

CODE OF CONDUCT



Foreword by the Board of Directors of HUBER SE	3
HUBER SE – Our Mission & Vision	4
Principles of the HUBER Code of Conduct	6
▶ Law-abiding conduct	6
▶ Dealing with competitors	6
▶ Dealing with suppliers	7
▶ Anti-corruption policy	7
▶ Prohibition of tax evasion and subsidy fraud	7
▶ Cross-border trade	8
▶ Conflicts of interest	8
▶ Handling tangible and intellectual company property	8
▶ Environmental protection and sustainability.....	9
▶ Occupational health and safety	9
▶ Data protection	10
Scope and implementation	10
Help Whistleblowing	11
Imprint	12

Foreword by the Board of Directors of HUBER SE

Dear employees,

The brand HUBER not only stands for the highest quality of its products and processes, but also places the highest demands on the behaviour of its employees. Worldwide, HUBER is regarded as a fair and reliable partner. We want our customers and business partners to be able to rely on our products, employees and the entire company also in the future.

But HUBER can only live up to this responsibility if every employee always acts correctly and in an exemplary manner.

As the Board of Directors of HUBER SE, we have therefore decided to draw up the **HUBER Code of Conduct** based on the **HUBER Mission Statement**, which is intended to serve as a guide for all of us in our daily work.

We want to comply with the law at all times and observe our internal guidelines and principles. Respectful interaction with each other and with our business partners is a matter of course for us.

The **HUBER Code of Conduct** should be a compass for all of us and help us to do the right thing in different situations. It is also intended to promote sensitivity to problematic behaviour.

The **HUBER Code of Conduct** is binding for all employees of HUBER SE – for the board of directors, managers and all employees.

Berching, February 2022,



Georg Huber



Dr.-Ing. Oliver Rong



Dr.-Ing. Johann Grienberger



Rainer Köhler

A handwritten signature in black ink, appearing to read 'Georg Huber'.

Georg Huber
CEO, Chief Financial &
Human Resources Officer

A handwritten signature in black ink, appearing to read 'Oliver Rong'.

Dr.-Ing. Oliver Rong
Vice CEO, Chief Production
& Engineering Officer

A handwritten signature in purple ink, appearing to read 'Johann Grienberger'.

Dr.-Ing. Johann Grienberger
Chief Technology Officer

A handwritten signature in black ink, appearing to read 'Rainer Köhler'.

Rainer Köhler
Chief Sales Officer

HUBER SE – Our Mission & Vision

No. 1 in WASTE WATER Solutions – Worldwide

Our aim is to promote the sustainable use of water, energy and resources.

Water, wastewater and energy as a whole

We offer our customers systems and services together with products that can purify, save and protect water. In addition, we have processes that will utilize any beneficial residual materials that are produced.

Customer service is a major priority

The customer's benefit and their satisfaction are the basis of our past and future success.

Game-changing technical solutions

We offer high quality innovative products on a competitive basis. Our solutions can be tailored to meet specific requirements of individual customers.

Overall experience

Our flexibility and independence allow us to ensure customer satisfaction and we are confident that our strength and ability will guarantee the quality of the services we can provide. As an international company we provide the individual elements of our value chain where it has the maximum benefit for the customer and company.

Living processes

As a company we are constantly working to improve our internal workflows and processes to ensure that the structure of our organization is efficient and forward looking. This enables us to continuously develop and enhance the quality of our solutions and products and allow us to provide excellent customer service.

Success through cooperation

Our company actively encourages cooperation in working relationships and responsible management based on trust and respect. Our company employs highly qualified staff and we ask each and every one of them for a high level of commitment, motivation and professionalism.

Responsibility for environment, society and employees

Our products and services contribute to protecting the environment and we are committed to ensuring that our products and services act in accordance with the principles of sustainability. It is our aim to meet the social responsibility our company has. Occupational health and safety are part of our self-concept and are an important contribution to the company's success.

Our company

Our company has remained a family owned business since its foundation in 1834, which has given us financial independence. This has resulted in a business strategy that has provided the basis for long term planning and development leading to profitable future growth.

PRINCIPLES





*Integrity means doing the right thing,
even when no one is watching.*

C.S. Lewis, author

Principles of the HUBER Code of Conduct

► Law-abiding conduct

We are a globally active company and operate in numerous countries. It is a matter of course for us that we observe the legal framework conditions of these countries. Our first principle is to conduct our business activities in compliance with the applicable laws. In doing so, we avoid the risk of loss of reputation and orders as well as criminal prosecution and damages for our company.

Law-abiding behaviour should not only be a matter of course for the company as a whole: All HUBER SE employees¹ who act unlawfully expose themselves to the threat of criminal prosecution. Law-abiding behaviour therefore not only serves for the protection of the company, but also for the employee's own protection.

It is the duty of every employee to inform him/herself about applicable regulations and laws in his/her area of responsibility and to observe them. For HUBER SE employees, this means that everyone must both know and comply with the legal regulations relevant to their area of responsibility. In case of questions and uncertainties, the managers provide support.

Beyond observing the law, we respect the values and ethical ideas of the countries in which HUBER SE operates.

► Dealing with competitors

We want to deal fairly with our competitors. Free competition is an important element of the market economy as it promotes innovation and productivity. Consequently, we comply with all applicable national and international antitrust and competition laws and reject practices such as:

- Collusive pricing and price fixing
- Collusion on terms and delivery times
- Allocation of markets and regions
- Allocation of customers

¹ For ease of reading, we use the generic masculine form in the following. HUBER SE explicitly addresses all genders.

► **Dealing with suppliers**

We strive for business relationships with our suppliers based on trust, reliability and honesty. We expect our suppliers to comply with the following value principles:

- Compliance with current and applicable laws
- Prohibition of corruption
- Respect human rights for all their employees
- Compliance with laws against child labour
- Responsibility for health and safety for all their employees
- Compliance with relevant laws on environmental protection
- Willingness to ensure that these value principles are also implemented and complied with in their own supply chain

► **Anti-corruption policy**

Bribery and corruption are very serious problems that affect not only economic transactions. They can distort competition, harm individuals as well as society and lead to decisions being made for improper reasons.

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties. Our employees are prohibited from accepting or granting favours of any kind (e.g. cash, travel, gifts, etc.) that are linked to an undue advantage (award of contract, project award, etc.).

Our business partners are also required to avoid conflicts of interest that entail a risk of corruption.

Consultants, intermediaries and sales partners only receive commissions and remuneration for permissible activities and only after prior written agreement. The amount of the payment must be in reasonable relation to the service actually rendered.

► **Prohibition of tax evasion and subsidy fraud**

We reject any kind of tax evasion and subsidy fraud and do not assist or abet them. By observing tax and customs regulations, we earn the trust of customers, business partners, authorities and the public. In the opposite case, irregularities can result in serious loss of reputation and considerable financial damage. The responsible employees also have to expect corresponding consequences.

Every employee must be aware that in the case of tax offences, the risk of detection is particularly high due to regular and careful audits by the tax authorities. At the first moments of suspicion, law enforcement agencies already begin to look into the case in question.

We are aware that the assessment of facts under tax or subsidy law is often difficult. If there is any uncertainty, superiors as well as internal and external specialists will help.

► **Cross-border trade**

As an internationally active company with a high export quota, HUBER delivers numerous products to other countries every day. Legal rules apply to the transfer of goods, services or technologies across certain national borders. HUBER complies with all relevant laws for export and import as well as customs regulations.

Of particular importance are the control laws for direct or indirect exports or imports from or to sanctioned countries. These also include contacts with third parties suspected of posing a threat to national security or involved in criminal activities. Non-compliance with the laws can lead to fines and imprisonment.

Import and export transactions are therefore only carried out with the help of the relevant departments and expertise of the relevant staff.

► **Conflicts of interest**

Our daily activities for HUBER are governed by the interests of the company and not by our own interests. Our business decisions are made for the benefit of HUBER and not according to personal interests or to gain personal advantages.

Business and private interests must therefore be strictly separated in order to avoid any risk of conflicts of interest.

Secondary business activities require the approval of HUBER, in particular in the following cases: activities for suppliers, customers or competitors as well as financial participation in these. The Management Board must be informed about the involvement of close relatives with suppliers, customers or competitors in order to disclose potential conflicts of interest at an early stage.

► **Handling tangible and intellectual company property**

HUBER has extensive tangible company property that is indispensable for maintaining business processes. This includes production machines, tools, telephones, copiers, computers, software, vehicles and much more. These goods may only be used for company purposes and not for private use, unless this is expressly permitted. We handle HUBER's company property responsibly and carefully.

As one of the most important companies in its industry, HUBER possesses extensive technical know-how as well as valuable company and trade secrets.

This intellectual property forms the basis of our business success and is a significant competitive advantage for us.

Protecting intellectual property is therefore a top priority. We treat all confidential information with care and do not disclose it to unauthorised persons – this applies both inside and outside our company.

Unauthorised disclosure of this knowledge may not only have a negative impact on HUBER, but may also have consequences for the employee under labour, civil and criminal law.

► Environmental protection and sustainability

As a company active in the field of environmental protection, HUBER recognises its ecological responsibility and has committed itself to sustainable behaviour also in the **HUBER Mission Statement** for example.

The [HUBER Sustainability Report](#) is published every two years and summarises HUBER's activities in the three areas of "Economy", "Ecology" and "Social".

HUBER has operated an environmental management system for many years and is both ISO 14001 and EMAS (Eco-Management and Audit Scheme) certified. The [HUBER Environmental Policy](#) contains the measures through which we fulfil our responsibility for the environment. In production and throughout the company, we strive to save resources and to burden the environment as little as possible. Compliance with all legal regulations is a matter of course.

HUBER also sets itself annual environmental targets in order to continuously improve its environmental protection performance.

► Occupational health and safety

Creating and maintaining a safe working environment that promotes health and performance contributes to the success and future security of our company. Occupational health and safety is therefore an important part of our Mission Statement.

Die [HUBER Occupational Health and Safety Policy](#) summarises the principles to which we are committed as a company:

- Safe and healthy workplaces
- Define goals for occupational health and safety
- Avoid and eliminate hazards and dangers
- Comply with all legal obligations and regulations in the field of occupational health and safety
- Continuous improvement of occupational health and safety with the involvement of employees

In addition, we operate an occupational health and safety management system in accordance with ISO 45001.

PRINCIPLES

The health and safety of our customers, as users of our machines and plants, is also of great importance to HUBER SE. For this reason, we ensure during development, production, assembly and commissioning that the machines we install meet the requirements of the Machinery Directive and other relevant directives. Possible risks in the daily handling of our machines are thus minimised.

► Data protection

When dealing with personal data of employees, customers, interested parties and other third parties, we observe the requirements of the General Data Protection Regulation (DSGVO). Personal data is only collected, processed and used for defined, clear and lawful purposes. The collected data is stored securely and is not kept longer than legally permissible or necessary. The handling of personal data is transparent and is described in detail in the [HUBER Privacy Policy](#). Data subjects have the right to information, objection, blocking or deletion of data at any time in accordance with DSGVO.

SCOPE

Scope and implementation

The **HUBER Code of Conduct** is binding for all bodies and employees of HUBER SE.

The managers of HUBER SE have a special responsibility: They are called upon not only to exemplify in their own practice the rules of conduct and values described in this Code, but are also the first point of contact for questions from their employees. The respective manager is also responsible for ensuring compliance with this Code in his or her area of responsibility.

HUBER investigates all indications of violations of this Code of Conduct. Contact persons and contact options can be found in the next point. Violations of this Code will not be tolerated and will result in disciplinary action.

Help | Whistleblowing

Help

If employees have any questions regarding the **HUBER Code of Conduct** or the correct behaviour in a specific case, they can contact their line manager or even the Board of Directors. The contact persons in the human resources department and the employee representatives are also available for support.

Whistleblowing

If you have concrete indications that our Code of Conduct, internal rules or laws are being or have been violated, we ask you to share this information with us and to actively assist in clarifying the incidents. This offer to speak up is made to all our employees but also to our customers, suppliers and other business partners.

Please share your concerns with us via our Whistleblowing Portal. The whistleblowing system allows both written and verbal reports. You are free to decide whether you want to make the report anonymously or by providing your contact details.

If you wish to report anonymously, the whistleblowing system allows you to set up a protected mailbox. Via this mailbox, we can communicate with you in writing, ask further questions that are important for the investigation and inform you about the progress of the investigation. Your anonymity is always guaranteed.

You can find the link to the Whistleblowing Portal on our homepage at www.huber.de/compliance or directly via the following QR code.





Imprint

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