTRODUCTION - PREAMBLE

HEDELIUS Maschinenfabrik GmbH ('HEDELIUS') is committed to socially, ecologically and ethically responsible corporate governance.

We expect this behaviour from our employees as well as from all our suppliers and sub-suppliers who are used by our direct business partners to fulfil contracts along the entire supply chain. HEDELIUS products are continuously optimised and adapted in terms of sustainability and, thanks to our high quality standards, set benchmarks in the industry for high-quality milling machines and machining centres as well as complete automation solutions.

We adhere to the principle of legality in our daily activities, in our measures,

contracts and all other processes. This includes, in particular, unrestricted respect for human rights and compliance with all relevant laws. Any violation of the principles set out below by our suppliers (including their upstream suppliers) may ultimately be grounds for terminating the business relationship. For our employees, a violation can lead to disciplinary measures, including dismissal.

If existing national regulations conflict with the contents of the Code of Conduct or if the domestic context makes it impossible to comply with it without restriction, HEDELIUS will seek ways to meet the requirements of the Code of Conduct.



1. Compliance with the law

Compliance with applicable laws, regulations and minimum industry standards, as well as adherence to internal rules, is a matter of course for HEDELIUS. Employees are required to regularly inform themselves about the regulations applicable to their area of responsibility and to constantly question the legality and lawfulness of their actions.

2. Ethical/moral obligation and integrity

HEDELIUS pursues exclusively legal business objectives and practices and only maintains business relationships with reputable partners. HEDELIUS treats its business partners and customers fairly and with respect. HEDELIUS respects different legal, economic, social and cultural backgrounds and the specific circumstances of the countries and regions in which HEDELIUS operates. HEDELIUS always bases its business activities on universally accepted ethical values and principles, including integrity and respect for human dignity. HEDELIUS is committed to free and fair global trade.

3. Corruption, trade control, money laundering

HEDELIUS rejects any form of bribery and corruption. To this end, we avoid even the appearance of such practices, whether in the form of granting or accepting unfair advantages. HEDELIUS acts in accordance with the applicable import and export control regulations and complies with the legal requirements for the prevention of money laundering.

4. Fair competition

HEDELIUS advocates free and fair competition. HEDELIUS does not tolerate anticompetitive agreements and ensures that the company acts in accordance with applicable antitrust laws. HEDELIUS rejects competitive advantages gained through unfair business practices.

Handling of personal data, protection of confidential information and intellectual property

HEDELIUS respects the personal rights of its employees, business partners and customers and complies with the applicable legal and regulatory requirements for the processing of personal data and information security when handling personal information.

HEDELIUS protects the business secrets and other confidential information entrusted to it by its business partners and customers from unauthorised acquisition, use and disclosure, at least in accordance with the relevant legal provisions on the protection of business secrets.

HEDELIUS respects the intellectual property of its business partners, customers and other third parties and ensures that sufficient precautions are taken to protect intellectual property rights when exchanging know-how and technologies. Our suppliers and business partners ensure that confidential information from HEDELIUS is kept secret even in the event of a termination of business relations.

6. Ecological responsibility and commitment

The protection and preservation of natural resources concerns and obliges us all. With this in mind, HEDELIUS conducts its business activities in an ecologically responsible manner and is committed to the goal of a climate-neutral future.

7. Protection of the environment and climate

HEDELIUS fulfils its ecological responsibility by applying the applicable legal requirements and recognised standards for the protection of the environment and climate. HEDELIUS works to continuously reduce the negative impact of its business activities on the environment and climate. HEDELIUS applies applicable law and takes appropriate measures based on legal and internationally recognised standards, covering topics such as:

- Proper, professional and responsible handling of hazardous substances, chemicals and waste, including their disposal
- · Measures to reduce or avoid waste
- Minimising emissions from operational processes (e.g. waste water, exhaust air, noise, greenhouse gases)
- Conservation of natural resources, for example through measures to save water, chemicals and other raw materials and promote the circular economy
- Use of climate- and environmentally-friendly technologies, processes, raw materials and products
- Measures to increase energy efficiency and the share of renewable energies in energy consumption at company locations

8. Handling of conflict materials

For conflict minerals such as tin, tungsten, tantalum and gold, as well as for comparable raw materials such as cobalt, our suppliers establish processes in accordance with the Organisation for Economic Co-operation and Development (OECD) guidelines for fulfilling due diligence to promote responsible supply chains for minerals from conflict and high-risk areas. Further requirements can be found in the 'REACH Information' and 'RoHS Information' documents, available at https://www.hedelius.de/agb.

9. Human rights and labour standards

Human dignity is inviolable. HEDELIUS therefore respects the internationally recognised human rights set out in the United Nations Universal Declaration of Human Rights. HEDELIUS adheres to the internationally recognised labour standards of the International Labour Organisation (ILO), as listed in the Code of Conduct below.

In all its business activities, HEDELIUS endeavours neither to cause nor contribute to human rights violations. HEDELIUS expects the same from its business partners.

10. EMPLOYMENT RELATIONSHIPS

HEDELIUS treats its employees with respect. HEDELIUS rejects any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment of employees.

HEDELIUS applies the applicable labour law to all employment relationships and expects the same from its contractual partners. At the start of the employment relationship, employees must be provided with clear information about the essential working conditions, including their rights and obligations, working hours, remuneration and payment and accounting arrangements.

HEDELIUS respects and protects the right of employees to terminate their employment relationship in compliance with the applicable notice period.

11. Rejection of child labour and protection of young workers

HEDELIUS does not tolerate child labour and complies with the applicable legal minimum age for employment. In any case, HEDELIUS does not employ anyone under the age at which compulsory schooling ends according to the law of the place of employment, or under the age of 15. Internships are organised in accordance with legal requirements.

HEDELIUS expects its contractual partners to have appropriate means of determining age in order to prevent child labour. If child labour is detected, all necessary measures must be taken immediately, focusing on the welfare, protection and development of the child.

In the case of persons under the age of 18, the rights of young workers must be observed; they may only be employed if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are detrimental to their development.

12. REJECTION OF FORCED LABOUR

HEDELIUS rejects forced or compulsory labour in any form. This also applies to any form of debt bondage, serfdom, slavery or slave-like practices, human trafficking and extends to all forms of involuntary labour and services that are not compatible with internationally recognised labour and social standards.

13. PRINCIPLES OF REMUNERATION

HEDELIUS applies the statutory provisions when remunerating work performed. HEDELIUS ensures that the remuneration of employees in the company does not fall below the applicable statutory or industry-standard minimum wage. Our suppliers must also ensure that all national laws and regulations at the respective place of employment are complied with, in particular regulations on working hours, overtime, remuneration, breaks and regular holidays.

HEDELIUS does not tolerate any wage deductions that are not permitted by law, including wage deductions as a disciplinary measure.

14. WORKING HOURS

HEDELIUS applies the statutory provisions on working hours, including overtime, rest breaks and annual leave. HEDELIUS ensures that

- the regular weekly working hours plus the maximum possible overtime are not exceeded
- · working time regulations are complied with

15. Freedom of association

HEDELIUS respects the right of employees to freedom of association and assembly, as well as the right to collective bargaining and wage negotiations, insofar as this is legally permissible and possible in the respective country of employment. If this is not permissible, HEDELIUS seeks appropriate compromises for its employees.

16. Equal opportunities and equal treatment

HEDELIUS offers equal opportunities for all. Discrimination on the basis of ethnicity or nationality, gender, religion, ideology, age, disability, sexual orientation, skin colour, political views, social background or other characteristics protected by law will not be tolerated. Employees are selected, hired, promoted, advanced and remunerated solely on the basis of their qualifications and abilities.

17. Health and safety at work

HEDELIUS complies with national and international occupational health and safety standards. HEDELIUS ensures a safe and healthy working environment (avoiding accidents, injuries and work-related illnesses) in order to maintain the safety and health of its employees and third parties.

18. Foreign trade regulations

HEDELIUS stands for consistent compliance with the applicable international and national regulations of customs and foreign trade law, in particular export control and embargo regulations.

19. Business partners

HEDELIUS expects all business partners to apply the contents and values of this Code of Conduct as the basis for a business relationship. HEDELIUS also expects its business partners to work towards the consistent dissemination of these standards in the supply chain and to comply with CSR principles. Furthermore, HEDELIUS expects its suppliers to comply with human rights and environmental due diligence obligations within the supply chain, right down to the extraction of raw materials, at least in accordance with the applicable provisions of the Supply Chain Due Diligence Act (LkSG).



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