

Preamble

To guarantee the integrity of all business activities at HH, we have developed this Code of Conduct. It comprises of the basic expectations regarding the conduct of every company employee and forms the binding framework for all international business guidelines. At the same time the Code of Conduct is a promise for fair and responsible conduct towards customers, partners, suppliers and all other relevant groups always.

1. Statutes and Law

We always abide by laws and regulations.

Legally compliant and socially responsible Corporate Management is the basis for Harro Höfliger's business activities. Valid laws and regulations are always adhered to. National laws and regulations take precedence over internal regulations.

To respectfully comply with internationally recognized human rights and combat corruption, we follow the International Society of Automation (ISA), ISO 37001 and the 10 rules of the UN Global Compact.

We firmly reject any form of forced and child labour. We follow the legal requirements for lobbying and avoid undue influence on politics and legislation under all circumstances.

2. Conflict of interests

We make sure that one's own interests do not conflict with those of the company.

As soon as one's own interests contradict those of the company, there is a conflict of interest. We do everything in our power to avoid conflicts of interest and to solve unavoidable conflicts as soon as possible. We respect the private sphere of every employee.

Within the framework of our business, we are guided exclusively by the company's interests. Our employees act independently and will not demand or ask for monetary benefits, gifts or other favours and will protest the prospects of such. Accepting gifts within the framework of the law up to the maximum value of Euro 50,00 or the comparable amount in a local currency is permitted.

We see ourselves as part of society and support voluntary work, as well as recognised aid organisations and sustainability projects.

3. Protection of Information

We protect the business secrets of our company and those of our business partners.

To strengthen the protection of our data and information, as well as the data and information provided to us, we operate a certified Information Security Management System (ISMS) in accordance with ISO/IEC 27001. This system provides a structured framework for identifying, assessing, and addressing information security risks. Measures include access controls, data encryption, and regular security training. We place great importance on the completeness and accuracy of the information we create, never misuse confidential information, and do not disclose it to third parties without authorization.

Regular internal and external audits and reviews of the ISMS enable continuous improvement and adaptation to new threats. This proactive approach fosters trust among our stakeholders and protects the integrity of all data, ultimately contributing to the long-term stability and security of our company.

4. Data Protection

We protect personal data with the utmost care and in accordance with applicable law.

The protection of personal data is a central concern for us. We process personal data of our employees, customers, suppliers, and other partners exclusively within the framework of applicable data protection laws. Personal data is only collected, processed, or used when it is necessary for the establishment, execution, or termination of an employment or business relationship, or when explicit consent is given. In doing so, we adhere to the principles of purpose limitation, data minimization, transparency, and storage limitation.

We implement appropriate technical and organizational measures to protect personal data from unauthorized access, loss, or misuse. These include, among other things, access restrictions, encryption, training, and regular reviews of our data protection measures. All employees are required to comply with the data protection regulations and consult with the data protection officer in case of uncertainties. Data protection breaches are thoroughly investigated and lead to appropriate actions.

5. Fair Competition and Transparency

We achieve sustainable business performance through fair and honest conduct.

We maintain trusting, fair and respectful business relations with our business partners and expect the same from them. We communicate our guiding principles to our business partners regarding ethical and fair transactions. We encourage them to follow the same standards in their own transactions. We consider the laws and regulations of the countries in which we work.

We adhere to the internationally recognised standards of good business management. All employees contribute towards ensuring that our business transactions are complete and correctly documented. A transparent financial reporting serves to manage the steering of our company.

6. Respect

We treat every person with dignity and respect.

Our employees are the basis of our business transactions and success. In accordance with ensuring equal opportunities for all, neither a person's age, disability, ethnic origin, skin colour, sex, pregnancy, sexual identity, nationality nor their religion or civil status play a role in employee selection. We respect the right to free speech and protection of personal rights and the private sphere.

All employees have the right to fair pay. We assess our employees based on their performance and give them hereto fair feedback. We treat each other with dignity and respect. Employees who do not follow these guidelines are not suitable for our company. We endeavour to solve problems within the workplace quickly and confidentially whilst considering the interests of all parties. Managers support their employees to achieve an acceptable work-life balance.

7. Workplace

We provide our staff with a safe and healthy work environment.

Work safety is achieved through leading by example and the willingness of our employees to take responsibility. We expect all employees to observe relevant work protection and work safety regulations. This calls for environmentally friendly and safe working methods. It is for this reason that we observe all valid environmental laws and use sustainable technologies as far as possible.

We treat our work materials carefully and use these solely for the purpose for which they are required. We endeavour to use our resources efficiently.

8. Education and qualification

We support our employees in their professional and personal development.

The skills and abilities of all employees are elementary for the secure and successful future of Harro Höfliger. We therefore constantly ensure comprehensive introductory, part-time and job-related training as well as further education. We also promote the personal development of everyone and support the desire for career progress.

We involve our suppliers in educational activities and encourage them to also enable their employees to receive comprehensive training and further education. Conversely, Harro Höfliger regularly provides its suppliers with technical know-how to achieve the best possible results within the scope of our cooperation.

9. Sustainable environmental and climate protection

We care for our future and operate sustainably.

As a commercial enterprise, we develop and manufacture production and packaging systems for customers worldwide and additionally, offer extensive support services.

In this context, sustainable environmental and climate protection as well as resource efficiency are important corporate goals.

In the development of new products and services as well as in the manufacture of production systems, we ensure that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection.

We are constantly working on innovative mobility and energy concepts that contribute to ecologically sustainable development.

10. Measures in the event of violations

We do not accept any violations against the Code of Conduct.

Violations of any kind against the Code of Conduct will not be tolerated. Employees to whom this applies are called upon to change their conduct. In the event of serious violations, punishment or disciplinary measures will follow.

All our employees and partners are required to inform the Harro Höfliger complaints office if they have conflicts of interest or become aware of violations.

This can be done at any time using the whistleblower features either personally by telephone or anonymously by email on our homepage <https://hoefliger.com>.

The reports are recorded and documented by an independent monitoring body and archived in a standardized procedure after the investigation has ended.

11. Validity

This Code of Conduct comes into force after it has been ratified by Senior Management and the Supervisory Board.

Allmersbach im Tal, July 28th, 2025

A handwritten signature in black ink, consisting of a large 'M' and a stylized 'H'.

Markus Höfliger
Chairman of the Supervisory Board

A handwritten signature in blue ink, featuring a large 'T' and a stylized 'W'.

Thomas Weller
CEO