

Our Code of Conduct

Committed to ensuring that our business
practices are responsible and transparent

clpt CIMC Liquid
Process Technology

 Ziemann
Holvrieka

 BRIGGS

 DME

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The CLPT Group has a rich history. Our culture is based on values that have been built over many years, even centuries. Together, we design, build and install solutions for the world’s leading companies active in brewing, distilling, pharmaceutical and other industries. We are responsible for supporting our customers, keeping our business strong and passing it on to future generations in an even stronger shape.

Our ambition is to be the best performing and most respected global provider of tanks and process systems for a wide range of industries. To realise this, we are committed to conduct business with integrity, respect and fairness. This document sets out what we stand for, what our corporate values are, and it explains how we aim to do business: now and in the future. It is a set of guiding principles that should support you in doing your work to the best of your ability, fostering a culture that is a model for our group.

The essence of our Code of Conduct expresses itself every day through the values that our people live and work by, which is to always be safe, sustainable, customer focused, honest and to always deliver. These values are integral to our culture as they form a major part of our mindset and actions.

Our mission is to design and deliver innovative solutions to perfect the sustainable production of life’s liquids. Clearly communicating what we expect of the people who work for and with us, is of paramount importance to realise our goals.

As a group, we recognise our responsibility for the environmental, societal and economic consequences of our activities. Therefore, we strive to engage with different stakeholders to ensure that we continue to conduct business in a sustainable and responsible way. Our group’s sustainability initiative supports this journey of continuous sustainable development.

All of us are responsible for understanding the Code of Conduct and the underlying supporting policies.

We trust that this Code of Conduct will guide all employees in making the right choices. Therefore, we expect and encourage you to familiarise yourself with its content. If you have concerns about a possible violation of our Code or the underlying policies, please speak out via the channels specified in this document.

The success of our group begins with the actions of all of us: individually and as a team, in every country and at every level. By remaining committed to our values and business conduct as described in this document, we will pave the way towards a sustainable future for CLPT.

Klaus Gehrig, Group CEO
CIMC Liquid Process Technology (CLPT)

Our code of conduct

CIMC Liquid Process Technology (CLPT) and its subsidiaries (Ziemann Holvrieka, Briggs of Burton and DME) are committed to ensuring that business practices are responsible and transparent.

As mentioned in the foreword, this aligns to our core values, which is to always be:



Being a global operation, this commitment spans the legal requirements of the nations in which we operate. Besides the law, we respect the principles of the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. In addition, we are committed to implementing the United Nations (UN) Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Our Code describes the attitude and conduct that we expect from each other. It forms a guideline for our actions and our decisions, and helps us to perform our duties properly, with due care and integrity. It also shapes the way we treat each other, the way we serve our customers, our cooperation with suppliers and our responsibility for the communities in which we work and live.

Fundamentally, Our Code helps us to make meaningful and responsible choices.

Our Code does not cover every possible situation, nor would you expect it. It does however provide a guide towards good judgement and sets a high ethical standard of everyone who adheres to it. Employees and other stakeholders are encouraged to speak up when they have questions or concerns. There may be times when local laws, regulations, or customs conflict with Our Code. In case of a conflict or a difference between an applicable legal requirement and Our Code, we will always seek guidance whilst complying with the law.

Our Group does not knowingly violate Our Code.

Our Code shall, periodically be reviewed, based on practical experience obtained, and when necessary or desirable, adjusted to ensure:

- i. its continued conformance to applicable law
- ii. it meets or exceeds industry standards, and
- iii. any weaknesses revealed through monitoring, auditing, and reporting systems are eliminated or corrected

Our Code may evolve to better serve the people and societies that we operate in.

For clarification, a description of definitions used throughout Our Code is included at the end of this document.

Our values



People first

People are our most valuable asset. The safety of our employees and the people we influence, is always our first priority. We believe in a respectful, supportive and rewarding working environment that increases satisfaction and promotes career opportunities

Act with integrity

We are committed to conducting business in an ethical, responsible and accountable way. We are open and honest in our communication; we value cultural awareness and diversity and treat everyone with trust and respect.

Driving sustainability

Focusing on the future of our society is at the heart of our approach to sustainability. Reducing the impact of our own operations and supporting our customers with efficient and sustainable solutions is key to achieving our long-term sustainability goals.

Deliver results

We deliver what we promise, every time. We know that by doing so we develop trust, and secure long-term relationships with customers, colleagues and stakeholders.

Customer focused

We are dedicated to perfecting the quality of the products and services we offer to our customers. In a close partnership, we understand our customers requirements, which inspires us to innovate for what's next.

Applicability

Our Code applies to all entities in CLPT and its employees including contracted parties that act on behalf of CLPT

All business partners and third parties can have a direct impact on our reputation through their behaviour. For this reason, it is important that they share our commitment to sustainability, ethics, and compliance by acting in accordance with the responsibilities mentioned further in this document.

We achieve all that we do through a highly integrated supply chain where our actions and relationships are critical to our current and future operations.

Responsibilities

Our Code only works if all parties are aware of their responsibilities and expectations.

All our employees are expected to:

- Read, understand, and comply with Our Code.
- Ask for help when they are not sure if a decision or action, they are considering is aligned to our values, is compliant or lawful.
- Promptly report any activity that in their opinion or judgement would violate Our Code.

All managers are expected to:

- Lead by example, in both words and action towards employees and third parties representing CLPT.
- Promote "Open and Honest" two-way communication with their team, encouraging them to raise questions and concerns and letting them know when an issue has been resolved.
- Acknowledge and support any employee and third parties representing CLPT that comes forward to discuss an issue or report a potential violation and ensure that there is no repercussion for doing so.
- Ensure that action plans to address compliance risks are promptly implemented.
- Promote CLPT rules and procedures designed to prevent and detect non-compliant or illegal conduct.

- Discuss this Code of Conduct and the company values with their team and ensure that employees are trained and informed about the policies, procedures and compliance risks that apply to their position or company where they work.

All CLPT companies are expected to:

- Comply with this Code of Conduct.

All third parties are expected to:

- Read, understand, and act in a manner consistent with this Code of Conduct.

In case of any inconsistencies with their own Code of Conduct, a check is done to ascertain whether their Code of Conduct sufficiently covers the principles of CLPT.

This can be done by the Legal department or the Internal Audit department. If not, it shall be at the discretion of the Board of CLPT to determine what to do.

Human and labour right

CLPT respects the rights of every person affected by our business.

Our Group takes constant care to avoid causing or contributing to adverse impacts on people – whether in our own companies, in our supply chain or in the communities in which we operate.

Without the people we influence, we have no business.

There are many aspects of our business which can cause, contribute, or be linked to adverse impacts on people. When there is a risk of adverse impacts, we will act or use our leverage to prevent or mitigate these impacts and address them.

Health & Safety

Keeping the people we influence safe and healthy every day, is a core value of our Group.

In CLPT we value a safe workplace that supports the health and well-being of all employees and contractors in our global organisation. We exercise duty of care by applying policies to ensure the safety and security of our people and operations globally.

We must be always aware of potential safety and security issues and encourage our employees' and any other workers to raise their concern should they see anything that poses a threat to the safety, security, and well-being of anyone in our Group.

We comply with the travel policy set by the relevant business unit by making travel arrangements through our selected vendors and provide travel security information before departure, especially when travelling to high-risk destinations.

Safety and security performance is a key factor in the evaluation and selection process of contractors and business partners.

We are constantly taking responsibility for promoting awareness of safe and healthy behaviour among our team, our contractors, and our business partners.

We report all safety and security incidents promptly and handle incidents at the appropriate level in the organisation. We then apply these learnings to satisfy our continuous improvement of Health and Safety practices across our organisation and others we work alongside.



Diversity and inclusiveness

Our Group enables everyone to be themselves, to feel welcome and experiences the freedom and safety to participate.

In CLPT:



Different perspectives, backgrounds, knowledge, and experiences contribute to the realisation of our Group's objectives and are optimally used and deployed in innovative, sustainable solutions for our customers.

In CLPT, all employees are given room to use their unique talents to achieve our objectives.

We treat our colleagues and business partners with respect and dignity - regardless of their:

nationality | gender | age | function | social status | ranking or other attributes

We do not tolerate:

harassment of any kind | bullying | or sexually transgressive behaviour

Our people are our greatest asset, and our Group is evolving to cater for the diversity that strengthens the team and enables our Group to prosper.

Fair payment

Living wages are a basic need.

We recognise that living wages are an essential part of decent work and are crucial to meeting employees' basic needs.

We will therefore pay at least the minimum living wage and mandated benefits required by local laws. We will ensure the payment of employee wages is in the appropriate legal tender, and at regular intervals.

Freedom of association

Our Group is balanced in recognising the right to and refrain from collective representation.

We respect our employees' right to associate freely, form or join organisations of their choosing and to bargain collectively in accordance with recognised international instruments, local laws, and regulations. We also recognise our employees' right to refrain from collective representation. Their doing so will not result in any negative consequences for them, or repercussions from the Company.

We are committed to upholding the privacy of our employees. We follow fair disciplinary, grievance and dismissal procedures, which are defined by company policies and collective bargaining agreements, including upon request or through the provision of exit conversations for employees leaving any of our companies.

We are committed to ensuring full compliance with applicable laws, regulations and relevant collective agreements concerning working hours, overtime, leave and minimum rest periods.

Child labour and forced labour

Our Group does not use any form of forced or involuntary labour.

Our Group refrains from any practices that will give rise to a risk of involuntary labour. We feel a responsibility to respect, promote and realise the abolition of child labour.

Under no circumstances will we employ children.

In no event children below the age of 15 years are employed nor will we permit hazardous work or night work for children below the age of 18 years. Furthermore, we will not use any form of forced or involuntary labour, and refrain from practices that can give rise to a risk of involuntary labour.

Integrity, bribery and corruption

Our Group has a zero-tolerance to bribery and corruption and seek to uphold the highest integrity.

In CLPT we ensure all payments are responsible. We have a zero-tolerance policy on corruption, bribery, money laundering or unauthorized political donations.

Corruption can take many forms and it does not necessarily involve money. Certain gifts or entertainment can also be considered a bribe depending on the value. We never offer, authorize, or accept bribes, kickbacks, or anything of value for the purpose of obtaining or retaining business or any other improper advantage for CLPT.

We therefore use the "four eyes" principles before any formal binding documentation (commercial terms or otherwise) are sent out or signed off.

In case of interaction with government officials, Our Group are mindful that some jurisdictions impose strict procedures and rules on how private parties may interact with government officials.

We strive to ensure that our business is never used as a vehicle for any illegitimate flow of money, neither in our core business nor through the financial services we provide. Specifically, we ensure that adequate counterparty screening is carried out when we make outgoing payments to vendors or customers.

Small gifts and entertainment (less than 50 euro) can be provided if they are strictly business related, in accordance with internal guidelines and in compliance with local and international laws in the relevant country. Gifts of cash and cash equivalents for external parties are prohibited.

CLPT is committed to internal transparency and control of all political donations. No financial or other donation of monetary value may be made to political parties, candidates, governments, or other governmental bodies without prior approval of CLPT board. All political donations shall be reported to the authorities in accordance with national laws and regulations.

Fraud

Our Group does not tolerate any attempt of fraud.

Fraud is a deliberate deception with the intent to gain direct or indirect advantage at the expense of or to the detriment of CLPT, our customers, or suppliers. We reject committing to or being complicit to committing any act or attempt of fraud.

We act objectively and in the best interest of the company, by avoiding any conflict of interest or any perception thereof.

Company resources are used for business purposes only, unless any exceptional (for example temporary) non-business usage has been authorised in writing by a supervisor.

We refuse any favours (whether financial or non-financial) offered by any external party with the intent to provide this party with a preferential or more favourable treatment by CLPT. We do not influence the hiring decision-making process if the person being hired, or the vendor being selected is a friend or a family member.

We ensure financial and non-financial statements, either for external or internal purposes, are always prepared free of any intentional misstatement.

Competition compliance

Our Group are compliant and operate fair competition.

CLPT is committed to conducting business in compliance with all competition laws globally and will continue to compete fairly whilst maintaining business. We always adhere to and encourage compliance with competition laws at all levels of the business.

In CLPT our core values encourage and require upholding the highest standards in competition law compliance in all jurisdictions in which we are active.

We consult with and are guided by our legal department in case of any questions regarding compliance with regulations on fair competition.



Trade controls

Trade controls are important for our global operations and the customers we serve.

CLPT's global business consists of many operations and transactions that are subject to foreign trade controls. Foreign trade controls are national and international laws and regulations restricting business transactions with certain countries, organisations, and individuals (for instance economic sanctions). Export control regulations cover the actions required to identify the items (such as goods, technologies, and software) that are subject to licenses when they are exported from one country to another, or imported there, and it is our responsibility to assure all required approvals and licenses are obtained in compliance with internationally applicable regulations. In certain cases, depending on the applicable terms, the customer is responsible for compliance with local laws, and we must rely on the customer's assurance of compliance.

We pay special attention to dealings with highly sanctioned countries or parties as these dealings may be restricted. Please refer to the Sanctioned Countries Lists and Sanctioned Persons Lists which can be made available by the CLPT legal department.

Responsible communication

Our Group believes in the importance of open exchange and freedom of speech.

We always position CLPT Group in line with our strategy. Daily, we protect our Group's and our companies' names in the eyes of our customers, employees, partners, and the wider population, whilst consistently protecting and improving our global reputation and building trust in our brands.

CLPT Group believes in the importance of open exchange and freedom of speech. We encourage employees to interact on internal and external channels. To avoid risks associated with social media use, we utilise common communication sense just as we would in any professional environment. We always use a disclaimer when posting or commenting on social media to ensure that all personal views are not tied with that of our Group's positions.

If an employee of our Group is contacted by the media, the employee should inform CLPT board and they will advise whom to contact. Any (scientific) publications of employees and publications related to CLPT Group, and our companies are subject to prior approval by CLPT Board. Approval will never be unreasonably withheld and in such cases solely based on serious grounds or the Group's legitimate interests.

If an incident or crisis occurs, CLPT Board should be informed immediately.

Safeguarding information

Protecting information is important for Our Group.

For CLPT Group, information is a valuable asset and unauthorised disclosure, or misuse of information could adversely impact the company, our customers, suppliers, business partners and our colleagues who have entrusted us with such information.

As CLPT employees, it is our duty to ensure that all information - whether it represents intellectual property rights, trade secrets, confidential information, or personal identifiable information - is processed responsibly and in accordance with the highest of standards and policies.

We protect information through the appropriate use of access control, encryption, and appropriate business processes to ensure that the risk of unauthorised access or disclosure is minimised.

We respect and agree with the responsibilities in place to safeguard information and intellectual property rights. We adhere to them and expect all our business partners and any third party we deal with to do the same.

We maintain organisational processes to ensure that data breaches are reported within legal, regulatory, and contractual obligations. We report any breach of confidential information.

Cyber security

Our Group complies with all international national, and local laws and regulations on cybersecurity.

A strong cyber security capability gives CLPT Group a competitive edge and builds trust with our people and our customers. We comply with all international national, and local laws and regulations on cybersecurity. We all have a responsibility to be cyber secure and we take time to understand what we need to do to protect our networks, systems, devices, and the information that we use daily.

We focus on the resilience and protection within our IT and security areas and focus on the security of operations as new processes and technology capabilities are developed.

We assess technology solutions and business processes to understand the associated cyber risks and how these can be appropriately mitigated.



Sustainability

Process & Progress

Our pathway to a Sustainable Future

CLPT Group has ambitious goals on sustainability and encourages suppliers to contribute to these goals. We work systematically to reduce our negative impacts and to enhance our positive impacts on society and the environment.

We take action through our business, products, production processes and partnerships to be part of the solution to global sustainable development challenges. We comply with all international, national, and local environmental laws and regulations that are applicable to our business operations. When applicable, we ensure we obtain all necessary permits, approvals, and registrations.



Working with suppliers

Suppliers are integral to Our Group and realising our ambition.

We treat our suppliers with fairness, honesty, and respect, we expect them to uphold values similar to ours and conduct business in a manner that does not cause adverse impacts to people and the planet. By promoting ethical and responsible business practices in our supply chain, we not only mitigate supply chain risks but also leverage our purchasing power to drive positive social and environmental outcomes. In doing so, we also support our customers in building sustainable supply chains.

We conduct business with suppliers with high standards of integrity and in compliance with applicable laws and regulations. We are vigilant and raise concerns if we know or suspect that suppliers are not meeting our requirements.

All suppliers are required to sign to confirm their compliance with this Code of Conduct and its requirements on business ethics, labour and human rights, health and safety, environment, and subcontractor management. Failing such written undertaking, they should demonstrate the existence of and compliance with their own code that is comparable in content and no less stringent than this one.

Working with governments

Our Group are transparent and consistent in messaging.

CLPT engages in dialogues with governments and authorities at local, regional, and global levels on an ongoing basis. When working with governments and authorities, we are consistent and transparent in our positions and messages.

Interactions with policymakers and government authorities should take place in accordance with our values and commitment to responsible business practices.

Work with governments should always be conducted directly or through organizations of which we are a member. In case our position differs from that communicated by the relevant organization, we are aware that we have an obligation to raise such differences.

We do not use external public affairs representatives without approval in accordance with internal policies. We ensure that external representatives are bound by written agreements that are set in place to regulate confidentiality and conflict of interest issues.

We remain vigilant to potential conflicts of interest.



Accounting

Our Group faithfully reflect the economic substance of our companies' business activities.

CLPT Group accounting and reporting will faithfully reflect the economic substance of our companies' business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

As an organisation operating in multiple jurisdictions, we comply with tax laws in the countries in which we trade and to ensure compliance and responsible conduct.

Retaining and managing business records enables CLPT Group to make business decisions, analyse its operations, inform external stakeholders, and answer questions that may arise from audits, tax reviews or legal proceedings.

We prepare timely, accurate and complete financial information for use in all reports. We ensure that management decisions are based on sound economic analysis based on complete facts with appropriate consideration of short, medium, and long-term risks.

We comply with all applicable laws and regulations relating to the preservation of documents and records.

Reporting of misconduct

Our Group strive to conduct our business in a responsible and honest manner.

We welcome concerns from anyone within or outside of CLPT Group about acts of employees, management, our Board of Directors, or business partners linked to our Group's operations (such as third-party agents, brokers, vendors, suppliers, or contractors/subcontractors). We do not tolerate retaliation against persons making reports in good faith.

In case of any reported misconduct, the Board of Our Group shall determine whether violations of this Code of Conduct have occurred. If this is the case, the Board will determine the disciplinary measures (up to and including termination of employment) to be taken against whoever has breached this Code of Conduct.

Definitions

As used in the Code of Conduct:

Company or Our Group	means CIMC Enric Liquid Process Technology Ltd. ("CLPT") by itself or including its subsidiaries.
Laws	means laws, rules and regulations of governmental agencies and authorities.
Board or Board of Directors	means the Board of Directors of CLPT Group.
Management	means head of a department or a legal entity.
Manager	means an employee with a hierarchic responsibility over one or more other employees.
Employee	In this Code of Conduct, employees are understood to mean all persons who work for CLPT Group and its subsidiaries, irrespective of whether such work is carried out based on an employment agreement or otherwise.

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