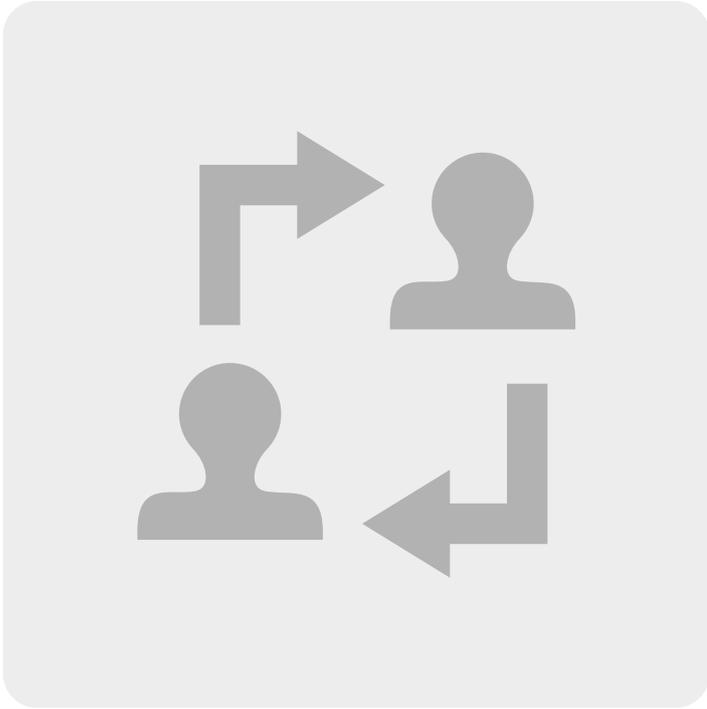


# CODE OF CONDUCT



# Values

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A portrait of Wolfgang Ehrk, a middle-aged man with short brown hair and glasses, wearing a dark blue suit jacket, a white dress shirt, and a grey patterned tie. He is standing in front of a window with a view of a snowy outdoor area.

Wolfgang Ehrk  
CEO & COO

A portrait of Thilo Rau, a middle-aged man with short grey hair and glasses, wearing a dark suit jacket, a white dress shirt, and a red and blue striped tie. He is standing against a dark grey background.

Thilo Rau  
CIO

## Our commitment

Dear colleagues,

Pfeiffer Vacuum's products are in use all over the world. In more than 60 countries, our vacuum experts support the customers on site. Quality, reliability, and advanced technological solutions; these are represented by the Pfeiffer Vacuum name. For years, the Company has belonged to the top players in the sector and continues to reach milestones with its technological advances.

Business all around the globe is very promising but also conducting our business with high standards of ethics and integrity when dealing with our employees, customers, business partners and shareholders is our top priority. This doesn't mean just complying with the laws and regulations; it also means leading by example in the way that we do business and in the way that we behave.

Acting with integrity is how we do business at Pfeiffer Vacuum. Integrity is one of the core values of our Company. Integrity is fundamental for building and justifying the trust in our relationships with our business partners. Integrity is the precondition for our operational excellence as well as our continuous success as one of the world's leading suppliers in the vacuum industry.

It is our firm conviction that sustainable economic success is inseparable from compliance with laws and our internal standards. The success and reputation of the Pfeiffer Vacuum Group crucially depends on your conduct. Every one of us contributes to the success of the Company through our work.

Inappropriate behavior from a single employee can endanger the reputation of the whole Group and may cause significant damage to the Company. We therefore appeal to you to use our Code of Conduct as a guideline in your business decisions. The Management Board is fundamentally committed to this Code of Conduct and in addition to the "zero tolerance" principle.

Not following the Code of Conduct may result in breaches of laws and regulations and a loss of reputation. For individuals it could also mean disciplinary action or dismissal. It is therefore essential that you familiarize yourself with it, and make following it a daily habit.

If you have any queries or concerns about what the Code of Conduct means or how you should behave in any particular situation, it is important that you seek guidance from your line manager, local Human Resources team or the Compliance team.

We all, you and the Management of the entire Pfeiffer Vacuum Group, are together responsible for the reputation of the Company. Let us work together to live this Code of Conduct and find greater success within the strong framework that we have built over the years.

Sincerely yours



Wolfgang Ehrk  
CEO & COO



Thilo Rau  
CIO

## I. Introduction

### I.1 Our values

Our values are the principles we use to run the Company on a daily basis. They are so important that they are the source of our entire Code. They guide our behavior in business and our relationships with others. Our values are the foundation on which we built our success over the years and foster trust by all our stakeholders.

Integrity is at the heart of everything we do because it means that we act in accordance with our values.

#### **Respect**

We respect everyone at every level of our business. We communicate openly and fairly with each other. We value our diverse and talented employees and support them so that they can contribute to their full potential.

We honor the diverse interests of our customers, employees and business partners with respect, fairness and honesty. We strive for excellence in both our business development and our ethical behavior.

#### **Customer Focus**

We are committed to supply best value to our customers by providing high quality products and services. We recognize that our customers are the reason for our success in business, and are committed to listen and respond positively to their needs and strive to go beyond their expectations.

We seek to add value for our customers through exceptional solutions and support. We maintain a close relationship with our customers, work in partnership with them and focus on building personal and long-term relationships.

#### **Safeguarding a diverse and inclusive culture**

We respect human rights and have integrated as ours the principles of the United Nations Universal Declaration of Human Rights, as well as the declarations of the International Labor Organization. We promote equal opportunities and we treat all individuals fairly and impartially, without discriminating with regard to color, nationality, ethnicity, religion, gender, sexual orientation, civil status, age, disability, or family responsibilities.

#### **Fairness against customers, suppliers and competitors**

We deal with all our customers, suppliers and government agencies in a transparent manner. We prohibit all forms of bribery. We do not permit promising, offering or giving any benefit or advantage to influence any kind of decisions. Under no circumstances we accept unethical and unprofessional behavior towards business partners.

We inspire our conduct towards the competitors based on the principles of loyalty and integrity and, consequently, prohibit unfair competition. In particular, we prohibit any form of unlawful use of other Company's brands, the use of false or inaccurate information designed to discredit a competitor or obtaining illegal confidential information. Pfeiffer Vacuum has an indispensable principle of compliance with antitrust laws.



Anna-Charlotte Rausch  
Pfeiffer Vacuum Germany

## **Compliance of rules and laws**

Compliance with all applicable laws and regulations is a fundamental principle in the Pfeiffer Vacuum Group. Every employee has to comply with the laws and regulations of the legal systems within which they are acting. Violating the law must be avoided under all circumstances.

Regardless of the sanctions that could be imposed by law, any employee guilty of a violation will be subject to disciplinary consequences because of the violation of his/her employment duties.

## **Environmental responsibility**

We are committed to protect the environment and the health and safety of all stakeholders by continuing to operate responsibly and efficiently worldwide.

For the good of our planet and future generations, we act as stewards of our environment. At all times, we must strive to meet, if not exceed, all applicable legal and regulatory requirements, as well as internationally accepted environmental standards.

## **I.II Our guiding principle in business: Integrity**

This Code of Conduct expresses Pfeiffer Vacuum's commitment to conduct business ethically. It explains what it means to act with integrity and transparency in everything we do and in accordance with our culture and values. Our business decisions must be aligned with the highest ethical principles and a consistent framework of rules and overall values that are generally accepted and perceived to be fair. This is essential to be successful in the long run.

Compliance and integrity are directly related. After all, acting with integrity also relies on compliance with relevant laws and regulations. Violations of relevant laws and regulations will be investigated and sanctioned.

Our Code of Conduct will help us to ensure that our business activities always correspond to the highest ethical, legal and professional standards.

It will serve as a guideline to maintaining integrity with all our stakeholders.

## **I.III Our Code of Conduct**

Our Code of Conduct has been created to help our employees understand our core values and the behaviors expected to support them. It provides guidance and support for our employees worldwide, with high standards of ethical behavior and compliance with local laws and regulations being essential to protecting the reputation and long term success of our business.



### **Doing the right thing?**

#### **What should I do if this Code and the law conflict?**

First and foremost, you must always comply with the law. The Code will usually be stricter than the law requires, in which case you will follow the Code.

We must constantly live up to our values so our employees, business partners and stakeholders are confident they can fully rely on us. Local laws always prevail when they are stricter than this Code. If you are in doubt about the meaning or applicability of this code, a rule or regulation, please seek advice from your local Human Resources or your Compliance team.

Every Pfeiffer Vacuum employee worldwide must read, understand and adhere to our Code as well as understand and comply with the internal policies. You must make time to read and understand all documents.

This Code of Conduct is also available on our Company website at:

<https://group.pfeiffer-vacuum.com/code-of-conduct>

### **What is correct Conduct?**

The Pfeiffer Vacuum Group constantly deals with a variety of people, organizations and representatives of diverse interests. Our image as a Company depends on how employees conduct themselves in the business world.

There is no substitute for personal integrity and sound judgment. When faced with a difficult situation, consider these questions:

1. Is my action or decision legal?
2. Does it comply with the letter and spirit of this Code and other Group policies?
3. Is it right and free of any personal conflicts of interest?
4. Could my action or decision withstand public review? What would it look like in a newspaper?
5. Will my action or decision protect the reputation of the Pfeiffer Vacuum Group as a Company with high ethical standards?

If the answer to each question is “yes”, the action or decision complies with the following principles of conduct and is most likely the correct one.

If you are not sure, ask! And keep asking until you are sure!

### **Doing the right thing?**

#### **How do I know if I am doing the right thing?**

Doing the right thing is not always easiest in the moment, but ultimately it is the best decision for you. When we make decisions that are in alignment with our truth, we feel good and therefore are connected to the highest version of ourselves. When we do the right thing by others, we do the right thing for ourselves.



## II. Integrity at our Company

### II.1 Equality and mutual respect

We stand for fair treatment and fair working conditions. This includes the free choice of employment, i.e. the prohibition against forced or slave labor, human trafficking or child labor, complying with compensation that has been legally or contractually stipulated or agreed upon, the freedom of association and the right to humane treatment at work. Modern slavery is a crime and a violation of fundamental human rights.

We are committed to the freedom and equality of people irrespective of ethnicity, color, sex, language, religion, political or other opinion, national or social origin, birth or other status. We act according to the principles of the United Nations Universal Declaration of Human Rights, as well as the declarations of the International Labor Organization.



#### Doing the right thing?

**Your team's line manager is becoming increasingly hostile to a colleague of a different ethnicity. You feel the atmosphere in the team is worsening, particularly as other team members are following your manager's lead. What do you do?**

Raise your concern with your Director. Alternatively you can raise your concern with Human Resources or the Compliance team.



#### Doing the right thing?

**Does harassment have to be physical?**

Absolutely not! Harassment can also be verbal or non-verbal. Words and gestures can be just as offensive as physical acts. Jokes, obscene gestures, sarcastic remarks, suggestive or insulting sounds, stories or comments with regard to ethnicity can be classed as harassment and can create a hostile working environment.

Diversity is a key part of our daily business and culture. We do not tolerate discrimination, (sexual) harassment or abusive language under any circumstance.

Harassment includes unwelcome verbal, non-verbal, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. We must never act in a harassing manner that causes other employees to feel uncomfortable in their work environment. Any behavior, including gestures and statements, that makes our colleagues feeling insulted, humiliated or embarrassed is not tolerated at the Pfeiffer Vacuum Group. This also includes any form of bullying as deliberate exclusion and humiliation of employees.



#### Doing the right thing?

**What does sexual harassment look like?**

Sexual harassment might consist of verbal, non-verbal or physical conduct of a sexual nature that is unwelcome and that a reasonable person would find offensive. It can take many forms such as:

- Sexual advances, requests for sexual favors or unwelcome demands for dates
- Sexually oriented jokes, pictures, text or email messages
- Explicit or degrading comments about appearance
- Display of sexually suggestive pictures or pornography

## II.II Professional development and remuneration

We communicate our goals and strategies to our employees so they are committed to and enthusiastic about our vision.

We support our employees' personal and professional development, we encourage our employees to get involved in improving their own skills and knowledge.

Our selection, recruitment, training and internal promotion policies are based on clear criteria relating to skills, competences and merit. We keep our employees informed on how we evaluate their contribution at work.

We expect them to actively take part in the evaluation process so they can keep improving their performance.

We reward our employees fairly, in line with the labor markets where we work.

## II.III Health, safety and environment

We provide our employees and partners with a safe working environment. We have suitable mechanisms to avoid workplace accidents, injuries or diseases associated with our work activity through strict compliance with all relevant regulations and the preventive management of workplace hazards.

We do not compromise on safety practices, behaviors or conditions. No job is worth putting someone's health or life in danger. Thus, we expect all employees to comply with our health, safety and security regulations, promote a safe and healthy work environment and improve our health and safety culture.

### SAFETY

- Ensure you know who the First Aiders are for your building
- Look out for your own safety and others around you
- Report to Human Resources any accident, near miss, injury, ill health or unsafe condition so appropriate action can be taken
- Ensure you are properly trained for the work you are doing
- Familiarize yourself with your building's fire extinguishers, fire exits and emergency evacuation procedures



We are committed to environmental protection as a corporate objective and declare the sparing use of resources and energy efficiency a pivotal production factor in our manufacturing processes.

Protecting the environment and conserving its resources are high-priority targets for our Company. A worldwide environmental management ensures observation of the law and sets high standards for this purpose. Already at the product development stage, environmentally friendly design, technical safety, and health protection must be fixed targets.



Cindy Guo  
Pfeiffer Vacuum China

# Sustainability

We incorporate the requirements of an intact environment into the development, design, manufacturing process, packaging and shipping of our products.

We are committed to sustainable development, protecting the environment and reducing any negative impact we might have on our surroundings.

## Doing the right thing?

### **What can I be doing to help the environment?**

You can be mindful of the impact on the environment as you undertake your day-to-day duties at Pfeiffer Vacuum. Think about opportunities for recycling or cutting down on the amount you print each day. Also consider whether a conference call could be a potential alternative to an internal meeting; or car sharing if going to an off-site meeting.



## II.IV Conflict of interests

A conflict of interests is a situation in which there is a risk that personal interests of an employee or third party may impact Pfeiffer Vacuum or our business partners' interests. It is very important that our employees do not enter into conflicts of interests or loyalty. We do not abuse our position or contacts to benefit ourselves, family members or others with whom you have a significant relationship or entities in which you have a significant financial position.

We rely on all our employees not to be influenced by personal interests and relationships in business decisions.

Employees are obliged to notify their line managers immediately of a potential conflict between their work and private interests.

## Doing the right thing?

### **Your client asks for your help. Her daughter is looking for a job and she would like you to interview her for a role at Pfeiffer Vacuum. What should you do?**

Employing your client's daughter in your team may lead to a perceived conflict of interest. Speak to your line manager for advice and guidance. However, opportunities to employ talented people should not be overlooked but this must be a fully transparent process and in accordance with our Human Resources procedures. You should remove yourself from any potential hiring process as it could lead to a conflict of interest now or in the future.



## Secondary employment

During the employment at Pfeiffer Vacuum, any secondary employment that may affect the performance or the interests of the employer is prohibited. The employee must notify their line managers and Human Resources department in writing before taking any second employment. In addition, any employee who obtains additional outside employment or has an outside business must not:

- a) Use any time at work or any Pfeiffer Vacuum assets for the other job;
- b) Use his/her position at Pfeiffer Vacuum to solicit work for the outside business or to obtain favored treatment;
- c) Participate in an outside employment activity that could have an adverse effect on the ability to perform duties at Pfeiffer Vacuum and/or
- d) Use Pfeiffer Vacuum confidential information to benefit the other employer.

## Financial investments

Employees who have acquired/are planning to acquire material financial stakes in competing enterprises, customers, or suppliers are bound by a duty of disclosure to require the prior approval of their Human Resources department.

Material financial stakes held by employees' immediate family members that might result in a conflict of interest situation must also be disclosed.

Material financial stake means any direct or indirect financial interest amounting to:

- more than one percent of the capital value of a non-listed Company, or
- more than a one-percent shareholding in a listed Company.



## CONFLICT OF INTEREST

### When having a conflict of interest issue, ask yourself:

- Would this create or appear to create an unfair incentive for me or my friends and family?
- Am I putting Pfeiffer Vacuum at risk of violating laws or agreements with our customers?
- Would this look bad if it was brought up in social media?
- Would this distract me from doing my job?

## II.V Our commitment to our shareholders

### Corporate governance

We manage the Company in line with the highest standards and best practices in corporate governance, in compliance with, amongst others, the German Corporate Governance Code. For further information, please refer to:

<https://group.pfeiffer-vacuum.com/code-of-conduct>

We focus the Company's management on creating value for our shareholders. We provide all the relevant information for their investment decisions, promptly and without discrimination.

### Capital market compliance

Compliance with Capital Market regulations, specifically the Market Abuse Regulation (MAR) is the utmost priority and must be observed at all times. Violations may not only entail large damages but can also cause substantial harm to our reputation and profitability. As a stock listed Company we carefully perform the wide range of capital markets compliance and securities related services in accordance with regulations and in our shareholders's best interest. In addition, we conscientiously perform our duties related to transparency, fair and equal disclosure and ad hoc publicity.

### Insider information

We are committed to fair and sustainable securities trading. It is important for our reputation that we treat insider information in accordance with applicable laws and regulations. Insider information is any non-public information which is not yet known on the market and whose disclosure can considerably influence the market price of the affected shares (i.e. information on planned Company acquisitions, strategic agreement for a joint venture between two companies, financial results, new products, problems with products, or important agreements).

Inside information must be disclosed by way of an ad-hoc notification by the Company to the market to allow informed decisions by shareholders and other investors. Disclosure may only be postponed by the Company in certain circumstances where immediate disclosure would lead to detrimental effects for the Company and to the extent confidentiality can be ensured. Breaches of confidentiality relating to insider information or insider trading can lead to substantial fines for the Company and criminal prosecution for the employee concerned.

#### Doing the right thing?

**An employee of the Company overhears a meeting between the CEO and the CFO. Two weeks before the Company releases its earnings, the CFO discloses to the CEO that the Company did not meet its sales expectations and lost money over the past quarter. The employee knows her friend owns shares of the Company. Can he warn her friend to sell her shares right away?**

No. This trading is considered illegal as the information used has not been released to the public. However, if she trades after the earnings are released, it is not considered illegal because she does not have a direct advantage over other traders or investors.



### INSIDER INFORMATION

#### Examples of "inside information" about a Company or its shares:

- Planned acquisitions, mergers, or divestitures
- Financial or sales figures
- Operational plans
- Ongoing or threatened governmental investigations or lawsuits legal settlements
- Changes in management or other key staff
- New product development
- Product approval or rejection by a government entity

During the course of working at the Company or with our clients, you may hear about this type of information. You must not act on it, and you must not share it with anyone outside of our Company or even with those people within our Company who do not have a business-related "need to know."



## III. Integrity with business partners

### III.I Fair competition

Pfeiffer Vacuum is committed to fair competition as a driver for efficiency, innovation and excellence. We compete in many countries, and always act in accordance with applicable antitrust and competition laws.

Agreements with competitors which aim to restrict competition constitute a severe violation of the law. They are void and may trigger substantial fines. Such agreements include arrangements with competitors regarding: price fixing, customer or markets division, reduction of production volumes or capacities; and boycotts of customers or suppliers.

Employees must also refrain from sharing commercially sensitive information with competitors. They are also forbidden from acquiring competition-related information through industrial espionage, bribery, theft or electronic eavesdropping, and from knowingly disseminating false information on a competitor or its products or services.



#### Doing the right thing?

**A representative of another vacuum Company – a direct competitor – called me and asked me to come to a meeting in another country about “rationalizing” the market for a vacuum product we both offer. The “rationalizing” meeting is outside the EU. Would it be possible for me to join the meeting?**

No. You must immediately contact the Compliance team. Attending a “rationalizing” meeting could be the formation of an illegal cartel. Don’t be fooled by seemingly harmless terms like “rationalizing.” Having the meeting in another country would not change the result. This meeting can still break anti-trust laws of the EU or any other affected jurisdiction.

**You are participating in a scientific conference. In the evening you are approached by a representative from a direct competitor who asks you how business is at Pfeiffer Vacuum these days. After the second drink he starts asking very detailed questions about specifics such as manufacturing volumes. How should I respond?**

Politely refrain from giving any details. While you can discuss general market developments or publicly available technical standards you must not talk about prices, costs, production capacities or volumes, in particular relating to individual customers and suppliers, products or markets. Such an exchange of information could lead to a coordination among competitors that increases prices. In addition, revealing such information would likely be in violation of your confidentiality obligations. You should report this occurrence to the Compliance team afterwards.



#### FAIR COMPETITION

**Commercially sensitive information relating to the following topics should not be discussed with competitors:**

- Prices
- Costs
- Production volumes and capacities
- Customers (including terms and proposals)
- Markets

### III.II Anti-bribery and anti-corruption

We trust that the excellence of our services is the key to our business success. Therefore we deal with all our business partners in a transparent manner and in compliance with international anti-corruption standards, for example those in the United Nations Global Compact as well as applicable anti-corruption and bribery laws.

We prohibit all forms of bribery. We do not permit promising, offering or giving any benefit or advantage of any nature to persons, to influence any kind of decisions (including official, administrative or judicial decisions) or obtain improper advantages for the Company. It is also prohibited to accept any benefit or advantage that might result in a failure of the duties and obligations of an employee.

#### Doing the right thing?

**You visit an international conference in a country outside Europe and the US. After arrival at the airport, the immigration officer kindly offers you a fast-track treatment for only 50 €. Since you are already running late because of a delayed flight, you are considering accepting this offer. Is that correct?**

Even if you do risk a timely arrival you cannot pay this government official the requested facilitation payment. This might be regarded as bribery under certain legislations (e.g. UK Bribery Act 2010).



#### RED FLAGS WHILE TRANSACTING WITH THIRD PARTIES

- Background check reveals a flawed background or reputation.
- Transaction involves a country known for corrupt payments. Refer to Transparency International's list for this ([www.transparency.org](http://www.transparency.org)).
- Agent suggested by a government official.
- Agent objects to anti-corruption compliance requirements.
- Agent has a personal or business relationship with a government official.
- Unusual contract terms or payment arrangements such as payment in cash, payment in another country's currency or payment to a financial institution outside the country where the contract is performed.
- Requests that identity of the agent be kept confidential.
- Commission exceeds the going rate or must be paid in cash.
- Indication that facilitation payments are required to get the business moving.
- Request false invoices or any other type of false documentation; or
- Payment in a third country or in another party's name.



### III.III Gifts and entertainment

Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate, if refusing the invitation would be discourteous, and if they are in line with our Global Travel and Entertainment Policy.

If a business partner or office holder demands or offers a personal advantage to a Pfeiffer Vacuum employee, the employee must under no circumstances agree to this and must also immediately inform his or her line manager as well as the responsible Compliance team.



#### Doing the right thing?

**A sales person from a Pfeiffer Vacuum supplier brings chocolate and some wall calendars as Christmas gifts to our office. Can I accept these gifts and share these with my colleagues?**

Yes, you can – always assuming that these gifts are within customary practice and appropriate value range.

**While negotiating prices, one of our partners offered to get me a ticket for a soccer game which I really want to see. Is it all right to accept the ticket?**

No. Pfeiffer Vacuum employees are not allowed to accept gifts or entertainment from any individual or Company while being in business negotiations, tender processes or similar.

**A key customer is having a dinner party to celebrate his Company's anniversary. Other important business people will be there. Am I allowed to accept the invitation?**

Yes, provided you are making it clear that you accept the invitation as a Pfeiffer Vacuum representative.

**A Pfeiffer Vacuum business partner has invited my wife and me for a golf weekend to a five-star resort location including accommodation and travel cost as a thank-you to a long-standing customer. May I accept?**

No. The value of the trip would certainly go beyond courtesy. Accepting the invitation could compromise your independence in your future interactions with the partner.



#### GIFT AND ENTERTAINMENTS

**If you are not sure if you can receive or give a gift, answer the following questions:**

- Is the value of the gift or the entertainment according to the internal policies?
- Do the policies of the business partners allow offering gifts or entertainment?
- Am I allowed to give/receive cash, gift cards, gift certificates or other cash equivalents?
- Is the purpose of the gift to obtain special or favored treatment?
- Is giving or accepting the gift legal in your Country?
- Is the recipient a government official?

Steffen Herrmann  
Pfeiffer Vacuum Germany



### III.IV Money laundering

Money laundering means the introduction of illegally generated money (e.g. through terrorism, drug trafficking, corruption and other criminal offenses) or illegally acquired assets into legal financial and economic circulation.

We combat all forms of money laundering, take precautions to avoid being involved in money laundering issues, and comply with applicable national and international sanctions, embargo regulations, and other restrictions of foreign trade legislation.



#### Doing the right thing?

**A customer has asked you to pay the order from multiple accounts and using a combination of multiple payment types (e.g. cash and check). What should you do?**

This is a suspicious behavior potentially involving money laundering. You should immediately consult the Compliance team. You should only take further steps in the transaction, including accepting payment from the counterparty, after the Compliance team has advised you how to proceed.

### III.V International business and export control

Pfeiffer Vacuum is a global Company. Within the scope of our international activities, we must comply with export regulations.

Various national and international laws and embargos limit or prohibit the import, export or domestic trade of goods, technologies and services as well as monetary transactions and the movement of capital. The limitations and bans can be due to the nature of the goods, the country of origin, the country in which the goods are to be used, or who the business partner is.

We are also committed to combating smuggling. Within the scope of all import and export business we perform, each entity within Pfeiffer Vacuum Group and its acting employees must comply with the respective export and customs regulations.

## IV. Protection of Company assets

### IV.I Protection of Company assets, product safety and know-how

#### Protection of Company assets

Our assets are used to achieve our business objectives and it is in our interest to protect our property and assets. Assets can be financial, physical or intangible. Our assets should only be used for suitable and authorized purposes; the unsuitable or unauthorized use of them is prohibited.

Each employee is obligated to treat all operating equipment, in particular machines and tools as well as all information and communication systems carefully and in accordance with their intended purpose. The workplace and all facilities that serve the workforce or the Company must always be kept orderly and damage must be reported to the supervisor.

#### Product safety

Our success is determined by the safety and reliability of our products as well as by their performance. Product safety begins at the development stage, continues during the procurement and production processes and is of fundamental importance during the installation of our products at the customer's site and during servicing.

A multitude of legal stipulations relating to the development, production, approval and sale of our products serve to guarantee the safety of them. Pfeiffer Vacuum products must not endanger the safety and health of consumers and must meet certain quality standards.

#### Know-how

Pfeiffer Vacuum has valuable know-how as well as business and trade secrets. This knowledge is the base of our business success. It is our responsibility to ensure the confidentiality, availability and integrity of this information, whether in electronic form or on paper.

The unauthorized transmission of know-how as well as trade and business secrets, their unauthorized alteration, destruction or disclosure, may cause great damage to the Company. It can lead to labor, civil and criminal penalties for the employee concerned.

#### Doing the right thing?

##### **During my commute to Pfeiffer Vacuum on the train, I sometimes make work-related mobile phone calls. Is this a problem?**

You must be careful not to discuss non-public Company information in public places, such as in taxis, trains, planes, elevators or at conferences and trade shows. When it is absolutely necessary to conduct a telephone call in a public place, be mindful of your surroundings.



IT security supports the protection of intellectual property against access by unauthorized third parties, against data theft, know-how drain or the consequences of malware through diverse IT security measures such as passwords, anti-virus programs and access concepts.

We acknowledge the intellectual property of competitors and business partners. All employees are obliged to keep third party trade and business secrets and to only use them as agreed with the respective third party.

Furthermore, employees are not permitted to take part in public discussions without approval (e.g. lectures, internet forums, etc.) or to publish Company-relevant information (e.g. on the internet) in their capacity as Pfeiffer Vacuum employees.

The loss of Company secrets can have a negative impact on both, the future success of the Company and the employees.

#### IV.II Proper documentation and reporting

We ensure that appropriate controls are in place to assess and manage the risk to our business, our employees and our reputation. We prepare our business, financial and accounting records accurately and reliably.

We collaborate in and facilitate the work of the internal auditing and inspection units, and other internal control units, as well as that of external auditors and competent authorities.

Pfeiffer Vacuum is committed to an accurate and truthful reporting. This applies equally to the relationship with investors, employees, customers, and business partners, as well as with the public and all governmental offices. Any records and reports produced internally or distributed externally must be accurate and truthful.



#### BUSINESS RECORDS

**Strive to be accurate when preparing business records. Some examples of business records include:**

- Expense reports
- Invoices
- Time records
- Financial reports
- Personnel files and reviews
- Business plans
- Contracts
- Customer lists
- Marketing information

消火栓  
Fire Hydrant

火

PFEIFFER VACUUM

Clarence Meng  
Pfeiffer Vacuum China



## IV.III Data protection and information security

### Data protection

We process personal data in accordance with the provisions of the respective applicable data protection laws. Data is deemed personal if it contains personal or factual information about a known individual, or an individual who can be identified from said data, including the address, date of birth, bank details, religion, health-related data, etc. of customers, employees, suppliers and shareholders, and any other individuals. We attach great importance to protecting information of this nature entrusted to us and to ensuring that it remains confidential.



#### Doing the right thing?

**You notice a colleague copying data from the Company's database and are suspicious about its intended use. What should you do?**

You should report this to your line manager or director immediately. They must ask the individual their reason for copying the data and take any the necessary actions in accordance.

It is in our interest to protect personal data from unauthorized collection, storage, modification, dissemination or deletion. We obligate our employees to protect the personal data entrusted to the company against unlawful processing and misuse and to take appropriate measures to protect the same.

### Information security

The reputation of the Company depends heavily on the actions and integrity of our employees. Employees are prohibited from using or copying software from Pfeiffer Vacuum IT-systems for private purposes, and from installing private software on Company-owned hardware without permission from the IT department.

E-mail services and Internet access are provided mainly for business purposes. You should apply the same standards of care and customary handling as used in hard-copy communications when sending and receiving E-mails and attachments on your Pfeiffer Vacuum account. You must not under any circumstances abuse Pfeiffer Vacuum's IT-systems, internet access, E-mail accounts or any other information and communication media for illegal or unethical purposes. Searching, downloading or forwarding of information with content of a racist, propagandistic or pornographic nature or glorifying violence is regarded as particularly abusive and can lead to severe sanctions.



#### Doing the right thing?

**You download copy of a Microsoft Word installer file on a USB stick and plan to install it on your home computer. You feel that Pfeiffer Vacuum would not be harmed because the original file remains on its systems. Can you proceed?**

No. When Pfeiffer Vacuum purchases software it is usually bound by a license agreement with the software manufacturer. Using the software for private purposes will most likely infringe such license agreements and Pfeiffer Vacuum could be held liable for the acts of its employees.

# Safeguard

## IV.IV Public communication

Any communication with external stakeholders, such as our clients, shareholders, or even the media, must be clear and truthful. We urge you to take care when using social media and email. Remember that once you have made a public statement you have no control over what happens to it or who uses it.

All external communication must be approved by our Corporate Communications team at Headquarters.

Internal communication is equally important as this can easily make it into the outside world. Always be aware that your actual audience might not be the one you intended to address.

### Doing the right thing?

**You have been approached by a journalist who is writing an article on the employment market – she is keen to get your views as an expert in the industry. What should you do?**

Refer the inquiry to your Corporate Communication team at Headquarters. They will work with you to ensure our response is consistent with our values and direction, or even find the best spokesperson for the subject.



Isabell Kühn  
Pfeiffer Vacuum Germany



# Responsibility

## V. Corporate social responsibility

We regard ourselves as an active corporate citizen and try to make a contribution to the communities in which we are located. We use our donations and sponsorship to promote regional objectives, such as the work of disabled persons' and children's aids organizations, educational purposes, science, and sport. We donate voluntarily, demand nothing in return, and comply with applicable laws and local regulations.

We categorically exclude donations, either in cash or in kind, to political parties, political candidates, managers of political offices, or representatives of the public administration.



# Compliance

## VI. Requirements and scope

### Implementation of the Code of Conduct

A specially-appointed Compliance Manager is responsible for the implementation and observance of this Code of Conduct.

The management of Pfeiffer Vacuum and its subsidiaries throughout the world shall actively foster the widespread distribution of the Code of Conduct and ensure that the rules included herein are implemented permanently.

This Code of Conduct will help to understand our values, our culture and our way of working. However, employees may be confronted with complex situations where they feel that these documents do not provide a clear answer. When this is the case, we expect the employee to discuss the matter with their line managers, with the respective Human Resources department or with the Compliance team.

Board members and senior managers are responsible for ensuring that this Code of Conduct is complied with. The managers must clearly communicate to the employees that violations of the law are disapproved of and will have employment consequences.

The Company will review this Code of Conduct on a regular basis and the Management Board will decide upon amendments as appropriate.

### Tone from the top

Board members, managers and supervisors have an important function as role models for compliance with this Code of Conduct.

They have the following responsibilities:

- Be a role model of ethical behavior.
- Encourage your team to raise issues and speak up.
- Communicate a positive message about your commitment to ethics and compliance.
- Promote our values, the Code of Conduct and compliance with policies and the law.
- Actively support ethics and compliance awareness and training programs.
- Have open avenues for communication.
- Listen and respond fairly to employee concerns.
- Find satisfactory and complete resolutions to ethical issues.
- Escalate concerns when additional assistance is needed.

The standards used to assess any potential misconduct by Board members, managers and supervisors are stricter than those used for other employees.

### Zero tolerance

While this Code of Conduct gives you guidance for certain situations there are specific areas where we have a zero tolerance policy:

- Unsafe, illegal or unethical working practices
- Violence and aggression
- Discrimination, bullying and harassment
- Bribery and corruption
- Retaliation against anyone who speaks up and does the right thing



Katia Witting-Alvites  
Pfeiffer Vacuum Germany

# Speak up!

## VII. Contact and support

### Reporting a violation

Should you become aware of a potential issue of compliance with this Code of Conduct, we encourage you to speak up. All concerns are taken seriously, and the person voicing their concern should not fear any disciplinary measures or sanctions even if the alleged misconduct is not confirmed.

Where the Code of Conduct is infringed, employees may inform their supervisor and/or the Compliance Manager. Reports of violations of the Code of Conduct may also be made anonymously using our reporting lines indicated below. Where the complainant's identity is known, it is kept confidential. Investigations to clarify the facts are initiated straight away and suitable counter-measures are taken. Upon request, the complainant is provided with information about the treatment of his or her complaint.

For the sake of an open working environment and a more efficient follow-up to your report, we encourage you to identify yourself when reporting a possible violation.

However, confidentiality is ensured if the person making the accusation so wishes.



### Speak up!

**If you believe that you have been discriminated against, harassed or have not been given equal opportunities at work, you are encouraged to submit a complaint to:**

- Your line managers
- Your manager
- Your skip-level manager
- Human Resources
- Compliance team
- Our web-based whistle-blower system

### Contact Persons

Pfeiffer Vacuum has a Compliance Manager who is required to address in an independent and objective manner all issues reported. The Compliance Manager should answer employees' questions and advise them on matters relating to this Code of Conduct. The Compliance Manager is bound to treat all information confidential.

We expressly encourage all employees to direct all issues pertaining to the Pfeiffer Vacuum Code of Conduct to the Compliance Manager. We give our assurance that employees who pass on information to Compliance Managers will not suffer any negative consequences as a result.

Compliance Manager of the Pfeiffer Vacuum Group is Mrs. Katia Witting-Alvites (e-mail: [katia.witting-alvites@pfeiffer-vacuum.de](mailto:katia.witting-alvites@pfeiffer-vacuum.de); Phone: +49 6441 802 1130).

### No Retaliation Policy

Pfeiffer Vacuum has a policy of not retaliating against anyone who reports concerns in good faith. You will not lose your job or your benefits or be demoted, suspended, threatened, harassed, or discriminated against for sharing your concerns in good faith. Anyone who violates our no retaliation policy will be subject to disciplinary action, up to and including termination with or without notice, in accordance with applicable law.

#### Doing the right thing?

##### **I'm worried about being penalized or treated differently if I whistle blow.**

If you suspect wrongdoing you should always report it. If you experience any retaliation or harassment as a result of your action, we will investigate and take appropriate action against the harasser, in accordance with our internal policies.



### Disciplinary actions

Pfeiffer Vacuum does not tolerate any violations of laws, regulations and internal standards of conduct.

Employees who fail to adhere to this Code of Conduct may be subject to appropriate disciplinary measures or sanctions as stated in the applicable regulations.

Pfeiffer Vacuum managers including supervisors may also be disciplined should they fail to detect any infringements in this respect if such failure is attributable to inadequate supervision of employees in their areas of responsibility.



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