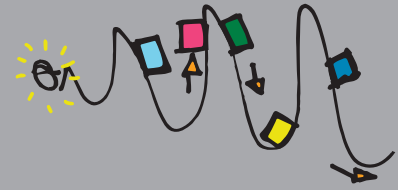


# Heber Fördertechnik



## CODE OF CONDUCT

HEBER Fördertechnik GmbH



## PREFACE

›› WE WANT TO SECURE OUR SUSTAINABLE SUCCESS WITH TECHNOLOGICAL EXCELLENCE, INNOVATIVE STRENGTH AND OUTSTANDING QUALITY. BUT ALSO WITH THE WAY WE DEAL WITH EACH OTHER, HOW WE CONDUCT OURSELVES IN BUSINESS AND HOW WE ARE COMMITTED TO COMMUNITY ISSUES. ‹‹

Max Heber, Managing Director HEBER Fördertechnik GmbH

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# 1.

## THE RELEVANCE OF THE CODE OF CONDUCT FOR OUR COMPANY AND EACH OF US

The Code of Conduct of Heber Fördertechnik serves as a guideline for legally and ethically correct behaviour in the workplace. It outlines the essential legal frameworks and ethical standards. Furthermore, the Code describes the expectations that our business partners and other stakeholders have regarding our company. It also reflects the value system of our organisation. The rules established in the Code serve as guidance for the behaviour of all employees and the management. The Code is designed to provide every employee with a sense of security in their daily work. As a company and as individuals, we are all of us responsible for adhering to the rules set forth in the Code. In collaboration with our business partners, especially customers and suppliers, we enforce compliance with these principles. To ensure the implementation of the Code's behavioural standards, we have established a central trust office within the management team. This office offers support for issues, questions, and concerns related to the principles of the Code.

# 2.

## BASIC BEHAVIOURAL GUIDELINES OF HEBER FÖRDERTECHNIK

### What Matters to Us:

Every employee of Heber Fördertechnik GmbH and our business partners has the right to respect, courtesy, and fair treatment in their work environment. Discrimination of any kind – for example, based on ethnicity, physical or mental disability, age, gender, religious beliefs, or sexual identity – is expressly not tolerated. Harassment or discrimination is not acceptable on the premises of Heber Fördertechnik GmbH nor during on-site installations or appointments with our customers and business partners. The company's property, both material and immaterial, is intended to best support our employees in their daily tasks. We protect it from damage, loss, or abuse. Workplace safety, as well as the preservation and promotion of the health of our employees, is of utmost importance to us.

# 3.

## OUR DAILY INTERACTIONS

Heber Fördertechnik GmbH operates beyond the borders of the Federal Republic of Germany, working with individuals of various nationalities, cultures, and skin colours. The individuality of each person is emphasized through Heber Fördertechnik's open corporate culture. We support the fundamental principles of the United Nations Charter of Human Rights and respect the personal dignity, privacy, individual opinions, and personal rights of every employee, applicant, and business partner associated with our company. Discrimination against any individual – for example, based on skin colour, gender, sexual orientation, religion, age, physical or mental disability, nationality, or social and ethnic origin – is not tolerated by Heber Fördertechnik.

We honour our commitments, and harassment or insults directed at employees, applicants, or business partners are not tolerated.

# 4.

## EQUAL TREATMENT

The aim and goal of our entire company is to treat our employees, applicants, and business partners in a fair, honest, and equal manner. Equality among men, women, and diverse identities is ensured at Heber Fördertechnik GmbH. In recruiting new employees and promoting our existing workforce, we are explicitly committed to complete equality. We expect every employee at Heber Fördertechnik GmbH to adhere to the legal regulations and policies on equal treatment and non-discrimination at their respective workplaces. This applies both to work performed on the company premises and within the operational buildings of Heber Fördertechnik, as well as during installation assignments and on-site work. Heber Fördertechnik GmbH requires that its suppliers and service providers also comply with the provisions of this Code of Conduct. In particular, Heber Fördertechnik aims to ensure that the principle of non-discrimination is respected when selecting suppliers and in ongoing collaborations with suppliers and service providers.

# 5.

## RESPONSIBILITY FOR COMPANY PROPERTY AND RESPECT FOR CORPORATE ASSETS

The corporate property of Heber Fördertechnik GmbH, whether material or immaterial, is intended to support our employees in their daily tasks. Its use is permitted only for lawful business purposes. Under no circumstances should the handling of Heber Fördertechnik's assets be used to provide personal benefits to employees or business partners. Managers and employees are expected to handle the intellectual property of Heber Fördertechnik responsibly. We all share the responsibility of appropriately using and protecting company property.

The private use of company property is permitted only with prior approval. This applies especially to the private use of work services, resources, buildings, and goods such as machinery and vehicles. Suitable control measures must be implemented to prevent financial harm to Heber Fördertechnik GmbH, ensuring that the company does not suffer economic disadvantages due to property misuse.



# 6.

## PROMOTING HEALTH AND WORKPLACE SAFETY

Heber Fördertechnik GmbH is committed to supporting health initiatives and protecting employees from accidents or other risks. Therefore, workplace safety, as well as the promotion and maintenance of our employees' health, is our top priority. We comply with laws and regulations regarding workplace safety and health. We continuously strive to create and develop a safe, secure, and healthy working environment. Compliance with safety regulations, practices, and internal guidelines is ensured through regular safety checks conducted by designated experts. Heber Fördertechnik ensures that first responders are present on company premises and during on-site installations. Furthermore, safe workplace equipment is provided.

# 7.

## FAIR COMPETITION PRACTICES AND COMPLIANCE WITH LEGAL REQUIREMENTS

Heber Fördertechnik GmbH operates not only in Germany but also in European and non-European regions. All employees, subcontractors, and managers are personally responsible for complying with national and local laws and regulations in the respective countries where the work (e.g., installation activities) is carried out. We fully commit to the principles of fair and free market competition. Fair competition is an essential element of the market economy. We do not tolerate any misleading of tax authorities domestically or abroad and fully meet our tax obligations. We also expect our suppliers and business partners to fully comply with legal requirements and implement fair competition practices without exception.

# 8.

## COMPLIANCE WITH TAX LAWS AND OBLIGATIONS

Heber Fördertechnik GmbH fulfils its tax obligations in full. The company adheres to tax regulations in accordance with laws, implementation guidelines, and directives. We oppose all forms of tax evasion and aggressive tax optimization. Employees and managers are committed to full compliance with tax laws in their respective areas of responsibility, ensuring proper documentation and legal archiving of records. We ensure that tax obligations are met when importing or receiving goods or services from abroad. We categorically refuse to cooperate with customers, suppliers, or other business partners who engage in activities intended to deceive tax authorities or obscure tax-related matters.

# 9.

## ADHERENCE TO NATIONAL AND INTERNATIONAL FAIR COMPETITION REGULATIONS

The fundamental aim of competition and antitrust laws is to ensure fair competition for all market participants. All activities or services provided by Heber Fördertechnik GmbH are designed to consider the legitimate interests of customers and business partners. Heber Fördertechnik GmbH fully supports this principle. We do not participate in competitive practices that are unethical or illegal. For example, we explicitly reject price-fixing and territorial agreements with competitors. Our excellent and renowned market position is based on the high quality of our services, reliability, and fair practices. Every one of us respects laws and regulations regarding anti-corruption, money laundering prevention, counter-terrorism financing, customs and foreign trade law, and environmental protection.

# 10.

## LOYALTY TO HEBER FÖRDERTECHNIK GMBH

The loyalty of all employees and managers to Heber Fördertechnik GmbH is of utmost importance. In principle, conflicts of interest can undermine the quality of business decisions and cast doubt on the integrity of the person making those decisions. We assume that personal interests do not influence business decisions and actions. We aim to prevent situations where private economic interests of employees, managers, or members of the management board of Heber Fördertechnik GmbH lead to conflicts of loyalty. It is expressly prohibited to exploit one's position in the company for personal gain or to benefit close family members or friends. For example, it is not permissible to favour suppliers or business partners due to personal interests.

# 11.

## SECONDARY EMPLOYMENT AND ACTIVITIES

In the context of this Code of Conduct, secondary employment or activities include any work with another employer, additional tasks within our own company, or independent work on behalf of oneself or third parties that could jeopardize the primary employment at Heber Fördertechnik GmbH. Regardless of their nature, secondary activities must not interfere with employees' contractual obligations to Heber Fördertechnik GmbH. Before undertaking any secondary activity, it must be reported to the appropriate supervisor or management, and written approval must be obtained. As a company, we are generally open to voluntary activities and social engagement in associations, clubs and other institutions and wish to support them. However, such activities must not conflict with the interests of Heber Fördertechnik GmbH or hinder contractual job obligations. This is particularly dependent on the amount of time and the level of personal effort required from employees in the course of carrying out the secondary activity.

# 12.

## CORPORATE INVESTMENTS

Significant investments by employees of Heber Fördertechnik GmbH or their close relatives (e.g., spouses, partners, or minor children) in competitors, customers, suppliers, or other business partners must not conflict with or oppose the interests of Heber Fördertechnik GmbH. Significant investments in this context include equity holdings, stock options, or similar corporate connections amounting to at least 10%.

Employees are prohibited from directly or indirectly investing in non-listed companies that compete with Heber Fördertechnik GmbH. As soon as an employee becomes aware of the involvement of close relatives (such as spouses or partners, children, parents, or adoptive parents) in a competing company, they must report this to the trust office within the management team. The notification will be recorded in the personnel file. Additionally, the same rules that apply to secondary employment also apply to capital investments in companies of any kind. These rules do not apply to capital investments made as part of a regular private asset management strategy but do apply to potential commercial investments or professional financial ventures.

# 13.

## POSITIONS OUTSIDE OF HEBER FÖRDERTECHNIK GMBH

Positions or activities outside the company, as defined by this Code of Conduct, include roles such as board memberships, executive management, supervisory board duties, advisory board roles, or official positions in associations, clubs or foundations. Generally, employees of Heber Fördertechnik GmbH are not permitted to hold organizational roles at competitors. Such engagements could cause direct conflicts of interest. In cases of doubt, the management decides who qualifies as a competitor. Taking up an organizational position with customers, suppliers, or other business partners of Heber Fördertechnik GmbH requires prior written approval from the management. If employees hold multiple organizational roles in different companies (e.g., various supervisory or advisory board memberships), each position must be individually approved.



# 14.

## EMPLOYMENT AND COLLABORATION WITH CLOSE RELATIVES

The employment and engagement of close relatives of Heber Fördertechnik GmbH employees within the company is generally acceptable, provided there is no significant risk of a conflict of interest. Employment opportunities can generally be offered to close relatives or other persons in the employee's personal network. To avoid conflicts of interest, sensitive information about the content and nature of the employment relationship between relatives or other close persons should not be exchanged. Internal transfers or physical separation within company premises may be considered as necessary. Exceptions must be approved by the trust office or management. Relatives or close persons of employees are generally permitted to engage in activities for customers, suppliers, competitors, or business partners of Heber Fördertechnik GmbH. Direct business interactions between employees of Heber Fördertechnik GmbH and relatives or other close persons who work for our customers, suppliers, or other business partners are generally prohibited.

Such transactions must be individually approved by the trust office or the management. Occasional (random) content reviews of such interactions are advisable.

# 15.

## BEHAVIOURAL GUIDELINES TOWARD EXTERNAL PARTIES

Heber Fördertechnik GmbH is committed to fair competition and respects the regulations of competition and antitrust law. In our business relationships with customers, suppliers, and other business partners, we demonstrate integrity. Employees of Heber Fördertechnik GmbH are strictly prohibited from accepting or offering bribes, whether directly or indirectly. All employees are forbidden from soliciting, accepting, offering, or granting advantages if such actions could unduly influence business decisions or create even the appearance of impropriety. Without prior written approval from management, no direct or indirect donations or contributions may be made in the name of Heber Fördertechnik GmbH to political parties, interest groups, election candidates, or public office holders.

# 16.

## CONDUCT TOWARD BUSINESS PARTNERS

Heber Fördertechnik GmbH is characterized by fairness and honesty in its collaborations with all business partners. The company and its employees stand out due to their expertise, experience, commitment to service, customer-friendliness, and reliability. We do not engage in unethical or illegal business practices. It is our goal to meet the needs and expectations of all our business partners as fully as possible.

# 17.

## OFFERING AND ACCEPTING (FINANCIAL) BENEFITS

Other (financial) benefits, such as commission payments for initiated, executed, ongoing, or completed transactions, are not granted to employees of Heber Fördertechnik GmbH. Employees receive their salaries, wages, and approved additional remuneration, including variable compensation or benefits in kind. Additionally, employees may receive (financial) benefits during company events, such as company outings or Christmas parties.

# 18.

## BENEFITS AND GIFTS FROM THIRD PARTIES

Employees of Heber Fördertechnik GmbH may only accept gifts, favours, hospitality, or other benefits from individuals or organizations conducting or seeking to conduct business with the company, or from competitors, under specific conditions. Such gifts, favours, hospitality, or other benefits must not exceed the bounds of customary business practices and must not have an inappropriately high value. Otherwise, they may be interpreted as bribes. They must comply with applicable laws and ethical principles and must not place either the company or the employee in a position of public misunderstanding. Any attempts by third parties to bribe employees of Heber Fördertechnik GmbH must be immediately reported to the trust office. Third parties may only provide compensation in forms such as invitations to sporting events or discounts on purchases if the employer actively participates in the process. For this reason, the employee must present such matters to the company so that any potential tax obligations related to these benefits can be assessed. The (direct) supervisor should be contacted to ensure that the next steps are coordinated without unnecessary delays. These rules are particularly relevant in collaborations with suppliers. To avoid qualifying benefits as taxable wages, it is necessary to exercise appropriate restraint when attending business meals or entertainment events organized by third parties. The purpose of such events must be to initiate or enhance business relationships. In such cases, employees should ensure that the inviting party has properly paid taxes on these events in accordance with Sec. 37 Para. b of the Income Tax Act. If this is not the case, taxation must be clarified and ensured with the payroll department of Heber Fördertechnik GmbH. In case of doubt, it is advisable to consult the trust office within the management team.

# 19.

## GIFTS AND DONATIONS TO EXTERNAL PARTIES

Employees of Heber Fördertechnik GmbH must not offer cash gifts, monetary advantages, or similar benefits to employees of customers, suppliers, competitors, or other business partners. Cash or contributions in kind to third parties are only permitted if:

- They are clearly and exclusively intended for planning, concluding, and/or implementing business activities.
- They fall within the scope of customary business practices.
- They are of minimal value.

Gifts given for business purposes should be appropriate to the recipient and occasion. The current value limit for tax-deductible business expenses is € 50 net per recipient per year (cf. Sec. 4 Para. 5 of the Income Tax Act). This should serve as a guideline. No laws, state or regional regulations, or general ethical principles should be violated when passing them on. Gifts and other benefits of any kind are strictly prohibited when offered to public officials or employees of public authorities. In particular, benefits and gifts are strictly prohibited in cases involving subsidies (e.g., repayment grants). If employees of Heber Fördertechnik GmbH become aware of such incidents, they must notify the trust office within management.

# 20.

## MEMBERSHIPS OF HEBER FÖRDERTECHNIK GMBH AND SPONSORSHIP

Special care must be taken when handling requests for donations, sponsorships, and corporate memberships. A thorough review must ensure that this is neither a covert attempt at bribery nor solely aimed at serving the personal interests of the respective employee of Heber Fördertechnik GmbH who initiated the measure, or the interests of related or affiliated individuals. To guarantee this, all donations and sponsorship activities, regardless of the amount, must adhere to the four-eyes principle.

# 21.

## CONFIDENTIALITY OF INFORMATION

All individuals are prohibited from using the intellectual property of Heber Fördertechnik GmbH, directly or indirectly, to gain personal advantages. This applies both during and after the employment relationship. We safeguard confidential information from unauthorized use or disclosure. We are aware of our responsibility for the company's reputation when engaging in social media. We do not disclose confidential information. We respect the privacy of all our business partners and employees. We comply with applicable laws and regulations when collecting, processing, and using personal data from our employees and business partners. In dealings with authorities, we ensure our employees act with integrity.



# 22.

## INTELLECTUAL PROPERTY OF HEBER FÖRDERTECHNIK GMBH

Our intellectual property includes information about business strategies and processes, organizational structures, contracts with business partners, internal metrics, personnel data, and personal contact information. Other intellectual creations, such as business ideas developed during work, are also considered the company's property. Protecting our intellectual property is crucial. Employees working with sensitive data bear significant responsibility. However, it is ultimately every employee's duty to protect confidential information from unauthorized access and disclosure.

# 23.

## USE OF SOCIAL MEDIA

Heber Fördertechnik GmbH is committed to mutual respect and equal treatment. We reject statements that are radical, racist, or defamatory, including those that may be shared or published by employees on social media. We do not tolerate derogatory criticism, insults, or defamatory remarks made by employees about colleagues, superiors, or the company Heber Fördertechnik GmbH on social networks. Information spreads rapidly and almost uncontrollably on social media, and once published online, it is challenging to remove it entirely. Everyone should carefully evaluate how they present themselves and ensure their statements are truthful. Employees often list their positions at Heber Fördertechnik GmbH on social media platforms such as XING, Facebook, or LinkedIn. These descriptions and details should be approved in advance by the trust office within management.

# 24.

## COMPLIANCE WITH DATA PROTECTION REGULATIONS

We prioritize the careful handling of personal data belonging to our employees and business partners. This demonstrates our respect for individuals and forms the foundation for a trusting collaboration. It is everyone's responsibility to ensure that personal data is protected at all times as part of their tasks. We collect, process, and use the personal data of our employees and business partners exclusively in compliance with legal requirements. We respect the right of employees and business partners to informational self-determination by enabling them to access, correct, object to, block, or delete their data.

Heber Fördertechnik



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