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CODE OF CONDUCT



part of



Code of Conduct of **TREIBACHER GROUP**

We, the executive boards of Treibacher Group's companies, maintain the core belief that compliance to strong ethical values is crucial in both private and business life. This includes showing fairness in the way we deal with each other and acting in accordance with established standards in our daily business life. We believe that since our customers' success is the key to us achieving sustainable, long-term business success and constant growth, it is clear that we must fulfill the requirements of all interest groups. As the members of the executive boards of Treibacher Group's companies, we are committed to our responsibility for ensuring a sustainable corporate strategy and its implementation. Integrity and also compliance with the law and ethical principles are key elements for safeguarding the authenticity of our company.

This „Code of Conduct“ defines how we conduct our business in an ethical and socially responsible manner. In combination with the respective management principles and the quality, safety and environmental guidelines, the Code of Conduct establishes standards and instructions that guarantee respectful and dignified treatment for our employees, safe working conditions and sustainable environmental practices. This document explicitly applies to all employees, managers, executive directors and board members of Treibacher Group.

This Code contains the following:

- how our management assumes its responsibilities,
- how we deal with our employees and colleagues,
- what behavior customers can expect from us,
- how we deal with our suppliers and
- how we behave in our dealings with communities and the environment.

Every manager and each and every employee is responsible for behaving in a manner consistent with the Code. The conduct of our managers serves as a role model because they exemplify the standards of conduct and endeavor to apply them in every situation.

Human rights

We are firmly committed to the protection and promotion of human rights. Our actions are guided by and consistent with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact and the core labour standards of the International Labour Organisation (ILO). We regard human rights as core values that must always be respected by all.

It goes without saying that we do not use child labour and categorically reject any form of forced labour. We do not tolerate working conditions that violate national or international laws and standards. We also take a firm stance against any form of verbal

abuse and bullying.

Discrimination

We do not use any form of discrimination against our employees on the grounds of ethnic origin, sex, age, marital status, religion or beliefs, disability, pregnancy, sexual orientation or membership of a union or political party in matters of recruitment, compensation, training opportunities, promotion or dismissal and we naturally also require our employees to oppose any such discrimination.

Freedom of association and right to collective bargaining

As Treibacher Group's companies, we respect the right of all employees to join or leave associations or organizations of their choice for the purposes of promoting and protecting employees' interests, to work for and also to establish such associations or organizations and we abide by the corresponding agreements with collective representations of our employees in accordance with locally applicable laws and provisions. We fulfill collective minimum wage standards and transparently ensure the compliance with limits on working hours.

Motivation and training of employees

We consider motivated employees and their ability to identify with our company's goals a key factor in our success. Consequently, the respective management principles place special emphasis on furthering our employees. We focus on job-related training that is relevant to the company and on developing and furthering potential future managers.

Health and safety

We attach great importance to protecting the health and safety of our employees by providing a healthy and safe working environment. By complying with the safety regulations applicable within our company, each and every individual contributes to a safe and healthy working environment. Moreover, we offer our employees a voluntary health program together with training in all areas of relevance for health and safety.

Compliance with antitrust and competition legislation

Our high-quality products, innovative solutions and reliability allow us to be judged openly and fairly on global markets. Under no circumstances do we engage in illegal and/or criminal practices, such as bid-rigging, that exclude, distort or restrict competition.

Conflicts of interest and bribery/corruption

Management and employees avoid situations in which their personal or financial interests conflict with those of the company. In particular, they are prohibited from taking participating interests in companies of competitors, customers or suppliers or from engaging in business relationships with them in a private context

if this would create a conflict of interests. Such a conflict always exists if the type and scope of a participating interest are likely to influence an employee's actions in any way when working for our company. Our management and employees clearly distance themselves from demanding and accepting unjustified or illegal benefits that may influence business decisions or transactions. Similarly, when conducting all types of business transactions, none of our management or employees will offer, create or attempt to offer or create benefits to/for business partners, their employees and other third parties, or enter into corresponding agreement.

Safeguarding of assets and secrecy

It is expected that every individual will safeguard the company's tangible and intangible assets, treat business and operational secrets and also customer-related business information in confidence and comply with applicable principles on data protection. All employees adhere strictly to the applicable IT security guidelines.

Customers & Suppliers

As suppliers of our customers, we ensure, that all our products are fully and properly registered, labelled, packed and dispatched. We comply strictly with local customs and import laws, rules and procedures of government authorities. Likewise, we place high expectations on our suppliers and require that, when managing their businesses and in particular when dealing with employees, they abide by the same strict principles that we ourselves apply.

Environment & recycling

As a chemical and metallurgical company, we also have a responsibility toward nature. We protect our environment by operating state-of-the-art facilities. Every employee contributes to ensuring that high quality products are manufactured using processes that protect the environment. We conserve environmental resources by energy generation and resource extraction from secondary raw materials.

Corporate citizenship

We are deeply aware of our responsibility as a citizen of the communities in which our plants operate and are committed to open communication with all authorities and with social and public interest groups.

Due diligence along the supply chain

For us, sustainability extends beyond the boundaries of our own system. We rely on strong partnerships with suppliers and customers. One of our main concerns is to establish and maintain long-term relationships with all our suppliers.

With regard to conflict minerals, we follow nationally and

internationally recognised guidelines, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We are implementing the requirements of the European Conflict Minerals Regulation (EU) 2017/821, which lays down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold originating from conflict-affected and high-risk areas. Our policy regarding conflict minerals and the due diligence report are published on our company website for interested parties.

Compliance

The present Code of Conduct has been approved by the executive board of each company and has been brought to the attention of the management and all employees. Management, directors and employees must comply with this Code without exception in the performance of their duties. Stricter or more detailed guidelines may apply to certain regions, countries or functions, but these must always be consistent with these corporate principles. Questions regarding the application or interpretation of this Code, or reports of potential violations, should be directed to the appropriate line manager.

We promote a culture of openness in which reports of any behaviour that may be inconsistent with the values of this Code of Ethics and Conduct are expressly welcomed. All reports, whether made by employees, suppliers or other stakeholders, will be treated confidentially and investigated carefully. Procedures, practices or actions that are inconsistent with this Code will be dealt with consistently and appropriately.

For the management:

Stefan Greimel & René Haberl
Board members of Treibacher Industrie AG

Ingomar Rogler & Katharina Kumerschek
Executive directors of Mittlere Gurk Immobilienbesitz- und
Infrastrukturdienstre GmbH

Franz Melcher & Josef Miklautsch
Executive directors of Evonik Treibacher GmbH

Georg Bouvier & Stefan Greimel
Executive directors of Tribotecc GmbH

Wolfgang Eisenberg & Dominik Uhlich
Executive director of Leuchtstoffwerk Breitung GmbH

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