



SUPPLIER CODE OF CONDUCT

Scope, Purpose and Applicability

The Code of Conduct is based on national and international laws, directives and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations "Business and Human Rights", the international labor standards of the International Labor Organization and the United Nations Global Compact, all as amended from time to time. Acting with personal integrity, and in compliance with laws and regulations, is the basis of all our business relationships.

HOERBIGER companies ("HOERBIGER") seek the collaboration with suppliers ("SUPPLIERS") who share the same values, principles and aspirations. HOERBIGER expects that its SUPPLIERS conduct its business with integrity and are committed to follow and uphold the principles of this Supplier Code of Conduct ("Code"). By conducting and executing business transactions with HOERBIGER SUPPLIERS given their consent to comply with this Supplier Code of Conduct.

I. Compliance with laws and regulations

SUPPLIERS shall comply with all applicable national and international laws, directives and regulations of any country where they conduct business, or as may otherwise be applicable. SUPPLIERS accept and recognize the legal obligations of HOERBIGER companies in their respective jurisdictions. SUPPLIERS will support HOERBIGER in its compliance obligations and provide relevant information and assurances as HOERBIGER may require.

II. Human Rights

SUPPLIERS shall respect the protection of internationally recognized human rights. SUPPLIERS shall treat their employees fairly and respectfully. The work environment shall be free of discrimination or harassment of any kind, including on grounds of age, gender, sexual orientation, disability, health status, ethnicity, nationality, religion, social origin, or political opinion. The personal dignity, privacy and personal rights of each individual are respected.

III. Child and forced labor

SUPPLIERS shall reject all forms of modern slavery. SUPPLIERS shall endeavor that their own operations as well as those of their suppliers are free from child labor or forced labor.

IV. Working conditions

SUPPLIERS shall pay wages, benefits, and social contributions in compliance with legal or statutory requirements. SUPPLIERS shall comply with applicable work time and safety regulations. SUPPLIERS shall provide a safe work environment with adequate protections against occupational hazards. SUPPLIERS shall respect its employees' rights of free association and collective bargaining.

V. Conflict Minerals

SUPPLIERS shall implement the "OECD Due Diligence Guidance for Responsible Supply Chains". They shall take appropriate steps that tin, tungsten, tantalum or gold used in their products are not sourced from mines that fund state or non-state armed groups or illegal security forces, contribute to conflicts, money-laundering or human rights violations. SUPPLIERS shall provide HOERBIGER all necessary information to meet reporting obligations on conflict minerals.

VI. Anti-corruption and bribery

SUPPLIERS shall strictly prohibit all forms of corruption, bribery, and any other fraudulent practices. No bribes or facilitation payments shall be given to, or accepted from, government officials, candidates for public office, business partners or their associates. SUPPLIER anti-corruption policies and practices shall ensure compliance with all legal requirements of jurisdictions linked to a transaction.

VII. Money Laundering and terrorism financing

SUPPLIERS shall perform appropriate risk-oriented business partner due diligence to comply with anti-money laundering regulations. This may include identification of ultimate beneficial owners of businesses, and the identification of origin of payments as required by relevant laws and regulations.

VIII. Export control & Sanctions

SUPPLIERS shall comply with EU, US, UK, UN and OSCE import and export control laws & sanctions and regulations to the extent applicable and which are linked to business transactions of any kind with HOERBIGER. SUPPLIERS will provide to HOERBIGER all relevant information pertaining to the country of origin, material or product composition, customs classification and licensing requirements of goods or services sold to HOERBIGER and will obtain and maintain any required export license or other governmental approval, if necessary.

IX. Competition law

SUPPLIERS shall not engage in any conduct that unlawfully restricts or may restrict competition. This includes anti-competitive business practices such as price fixing, bid rigging or market allocation.

X. Intellectual Property

SUPPLIER must protect HOERBIGER's technology and proprietary information against unauthorized use, access and disclosure through appropriate contractual, organizational and technical means (e.g. non-disclosure agreements, access restrictions, state of the art IT security).

XI. Data Protection and Information Security

SUPPLIERS must comply with data protection and information security laws and regulatory requirements, including safeguards for the processing of personal data. SUPPLIERS shall promptly notify HOERBIGER of security incidents which could affect the security of HOERBIGER's information systems or communications. SUPPLIERS shall immediately inform HOERBIGER when they become aware that HOERBIGER's personal data may be affected (such as an actual or suspected data breach).

XII. Environment

SUPPLIERS shall conduct its operations in an environmentally sustainable manner, and in compliance with applicable laws, regulations, and international conventions. SUPPLIERS shall prevent and continuously strive to decrease adverse impacts of its operations on the environment which encompasses air, water, soil, plants, animals, and ecosystems.

XIII. Supply chain compliance

SUPPLIERS shall take appropriate measures to communicate the principles of this Supplier Code of Conduct to their suppliers. They shall make good faith efforts to monitor compliance, and work towards ongoing improvements of sustainable business practices in their supply chain.



XIV. Reporting of compliance incidents

SUPPLIERS shall inform HOERBIGER promptly of significant compliance incidents or violations of the SUPPLIER Code of Conduct at their own operations or in their supply chain. Such reports shall be submitted to compliance@hoerbiger.com.

SUPPLIERS are encouraged to advise their employees and business partners to report compliance violations in relation to HOERBIGER’s business through the HOERBIGER reporting channel <https://hoerbiger.integrityline.org/>.

XV. Audit

SUPPLIERS shall provide HOERBIGER with reasonable access to facilities, personnel, and records to confirm compliance with this Supplier Code of Conduct.

SUPPLIER’s acknowledgement and signature

I am a legal representative of the SUPPLIER company. By signing the Supplier Code of Conduct, I confirm that SUPPLIER complies with this Supplier Code of Conduct and operates in compliance with all applicable laws and regulations.

Company Name: _____

Company Address: _____

Company registration no.: _____

Name: _____

Position: _____

E-mail: _____

Place, Date: _____

Authorized Signature: _____