



Supplier

## CODE OF CONDUCT

 **austrocel**  
hallein  
We add value to wood.

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AustroCel Compliance Management

## 1. INTRODUCTION

Compliance and ethically correct behaviour form the basis of our business activities. With regard to compliance, we are committed to integrity, appreciation, reliability and sustainability as the cornerstones of our actions. AustroCel expects the same behaviour and commitment from its suppliers.

This Supplier Code of Conduct ("Supplier Code") is based on AustroCel Hallein GmbH's Code of Conduct and sets out the expectations of all suppliers in the supply chain with regard to business practices. Therefore, AustroCel expects its suppliers to comply with all legal requirements and to implement and maintain appropriate compliance procedures to ensure effective compliance with this Supplier Code or equivalent guidelines or codes of conduct established by the supplier itself.

Suppliers will also oblige the companies in their supply chain to assume environmental and social responsibility and to comply with all legal norms (ESG compliance). Suppliers must identify risks in the supply chain, establish risk minimization concepts and, if they become aware of a violation in the company or in the supply chain, take appropriate remedial measures.

## 2. ENVIRONMENTAL RESPONSIBILITY AND SUSTAINABILITY

AustroCel lives the Green Spirit and pursues a clear sustainability strategy. AustroCel expects suppliers to manage their operations in a responsible manner so that the environmental protection requirements defined in the relevant laws, regulations or authorisations are met. We expect suppliers along the supply chain to establish and continuously improve an adequate environmental management system, to avoid hazardous substances in products and to reduce negative environmental impacts. Suppliers are required to exceed minimum standards wherever possible.

### **Waste/Emissions**

Special focus areas are the reduction of air emissions, waste reduction, waste recovery and management, water utilisation and wastewater disposal as well as greenhouse gas emissions.

### **Conservation of resources/Climate protection**

Suppliers are expected to use natural resources (e.g. water) economically and responsibly and to prevent waste. Negative effects on the environment and climate should be minimised or eliminated as far as possible.

Suppliers should participate in the development and further development of climate-friendly products and processes. Appropriate handling of raw materials and products as well as transport, storage, recycling, reuse and the best possible avoidance of waste, air emissions and waste water must be ensured.

## 3. SOCIAL RESPONSIBILITY

Suppliers commit to fulfil their social responsibility towards employees and society in the broader sense. The following aspects in particular are emphasized in this context:

### **Work safety**

Work safety is a top priority for AustroCel. Suppliers commit to comply with the applicable occupational health and safety regulations and ensure a safe and healthy working environment in order to maintain the safety and health of employees, protect third parties and prevent accidents, injuries and work-related illnesses.

Finally, suppliers commit to provide their employees with appropriate training in all health and safety topics in their native language.

### **Compliance with human rights and labour law**

Suppliers commit to protect human rights and ensure compliance with them. Any form of child labour is prohibited and suppliers must not profit from child labour in any form. All applicable labour laws and standards of the International Labour Organization (ILO) must be complied with. Suppliers must prohibit the use of any form of forced or involuntary labour and treat all employees with respect.

The remuneration paid to employees must in any case correspond to the applicable national minimum wages and salaries or comparable remuneration provisions and enable an adequate standard of living. The suppliers commit to comply with the applicable laws and regulations, in particular with regard to the restriction of maximum working hours and the granting of rest periods, leisure and holidays.

### **Prohibition of discrimination and unequal treatment**

Suppliers commit not to discriminate on the basis of age, gender, skin colour, ethnic or social origin, sexual identity, disability, religion or political opinion and to provide employees with a respectful and appreciative working environment. In particular, employees must receive equal pay for work of equal value. All forms of harassment in the workplace must be stopped immediately.

Suppliers shall ensure that employees are free to organise themselves into trade unions and prevent any discrimination or retaliation in the event of the formation or membership of a trade union or interest group.

## **4. ETHICAL BEHAVIOUR IN BUSINESS TRANSACTION**

Suppliers must conduct their business with integrity and in accordance with legal requirements and internationally agreed standards of business ethics.

### **Rejection of corruption**

Suppliers shall ensure that any form of corruption, bribery, coercion or embezzlement, in particular by public officials, is prevented. Suppliers must not influence or attempt to influence anyone by providing the person or third parties with unlawful inducements, in particular gifts, favours, personal benefits or preferential treatment. It is also expected that AustroCel employees are not granted or offered any gifts that are likely to influence them.

### **Expression of concerns**

Suppliers are obliged to give their employees the opportunity to report concerns or possible unlawful activities in the workplace in good faith while maintaining confidentiality and preventing retaliation. Reports must be investigated and remedial action taken if necessary.

### **Fair competition**

Suppliers commit to behave fairly in competition and to comply with the applicable competition law regulations, in particular antitrust laws, and to ensure that neither their services nor their goods infringe the property rights of AustroCel and/or third parties. In particular, price fixing with competitors, market sharing with competitors and the abuse of a dominant market position through price discrimination and other behaviour will not be tolerated.

### **Business partnerships**

AustroCel suppliers shall ensure that applicable laws and regulations to prevent money laundering are complied with and that the use of cash in business transactions is avoided whenever possible.

Suppliers agree to comply with all applicable export controls, sanctions, customs laws and regulations, including applicable trade restrictions, embargoes and other restrictions on the import and export of goods, services and information.

Suppliers also commit to inform AustroCel in advance of any foreseeable financial bottlenecks or financial difficulties. For this purpose, a current financial report may have to be submitted and an assessment of the consequences made.

### **Data protection**

We demand from our business partners to provide adequate protection to safeguard the privacy of their employees and their personal data and to comply with the statutory provisions on data protection.

### **Resources**

Suppliers commit to supply raw materials that do not contain any metals that originate from minerals or their derivatives that come from conflict regions and directly or indirectly finance or support armed groups. AustroCel shall be provided with information on the country of origin of raw materials on request.

## **5. MONITORING AND REPORTING OPTIONS**

In the event of suspected violations of the standards and regulations set out in the Supplier Code and to safeguard the supply chain, suppliers agree that AustroCel may carry out audits to verify compliance with the Supplier Code after reasonable advance notice.

As part of AustroCel's compliance programme, suppliers agree to complete a compliance questionnaire at AustroCel's request and to comply with a request for an on-site meeting or an on-site audit of the supplier's compliance management system.

Should suppliers become aware of a violation of this Supplier Code, they are obliged to report this violation to us immediately, stating the measures taken. A breach of this Code of Conduct shall

entitle AustroCel to terminate the contractual relationship extraordinarily. If necessary, AustroCel shall use external systems to evaluate the suppliers.

Reports or information can be submitted to the direct contact person in the respective department or via the e-mail address [compliance@austrocel.com](mailto:compliance@austrocel.com). It is also possible to use the AustroCel whistleblower system on the homepage (<https://www.austrocel.com/compliance/>).

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