

Anti-Corruption Policy

Hielscher Ultrasonics GmbH

Hielscher Ultrasonics GmbH, Oderstr. 53, 14513 Teltow, Germany

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1. Purpose and Scope

Hielscher conducts business without bribery or corruption of any kind. This policy implements the Code of Conduct and Ethics and applies to all employees, representatives, agents, consultants, and intermediaries acting for Hielscher, and forms the basis for contractual commitments by business partners. It covers active and passive bribery in both public and private sectors, including under the German Criminal Code (§§ 299, 331 ff. StGB), the UK Bribery Act, and the US FCPA where applicable.

2. Prohibited Practices

No one may offer, promise, give, request, or accept any undue advantage — monetary or non-monetary — to or from any person, including public officials, customers, suppliers, or intermediaries, in order to obtain or retain business or an improper advantage. This expressly includes kickbacks, facilitation payments, bribery through third parties, and corrupt donations or sponsorships.

3. Gifts, Hospitality, and Other Benefits

- Normal, customary gifts and hospitality are permitted only if they are modest, given or received openly, made in a business context, not cash or cash equivalents, not prohibited by local law or the counterparty's rules, and cannot reasonably be understood as influencing a decision.
- Indicative limit: EUR 10 per occasion per person, unless a supervisor approves a higher amount in writing, and any benefit involving public officials requires prior management approval.
- Political donations by or on behalf of Hielscher are prohibited. Charitable donations require documented management approval and may not be used to circumvent this policy.

4. Intermediaries and Business Partners

Agents, distributors, consultants, and similar intermediaries are engaged only after due diligence (lawful registration, beneficial ownership where material, no sanctions or corruption red flags), on documented terms with genuine services, market-standard compensation paid to a business account in the intermediary's country, and contractual anti-corruption undertakings with audit rights.

5. Public Officials

Additional care applies in dealings with government officials and state-owned enterprises: no gifts, entertainment, travel, or employment offers without prior management approval; no use of personal contacts to influence official decisions.

6. Books, Records, and Controls

All payments and benefits must be accurately recorded in the books and accounts. No off-the-books accounts, slush funds, or false invoicing. Bank payments go only to the contractual counterparty's account unless an exception is documented and approved by management.

7. Training, Reporting, and Sanctions

Employees receive regular anti-corruption awareness training. Suspected violations may be reported to management or confidentially to compliance@hielscher.com (whistleblowing); good-faith reporters are protected from retaliation. Violations lead to disciplinary action up to termination and may be reported to authorities.

Approved by the Management of Hielscher Ultrasonics GmbH.