

Innsbruck, 13 February 2019

## **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.

**Health and Safety**

We will provide a safe and healthy working environment. Therefore, we have implemented the STOP principle (substitution before technical, organisational and personal measures) to prevent and combat risks at its source. Since 2010, we have also been applying a job safety management system according to OHSAS 18001 and, since 2018, according to ISO 45001. Additionally, our corporate health management includes preventive measures, such as a good working atmosphere and healthy nutrition as well as an HR vision that encourages individual responsibility and job satisfaction. An occupational health professional is available for consultation twice a month.

**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 to minimise environmental pollution and to contribute to environmental protection. Since 2006, we have been using an environmental management system according to ISO 14001. We also strive to continuously improve our energy efficiency by investing in sustainable technologies (e.g. our photovoltaic system) and eliminating wasteful use of energy.

**Conflict Minerals**

We do not use minerals known as '3TG' (Tantalum, Tin, Tungsten and Gold) for the production of our products and materials, which 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.

A handwritten signature in black ink, appearing to read 'Walter Mittermueller', written in a cursive style.

Walter Mittermueller

Managing Director