# MULTIVAC Code of Conduct





### **MULTIVAC Code of Conduct**

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"In addition to our responsibilities within our company and in our mutual dealings with each other, we also bear responsibility for our products and our environment."

Christian Traumann, Group President Guido Spix Group President



### **Preface**

Within our sector the name MULTIVAC is associated with many defining standards as regards technology efficiency and reliability.

This MULTIVAC Code of Conduct is intended to give an overview of the internal standards and requirements of the MULTIVAC Group. The standards of conduct are in harmony with the current legislation and an ethical understanding of basic responsibilities. The standards specified here are intended to give guidance to our staff members, customers, suppliers and business partners about the way, in which MULTIVAC conducts itself as a company.

The guidelines described here should not be considered as final and conclusive, but rather as a process of continual development.

With kind regards,

Christian Traumann Group President Guido Spix Group President



### 2/ Basic principles of the company

"We are guided in all our business activities by our firmly held principles and the current rule of law."



### 2/1 Principles and rules of the Code of Conduct

The MULTIVAC Code of Conduct is intended to make clear to all stakeholders the important basic principles of the company, as well as the legal framework and the company's own internal regulations. This is intended to promote the company culture and an ethical code of behaviour, so that the company can be protected from misconduct arising from ignorance or negligence.

This Code of Conduct lays down the basic principles of MULTIVAC's business activity, and we require all our staff members worldwide to comply with this code of behaviour. The regulatory content applies to all subsidiaries and other business units within the company.

MULTIVAC also expects the same basic understanding of the Code of Conduct from its business partners. This does not create any third-party beneficiary rights.

It is the aim of this Code of Conduct, that these rules are observed on the basis of understanding and acceptance rather than coercion.

# 2/2 MULTIVAC's basic values

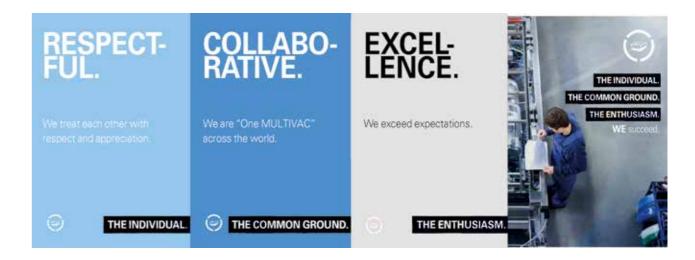
MULTIVAC develops a set of values, which reflect good behaviour based on the company's Code of Conduct, and which define the culture of the company on a sustainable basis.

These MULTIVAC values are intended to help managers in their management responsibilities, and also to act as an aid to staff members in decision processes.

MULTIVAC lives by the trust of its customers, suppliers and staff, as well as by the transparency of the company's conduct and integrity.

MULTIVAC pursues a culture of open questioning and constructive criticism without fear.

This is also manifested in the Mission Statement, which has set itself the aim of promoting responsible action.





### 3/ Implementation and achievement

"Responsible action and awareness form the framework of our business policy."



# 3/1 Compliance with rules and sanctions

Non-compliance with the values and rules laid down here can be damaging to staff members, customers, suppliers, the environment and the company itself. This damage can be of a material or immaterial nature.

Compliance with the rules and guidelines is therefore the duty of each individual.

In the event that local laws and regulations are less restrictive, MULTIVAC's business activity will however be based on the principles of this Code of Conduct. In those cases, where there is a direct contradiction between the mandatory local law and the principles in this Code of Conduct, precedence is given to the local law. MULTIVAC does however strive to comply with all aspects of the present Code of Conduct.

#### 3/2 Communication

MULTIVAC seeks to communicate openly and frankly with all stakeholders about the requirements of this Code of Conduct and its implementation.

# 75/3 Possible means of reporting infringements

MULTIVAC offers its staff members and business partners access to a protected mechanism, by which possible infringements against the principles of this Code of Conduct can be reported in confidence.

If you have some information, please contact the following office, anonymously if preferred: compliance-office@multivac.de



### 4/ Integrity and compliance

"Compliance with standards and laws are the basic preconditions for all our business activities."



#### 4/1 Corruption

MULTIVAC does not tolerate corruption as defined in §§ 299, 335 of the StGB (German Criminal Code).

Inducements, which are intended to influence business decisions or gain any other prohibited advantage, or which could give the appearance of wishing to do so, are not offered, granted, demanded or accepted in our business relations, and we do not allow any promises of such inducements to be made.

A particularly strict standard is to be applied, when dealing with persons, for whom special regulations apply in terms of liability and criminal indictment (e.g. office holders and other public officials).

# 4/2 Dealing with gifts and conflicts of interests

MULTIVAC staff are not permitted to solicit invitations to meals or events, nor to demand gifts, other gratuities, personal services or favours from business partners.

Gifts and invitations of an unsolicited nature must not influence business decisions. It is the policy of MULTIVAC to avoid all internal and external conflicts of interest, which could have an illegitimate influence on business relations. If this is not possible, these conflicts are disclosed by MULTIVAC.

### 4/3 External consultants and intermediaries

MULTIVAC only engages external consultants and intermediaries, if these bring verifiable benefits for MULTIVAC with their consultancy and intermediary services.

The relationship between the benefits of the consultancy and intermediary services provided and the remuneration paid must be reasonable and in line with market practice.

#### 4/4 Donations and sponsoring

Sponsoring is permitted, if benefits flow back to MULTIVAC, which are proportionate and serve the business interests of the company.

In the case of donations, there must be no agreed service in return, i.e. the donation is not to be used to give the donor a particular (material or intangible) benefit.

#### 4/5 Fair competition

MULTIVAC supplies products, which are worldwide leaders in their sector, and which are available to the market under free competition.

MULTIVAC conducts its business in accordance with the national and international competition and cartel laws, and it does not participate in price fixing, collusion with quotations, or in agreements to split markets and customers.



# 1/ 4/6 Prevention of money laundering

To the best of its knowledge and conscience, MULTIVAC only conducts business relations with reputable and legitimate commercial partners, whose business activities are in accordance with the legal requirements, and whose financial means are from a legitimate source.

All payment streams are to be transparent and open.

# 4/7 Protecting information and intellectual property

MULTIVAC treats all company information confidentially, both internally and externally. When communicating with external partners (suppliers or customers), only the information, which is required for this partnership, is to be transferred. MULTIVAC observes all the current laws on the protection of business secrets.

MULTIVAC concludes non-disclosure agreements with external partners.



#### 4/8 Data protection

MULTIVAC protects the data of its staff members, customers, suppliers and other business partners.

The handling and processing of data at MULTIVAC is restricted to that data, which is necessary to ensure a managed and successful business operation.

MULTIVAC processes, saves and protects personal data in accordance with the legal regulations. Personal data is used confidentially and only gathered for purposes, which are legitimate, transparent and specified in advance.

MULTIVAC only processes personal data, if it is protected by the appropriate technical and organisational means against loss, alteration, prohibited use or disclosure.

#### 4/9 Export controls

MULTIVAC is committed to complying with the legal standards applying to export controls - particularly approval requirements and bans on exports or support - in relation to the shipment and export of its goods.

#### 4/10 Tax compliance

MULTIVAC complies unequivocally with the current laws on tax and social contributions.

#### 4/11 Financial reporting

MULTIVAC promotes and demands correct and factual accounting procedures and generation of reports.

MULTIVAC systematically implements the basic principles of proper and lawful accounting processes.

MULTIVAC has an internal monitoring system in place to ensure that this is the case.



### 5/ Staff members

"Our most valuable asset is our staff members.

MULTIVAC sees the people in the company as
its most important investment in the future.

MULTIVAC is committed to appreciation, respect and fairness towards every staff member."



# 5/1 Compliance with human rights

MULTIVAC observes and fully supports compliance with internationally recognized human rights, and it respects the personal worth, private sphere and human rights of each individual.

MULTIVAC protects and respects the right to freedom of opinion and free expression.

MULTIVAC does not tolerate unacceptable treatment of staff members, such as for example physical or psychological mistreatment, discrimination, and sexual or personal harassment. These include the following basic principles:

- Ban on child labour
- Ban on forced labour
- Protection of the freedom of association and collective negotiations
- Securing diversity and equal opportunities.

#### 5/2 Equal treatment

One of MULTIVAC's strengths is the diversity of its staff members. All staff members and managers should foster open and tolerant dealings with each other. All staff members and job applicants are treated absolutely equally in accordance with the German Equal Treatment Law (AGG) irrespective of

- their sex
- their age
- their ethnic background
- their sexual orientation
- their religion
- their political views
- any possible disabilities/handicaps

# 5/3 Remuneration and working hours

Remuneration is based on the current statutory provisions, and it is also complemented by the relevant national minimum wage laws.

Staff members are given clear, detailed and regular information about the composition of their remuneration package.

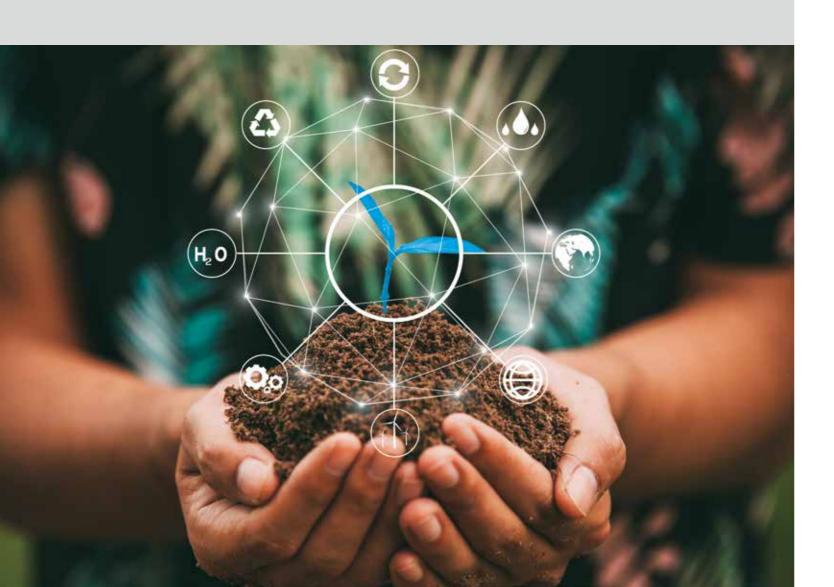
MULTIVAC complies with the current national legislation and (international) standards in terms of maximum permitted working hours, and it also ensures that

- working hours, including overtime,
   do not exceed the legally permitted
   maximum limits
- the weekly working hours, including overtime, are not longer than 60 hours, even in exceptional cases, if there are no provisions to this effect
- employees have at least one whole day per calendar week free from work.



### 6/ Processes

"Securing healthy working conditions and ensuring responsible practices form the basis of our business."



#### 6/1 Health & Safety

The workplaces and working conditions at MULTIVAC offer a safe, protected and healthy working environment. MULTIVAC undertakes to offer all employees, customers, suppliers and local authorities an environment of health and safety protected by MULTIVAC.

All measures taken in the working environment, as well as all business activity within the company, are based on the premise of maintaining and improving this protection.

MULTIVAC safeguards the health of its staff members, by taking suitable Health & Safety measures, such as for example the implementation of a company Health & Safety Management System. This also applies in the context of addictive illnesses and the effects of addictive substances.

# 6/2 Environment, energy and climate protection

At MULTIVAC there is an environmental awareness of all the life phases of a product - from its development and through all manufacturing processes right up to delivery.

MULTIVAC conducts its business activity in full compliance with all current legislation, and it also aligns itself with international standards, such as the ISO 14001 environmental standard, so that negative effects on the environment are minimised, and measures to protect the climate are continuously improved.

This includes the protection of our environment and the conservation of natural resources.

# 5/3 Dealing with conflict minerals

MULTIVAC takes the necessary measures with due diligence to avoid using conflict minerals in the manufacture of its products, in order to forestall corruption, infringements of human rights, and the financing of armed groups or similar bodies.

#### 6/4 Supply chain

MULTIVAC expects from its suppliers, that they will comply with the principles of this Code of Conduct, or alternatively apply a code of behaviour with similar values. They are also encouraged to implement the principles of this Code of Conduct in their own supply chains.

If there is any lingering doubt, that a supplier is complying with this Code of Conduct, then the supplier will be asked to take suitable remedial measures, and he is obliged to give a report on this action to his contact in our company. If this proves unsatisfactory, the cooperation with the supplier will be ended.



### 7/ Products

"Our customers benefit not just from our comprehensive and high-quality support, but also our well-established closeness to our customers. We see customer satisfaction as the key to success."



#### 7/1 Product safety/quality

At MULTIVAC the safety and quality of products has the highest priority.

The business success of MULTIVAC is inextricably linked to the safety and quality of its products, which depend on the joint actions of the company's staff and managers.

Quality awareness and product safety are closely interlinked, and they ensure that MULTIVAC meets the requirements of its customers for reliability.

#### 7/2 Consumer interests/ Complaint management

The needs of its customers are at the very heart of MULTIVAC's business activity.

MULTIVAC knows its customers and offers them the highest possible level of benefit.

MULTIVAC offers solutions, which are individually tailored to the customer, as well as great expertise in all its business dealings.

MULTIVAC takes complaints very seriously and deals actively with them.





MULTIVAC is a supporter of the Alliance for Development and Climate. The foundation mobilises additional means for promoting sustainable development and climate protection. The commitment goes far beyond the statutory requirements for climate protection.



MULTIVAC supports the BLUE COMPETENCE Initiative of the Association of German Machinery and Equipment Manufacturers (VDMA).



MULTIVAC has joined the Climate-friendly Initiative of Small and Medium-sized Enterprises. The Climate-friendly Initiative of Small and Medium-sized Enterprises helps companies to act in a more climate-friendly way and reduce CO<sub>2</sub> emissions.



MULTIVAC is part of the R-Cycle initiative across all its companies. The common objective is to drive the loop system for plastic packs forward, based on an open and globally applicable tracing standard.



MULTIVAC supports the SAVE FOOD Initiative of the Food and Agriculture Organization. The aim of this initiative is to promote dialogue between industries, research institutes, politicians and the wider society about food wastage.

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