

HUBER Code of Conduct



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Foreword by the HUBER SE Board of Directors

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, our employees and the entire company group in the future as well.

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 the HUBER Group – for the board of directors, managers and all employees.

HUBER SE
Berching, September 2025

Georg Huber
CEO
Chief Financial & HR Officer

Rainer Köhler
Chief Sales Officer

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

Dr.-Ing. Johann Grienberger
Chief Technology 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 innovative high quality 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. We demand a high level of commitment and enhance the development of motivated and qualified employees thinking and acting in line with our corporate policy.

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 1872, 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.

Berching, November 2022

HUBER SE Board of Directors

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 employees of the HUBER Group 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 and comply with the legal regulations relevant to his/her area of responsibility. If employees have any questions or uncertainties, they can and should contact their managers, who are available to provide advice and support.

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

Responsibility in the supply chain

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, among others:

- 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 serious problems that affect not only economic transactions. They can distort competition, harm individuals and society and lead to decisions being made for improper reasons.

We do not tolerate any form of corruption or bribery, regardless of whether it affects our corporate assets or the assets of third parties. Our internal **'HUBER Anti-Corruption Policy'** sets out clear guidelines for our employees on how to interact with customers, suppliers and other business partners in their day-to-day work.

Our business partners are also obliged to avoid conflicts of interest that could pose a risk of corruption.

Consultants, intermediaries and sales partners receive commissions and remuneration exclusively for legally permissible activities and only on the basis of a 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 firmly reject any kind of tax evasion and subsidy fraud, and we do not with such activities in any way. Adhering to tax and customs regulations builds the trust of our customers, business partners, the authorities and the public. Violations, on the other hand, can lead to considerable financial loss and lasting damage to our reputation. Responsible employees must expect appropriate consequences under labour and criminal law for such violations.

Every employee should be aware that in the case of tax offences, the risk of detection is particularly high, especially due to regular and careful audits by the tax authorities. Even initial suspicions can lead to criminal investigations.

We are aware that the assessment of facts under tax or subsidy law can be complex. If there is any uncertainty, superiors as well as internal and external specialists are available to provide advice.

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 activities for suppliers, customers or competitors, as well as financial participation in these. The HUBER SE 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 material assets that are essential for our business processes to run smoothly. These include production machinery, tools, telephones, photocopiers, computers, software and vehicles. These resources are to be used exclusively for business purposes. Private use is only permitted with express authorisation. We expect all employees to treat company property responsibly and with care.

As a leading company in its industry, HUBER also possesses valuable technical expertise and confidential trade and business secrets.

This intellectual property is the foundation of our economic success and provides us with a significant competitive advantage.

The protection of 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.

Protecting this information is therefore a top priority. Confidential content must be treated with the utmost care and must not be disclosed to unauthorised persons, either within or outside the company.

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

Prohibition of discrimination and equal treatment

HUBER stands for a working environment that is free from discrimination and offers equal opportunities for all. Every employee has the right to respectful and fair treatment, regardless of:

- Gender
- Origin
- Religion
- World view
- Disability
- Age
- Sexual orientation
- Gender identity

HUBER does not tolerate any form of discrimination or disadvantage.

HUBER actively promotes diversity and strives to create a working environment in which all employees feel valued and respected.

Bullying and harassment

Treating each other with respect is one of HUBER's fundamental principles. We are committed to providing a working environment that is free from bullying, harassment and any form of discriminatory behaviour.

Bullying and harassment include all types of unwanted behaviour that aim to humiliate, unsettle or intimidate an individual. Such actions can be verbal, non-verbal, psychological or physical.

Examples of unacceptable behaviour include:

- Insults, verbal abuse or derogatory comments
- Threats or intimidation
- Spreading rumours or false claims
- Exposing or humiliating someone in front of others
- Unwanted physical contact
- Sexual harassment

We expect all employees to treat each other with respect and collegiality, actively contributing to the creation of a safe and appreciative working environment. Violations of these principles can result in consequences under labour law.

Respect for human rights

At HUBER, we recognise the universal validity of the human rights as enshrined in the United Nations Universal Declaration of Human Rights (UDHR), as well as the international human rights treaties based on it. We are committed to respecting and protecting human rights in all our business activities and relationships. This includes:

- Respecting the human dignity of every individual, regardless of gender, origin, religion, ideology, disability, age, sexual orientation or gender identity.
- Ensuring fair working conditions and equitable treatment for all employees.
- Prohibiting all forms of discrimination, harassment and bullying.
- Compliance with laws against child labour and forced labour.
- Safeguarding the health and safety of employees and business partners' employees.
- Respecting the rights of communities in which HUBER operates.
- Taking responsibility for ensuring that our suppliers and business partners comply with human rights.
- Promoting a corporate culture based on respect, fairness and equality.

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.

HUBER SE, as the parent company, has been operating an environmental management system for many years and is certified to both ISO 14001 and EMAS (Eco-Management and Audit Scheme). Throughout the HUBER Group, and especially in our global production companies, we strive to save resources and minimise our impact on the environment. Compliance with all legal requirements is a matter of course.

From 2013 to 2025, we published our HUBER Sustainability Report on the activities of HUBER SE every two years.

Starting with the 2026 reporting year, we will prepare a comprehensive report in accordance with the Corporate Sustainability Reporting Directive (CSRD), which will detail the environmental, social and economic impact of the entire HUBER Group, following EU-wide standards for sustainability reporting.

Occupational health and safety

Promoting a safe, healthy and productive working environment is a key concern for the entire HUBER Group. This contributes significantly to the long-term success and future security of our organisation.

All HUBER Group companies are committed to the following core principles for occupational health and safety:

- Safe and healthy workplaces
- Prevent 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, involving employees

The health and safety of our customers, particularly when using our machines and systems, is also a top priority for us. From the initial stages of development, production, assembly and commissioning stages, we ensure compliance with relevant safety guidelines, such as the EU Machinery Directive. In this way, we help to minimise risks in daily operations.

Data protection

The HUBER Group is committed to protecting the personal data of all its employees, customers, prospects and other third parties. We recognise that data protection laws vary around the world and are committed to complying with the applicable data protection regulations in each country in which we operate.

We only collect, process and use personal data for specified, clear and legitimate purposes. Any data collected will be stored securely and will not be retained for longer than is legally permissible.

The handling of personal data is transparent. Data subjects have the right to access, correct, object to, block or delete their data at any time in accordance with the applicable data protection regulations.

Use of social networks

HUBER recognises the importance of social networks for communication and information exchange. The **HUBER Social Media Guideline** applies to the use of these platforms by employees, both privately and professionally.

The internal guideline contains detailed information on the following topics:

- Representation of the company on social networks
- Confidentiality and data protection
- Respectful interaction with other users
- Copyright provisions
- Private use during working hours

Employees are obliged to familiarise themselves with the contents of the HUBER Social Media Guideline and to comply with them when using social networks.

Use of AI systems and IT security

HUBER uses AI systems to optimise business processes and develop innovative solutions. The use of AI is always in line with the ethical principles and values enshrined in the HUBER Code of Conduct. The internal **HUBER AI policy** applies to the use of AI systems by employees in all areas of the company.

The policy contains detailed information and instructions on the following topics:

- Ethical principles for the use of AI
- Responsible handling of data
- Transparency and traceability of AI decisions
- Ensuring fairness and non-discrimination
- Guaranteeing human control

IT security is essential for our company, as it ensures the protection of sensitive data and the integrity of our systems. All employees must familiarise themselves with the internal HUBER IT policy and comply with it. The policy includes the following aspects:

- Password policy
- Use of email, the internet and smartphones
- Data backup and data exchange with external parties
- Procurement and use of hardware and software

Scope and implementation

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

HUBER managers 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, the managing director or even the Board of Directors. Furthermore, Mr. Markus Beer (Markus.Beer@huber.de) is available as the **compliance officer** for all questions and concerns.

Whistleblowing

If you have concrete evidence 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.

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 stating 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 the HUBER SE homepage at www.huber.de/compliance or directly via the QR code.

The Whistleblowing Portal can be used by all employees of the HUBER Group, as well as by our customers, suppliers and other business partners.

All reports will be treated confidentially and investigated thoroughly and independently. Whistleblowers are protected from any negative consequences or reprisals.





Imprint

HUBER SE
Industriepark Erasbach A1
92334 Berching
Germany