

Social Responsibility Code of Conduct

Hereby we confirm that we have read, understand and confirm that we live up to the ALWERA Group Supplier Code of Conduct to the best of our ability.

Date	Company
Name	Signature
Contact person, sustainability matter	

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Preamble

The ALWERA Group, consisting of the parent company Alwera AG and its affiliated companies Estyria Naturprodukte GmbH, Milteco GmbH and Ascon3 Maschinenbau GmbH, is deeply convinced of the importance of maintaining the highest standards of ethical, social and environmental behaviour. This includes strict compliance with national and international legislation in our daily work. It encompasses all processes along our supply chain, and further measures as well. We strive for continuous improvement, in the interests of ensuring a safe working environment, a secure future and a world that our colleagues, fellow human beings and successors will want to live in.

The Code of Conduct enshrines our responsibilities towards society and therefore underpins all our corporate activities. It applies to all our employees and also to our business partners. We expect our employees and business partners to be in agreement with our Code of Conduct and the principles for correct behaviour and regulations associated with it and to comply with its content along the entire delivery chain.

The principles contained in the Code of Conduct constitute minimum standards for our business relations. The Code of Conduct is based on the following international guidelines and principles:

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- Conflict Minerals Regulation
- OECD Guidelines for Multinational Enterprises
- Core labour standards of the International Labour Organisation (ILO)
- Paris Climate Agreement
- Minamata Convention on Mercury
- Stockholm Convention
- Basel Convention
- The Ten Principles of the UN Global Compact (UNGC)

National and other relevant laws and regulations that apply in the countries where we operate, and the principles contained in this Code of Conduct, must be complied with. Of all the relevant regulations, the one that is most suited to achieving the protective purpose shall always apply. The standards derived from the underlying principles are discussed below. Corresponding internal procedures must be put in place to ensure that they are implemented and monitored.

1. Employment rights and human rights

Compliance with the following principles is in line with national legal regulations. It is a prerequisite that all these basic principles relating to employment and human rights will be complied with. All relevant employment legislation must be taken into account. Regulations and guidelines relating to employment, pay, working hours, overtime and working conditions are in accordance with legal regulations and must be properly implemented.

1.1. Elimination of forced labour, human trafficking and child labour

We are explicitly opposed to the use of child labour and to making people work under duress or coercion. Among other things, companies must ensure that all employees are legally entitled to be employed. Under Austrian law, anyone in employment must be over the age of 15 and have completed their compulsory schooling. Special regulations are in place to protect young people. Official photographic ID must be presented to the employer as proof of age. The guidelines on age restrictions in the relevant country must be observed.

We do not engage in business activities which use or could facilitate forced labour, human trafficking or any form of slavery. Working relationships are entered into voluntarily and every employee has the right to give in their notice and leave their employment. Threats, intimidation, harassment, penalties and exploitation are not tolerated. Disciplinary measures are taken in accordance with nationally and internationally recognised human rights.

Unreasonable disciplinary measures such as withholding documents, pay and/or social security payments are not tolerated.

1.2. Freedom of association and the right to collective bargaining

Freedom of association is respected without exception. All employees have the right to associate freely, to be a member of groups representing their interests, to engage in collective wage negotiations and to participate in events organised by a union. No reprisals or discriminatory measures may be taken against employees who exercise their right to freedom of association.

1.3. Health and safety in the workplace

Working conditions are safe and healthy. Employees are provided with a safe, hygienic and healthy working environment. This applies particularly to their immediate working area, but also to communal and recreational areas and washrooms. Proactive worker protection measures have been implemented in production areas to ensure safety in the workplace.

The working conditions in our production areas are monitored, analysed, evaluated and improved by regular inspection and with the involvement of external prevention specialists (safety officers and occupational health practitioners). All employees are kept regularly informed about health and safety and receive annual training or instruction, and measures are implemented to prevent or minimise illness, injury and accidents.

1.4. Ban on discrimination in employment and career opportunities

All employees are given the same opportunities and rights. Any differentiation based on nationality, religion, gender, disability, sexual orientation or age – indeed any kind of discrimination – is prohibited and will not be tolerated in any circumstances. Clear and transparent communication is central to our relationship of trust. The main criteria for selecting and promoting our employees are their abilities, experience and qualifications.

1.5. Remuneration and social security payments

We strictly enforce minimum wage and salary levels in accordance with the relevant legislation or collective and industry negotiations and we take account of the usual overpayments on wages and salaries. We also comply with the law on cross-border working. Wages and salaries are based on a proper, regulated and fair pay policy. Each employee is given a monthly written statement showing the constituent elements of their pay and social security payments.

1.6. Employment contracts and regulated working hours

The terms of employment are confirmed in writing, taking account of all relevant legislation, the provisions of any collective agreements and our own internal guidelines for working together successfully. Employees are given copies of all written agreements. An employee's working hours must take place and be documented within the permitted weekly working time, with overtime and rest periods carefully controlled and recorded. Excess hours are only worked when operationally necessary and employees are paid for them in accordance with legal requirements.

1.7. Conflict Minerals Regulation

The Conflict Minerals Regulation sets out the requirements for compliance with the duty of care in the supply chains of companies importing tin, tantalum, tungsten and their ores and also gold from conflict and high-risk regions into the EU. The aim of this regulation, passed by the EU, is to prevent armed groups from being funded by the proceeds of mining and trading in raw materials from conflict and high-risk regions. It is a prerequisite that suppliers comply with this important human rights objective.

2. Gender policy

Gender equality means that people have the same rights and opportunities, regardless of their gender. It is a prerequisite that these rights are extended to everyone involved in our business activities.

2.1. Gender-neutral language

We prefer to use gender-neutral language. The only reason for documents not to be written in gender-neutral language is in the interests of easier legibility. However, this does not imply any unfairness or discrimination. All terms referring to persons apply equally to all genders (female, male, other).

2.2. Gender equality

The interests of all genders must be taken into account and served at all levels and in all roles. No-one may be discriminated against on the grounds of their gender or family circumstances.

Companies should endeavour to have all genders proportionally represented at all levels and in all departments. If one gender is significantly under-represented in a particular context, the Code of Conduct recommends giving preference to applicants of the under-represented gender, provided they are equally qualified.

Companies support those forms of employment that enable employees to combine their work and family commitments. Flexible working patterns such as flexitime and part-time working for parents are available.

2.3. Ban on sexual harassment

The integrity and dignity of every individual must be safeguarded and respected. No form of sexual harassment or sexism is tolerated. Employees should feel safe at all times and be able to carry out their work without interruption.

3. Corporate ethics

A high value is placed on behaving responsibly and ethically in all our business activities.

3.1. Anti-competitive practices and aspects of antitrust legislation

Behaving in such a way as to restrict competition or reach pricing agreements will not be tolerated. Business relationships must be fair and transparent and all business practices must be in accordance with relevant legislation. Our approach is based on serious and legal business relationships as partners. No situation must be permitted to arise which could lead to a conflict between the company and an employee's personal interests or those of his family.

3.2. Bribery and anti-corruption

Corruption and bribery, whether active or passive, are strictly prohibited. Gifts and other benefits must not be accepted if this could influence forthcoming business decisions or if to do so constitutes a breach of laws or guidelines.

Our employees are also prohibited from accepting gifts worth more than EUR 100 in connection with any business relationship, without exception. If anyone suspects or becomes aware of such a breach, they must inform their manager immediately or report it through the whistleblowing system.

3.3. Conflicts of interest

Making business decisions that are influenced by personal or financial interests is strictly prohibited. Employees must always disclose any existing conflicts of interest to their manager or to the personnel department. Possible conflicts of interest include:

Secondary employment & rival companies

Employees undertake to work solely for their employer. Any professional work outside the ALWERA Group or involvement in other companies which may affect the employer's interests require prior consent from the employer and must be reported to the employee's manager or to the personnel department.

Business relationships with family members

Employees are not permitted to misuse their employment for personal advantage or to benefit friends or relatives. Business activities with relatives or people close to the employee must be reported to their manager or the personnel department.

3.4. Money laundering

No actions must be undertaken which could support money laundering or fund terrorism.

4. Environment

4.1. Environmental protection

Compliance with environmental protection legislation and regulations, and with bans on hazardous waste, mercury and persistent organic pollutants, is mandatory.

The requirements of legislation on waste, emissions and water protection must be observed without exception. All regulations on hazardous materials must be complied with – especially those regarding the storage and handling of hazardous materials and their disposal. Employees must be given training in how to handle any relevant hazardous materials.

The Minamata Convention bans the production and sale of products containing mercury (fluorescent lamps, thermometers, pesticides, biocides...). There are strict conditions governing the storage and disposal of mercury waste. It is important to comply with this convention in order to minimise harm to human health and the environment.

4.2. Protecting the climate and resources

Measures must be taken to prevent any kind of environmental impact or pollution such as changes to the soil, pollution of waterways, air pollution, harmful noise emissions and excessive water consumption. Other kinds of environmental pollution must be avoided or reduced as far as possible. Compliance with legal regulations is regarded as the minimum requirement with regard to all climate protection measures and activities to reduce global warming and make a positive contribution to slowing climate change. No measures may be taken which damage the health of employees or habitats for humans, flora or fauna.

We strive to obtain renewable energy, manage waste sensibly and, especially, use water resources carefully.

With regard to waste management, we must repeat the importance of handling the disposal of chemical substances extremely carefully. Importing and exporting hazardous waste across national borders is forbidden in principle and may only occur with explicit legal consent. Any waste and residual materials that cannot be recycled must be disposed of in an environmentally-friendly way by registered companies. We have already taken important steps to reduce water consumption within our company and we are constantly building on these.

Using resources carefully to protect the environment is a matter of great importance to our company and it is a prerequisite that companies with which we have business relationships will take the same approach.

4.1. Land rights

Careful consideration is given to existing land rights. No illegal evictions or illegal expropriation of land, forest or waterways on which the livelihood of one or more persons depends are permitted, in particular when purchasing land or building on it.

5. Compliance

5.1. Data protection/information security

All handling of personal data must be in accordance with our duty of care and the applicable data protection legislation. We therefore commit ourselves and our business partners to protecting all personal and confidential data from access by third parties. We protect our data carefully and recognise the intellectual property of business partners and other third parties. Among other things, we have a dedicated GDPR team which pays special attention to these matters.

Employees undertake to keep confidential any data that becomes known to them in the course of their professional activities. They are trained and made aware of the importance of data protection when they join the company. Any suspicious activities should be reported immediately to the IT department or the GDPR team. We understand the need to keep information technology and electronic data processing secure and we comply with the relevant regulations. It is a prerequisite that our business partners will take the same approach.

5.2. Whistleblowing/reporting system

A whistleblowing system should be set up for reporting breaches and complaints, whether of an internal or external nature. Managers are also available as a point of contact for their staff. Furthermore, there should be a complaints management system for reporting breaches of the guidelines in this Code of Conduct. No-one should be disadvantaged by making such a report.

The whistleblowing system was set up so that severe breaches of the rules can be reported confidentially, wrongdoing exposed and unfortunate developments prevented.

Any matter that is in breach of the law can be reported. However, the primary purpose is to report possible breaches in the following areas:

- Public procurement (bribery, irregularities in awarding contracts, fraud)
- Financial services, financial products and the financial markets, the prevention of money laundering and the funding of terrorism
- Product safety and conformity (non-compliance with general safety requirements)
- Transport safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and animal feed safety, animal health and welfare
- Public health
- Consumer protection (breaches of competition and antitrust legislation)
- Protection of privacy and personal data, the security of networks and information systems
- Abuse of power, corruptibility, acceptance of benefits, granting of benefits, bribery
- Sexual harassment, discrimination, breaches of personal integrity

The whistleblowing system is a tool that is available to all employees, business partners and others for reporting wrongdoing, either anonymously or giving their name.

The following people within the ALWERA Group can be contacted by email or letter marked "Hinweis" ("Reporting"), or by phone or in person:

Isabella Wesiak: hinweis.wesiak@alwera.at or +43 3178 2525-108

Herbert Kuwal: hinweis.kuwal@alwera.at or +43 3178 2525-219

Reports can also be sent directly by post to

Alwera AG
"Hinweis"
Wollsdorf 75
8181 St. Ruprecht/Raab
AUSTRIA

marked "Hinweis" ("Reporting") in the address section.

Feedback to the whistleblower:

Where it is possible to contact the person making the report, they are informed within 7 days that it has been received and within three – or in exceptional cases six – months of the measures that have been planned or taken as a consequence of their report.

All reports, regardless of whether they are anonymous or not, must be recorded by the relevant points of contact. This should include the contents of the message, the date of receipt, and the dates on which confirmation of receipt and any feedback were sent.

Guarantees to the whistleblower:

Any personal data – unless the report is anonymous – is removed from the report so that it cannot be disclosed. The whistleblower's identity may only be disclosed if this is a necessary and proportionate requirement under EU law or Austrian law, in the context of an official investigation or court proceedings.

We guarantee that we will treat all reports that we receive as confidential and will use all available means to protect any whistleblower who is acting in good conscience from possible disadvantage resulting from their report. We will not take any measures to identify anonymous whistleblowers. There will be no reprisals against people who report possible breaches in good faith.

5.3. Product conformity and safety

The ALWERA Group has an obligation to our customers and third parties to exclude as far as possible any risk, unfairness and threats to health, safety, the environment and capital assets. It is not only a legal obligation but also our mission to ensure that our products comply with the relevant legal and official regulations and our own internal standards. Our production methods and product processing are systematically specified and defined using prescribed and controlled procedures. These ensure that, in the event of any possible deviation, appropriate measures are taken in good time. It is essential that any employee who identifies a deviation from the rules reports it to their manager so that further steps can be taken to rectify the situation.

5.4. Sustainable procurement

Our Code of Conduct is automatically accepted when contracts and agreements are signed with us. These include the following sentence: *"By signing this agreement, our business partners undertake to comply with the principles and requirements enshrined in the ALWERA Group's Code of Conduct"*. This point is also explicitly repeated on the documents in question. It is important to note that compliance with the principles of our Code of Conduct must also be demanded and expected of suppliers and business relationships further up the supply chain. We expect risks within supply chains to be identified and appropriate measures taken to minimise such risks. Any breaches must be reported promptly and remedial measures taken.

5.5. EU regulation on deforestation-free supply chains

This regulation governs the availability on the EU market of certain raw materials and products (currently palm oil, soya, beef, cocoa, coffee, rubber and wood, and products made from them) which are associated with deforestation and forest degradation, and their export from the EU. For supply chains to be deforestation-free, it must be ensured that the production of agricultural raw materials does not damage either the total extent or the condition of woodland ecosystems in a defined area. We and our business partners, where relevant, undertake to issue a duty of care statement documenting the fact that no deforestation or illegal activity could be identified.

5.6. Remedial action

In the event of non-compliance with any aspect of our Code of Conduct, everyone involved in that business relationship and its supply chain is obliged to take all possible action quickly to put an end to or prevent the breach as soon as possible or to minimise the scale of the damage done.

5.7. Audits

The ALWERA Group and its affiliated companies reserve the right to monitor the points mentioned in this Code of Conduct. On request we can demand that all relevant information is made available to us. Subject to prior notice, the ALWERA Group is allowed to carry out an on-site inspection of a business partner's operating premises. Third parties may be instructed to carry out the audit, under a duty of confidentiality. All data protection provisions and business and operational confidentiality will, of course, be respected.

5.8. Termination

The ALWERA Group and its affiliated companies reserve the right, in the event of breaches of obligations under this Code of Conduct, to set a reasonable deadline for them to be rectified. If that deadline passes and the faults that were identified have not been rectified, the ALWERA Group can withdraw from or terminate the contract. In the event of severe breaches, no period for rectification will be granted. If they withdraw from or terminate an agreement, the companies in the ALWERA Group are not obliged to compensate the parties involved in the business partnership for any losses arising from the withdrawal or termination.

Closing remarks

We encourage open and honest dialogue between our employees and business partners. That is why we are also confident that our employees and business partners will act responsibly and loyally in carrying out our business and why compliance with our Code of Conduct is a prerequisite for working with us.

The senior management team at the ALWERA Group



A handwritten signature in black ink, appearing to read 'Cretnik'.

Andreas Cretnik
Executive Board Alwera AG



A handwritten signature in black ink, appearing to read 'G. Merdonik'.

Gerhard Merdonik
Executive Board Alwera AG



A handwritten signature in black ink, appearing to read 'Hubmann'.

Martina Hubmann
General Management Estyria Naturprodukte GmbH



A handwritten signature in black ink, appearing to read 'Georg Hutter'.

Georg Hutter
General Management Milteco GmbH



A handwritten signature in black ink, appearing to read 'Rene Tödling'.

Rene Tödling
General Management Milteco GmbH



A handwritten signature in black ink, appearing to read 'Bernhard Pfeiffer'.

Bernhard Pfeiffer
General Management Ascon3 Maschinenbau GmbH