

Code of Conduct and Ethics

Hielscher Ultrasonics GmbH

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

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1. Purpose and Scope

This Code sets out the ethical and business-conduct standards binding on all employees, managers, and the management of Hielscher Ultrasonics GmbH ("Hielscher"), and on suppliers and business partners to the extent they are contractually bound to observe equivalent standards. It combines our code of business conduct and our code of ethics in a single document.

2. Core Principles

1. **Lawfulness.** Comply with all applicable laws, including German and EU law, export control, competition, and product safety regulations.
2. **Integrity.** Act honestly; no deception, falsification of records, or misrepresentation of products and performance data.
3. **Respect and fairness.** Treat colleagues, customers, and partners with respect; zero tolerance for discrimination, harassment, or bullying.
4. **Responsibility.** Use company resources prudently and protect the environment in line with applicable environmental requirements.

3. Specific Obligations

- **Anti-corruption and anti-bribery:** No offering, giving, requesting, or accepting bribes, kickbacks, or improper gifts (see Anti-Corruption Policy).
- **Human rights and labour:** No child labour, forced labour, slavery, or unlawful restrictions on workers' rights, in our own operations and our supply chain (see Human Rights Policy).
- **Competition:** No price-fixing, market allocation, or exchange of competitively sensitive information with competitors.
- **Confidentiality and IP:** Protect business secrets, customer data, and third-party intellectual property; comply with data-protection rules (GDPR).
- **Company property:** No misuse of assets, IT systems, or working time.
- **Product safety and quality:** Deliver products and documentation that meet agreed specifications and applicable standards.
- **No money laundering / sanctions breaches:** Report unusual payment requests and screen business partners as required by our AML and Sanctions Policies.

4. Implementation, Reporting, and Whistleblowing

Compliance with this Code is a management responsibility and a performance criterion for all employees. Suspected violations may be reported to a supervisor, to management, or confidentially by e-mail to

compliance@hielscher.com (whistleblowing). Reporters acting in good faith will not suffer retaliation; genuine mistakes will not be punished.

5. Consequences of Non-Compliance

Violations may result in disciplinary measures up to termination of employment and, where applicable, legal action. For business partners, violations may justify contractual remedies or termination of the relationship.

Approved by the Management of Hielscher Ultrasonics GmbH.