SUPPLIER CODE OF CONDUCT (SCoC)

Principles of conduct for suppliers of the Wietersdorfer Group

COMMON RESPONSIBILITY

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It is a matter of course for us that all persons acting comply with the laws and regulations of the countries in which they are active and fulfill their obligations in a reliable manner. We expect our business partners not only to comply with these rules, but also to assume ecological and social responsibility.

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COMPLIANCE CONCERNS US ALL 1

We stand for

We thrive on the trust of our customers, employees, owners and the public as well as the performance and integrity of our Group. With our activities in the areas of pipes and building materials, we are a leading player in numerous countries in Europe, but also on other continents.

An important pillar of our success story is that we have always seen responsible and compliant behavior as an indispensable part of our corporate culture. We do not compromise when it comes to morals, ethics, the environment and safety.

We confess

That is why we have drawn up a „Code of Conduct“ for ALL our employees across our borders, cultures and languages. This sets out ethical and moral principles as well as our internal Group guidelines – compliance with these rules is our top priority!

After all, the integrity of each individual is indispensable and key to our corporate success. Legally compliant and ethical conduct protects against significant legal and economic risks and strengthens the reputation and trust in our company.

We expect

However, this does not only include our own employees. Every business partner is part of our responsible corporate strategy and shapes the reputation of our company through their appearance, behavior and actions.

In the present Supplier Code of Conduct (SCoC), we have therefore set out our principles for the purpose of legally secure, sustainable and responsible cooperation, compliance with which we expect from our suppliers.

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2 RESPONSIBILITY TOWARDS BUSINESS PARTNERS

Compliance with laws & standards

We expect our suppliers to comply with all laws, official regulations and other provisions that apply to their activities. This also includes compliance with export-related regulations and appropriate export controls (compliance with and consideration of embargoes etc.).

We expect transparent financial, accounting and business records that fully and accurately reflect all transactions and dealings and that comply with applicable laws, accounting principles and established practices.

After all, we also expect sensitive information and data to be handled confidentially.

Fair competition

Agreements and arrangements of any kind that restrict free and fair competition are not an adequate means of implementing projects. Our suppliers are committed to compliance with the relevant regulations and thus to an open, fair and competitive business environment. They do not participate in any agreements relevant under antitrust law (e.g. on prices, markets or customer segments) or in any other unfair business practices.

No corruption and bribery

We do not tolerate corrupt or white-collar criminal behavior in connection with any types of business activities or our entrepreneurial actions and activities. Our suppliers do not solicit gifts, personal services or favors from business partners. Our suppliers do not accept or offer personal benefits or gratuities from or to business partners that interfere with an objective and fair decision.

Avoidance of conflicts of interest

We require that our suppliers ensure that personal relationships or interests do not affect their business activities. Any (potential) conflict of interest must be disclosed immediately so that appropriate measures can be jointly taken to resolve it.

RESPONSIBILITY TOWARDS THE PEOPLE

Compliance with human rights and labour law

Our suppliers respect internationally recognized human rights and are committed in particular to complying with the UN Human Rights Charter and the ILO core labor standards of the International Labor Organization.

Local laws and regulations regarding labor and social legislation, in particular working hours and rest periods, as well as the right to freedom of assembly and collective bargaining, are respected and complied with.

Health and safety at work

The safety and health of people is our highest priority. Therefore, suppliers must provide a healthy and safe workplace for their employees and comply with legal requirements. Free access to drinking water, sanitary facilities, appropriate fire protection, lighting, ventilation and – where necessary – to suitable personal protective equipment must be provided.

No discrimination and harassment

We promote an environment characterized by mutual respect, appreciation and tolerance. We do not tolerate discriminatory or disrespectful behavior and firmly oppose any form of mobbing. We also expect our suppliers to promote equal opportunities and to prevent discrimination, especially in hiring, remuneration, promotion or the granting of training and development measures. Our suppliers respect cultural and individual diversity and treat every employee with respect and dignity.

No exploitation and no forced labor

Our suppliers are strictly prohibited from using forced labor, child labor or any other form of exploitation and contempt for human beings as well as human trafficking. All employees are fairly and adequately compensated by the supplier for the work performed, whereby legal requirements regarding minimum wages must be complied with. If a statutory minimum wage does not exist or is not sufficient to meet basic needs, appropriate wages and salaries are paid to ensure an adequate standard of living.

4 RESPONSIBILITY TOWARDS OUR ENVIRONMENT

Responsibility in the supply chain

We stand by our responsibility in the supply chain and the anchoring of social and ecological aspects in procurement and contract awarding. We therefore expect our suppliers to comply with the principles and relevant legal provisions set out here.

In addition, we require that our suppliers also communicate the contents of this Code to their suppliers and commit them to comply with the principles as well.

Environmental protection & sustainability

Our suppliers undertake to comply with all applicable environmental laws, official regulations and standards. These include the Minamata Convention, the Stockholm Convention and the Basel Convention.

Our suppliers take care to use environmentally friendly technologies, to preserve natural resources and to motivate all employees to act in an environmentally conscious manner. Internal processes and business strategies reflect a sustainable environmental policy.

Product safety and quality

We stand for high quality and professionalism towards our customers. Therefore, we also expect our suppliers to provide a professional and qualitative service.

Our suppliers comply with all applicable product safety regulations and specifications, in particular the legal requirements regarding the safety, labeling and packaging of products and the use of hazardous materials and substances. Our partners also comply with valid quality standards and strive to continuously improve their products.

RIGHTS OF AUDIT 5

We reserve the right to verify compliance with this Supplier Code of Conduct by appropriate and reasonable means.

Verification may take the form of self-assessment by the supplier or audits at the supplier‘s premises, the latter generally only taking place during normal business hours, after reasonable notice and in the presence of representatives of the supplier.

In the event of concrete indications of serious violations of this Supplier Code of Conduct or of applicable legal provisions, we reserve the right to carry out unannounced audits.

The audit procedures shall be carried out in accordance with the applicable national legal provisions. The audit shall not lead to disproportionate restrictions on the business activities of the suppliers or to breaches of confidentiality agreements with third parties.

In particular, the legitimate interests of the supplier and applicable data protection laws must be protected.

Within the scope of the audit, Wietersdorfer or a third party commissioned by Wietersdorfer shall be granted access to all relevant information, documents and business premises to the extent necessary for the audit.

Our suppliers are obliged to actively support Wietersdorfer in carrying out the audit procedures to a reasonable extent.

If deviations from this Supplier Code of Conduct are identified during an audit, the supplier is obliged to develop and implement appropriate corrective measures without delay.

Each party shall bear its own costs and expenses incurred in this connection.

6 CONSEQUENCES OF NON-COMPLIANCE

Violations of the rules of conduct and principles standardized here not only contradict our values and ethical standards, but also cause us lasting harm and may result in a variety of consequences and sanctions for us.

Therefore, Wietersdorfer will take action in the event of any violation of the provisions set forth herein and will take appropriate sanctions in the event of non-compliance with our principles or in the event of violations. This includes the possibility of extraordinary termination of business relationships and the reporting of criminal conduct to the competent authorities.

CONTACT & CONTACT PERSONS

We expect our suppliers to immediately report any relevant concerns or observed violations of the principles and rules of conduct standardized here. The Group-wide Compliance Organization (see below for contact persons) is available for this purpose. Furthermore, we have set up our anonymous reporting system „Tell it Cody“, which our suppliers can also contact confidentially via our website.

Compliance Department

compliance@wietersdorfer.com
Tel.: +43 463 566 76 8029

Ferdinand-Jergitsch-Straße 15
9020 Klagenfurt am Wörthersee

Mirna Zwitter-Tehovnik
Head of Legal, Compliance and Insurances

mirna.zwitter@wietersdorfer.com
Mobil: +43 664 612 43 60

We confirm that we have received and read this Supplier Code of Conduct (SCoC) and are committed to adhering to the principles standardized therein.

place , *date* *signature*

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Our compliance documents are reviewed annually in the fourth quarter to ensure they are up to date, and changes or updates are made as necessary. Policy manager: Dr. Mirna Zwitter-Tehovnik

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