

Innsbruck, 24 March 2017

Code of Conduct Corporate Social & Environmental Responsibility

As a global company, we perceive it as our obligation to bear responsibility in relation to social, environmental and economic issues as our contribution to sustainability. Our Code of Conduct applies to all our employees and includes the following principles and values:

Laws and Regulations

We will comply with the applicable laws and regulations of those countries where we conduct business.

Corruption and Bribery

Every form of corruption or bribery is forbidden, this is valid for active as well as passive bribery.

Forced Labour

Forced labour in any form is forbidden. This includes forced prison labour, bonded labour and all other forms of forced labour.

Child Labour

Child labour in any form is forbidden. Unless local law stipulates a higher age limit, children of school age or persons younger than 15 years of age (except as provided for by ILO convention No. 138) shall not be employed. Workers under the age of 18 shall not perform hazardous work and restrictions concerning night work may be applied whilst taking into consideration any educational needs.

Harassment

The personal dignity, privacy and personal rights of every individual have to be respected. Employees shall not be subject to corporal punishment or to physical, sexual, psychological or verbal harassment or abuse.

Compensation

Remuneration, including overtime or benefits, shall equal or exceed the level required by applicable laws and regulations.

Hours of Work

We respect the applicable local working laws regarding working hours.

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Legal form of Company: GmbH & Co KG Registered Office: Innsbruck Registered No.: FN 231479k VAT-No.: ATU 56551948



Health and Safety

We will provide a safe and healthy working environment to prevent accidents and injury. Where applicable, the provision of safe and healthy residential facilities must reflect local law as a minimum. A job safety management system according to OHSAS 18001 has been implemented.

Non-discrimination

All our employees, regardless of the colour of their skin, race, nationality, social background, possible disability, sexual orientation, political or religious conviction as well as their gender or age, shall be treated strictly according to their abilities and qualifications in any employment decision, including but not limited to recruitment, promotion, compensation, benefits, training, redundancy and termination.

Freedom of Association and Collective Salary Negotiations

We will respect the legal right of employees to freedom of association and collective salary negotiations.

Environment

We will comply with environmental regulations and standards applicable to our operations and will observe environmentally conscious practices in all locations where we operate. Environmental pollution shall be minimised and environmental protection shall be improved continuously. An environmental management system according to ISO 14001 has been implemented.

Conflict Minerals

It is our goal to ensure that any minerals known as '3TG' (Tantalum, Tin, Tungsten and Gold) contained in our products and materials do not originate from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. We expect our suppliers to implement a Policy for Conflict Minerals and to exercise due diligence to investigate the source of these minerals regularly.

Supply Chain

We shall oblige all our suppliers to recognise and respect the requirements of this Code of Conduct.

We hereby confirm to adhere to the requirements of this Code of Conduct.

Walter Mittermueller Managing Director

Paller Dittemules

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