

BIZERBA CODE OF CONDUCT – UNITED STATES

INTRODUCTION

Bizerba Solutions, Inc. / Bizerba Label Solutions, Inc. / Bizerba USA, Inc (hereinafter referred to as “Bizerba”) endeavors to practice a unitary corporate culture. This culture includes compliance with corporate values including: RELIABILITY and INTEGRITY, INNOVATION AND CUSTOMER ORIENTATION, FRANKNESS AND TRANSPARENCY. In this regard, Bizerba intends that this Code of Conduct provide guidance for the conduct of business by Bizerba, its affiliates and employees in relations with customers, partners, the society, Bizerba, and with one another.

I. SCOPE OF APPLICATION OF CODE OF CONDUCT

The Code of Conduct applies to Bizerba, its affiliates and all employees of Bizerba (Except as may be otherwise provided in this Code of Conduct, all employees of Bizerba and its affiliates, representatives and commercial agents, are hereinafter referred to as “employees”).

II. RELIABILITY and INTEGRITY

1. **Compliance with Legislation:** Bizerba assumes that the orientation of all acts by Bizerba and its employees are in line with the law regulations and minimum standards in industry. Frequently, however, decisions about conduct in compliance are equivocal. Hence every employee is called on to question the lawful nature of his or her acts and in case of doubt to seek out the relevant contact persons. The following questions can be of assistance:

- Is my conduct in line with Bizerba’s corporate values and my own ethical values?
- Is my conduct devoid of any conflict of interests?
- Is my conduct legal and in line with Bizerba’s directives?
- Can I assume the responsibility for my conduct with a clear conscience?
- What would my conduct look like in the newspapers – would it stand the “publicity test”?

In order to support the goal that the orientation of all acts by Bizerba and its employees are in line with the law and regulations, especially to prevent corruption (see under no.7) Bizerba has established this Code of Conduct and the

corresponding monitoring of business processes.

2. **Respect for Human Dignity:** Bizerba respects human dignity and is dedicated to the observance and protection of human rights. Every employee is under an obligation to ensure that these fundamental rights are observed.
3. **Environmental Protection Measures:** Bizerba is aware of its responsibility towards the environment and for the ecological use of resources. The minimum requirements regarding waste management, the handling of chemicals and other hazardous substances, emissions and waste water treatment shall therefore be observed in all areas of the company. Employees shall obtain information about the relevant requirements in their areas of work on the basis of corresponding training measures, or shall approach the representative or their superiors where questions arise.
4. **Corruption:** Corruption harms competition and prevents innovation. For this reason Bizerba does not tolerate any form of corruption. No employee, employee of an affiliate or representative of Bizerba may exert an unlawful influence on decision-makers in enterprises, public authorities or governmental institutions by promising, offering or granting benefits to them where such persons are not entitled to a legal claim in a corresponding amount. Likewise, no employee may demand, procure the promise of or accept such benefits from third parties in business dealings. Such benefits can arise in different forms:
 - a. **Gifts, Hospitality, Invitations:** Guest gifts and birthday presents, food and drink or cultural and sports events can go beyond the boundaries of what is permissible if they are abused in order to influence business partners.
 - b. **Advisors, Service Providers:** Where external advisors or service providers are involved, the impression of corruption can easily arise owing to the remuneration paid. Bizerba employees must work to prevent any such impression. Therefore, where such persons are involved the framework conditions established by Bizerba have to be observed insofar as they are applicable. Only performance actually provided is eligible for remuneration. The remuneration has to be

proportionate to the services or advice provided. Bizerba employees must vet the integrity of potential advisors and service providers in advance.

- c. **Relations with Public Authorities:** Strictest requirements apply as a rule to relations with public authorities throughout the world. Consequently, any and all payments have to be scrutinized, in particular, no payments shall be made that are unlawful or could be considered to exercise an unlawful influence.
 - d. **Donations and Sponsoring:** Bizerba does not make direct or indirect donations to political organizations or political parties, or to individual politicians. Exceptions to this policy shall always be discussed with the compliance office and the management. Sponsoring and donations to other non-political recipients have to be in conformance with the provisions of this Code of Conduct.
5. **Money-Laundering:** Money-laundering arises where money or other property originating directly or indirectly from criminal activity is placed onto the legal economic circuit, thus making such money or property appear legal. Liability for money-laundering does not depend on whether or not the offender was aware that money would be laundered through the relevant legal transaction or bank transfer. Careless participation in money-laundering can lead to severe penalties for all involved. It is Bizerba's declared aim to prevent money-laundering in all circumstances. To this end Bizerba employees shall carefully check the identity of customers, service providers, advisors and other third parties with whom legal relations are established. Business relations with serious business partners alone are to be maintained, whose business activities are in line with the statutory provisions and whose financial resources are of legitimate origin. Incoming payments have to be attributed to the relevant performance provided and have to be duly accounted for.
 6. **Confidentiality:** Business and trade secrets shall be treated confidentially. This policy also applies to other information, the secrecy of which Bizerba, its contracting partners and customers have an interest. Such information may therefore not be communicated to unauthorized persons by any person without consent. This obligation shall survive termination of the employment relationship.
 7. **Data Privacy Protection:** Bizerba protects information relating to persons and property of certain persons (personal data). Therefore, every employee shall comply with the

provisions of the laws on data privacy protection in order to safeguard the interests of employees, customers and contracting partners. The necessary diligence shall be applied in order to protect personal data within the context of assigned responsibilities. Irregularities ascertained shall be notified to the superior or the responsible data protection officer without undue delay.

8. **Foreign Trade and Export Controls:** Bizerba must comply with foreign trade regulations, in particular with the law on foreign trade and international embargo provisions. Employees are therefore under an obligation to check potential import/export regulations prior to making decisions on the import or export of goods, services or information. In case of doubt the responsible office must be consulted.

III. INNOVATION and CUSTOMER ORIENTATION

1. **Fair Competition:** Innovation is an objective for Bizerba only if it is the result of fair competition. In the interest of all consumers and market participants, free competition has to be protected against distortion. Bizerba wishes to be measured against its competitors solely according to the performance principle and rejects all anti-competitive conduct. Furthermore, participation in anti-competitive conduct would harm Bizerba's reputation and could lead to substantial fines or penalties. Bizerba has therefore drawn up directives and instructions for work, compliance with which by every employee of Bizerba is essential.
2. **Antitrust Law:** Conspiracies and other concerted practices with competitors and the abuse of a dominant position on the market are prohibited in order to protect fair competition. Consequently, neither Bizerba nor its employees shall not accept practices that are unlawful or prohibited under criminal or civil law, e.g., unlawful bid-rigging that excludes, restricts or distorts competition, price-fixing and the unlawful allocation of regional markets or customers. More specifically, Bizerba representatives shall not propose or enter into any agreements or understandings – expressed or implied, formal or informal, written or oral – with any competitor concerning the following aspects of competition between Bizerba and the competitor for sales to third parties: prices; terms or conditions of sale; costs; profits or profit margins; product or service offerings; production or sales volume; production capacity; market share; decisions to quote or not to quote; customer or supplier classifications or selection; sales territories; or distribution methods.

Even when there are appropriate reasons for communications between companies (such as customer or supplier issues arising from a potential joint venture), meetings and discussions between competitors present potential legal risks. Bizerba representatives shall avoid creating the appearance of improper agreements or understandings by keeping communications with competitors to a minimum and making sure that there is legitimate business reason for all such communications. Employees should consult with legal counsel regarding the steps they should take to minimize the potential legal risks posed by communications with competitors.

Finally, Bizerba representatives and employees should not propose or enter into any agreements or understandings with customers which restrict the price at which the customer may resell any Bizerba product or service. .

3. **Business Partner Policy:** Bizerba maintains contractual relations with a large number of partners in its day-to-day business. Hence the possibility of customer orientation and thus the financial success of Bizerba also depend on the partners' capacity to perform. Bizerba therefore expects that partners will be carefully chosen. Conflicts of interest have to be avoided; the criteria of integrity, quality, reliability, credit-worthiness and price are to be applied. An obligation to comply with the Bizerba Code of Conduct is to be imposed on partners, and their employees and suppliers also called on to comply accordingly. In those cases in particular where Bizerba obtains work or services from employees of such partners, it expects the partners to observe all provisions of tax, employment, and social security law in order to fulfil their obligations towards their own employees.
4. **Product Safety:** Bizerba's customer orientation also means that potential risks and hazards for health and safety arising from handling of the products have to be excluded as far as possible. For this reason all employees must comply with technical standards and may not compromise at the expense of product safety.

IV. FRANKNESS and TRANSPARENCY

1. **Ban on Child Labor:** Bizerba does not tolerate any form of child labor or the exploitation of children and young persons.
2. **Ban on Forced Labor and Unlawful Disciplinary Measures:** Bizerba opposes any

form of forced labor. No employee may be forced to work through direct or indirect violence and/or intimidation. The confiscation of ID documents or wages in order to force employees to work is therefore prohibited. Every employee shall treat his/her colleagues with dignity and respect. Physical punishment and psychological or physical duress are prohibited.

3. **Equal Employment Opportunity ("EEO"), Affirmative Action ("AA"):** Bizerba is focused on leveraging inclusion and diversity to drive innovation and creativity. Bizerba continues to recognize the importance of equal employment opportunity and affirmative action. To that end, Bizerba understands that focusing solely on compliance won't create the greatest value to Bizerba. Only the combination of compliance, inclusion, and diversity at Bizerba contribute directly to:
 - Success
 - Innovation
 - Commitment
 - Engaged Employees
 - Competitive Advantage
 - Consumer Trust/Confidence
 - Emotionally Connected Consumers

4. **EEO and AA Compliance:** Bizerba provides equal employment opportunity for all individuals without regard to race, color, religion, sex, national origin, age, sexual orientation, gender identity or expression, disability, veteran status, or marital status. Bizerba is committed to the practice of equal employment opportunity for all employees and applicants for employment as defined by federal, state, and local laws.

Specifically, Bizerba:

- Recruits, hires, trains, and promotes persons without regard to race, color, religion, sex, national origin, age, sexual orientation, gender identity or expression, disability, veteran status, or marital status.
- Administers other personnel-related activities without regard to race, color, religion, sex, national origin, age, sexual orientation, gender identity or expression, disability, veteran status, or marital status. These activities include compensation, benefits, promotions, transfers, layoffs, returns from layoff, Bizerba-sponsored training, educational assistance, and social and recreational programs.
- Encourages a culturally diverse workforce and makes employment decisions based on principles that promote equal employment opportunity.

All managers and supervisors are responsible for ensuring that nondiscrimination prevails throughout every aspect of employment.

5. **Harassment:** Bizerba does not tolerate any type of harassment of its employees, including harassment based on factors protected by federal, state, or local law. These factors include race, color, religion, sex, national origin, age, sexual orientation, gender identity or expression, disability, veteran status, or marital status. This specifically includes, but is not limited to, sexual harassment. While the harassment in question may not be considered a violation of law, it may still constitute a violation of Bizerba policies. Any employee who violates this policy may be subject to disciplinary action up to and including termination of employment.

Harassment by or of another employee, a contractor, vendor, or anyone else on Bizerba premises or in the course of Bizerba business is absolutely prohibited. Bizerba does not tolerate any situation where an employee's submission to harassment is made either explicitly or implicitly a term or condition of employment; is used as a basis for employment decision; or where harassment has the effect of creating an intimidating, hostile, or offensive working environment.

Employees have the responsibility to promptly bring to the attention of Bizerba management or a Compliance Officer designated by Bizerba, as the case may be, any incidents believed to constitute harassment against them or anyone else.

Bizerba supervisors and managers are required to report allegations of harassment immediately upon receiving them. Bizerba will conduct a prompt and thorough investigation of the allegations.

6. **Drug- and Alcohol-Free Workplace:** It is Bizerba's policy to attempt to create a drug-free workplace in keeping with the spirit and intent of the Drug-Free Workplace Act. The unlawful use of controlled substances and the misuse of prescription drugs are inconsistent with the behavior expected of employees. Illegal drug use subjects all employees and visitors to our facilities to unacceptable safety risks and undermines Bizerba's ability to operate effectively and efficiently. Reporting to work while under the influence; unlawful manufacture, solicitation, distribution,

dispensing, possession, sale, or use of a controlled substance; or the misuse of prescriptions in the workplace or while engaged in Bizerba business off Bizerba premises is strictly prohibited at all times.

Other than at Bizerba sponsored or approved functions where the consumption of alcohol is specifically authorized, alcohol consumption is prohibited at all times on Bizerba property and is prohibited during working times, including rest periods. Aside from Bizerba-sponsored or approved functions, anyone who consumes alcohol on Bizerba property or who comes to work while under the influence of alcohol, will be subject to disciplinary actions, up to and including termination of employment.

7. **Safety:** Bizerba is committed to providing a workplace that promotes health and safety, encourages responsible stewardship of the environment, and advances our dream to help people achieve lifelong well-being. This commitment is part of our ongoing efforts to ensure that every business decision we make reflects our dedication to improving the health and well-being of our employees, the communities we serve, and our planet. Employees, contractors, and vendors are responsible for integrating sound environmental, health, and safety practices into their everyday activities, and acting in a manner that supports health, safety, and the environment.

If you need to report a safety hazard, notify your supervisor, manager Bizerba Compliance Officer, as appropriate.

8. **Workplace Violence:** The safety and security of employees, customers, visitors, or others on Bizerba premises is vitally important. Bizerba has a zero-tolerance policy towards threats of workplace violence, threatening behavior, verbal abuse, acts of violence, or possession of weapons in the workplace. Bizerba is proactive in its commitment to create and maintain a violence-free workplace.

Bizerba prohibits firearms or weapons of any kind on Bizerba property or premises. Weapons include guns, knives, explosives, and other potential weapons.

Employees are responsible for reporting acts of violence or threats witnessed or received by them, another employee, customer, visitor, contractor, vendor, or any other person who is on Bizerba premises or who engages in a Bizerba-related activity. You must immediately

notify your supervisor, manager or Bizerba Compliance Officer where applicable.

9. **Treatment of Knowledge:** Insofar as relevant and expedient for the relevant responsibility, all employees shall ensure the rapid and smooth exchange of information within the enterprise. Accurate, relevant and comprehensive information must be forwarded to decision-makers at an early point in time where possible and permitted. Knowledge relevant to responsibilities may not be unlawfully withheld, hidden, adulterated or selectively forwarded. Such information must be forwarded, as appropriate, to other areas accurately and in full unless interests taking precedence are involved, in particular confidentiality interests.
10. **Handling Corporate Property and Assets:** All employees are under an obligation to handle the property and assets of Bizerba appropriately, economically and responsibly in all respects. No employee is entitled to make private use of assets or services of the enterprise.
11. **Conflict of Interests:** There is a conflict of interest where the private interests of an employee conflict or could conflict with the interests of Bizerba. If employees pursue private interests and fail to disclose that pursuit, or if they place private interests above the interests of the enterprise, this can harm Bizerba and cast doubt on the integrity and professionalism of the enterprise. All employees are obliged to safeguard the interests of Bizerba. Bizerba relies on all employees of the enterprise making their decisions solely on the basis of objective criteria without being influenced by private interests or relationships.
12. **Documentation:** Every employee and member of Bizerba should document his/her work so that it is readily understandable and can be set forth by anyone in case of an emergency. Business activity often gives rise to business documents that are of considerable value to Bizerba. Accordingly, comprehensive and permanent documentation is essential and also provides proof of Bizerba's integrity. Bizerba employees must comply with statutory requirements concerning the maintenance and archiving of business records. Bizerba expects its employees to implement the relevant documentation requirements diligently.
13. **Authority to Represent and Authority to Sign:** In the interest of good business relations with

its partners, and for its own protection, it is important for Bizerba to be duly represented at all times where contracts are concluded. For this reason every employee has to verify his/her authority before signing agreements. If possible, a second authorized person has to be involved (dual control principle), who on his/her part verifies the authority also in order to protect the initial signatory.

V. RESPONSIBILITIES and SUPPLEMENTS

The principles of this Code of Conduct are supplemented by internal directives and instructions for work that may be made available by Bizerba from time to time whether via intranet, email or physical documentation or publication.

Managerial staff members bear a particular responsibility, in particular managing directors and the executive staff members of Level 1 (LE1). They are called on to communicate the meaning and contents of this Code of Conduct to their employees, put them into practice and provide adequate notice of any changes or modifications. Employees will also be supported by the responsible departments when implementing the Code of Conduct, e.g., through training measures and preventive advice work that may be made available by Bizerba from time to time whether via intranet, email or physical documentation or publication.

Superiors are responsible for compliance with this Code of Conduct by their employees. They will therefore monitor and verify such compliance.

Employees must inform their superiors of breaches of this Code of Conduct. In connection with circumstances where the breach may have occurred by a superior, the employee should immediately inform the Bizerba Compliance Office. There is no obligation of report of a breach in case of self-incrimination, when regulated by law or in case of a legally allowed right to refuse to give evidence. Reporting outside the confines of Bizerba may take place, if at all, only after internal arrangement with and only by the Bizerba Compliance Office and management.

Bizerba national managing directors must appoint a competent Compliance Officer for the relevant national company as a contact person for the chief compliance officer of Bizerba and provide notice of such appointment to Bizerba and its employees. However, the national compliance officer may not be identical to the relevant managing director.

The corporate auditing department will conduct audits independent of processes to check compliance of this Code of Conduct across the group.