

Version 04/2026



Compliance Code of conduct

of Peter Huber Kältemaschinenbau SE

huber



Inspired by **temperature**

Preface



Our Code of Conduct outlines the values we share and how we want to work together – now and in the future. In order to ensure the sustainable success of our company, it provides us with a clear mission to be achieved. Based on the central philosophy "WE are Huber", we can only achieve this goal together. In particular, our values such as personal responsibility, open-mindedness and transparency, as well as legal and ethical conduct at all times, are of great importance.

For the first time, this Code of Conduct combines our important basic rules and principles, which are binding for us today and in the future, in one document. It provides a guidance framework and applies equally to each and every one of us - to the Executive Board, to managers and for each individual employee [1]. The Code of Conduct imposes a demand on us, and at the same time it is a promise to the outside world for responsible conduct towards business partners and the public, but also in our dealings with each other within the company. Together we are responsible for the reputation of our company. The misconduct of individuals can cause enormous damage to all of us. Therefore, we kindly ask you, dear colleagues, to read this carefully and use it – together with us – as a guideline for our daily conduct.

This is what we stand for!

Daniel Huber
Chairman

Joachim Huber
Vice Chairman

Beatrice Geiler
Member of the Board

Bärbel Huber
Member of the Board

Ben Huber
General Manager

[1] For reasons of better readability, we generally use the generic masculine. In the interest of equal treatment, the corresponding terms apply for all genders. The abbreviated form of language is for editorial reasons only and does not imply any judgement.

Content



Our guiding principle	5
Who are we?	5
What is our mission?	5
How do we practice it?	5
Conduct in a business context.....	6
Compliance with law and order	6
Avoidance of conflicts of interest	6
Fair competition	6
Prevention of money laundering.....	6
Conduct towards colleagues and other employees	6
Equal treatment and non-discrimination.....	6
Human and workers' rights	6
Collaboration with employees.....	7
Occupational health and safety representatives.....	7
Conduct within the company.....	7
Sustainable environmental and climate protection	7
Donations.....	7
Representation of political interests	7
Public appearance and communication	7
Handling information	8
Reporting	8
Confidential company information / insider information.....	8
Data protection and information security	8
Protection of company property.....	8
Implementation and contact	9

Our guiding principle

Who are we?

We, Peter Huber Kältemaschinenbau SE, are a family-run company in its 2nd generation. We are technology leader for high-precision temperature control solutions in research and industry. Our environmentally friendly and innovative temperature control systems ensure reproducible temperature control results in laboratories, pilot plants and production processes worldwide. Our product range offers solutions for all temperature control tasks from -125 to +425°C. Environmental protection does not only take place in our products; separate environmental guidelines also describe the demands we make on ourselves and our employees. Furthermore, social commitment and sponsoring is a matter close to our hearts. We support a wide range of regional and national projects in the fields of art, music, sport, social welfare and education.

What is our mission?

We will be the world's leading company for temperature control technology, which is characterised by modern working conditions and an excellent working atmosphere that offers secure jobs for motivated and enthusiastic employees. Innovation leadership and promotion of young talent, combined with sustainable economic efficiency will contribute to our lasting success!

How do we practice it? Our corporate principles

- **We** treat each other with tolerance and a high degree of mutual respect in our daily work. Appreciative, open, honest and trustworthy dealings, even beyond business, are a matter of course for us.
- **We** are curious, ambitious and enthusiastic about our work and constantly focus on the interests and requirements of our customers.
- **We** work conscientiously, reliably and together. We support each other, benefit from the impulses, knowledge and skills from different cultures, and react to changes in a solution-oriented way.
- **We** stand for equal opportunities and do not tolerate discrimination with regard to ethnic origin, gender, religion or belief, disability, age, etc.
- **We** promote flexibility, a willingness to learn, quality awareness and the courage to question and continually improve.
- **We** deal with criticism openly, fairly and objectively and find constructive solutions together.
- **We** act economically, success-oriented and ensure a lasting advantage over our international and domestic competitors with innovative solutions.
- **Our** most important word in dealing with each other is **"THANK YOU"**.

The responsibility for society expressed in the mission statement also includes an active commitment to sustainable development, which we achieve by considering the ten principles of the United Nations Global Compact. We are also committed to the United Nations Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO).

Compliance

Conduct in a business context

Compliance with law and order

For us, compliance with laws and regulations is a fundamental principle of economically responsible action. At all times, we comply with the applicable legal prohibitions and commandments, even if this entails short-term economic disadvantages or difficulties for the company or individuals. If national laws contain more restrictive regulations than the regulations applicable at Peter Huber Kältemaschinenbau SE, the national law shall take precedence. This understanding of the law means that we do not carry out illegal evictions and do not unlawfully appropriate land, forests and waterways through acquisition, development or other use. We also apply this standard to our business partners.

Avoidance of conflicts of interest

At Peter Huber Kältemaschinenbau SE, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organisations, should be avoided from the very beginning. If they nevertheless arise, they must be resolved in compliance with the law and the applicable group guidelines. A precondition for this is the transparent disclosure of the conflict.

Fair competition

The Compliance Commitment issued by the Executive Board of Peter Huber Kältemaschinenbau SE is the guideline for our actions in competition: Peter Huber Kältemaschinenbau SE stands for technological competence, innovative strength, customer orientation and motivated employees who act responsibly. This is the basis of our high reputation and the sustainable economic success of the group in global competition.

Corruption and cartel violations threaten these guarantees of success and are not tolerated (zero tolerance). For us, bribes or cartel agreements are not a tool to win a contract. We would rather lose business and fail to achieve

internal goals than violate the law. With its Code of Conduct, Peter Huber Kältemaschinenbau SE has taken far-reaching measures in the business environment to ensure compliance with corruption and anti-trust regulations and the group guidelines based on them. Violations will not be tolerated and will result in sanctions against the persons concerned. All board members, senior managers and other employees must be aware of the extraordinary risks that a case of corruption or cartel can mean for Peter Huber Kältemaschinenbau SE, but also for them personally. Every employee is requested to actively participate in the implementation of the Huber Compliance Programme in their area of responsibility.

Prevention of money laundering

Peter Huber Kältemaschinenbau SE complies with its legal obligations to prevent money laundering and does not participate in money laundering activities.

Every employee is required to check any unusual financial transactions, in particular involving cash, which could give rise to suspicion of money laundering.

Conduct towards colleagues and other employees

Equal treatment and non-discrimination

A culture of equality of opportunity, mutual trust and mutual respect is of great importance to us. We promote equal opportunities and prevent discrimination with regard to the recruitment of employees and the promotion or granting of training and further education measures. We treat all employees equally, regardless of gender, age, colour, culture, ethnic origin, sexual identity, disability, religious beliefs or ideology.

Human and workers' rights

We respect internationally recognised human rights and support their observance. We strictly reject all forms of forced labour and child labour. We recognise the right of all employees to organise trade unions and employee representatives on a democratic basis within the framework

Code of Conduct

of national regulations. The right to adequate compensation is recognised for all employees. Remuneration and other benefits shall at least be in accordance with the national and local legal standards or the level of the national economic sectors/industries and regions.

Collaboration with employees

For Peter Huber Kältemaschinenbau SE, a trusting and close cooperation with the employee representatives is a significant component and proven cornerstone of the company's policy. The basis for mutual trust and cooperation is an open and constructive dialogue characterised by mutual respect.

Occupational health and safety representatives

Besides the quality of our products and our economic success, the safety and health of our employees are equally important corporate goals. Occupational safety and health protection are an integral part of all business processes and are included in technical, economic and social considerations right from the start, and as early as the planning phase.

Each of our employees encourages safety and health protection in their work environment and complies with occupational safety and health regulations. Every manager is obliged to instruct and support their employees in the fulfilment of this responsibility.

Conduct within society

Sustainable environmental and climate protection

For us, 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 operation of production facilities, we ensure that all resulting effects on the environment and climate remain as low as possible. In addition, we ensure that all our products and services contribute to the sustainable use of resources.

Each employee is responsible for treating natural resources carefully and contributing to the protection of the environment and climate through their individual behaviour.

Donations

We consider ourselves to be an active member of society and are thus actively involved in various ways. Donations and other forms of social commitment are made solely in the interest of the company.

Representation of political interests

Political lobbying is carried out centrally, clearly and transparently. We follow the legal requirements on lobbying and avoid influencing politics and legislation unfairly at all costs.

Public appearance and communication

We respect the right to freedom of speech and the protection of personal rights and privacy.

Each employee should be aware that he or she can be perceived as a part and representative of Huber in the private sphere as well and is, therefore, urged to protect the reputation and standing of the company through his or her behaviour and appearance in public, especially towards the media. Regarding private expressions of opinion, we take care not to place the respective function or activity in Peter Huber Kältemaschinenbau SE in a context with the private expression.

Compliance

Handling information

Reporting

Peter Huber Kältemaschinenbau SE is based on strong values: reliability and honesty, credibility and integrity. Consequently, we value open and truthful reporting and communication on the company's business transactions vis-à-vis employees, customers, business partners, the public in general and government institutions. Each employee ensures that both internal and external reports, records and other documents of the company are in accordance with the applicable legal rules and standards and are, therefore, always complete and correct, as well as timely and system-compatible.

Confidential company information / insider information

We implement the necessary measures to adequately protect confidential information and business records from access and inspection by uninvolved colleagues and other third parties.

Data protection and information security

The protection of personal data, in particular of employees, customers and suppliers, is of great importance to Peter Huber Kältemaschinenbau SE.

Unless permitted by law or without the consent of the person concerned, no personal data may be collected or processed.

Protection of company property

We use the company's property and resources properly and carefully and protect them from loss, theft or misuse. The intellectual property of our company provides Peter Huber Kältemaschinenbau SE with a competitive advantage and is, therefore, an asset worthy of protection, which we defend against any unauthorised access by third parties.

We use material and non-material property of the company exclusively for company purposes and not for personal purposes unless expressly permitted. Together with their superiors, our employees are responsible for ensuring that the type and scope of business trips are always in an appropriate relationship to the respective purpose of the trip and are planned and carried out economically, taking into account time and cost aspects.

Implementation and contact

Peter Huber Kältemaschinenbau SE and the group companies actively promote the implementation of the guidelines underlying the Code of Conduct. The individual companies guarantee compliance with the Code of Conduct and ensure that no employee suffers any disadvantage as a result of complying with the guidelines or agreements.

As role models, our managers are particularly guided by the Code of Conduct in their actions. Being the first point of contact for questions regarding the understanding of the rules, they ensure that all employees know and understand the Code of Conduct. As part of their management duties, they prevent unacceptable behaviour or take appropriate measures to prevent violations of rules in their area of responsibility. A trusting and good cooperation between employees and managers is reflected in honest and open information and mutual support.

Indications of potential violations of laws or regulations that affect the individuals and Company of Peter Huber Kältemaschinenbau SE can be reported via the Huber Whistleblower System. The relevant links are available on the Huber website.

All information is to be handled with strict confidentiality.



Inspired by temperature

The Tango factory in Offenburg, headquarters of Peter Huber Kältemaschinenbau SE





Inspired by **temperature**
designed for you



Peter Huber Kältemaschinenbau SE
Werner-von-Siemens-Str. 1
77656 Offenburg / Germany

Phone +49 (0)781 9603-0 · Fax +49 (0)781 57211
info@huber-online.com · www.huber-online.com