

# Heraeus



## Code of Conduct

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## **01. Preamble: Purpose and Scope**

The Heraeus Group (“Heraeus”) is a highly-respected, family-owned international company that enjoys an excellent reputation throughout the world. Its operations are governed by this Code of Conduct (“Code”), which is an integral part of our responsibility-conscious management structure. This Code applies throughout the world to all employees, officers, directors, and organizations (“employees”) within Heraeus. By complying with the procedures described in this Code, we contribute to the security of our long-term business success.

The foundation of all transactions at Heraeus is compliance with all binding statutory requirements at the national and international level, as well as compliance with voluntarily accepted obligations. It is the employees’ responsibility to know and understand the laws applicable to their job responsibilities and to comply with both the letter and the spirit of these laws. Failure to comply with this Code will not be tolerated and may result in appropriate disciplinary action by the employer.

All employees and organizations at Heraeus are obligated to inform themselves regarding the requirements applicable to their area of responsibility in the company, and to obtain additional information and advice from the relevant offices in cases of doubt.

The Code will be supplemented with special guidelines for particular subject areas such as, for example, the guidelines applicable throughout the world for the procurement of goods and services and the guidelines for the prevention of money laundering.

## **02. Ensuring Fair Competition**

Heraeus expects its employees to comply with the applicable laws for the protection of fair and open competition. The applicable statutory provisions generally prohibit price or term agreements with competitors, agreements with

competitors for the purpose of market, or customer allocation, coordinated actions with competitors with respect to prices, terms, market, or customers, as well as unfair practices.

### **03. The Fight against Corruption**

Heraeus is convinced of the quality of its products and the capabilities of its employees. Heraeus absolutely prohibits bribery of business partners with money or objects of value. Employees of Heraeus are prohibited from demanding or accepting money or objects of value as consideration for the acceptance of products or other services. Heraeus has issued guidelines, which contain binding provisions for all employees, for the prevention of bribery in commercial transactions as well as for the procurement of goods and services.

### **04. Avoidance of Conflicts of Interest**

All employees have an obligation to act in the best interests of Heraeus. Employees should avoid any activity, interest, or association outside of Heraeus that could impair their ability to perform work objectively and effectively or that could give the appearance of interfering with their responsibilities on behalf of Heraeus or its clients.

Secondary employment at a company of a competitor, a customer or a supplier, as well as financial investments in such companies, which exceed a limit of one percent (1%), are allowed only after explicit approval in writing by the management of Heraeus. Notice of financial investments (greater than 1%) by close family members is to be provided to the management of Heraeus.

Favoritism for specific business partners due to private interests, in particular favoritism for family members, is prohibited. Even the appearance of favoritism due to private interests is to be avoided.

## **05. Compliance with the Basic Principles of National and International Trade**

Heraeus adheres to all national, multinational and supra-national foreign trade regulations. All employees are obligated to adhere to all official authorization provisions, in particular the applicable export and import prohibitions, as well as the applicable duty and tax requirements.

Compliance with the national and international provisions for the prevention of money laundering and the responsible handling of precious metals are of particular importance to Heraeus. Therefore, Heraeus has issued binding guidelines on the prevention of money laundering and participation in criminal acts, as well as on the acceptance of precious metals.

Heraeus actively participates in the development of industry-specific basic policies for the prevention of money laundering and for the responsible handling of precious metals.

## **06. Creating and Maintaining Safe and Fair Working Conditions**

Heraeus is committed to protecting its employees and creating and maintaining a safe and attractive work environment for its employees and to avoid adverse impact and injury to the environment and communities in which it conducts its business. Heraeus seeks to provide fair wages and reasonable hours of work to its employees in each country, and rejects all forms of forced labor and child labor.

Heraeus seeks to preserve and promote the health of its employees. This is why it is the goal of the company to ensure that all of the Heraeus production locations adhere to a high level of occupational safety. Heraeus expects that its employees, in particular its executives, will ensure occupational safety at any time.

## **07. Protection of Company Assets**

The commercial success of Heraeus is based on the innovative ability of its employees and the knowledge acquired over many decades. Proprietary and confidential information generated and gathered in our business is a valuable asset. All employees are required to ensure that operational and trade secrets of Heraeus, as well as those of its business partners, do not become known outside of Heraeus. It is not permissible to disclose operational or trade secrets without permission, or to use them for one's own purposes without permission.

Heraeus expects its employees to treat the assets of Heraeus responsibly, and to make business decisions on the basis of commercially comprehensible risk-benefit analyses. This also includes the careful verification of the integrity of the business partners of the Heraeus group as well as the private individuals who support the business partners' companies.

Heraeus places great value on the integrity of its employees. Depending on the type of business and the location of the staff member's employment, it may be necessary to review the financial status and personal integrity of the employees.

All documents of Heraeus, including financial reports, research reports (external use), and accounting documents and invoices (internal use) in particular, must reflect the relevant facts correctly and transparently.

Employees are not permitted to use business resources for personal purposes, unless the use of business resources for personal purposes is expressly granted to the employees through their employment agreement or their superior allows such use. Under no conditions may the employees use Heraeus's systems to view, store, or send unlawful, offensive or other inappropriate materials.

## **08. Environmental Safety and Product Safety**

Heraeus considers itself obligated to deal respectfully with the resources of nature. Compliance with applicable statutory provisions for the protection of the environment is therefore self-evident. With its innovative products for environmental protection, Heraeus makes an important contribution to the long-term protection of the foundation of human life.

Heraeus places the highest requirements on the quality and safety of its products over the entire product lifecycle.

## **09. Prevention of Discrimination**

Heraeus expects its employees to respect different outlooks on life and cultural or country-specific characteristics when dealing with other employees of Heraeus, including former employees of Heraeus, applicants and business partners. Heraeus strives to provide a workplace and a working environment in which discrimination and sexual harassment are not tolerated, and where everyone has an equal opportunity to work, progress, and contribute to our success. Heraeus selects, develops, promotes, and compensates employees, including former employees, applicants, and business partners based on objective and comprehensible criteria, without distinction or discrimination because of age, color, national origin, race, religion, gender, physical or mental disability, or any other legally protected personal characteristic.

## **10. Dealings with Media**

Transparent, dialog-oriented and consistent information for the public – including the media – strengthens the worldwide image of Heraeus. Official statements, in particular with respect to the media, may be made for Heraeus only by authorized employees.

## **11. Implementation**

The management of the company has appointed compliance officers (COs) for the individual companies of Heraeus, who ensure that the employees are informed in a suitable manner about the content and the implementation of the Code.

In addition, a Heraeus Compliance Officer (HCO) has been appointed for Heraeus, who supports the COs at the individual companies with the implementation of the Code and participates in the development and revision of guide-lines in the Code. The HCO also oversees the compliance with the Code and is a contact person for all questions in connection with the implementation of the Code. The HCO is responsible to the Board of Management of Heraeus Holding, however and is not dependent on taking directions.

The employees can turn to their supervisors or the relevant CO for inquiries about the content or interpretation of the Code, and report violations of the Code to them. In addition, they have the option to contact the HCO Mr. Bernhard Reckmann directly (telephone hotline: +49(0)6181.35-5500; e-mail: [heraeuscomplianceofficer@heraeus.com](mailto:heraeuscomplianceofficer@heraeus.com)). Any reprisal or retaliation against any person who has in good faith reported a violation or suspected violation of the Code is prohibited.



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